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January 16, 2026

Mr. John Hairston  
Bonneville Power Administration  
Administrator/Chief Executive Officer  
Via email: [techforum@bpa.gov](mailto:techforum@bpa.gov)

Re: Comments Concerning TC-27 December 17-19, 2025, January 6-7, 2026, and January 15, 2026 Pre-Proceeding Workshops

Dear Administrator Hairston:

Thank you for the opportunity to provide the Bonneville Power Administration (BPA) with the following comments on the above-referenced matter. Pacific Northwest Generating Cooperative (PNGC Power) is submitting comments to help further inform and shape BPA's TC-27 Tariff Proceeding. PNGC Power would support a combination of alternatives that could work together to help facilitate this goal and looks forward to reviewing the staff leaning on the combination of alternatives presented during the December 17-19, 2025, January 6-7, 2026, and January 15, 2026 Pre-Proceeding Workshops.

Initially, PNGC Power is concerned by the schedule that is currently proposed by BPA. At this time the staff leaning is to be presented during the first week in March with an assumption that customers will be able to provide comments after that workshop. The next item on the schedule is publishing the Federal Register Notice (FRN). PNGC Power urges BPA to consider that if there is strong disagreement with the proposed staff leaning, it would be beneficial to add additional workshops prior to the FRN. Due to the number and possible combinations of alternatives selected, at this time it is impossible for PNGC to predict where there will be agreement/disagreement with the proposed staff leaning and believe that some flexibility in the schedule is prudent. While PNGC Power wants to see the processing of Transmission Service Requests (TSR) resume, we cannot agree to a proposal or arbitrary schedule omitting additional frank discussion with BPA staff to fully understand the proposals and the impacts.

### **13 MW Threshold Impact**

Significant clarification was presented by BPA on the proposed 13 MW threshold and how NITS customers will be treated one day before comments were due. PNGC Power believes that this is unreasonable as there has not been sufficient time to review the possible implications of the additional presentation and robust discussion that occurred during the clarification presentation.

PNGC Power reserves its rights to provide comments on this aspect of BPA's proposal and will provide additional comments no later than January 23, 2026.

### **Readiness Requirements**

PNGC Power continues to support the implementation of a readiness standard provided it does not introduce significant procedural hurdles and barriers for customers seeking long-term firm service particularly for projects that are otherwise viable. BPA's readiness criteria must balance needs to support reliability, fair access to long-term firm transmission, and economic development opportunities. PNGC emphasizes its position that resources contributing to regional resource adequacy (i.e. WRAP) must take precedence to support regional reliability.

### **Collaborative and Transparent Discussions**

BPA is proposing major shifts in how TSRs will be processed, and staff have previously rushed participants through discussions to "get through the material." For the region to intelligently evaluate and respond with thoughtful comments, meaningful discussion is critical to fully understand the scope of the changes BPA is proposing to the process. The large volume of materials presented through the recent workshops are interrelated, and complex issues that require time to evaluate the impacts of a particular option, as well as consideration of any unintended impacts as a result of the final option selected warrant additional time for feedback and collaboration.

While the examples that BPA has presented have been helpful, additional examples will be critical for the next workshops when BPA presents the staff leaning. PNGC Power is requesting that BPA provide an updated comprehensive proposal complete with a decision tree that illustrates how requests would move through the entirety of the TSR process, with specific examples for the different TSR types and identification of the timeline and costs associated with any steps listed. PNGC Power believes that this level of detail is critical to ensure that parties have a consistent understanding of the process being proposed. For this reason PNGC Power strongly urges BPA to consider this effort to be the first draft of reform and establish a timeframe and a process to complete an assessment with stakeholders reviewing how changes implemented through the TC-27 Tariff Proceeding have either improved or worsened the processes associated with transmission service.

PNGC ranks the proposed alternatives are as follows<sup>1</sup>:

### **Source Maturity (EC-SM)**

Ranking			Alternative Code	Description	Comments
Not- Opposed	Neutral	Opposed			
X			EC-SM- ALT-1	For transition, only accept GIs that are late stage or bypass	

<sup>1</sup> PNGC Power does not adopt or concede to BPA's definition or inference of the use of the labels "Like," "Okay," or "Dislike," and provides these "rankings" to facilitate BPA's timeline without waiving PNGC Power's rights to object to any of these alternatives at a future date.

		X	EC-SM-ALT-2	LGIA executed	
	X		EC-SM-ALT-3	Issuance of the GI Facilities Study Report	
	X		EC-SM-ALT-4	Completion of GI Phase Two Cluster Study	
X			EC-SM-ALT-5	Completion of GI Phase One Cluster Study AND Execution of GI Phase Two Cluster Study Agreement	
X			EC-SM-ALT-6	Completion of Phase One of the GI study plus any needed restudy	
	X		EC-SM-ALT-7	Completion of Phase One GI study report	
		X	EC-SM-ALT-8	Completion of Phase One of the GI study	
		X	EC-SM-ALT-9	Consultant GI Study	
		X	EC-SM-ALT-10	Minimal GI Criteria	
X			EC-SM-ALT-11	Incent LSE Engagement by Providing POR Flexibility	

### Load Maturity (EC-LM)

For TSR requests related to load on a LSE system that is “Behind the Meter” flexibility needs to be available for the LSE in the same manner it has been proposed for Source Maturity. PNGC Power requests that an alternative be added to Incent LSE Engagement by Providing Flexibility. Load maturity needs to be accepted when the request is submitted by an LSE and the load is behind the meter on the LSE’s system within BPA’s BA. LSE’s do not always have the same process that BPA has or need to follow the same steps in completing studies. Flexibility needs to be offered in this case allowing BPA to accept what the LSE determines is the appropriate level of study to serve load requests for their system.

Ranking			Alternative Code	Description	Comments
Not-Opposed	Neutral	Opposed			
		X	EC-LM-ALT-1	Must be in execution phase (agreements signed/funded)	

		X	EC-LM-ALT-2	Facilities Study required to be completed	
	X		EC-LM-ALT-3	System Impact Study required to be started or completed	
	X		EC-LM-ALT-4	Feasibility Study required to be completed	
X			EC-LM-ALT-5	LLIR must be submitted, but no study required	
X			EC-LM-ALT-6	No requirement for LLIR submittal	
X			New Proposal	Incent LSE Engagement by Providing Flexibility	New Proposed alternative.

#### RAS Resource (EC-RAS)

Ranking			Alternative Code	Description	Comments
Not- Opposed	Neutral	Opposed			
		X	EC-RAS-ALT-1	Require upon TSR/FTSR submittal	
		X	EC-RAS-ALT-2	Require prior to preliminary engineering	
		X	EC-RAS-ALT-3	Require prior to environmental study	
	X		EC-RAS-ALT-4	Require prior to decision to build the relevant project(s)	
X			EC-RAS-ALT-5	Provide timing flexibility for resource specification, but customer contractually obligated to pay for the service upon project completion regardless of ability to utilize the service	

#### Requirements for Gen/Load Outside of the BPA Balancing Authority Area (EC-OB)

Ranking			Alternative Code	Description	Comments
Not- Opposed	Neutral	Opposed			
			N/A	N/A	

### PTP requests to NT PODs (EC-PTP)

Ranking			Alternative Code	Description	Comments
Not- Opposed	Neutral	Opposed			
X			EC-PTP- ALT-1	Require demonstration of interest from NITS customer upon submittal	
	X		EC-PTP- ALT-2	Require demonstration prior to execution of contract	
		X	EC-PTP- ALT-3	Only NITS Customers Allow to Submit PTP TSRs to serve their load	
		X	EC-PTP- ALT-4	Status Quo	

### Battery-to-Battery (EC-B2B)

Ranking			Alternative Code	Description	Comments
Not- Opposed	Neutral	Opposed			
		X	EC-B2B- ALT-1	Disallow battery-to- battery LTF F/TSRs	
	X		EC-B2B- ALT-2	Allow battery-to- battery F/TSRs if Customer can provide reasonable scenarios	
		X	EC-B2B- ALT-3	Allow LTF battery-to- battery F/TSRs	

### Additional Information (EC-ADD)

Ranking			Alternative Code	Description	Comments
Not- Opposed	Neutral	Opposed			
	X		EC-ADD- ALT-1	Modify section 17.2(x) and 29.2(ix) to read “Attachment K and other BPA transmission planning processes”	
		X	EC-ADD- ALT-2	Use existing language in 17.2(x) and 29.2 (ix) Any additional information required by the Transmission Provider’s planning processes established in Attachment K	

### Virtual Hubs | Mid-C and NW Market Hub (EC-VHUB)

Ranking			Alternative Code	Description	Comments
Not- Opposed	Neutral	Opposed			
	X		EC-VHUB- ALT-1	Remove Mid-C Remote only - see Sub- Alternatives (SUB)	
	X		EC-VHUB- ALT-1-SUB- A	Remove Mid-C Remote Only	
	X		EC-VHUB- ALT-1-SUB- B	Conform to NW Hub	
	X		EC-VHUB- ALT-2	Offer Reassessment Only	
		X	EC-VHUB- ALT-3	Mix of Firm and CF	
		X	EC-VHUB- ALT-4	Remove both from the LFT market	
		X	EC-VHUB- ALT-5	Require TSR pairing at NW Hub	
	X		EC-VHUB- ALT-6	Actively support LFT use of NW Hub	
	X		EC-VHUB- ALT-7	Status Quo	

### Delivering/Receiving Party Validation (EC-PV)

Ranking			Alternative Code	Description	Comments
Not- Opposed	Neutral	Opposed			
		X	EC-PV- ALT-1	Require confirmation of Delivering/Receiving Party; if not remove from queue	
	X		EC-PV- ALT-2	Utilize contingent validation; remove from queue if deal not executed	
X			EC-PV- ALT-3	If unable to provide required bilateral demonstration, provide only Reassessment CFS or Interim Service	
		X	EC-PV- ALT-4	Allow financial demonstration in lieu of required bilateral demonstration; if not provided remove from queue	

	X		EC-PV-ALT-5	Require FERC marketer registration if no bilateral demonstration; if not remove from queue	
	X		EC-PV-ALT-6	Short-term market only if bilateral demonstration unavailable; remove from (LTF) queue	
	X		EC-PV-ALT-7	Only Offer Up to 4 years, 11 months	
		X	EC-PV-ALT-8	Use points system for validation	
		X	EC-PV-ALT-9	Contingent Validation with Financial Option to Retain TSR	
		X	EC-PV-ALT-10	Allow a Dispute Mechanism – Only request verification when another party suggests that the information was incorrectly supplied	
		X	EC-PV-ALT-11	Status Quo, take information at face value without any further validation or confirmation	

#### Minimum Cap Requirements (EC-MCAP)

Ranking			Alternative Code	Description	Comments
Not-Opposed	Neutral	Opposed			
	X		EC-MCAP-ALT-1	Minimum capitalization requirement scaled based on level of transmission service request activity in study.	
	X		EC-MCAP-ALT-2	Flat minimum capitalization requirement regardless of level of transmission service request activity in study.	
X			EC-MCAP-ALT-3	Status Quo – do not have a minimum capitalization requirement.	

### Product Options (IS-POPT)

Ranking			Alternative Code	Description	Comments
Not- Opposed	Neutral	Opposed			
	X		IS-POPT- ALT-1	Seasonal Firm NITS	
		X	IS-POPT- ALT-2	Long Term 6-NN	
		X	IS-POPT- ALT-3	NITS LT 6-NN and PTP LT Priority 5 Non- Firm Service	
			IS-POPT- ALT-4	CFS - PTP vs NITS - <b>see Sub-Alternatives (SUB)</b>	
X			<i>IS-POPT- ALT-4-SUB- A</i>	PTP CFS	
		X	<i>IS-POPT- ALT-4-SUB- B</i>	NITS CFS	
X			<i>IS-POPT- ALT-4-SUB- C</i>	NITS Customer PTP Bridge CFS with NITS Firm Option	
			IS-POPT- ALT-5	CF on the BPA Network - <b>see Sub- Alternatives (SUB)</b>	
X			<i>IS-POPT- ALT-5-SUB- A</i>	for Ready PTP TSRs	
		X	<i>IS-POPT- ALT-5-SUB- B</i>	for Ready NITS F/TSRs	
X			<i>IS-POPT- ALT-5-SUB- C</i>	Offer CFS BPA Network to Ready NITS F/TSRs: PTP CFS for NITS Customers with Optional Transition to Firm	
		X	IS-POPT- ALT-6	Planning Redispatch	
		X	IS-POPT- ALT-7	Firming up 6-NN in ST	
			IS-POPT- ALT-8	Operations Constraint Management – <b>see</b>	

			Sub-Alternatives (SUB)		
X			<i>IS-POPT-ALT-8-SUB-A</i>	Increased PTP CFS Offering through Operations Constraint Management	
X			<i>IS-POPT-ALT-8-SUB-B</i>	Increased NITS CFS Offering through Operations Constraint Management	
X			<i>IS-POPT-ALT-8-SUB-C</i>	PTP CFS for NITS Customers with Optional Transition to Firm	
X			IS-POPT-ALT-9	Allow Mid-Term Offers	

#### Mandatory-Voluntary (IS-MV)

Ranking			Alternative Code	Description	Comments
Not- Opposed	Neutral	Opposed			
	X		IS-MV-ALT-1	Mandatory for early access	
X			IS-MV-ALT-2	Not mandatory until POS has been developed	
		X	IS-MV-ALT-3	Status Quo - Not Mandatory	

#### Curtailment Type (IS-CT)

Ranking			Alternative Code	Description	Comments
Not- Opposed	Neutral	Opposed			
	X		IS-CT-ALT-1	Systems conditions only.	
X			IS-CT-ALT-2	System condition and/or x% number of 8760 hours of the year.	

#### Applying Evaluation Criteria to the Queue (QM-ECQ)

Ranking			Alternative Code	Description	Comments
Not- Opposed	Neutral	Opposed			
X			QM-ECQ-ALT-1	Keep existing queue.	

		X	QM-ECQ-ALT-2	Empty existing queue.	
	X		QM-ECQ-ALT-3	Apply the new requirements through an agreement.	

### Collecting New Evaluation Criteria (QM-CEC)

Ranking			Alternative Code	Description	Comments
Not- Opposed	Neutral	Opposed			
		X	QM-CEC-ALT-1	Start where we are.	
		X	QM-CEC-ALT-2	Customers submit a new data form.	The development of a new form will take time and seems more appropriate for a future state rather than the transition state.
X			QM-CEC-ALT-3	Combine ALT-1 and ALT-2	

### Structuring the Queue for Study (QM-SQS)

PNGC believes that there is a combination of Batch studies that is workable and would be appropriate to consider. While BPA has stated that the batching of studies would disregard queue order, that is not necessarily the case. For example, if requests were batched by geographic location, the original queue order could be preserved by ranking them within the group based upon the date/time the request was initially received.

Ranking			Alternative Code	Description	Comments
Not- Opposed	Neutral	Opposed			
		X	QM-SQS-ALT-1	No Transition Study	
X			QM-SQS-ALT-2	Batch Studies - see Sub-Alternatives (SUB)	
		X	QM-SQS-ALT-2-SUB-A	Queue order	
X			QM-SQS-ALT-2-SUB-B	Geographic	
X			QM-SQS-ALT-2-SUB-C	POR/POD	

X			QM-SQS-ALT-2-SUB-D	LSE vs. Non-LSE	
X			QM-SQS-ALT-2-SUB-E	NITS vs. PTP	
X			QM-SQS-ALT-2-SUB-F	Resource/Load maturity	
X			QM-SQS-ALT-2-SUB-G	Options	PNGC prefers Option 3 for this choice. Study the remaining (F)TSR in one or more other types of batches. Each batch subject to the study model limit.
		X	QM-SQS-ALT-3	Cap the LTF Queue	

#### Handling New (F)TSR Submissions (QM-HNS)

Ranking			Alternative Code	Description	Comments
Not- Opposed	Neutral	Opposed			
		X	QM-HNS-ALT-1	Decline All (F)TSRs submitted after 12pm 8/15/24	
	X		QM-HNS-ALT-2	Study (F)TSRs in Proactive Planning Program (Future State)	
X			QM-HNS-ALT-3	Include in 2025 TSEP CS Group	
	X		QM-HNS-ALT-4	Second Transition Study	

#### Firm Service Prioritization (QM-FSP)

Ranking			Alternative Code	Description	Comments
Not- Opposed	Neutral	Opposed			
	X		QM-FSP-ALT-1	Status Quo	
		X	QM-FSP-ALT-2	Prioritizing Service Readiness	

X			QM-FSP- ALT-3	First Right of Refusal	
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### Transition Studies (PP-TS)

Ranking			Alternative Code	Description	Comments
Not- Opposed	Neutral	Opposed			
		X	PP-TS-ALT-1	Main Grid SIS, with Full POS After SIS Decision Point	
		X	PP-TS-ALT-2	Full SIS with Decision Point, prior to full POS	
X			PP-TS-ALT-3	Long-Term Planning Study + Partial Commercial Study	
	X		PP-TS-ALT-4	Long-Term Planning Study + Full Commercial Study	
	X		PP-TS-ALT-5	Study to Resolve Interim Service Ineligibility	
	X		PP-TS-ALT-6	Distribution Factors	
		X	PP-TS-ALT-7	10- & 20-Year Transition Study	
X			PP-TS-ALT-8	Wait for Future State Process	

PNGC Power appreciates Bonneville's collaborative approach to meeting the transmission service needs of its customers on a long-term, sustainable basis. It is recognized that there are no easy solutions and that difficult decisions will need to be made. BPA's obligation is to proactively plan, maintain and build a transmission system that will ensure reliable, long-term, firm service to its preference customers and the load growth customer's forecast. PNGC Power looks forward to continuing to work with the agency and its staff to resolve the current set of challenges together.

Sincerely,

/s/ Laura Dombrowsky

Laura Dombrowsky  
Transmission & Power Contracts Manager  
PNGC Power