

January 16, 2026



Bonneville Power Administration
Attn: Transmission Services
905 NE 11th Ave
Portland, OR 97232

via email (techforum@bpa.gov)

Re: Avangrid Comments on TC-27 Alternatives and Priorities

Avangrid Power, LLC (“Avangrid”) submits these comments to Bonneville Power Administration (“Bonneville”) following the TC-27 Pre-Proceeding workshop series beginning December 17, 2025 (“Winter Workshops”) where more than 100 unique alternatives to reform the agency’s transmission expansion process were discussed.¹ Bonneville staff did a tremendous job walking stakeholders through each alternative, and discussing the current transmission planning challenges, but has yet to identify a clear, complete future process that appears workable.

It is both critical to a successful reform effort and important to Avangrid that Bonneville establish a new path to Long Term Firm (“LTF”) transmission service that aligns with current project in-service dates, including transparent and reasonable security requirements, clear decision points with escalating financial commitments and offramps to balance risk, comparable service for different customer groups, alignment with open-access principles, and nondiscriminatory access to the transmission system.

More specifically Avangrid recommends Bonneville: 1) immediately resume processing LTF requests with *de minimis* impacts; 2) prioritize getting this reform done well, albeit with pragmatic and limited adjustments; 3) confirm how/when LTF transmission will be made available for projects in the current Generator Interconnection (“GI”) queue; 4) begin offering Interim Service as a voluntary product that can help expedite Transmission Service Request (“TSR”) processing; and 5) maintain status quo for less significant changes to allow all parties to focus collective attention on what must change now as opposed to what could be addressed later. These and other priorities are addressed in the below comments.

I. BACKGROUND

On February 2, 2025, Bonneville announced that the agency had paused its TSR Study and Expansion Process (“TSEP”) due to unprecedented queue volume and was planning to reform the LTF transmission planning process.² On April 21, 2025, the Administrator kicked off the TSEP reform efforts by sharing that he had asked the transmission team for “disruptive thinking” that could get the timing from a new TSR to the provision of that service down to five or six years. Bonneville staff began describing a new “proactive” planning process concept that could be paired with “on demand” service.

¹ Additional details regarding the reform alternatives considered in the TC-27 Pre-proceeding, including the meeting materials for the Winter Workshops (“Winter Workshops Slide Deck”) are available at <https://www.bpa.gov/energy-and-services/rate-and-tariff-proceedings/tc-27-tariff-proceeding>.

² Additional details regarding the TSEP pause and Grid Access Transformation Project—formerly referred to as the Transmission Planning Reform—are available at <https://www.bpa.gov/energy-and-services/transmission/grid-access-transformation-project>.

In July, the TSEP reform was combined with parallel efforts to reform transmission planning for Network Integration Transmission Service (“NITS”) customers and rebranded as the Grid Access Transformation (“GAT”) Project. On July 29, 2025, Bonneville published a suite of draft Business Practices (“BPs”), including new data validation “readiness criteria” that would be applied to the current TSR queue.

In September, Bonneville announced that it would pivot the GAT implementation from the proposed BPs to a new tariff proceeding (“TC-27”) and held another “kickoff” workshop to begin discussing the problems that resulted in the GAT Project. In October, Bonneville bifurcated the reform efforts between near-term tariff solutions (in TC-27) and longer-term process solutions (in GAT) and held a TC-27 “kickoff” workshop to clarify the scope and process for tariff changes aimed at ending the TSEP pause.

At the Winter Workshops, held between December 17, 2025, and January 7, 2026, Bonneville discussed more than a dozen potential reform concepts, each with numerous unique potential alternatives. As noted above there are over 100 unique alternatives, which could theoretically be combined into thousands of unique combinations. There were also potential solutions discussed without specific alternatives provided, e.g., for security, which increases the number of unique decision points. Bonneville asked for feedback from stakeholders by January 16, 2026, to inform staff’s proposal, which is expected to be presented during the March workshops. Bonneville is aiming to begin the formal TC-27 process as early as April 2026.

II. COMMENTS

At the Winter Workshops, Bonneville asked stakeholders to note any strong support (or opposition) to any of the specific alternatives presented and to make clear whether there were any aspects of the reform that should be prioritized over another. Avangrid recognizes the tension between different approaches and primarily provides this feedback to aid the agency in balancing competing interests. Avangrid recommends that Bonneville focus on identifying a process that will allow the agency to most efficiently process requests consistent with open access principles and leveraging best practices utilized in other regions facing similar volume growth. When considering the best overall alternatives, Avangrid suggests Bonneville consider the following topics and priorities.

A. Bonneville Should Resume Processing Redirects With *De Minimis* Impacts as Soon as Practicable

Avangrid supports Bonneville’s proposal to start TSRs that meet the agency’s threshold for *de minimis* impacts before concluding the TC-27 workshops. Additionally, to the extent that Bonneville is concerned about the potential for queue flooding to occur, Avangrid is amenable to discussing appropriate limits on new original TSRs to address this risk, as well as the elements of a durable policy.³

B. Bonneville Should Build on its Proposals that Provide Alternatives to a Bilateral Demonstration to Support the Eligibility of a TSR

Bonneville shared at the Winter Workshops alternatives that consider the financial viability of a TSR requestor in some form, either through requiring financial security or considering the credit risk of the requestor. Separately Bonneville also proposed considering whether the requestor has Federal Energy Regulatory Commission (“FERC”) market-based rate authority (as described by Bonneville: “FERC Marketer Registration”). Avangrid

³ See Summary of TC-27 Comments Received and BPA Staff’s Responses at 14 (Dec. 12, 2025) (“we are considering a partial reopening of the queue for original and redirect TSRs with *de minimis* impacts”), available at <https://www.bpa.gov/-/media/Aep/rates-tariff/TC-27/consolidated-responses-tc27-workshop-comments.pdf>.

would support any of these proposals, or all in conjunction, as potential avenues for Bonneville to consider the viability of a TSR, rather than through a bilateral demonstration (e.g., RFP Award, Letter of Intent, etc.). Primarily, though, Avangrid believes the best way to have certainty that a TSR requestor will not leave the queue is to provide as accurate cost projections regarding necessary upgrades as possible, ask TSR requestors to provide some form of security that will increase throughout the process, and include off-ramps or transfer opportunity for the TSR. These ideas were explored in previous Avangrid comments and continue to be a priority for Avangrid.

C. Delivering/Receiving Party Validation

Avangrid does not believe Bonneville has provided sufficient justification to move away from the status quo. Avangrid is neither aware of any other Transmission Provider that does any more than accept delivering and receiving party information provided in a TSR at face value, nor certain how often this leads to any actual transmission planning issues. To that end, the alternatives provided for third-party validation appear overly complicated and may not be the best way to validate new service requests.⁴ At the very least, they are likely to make Bonneville's validation process significantly less efficient for many TSRs and introduce anti-competitive elements similar to those discussed below with regard to NITS-only Point of Deliveries ("PODs"). Rather than involving delivering and/or receiving parties in the validation of other customers' TSRs, Avangrid would recommend Bonneville maintain status quo and continue to validate requests without further verification or third-party confirmation. If this information is needed in certain circumstances, e.g., when considering multiple requests for new large data center load, etc., then it may make sense for the agency to create a new LTF path for those kinds of requests and leave the current LTF PTP processing unchanged.

In a section above, Avangrid outlined its support for Bonneville to require a financial commitment, analysis of the credit rating of the requestor, or FERC marketer registration as an alternative path to providing evidence of a bilateral demonstration. These approaches keep Bonneville out of a subjective determination of project viability and, instead, put the onus on the TSR requestor to make an investment decision and assess project success – not Bonneville.

Bonneville also reviewed alternatives (alternative 3, 6, 7) that Avangrid recommend Bonneville reject. All three alternatives, contemplating Bonneville providing only Conditional Firm ("CF") service or Interim Service if a TSR is not backed by a bilateral intent, only short-term transmission if not backed by a bilateral intent, or only transmission service for up to 4 years, 11 months, would introduce significant hurdles into project financing for developers and significant risk. Avangrid does not see these proposals as viable options that support the region and recommend Bonneville eliminate.

The other alternatives considered by Bonneville, Alternatives 1, 2, 8 9, 10, either require a load-serving entity support and would not align with regional regulatory procurement processes or put Bonneville into a role that is not advisable as a subjective assessor of the viability of a TSR. To the extent possible, Avangrid would recommend retaining an objective set of criteria focused on financial viability.

D. Bonneville Should Provide a Clear Path to LTF Service Before Invalidating any TSRs

Customers should not be asked to surrender current queue rights without clarity as to how LTF rights will be granted going forward. Avangrid encourages Bonneville to consider a reform process similar to the one set out in FERC's GI reform, whereby a new permanent or "future state" process was established at the same time as

⁴ Winter Workshops Slide Deck at 100-113.

the transition “interim” process, along with decision points and clear eligibility requirements. In particular, that process permitted some projects an expedited path, some projects time to continue with the old process, and others clear time limits to meet new eligibility requirements to participate in the transition process. As applied here, the transmission expansion reform is lacking a clear path to LTF service if the new Evaluation Criteria cannot be met, clarity as to when/whether Interim Service will be available, how much security and/or collateral will be required and how much will be immediately at risk, etc.

E. Bonneville Should Explore an Expanded Option-to-Build Before Invalidating TSRs

Avangrid continues to see outsourcing engineering and construction work as the best way to start addressing the transmission queue. Stakeholders stand ready to assist the agency in implementing a fulsome process that would allow customers to construct network upgrades and interconnection facilities. Finding ways to leverage current engineering experience and shifting Bonneville’s team into verifying that work meets objective criteria - rather than planning and executing all work - should not be saved for later phases because it is likely the best way to get the most projects moving. Bonneville shared at the Winter Workshops that the agency is looking to expand outsourcing opportunities, but allowing customers to manage construction projects would be exponentially more efficient and would lead to outcomes more aligned with customer’s near-term needs. While Bonneville has indicated there are unique barriers that would be difficult for moving the agency into a verifier role, other transmission providers have found ways to enable customers to contribute in this important way while maintaining the security of the grid. Avangrid strongly urges Bonneville to reconsider prioritizing this work area as a way to implement disruptive thinking and developing a new way of business.

F. Bonneville Should Consider Allowing Customers to Voluntarily Self-Select Key TSRs Before Invalidating any TSRs

Bonneville shared at the Winter Workshops that there are a relatively small number of unique customers in the currently paused queue. Stakeholders may be able to support Bonneville’s efforts to shift the business model if there is a reasonable transition available for at least some of their current requests. Since Bonneville is able to continue processing requests for new transmission service based on normal NITS load growth, it stands to reason that some limited amount of LTF PTP service could be processed as well. If Bonneville were able to expedite some limited amount of PTP requests and provide clarity about what will happen with others (beyond immediate TSR ineligibility) customers might be more willing to give up some requests or at a minimum identify requests that can wait in the queue until a new process is established. Bonneville could characterize this as meeting heightened evaluation criteria, being more commercially ready, or simply implementing a voluntary cap but should coordinate with customers to prioritize meeting current project in-service deadlines before reforming the process.

G. Bonneville Should Provide Clear Guidance Regarding How its Transmission Rules will Impact the GI Queue

If TSRs associated with GI requests that have not progressed past a certain phase (to be determined) are invalidated, the agency should provide certainty to those customers about how and when transmission service will be made available for those projects *before* taking action that could impact the viability of the projects associated with the GI request.

The Winter Workshops provide 11 alternatives to demonstrate Source Maturity,⁵ all but a few of which would invalidate the TSRs tied to the current GI Transition Cluster. For example, EC-SM-ALT-2 would require an executed interconnection agreement, EC-SM-ALT-3 would require a GI Facilities Study Report, EC-SM-ALT-4 would require the completion of the Phase Two Cluster Study, etc. The problem is that Bonneville's current GI process (the TC-25 Transition Cluster) is scheduled to provide the Phase One study report later this month. That means that Bonneville is essentially asking all customers to weigh in on whether the GI Transition Cluster customers should be cleared from the transmission queue.

Avangrid is not conceptually opposed to releasing the TSRs tied to the GI queue but is hesitant to advocate for any such alternative if doing so might put the current GI projects at risk. These projects are desperately needed for the region and have already suffered substantial delay during the GI reform process, including increased costs associated with those delays. Bonneville should provide clarity about the eventual path to firm transmission service that these projects will be eligible to receive.

H. Interim Service Should be Voluntary and Used to Provide Additional Service, Not to Limit the Size of the Queue or Securitize Transmission Expansion

Avangrid continues to see potential value in a new Interim Service product but only as a voluntary option, and only if it is expected to receive a quality of service commensurate with the current CF service. Previously Bonneville has described Interim Service as needed to provide security for the transmission planning process and/or transmission expansion, which is better addressed with security provisions that are more directly tied to any transmission expansion needed.

A mandatory Interim Service requirement could potentially be a workable solution in the future state, e.g., after a plan of service has been developed but before LTF service is available or while awaiting affected system upgrades, but Avangrid strongly recommends that customers should not be required to pay for Interim Service prior to a generator commercial operation date and therefore considers deferral opportunities an important mechanism.

With respect to product options, the value of any new Interim Service product will be determined by the maximum amount it may be curtailed. Stated another way, a project that may be curtailed 8760 hours has very little value and should be priced like a Non-Firm ("NF") product rather than LTF. Relatedly, for a developer, certainty is necessary to receive project financing. The more curtailments associated with the service, the higher the cost of financing, which results in higher Power Purchase Agreement ("PPA") costs and rates for customers. Avangrid would encourage Bonneville to set the system conditions or max number of hours *and limit the number of offers granted* so that the new service is likely to enjoy the same quality of service as the current CF product.

To the extent Bonneville is considering a product that would be expected to be curtailed more often, the agency should consider a discount commensurate with that risk. Assuming a highly curtailable Interim Service product is unlikely to be utilized before the next planned rate case, any rate deviations and/or discounting could easily be dealt with in a subsequent rate proceeding. Establishing whether that product will exist, however, and when it will be offered should not be delayed. To be clear, Avangrid sees less value in a new highly curtailable product and would prioritize providing an Interim Service product akin to the current CF bridge service.

⁵ *Id.* at 32-45.

At the Winter Workshops, Bonneville shared that a small amount of the current transmission queue appears to be eligible for Interim Service, meaning that no subgrid constraints were identified, but that a very large amount requires additional analysis to make any such determination. That analysis will require an internal team of engineers and subject experts⁶ to discuss each request, which sounds like an inefficient and overly complex process that should be discouraged on principle. Rather than seek ways to get the study size back to historic volumes so the agency can continue an inefficient process, Bonneville staff should focus on finding a study process that will work irrespective of queue volume.

I. Feedback on Other Specific Alternatives

Avangrid is still working to review many of the proposed alternatives and may supplement this feedback but provides the below comments to reflect Avangrid's initial thinking. As a general matter, Avangrid would suggest Bonneville refrain from making tariff changes unless absolutely necessary to avoid unintended consequences. The use case for some of these alternatives is opaque, which makes Avangrid reluctant to endorse them. Instead, Avangrid would encourage Bonneville to find ways to focus its efforts on bad actors that are causing problems rather than requiring all parties to demonstrate what may often be superfluous data.

1. Remedial Action Schemes ("RAS")

Avangrid does not necessarily oppose imposing RAS requirements, and believes all of Avangrid's generation would meet any such requirements, but is unsure how other Balancing Authority Areas ("BAAs") may be impacted and confused about what would happen if a customer were trying to wheel through a third-party's BAA that didn't have adequate RAS. To that extent, Avangrid tepidly supports the more flexible contractual obligation option.⁷

2. PTP Deliveries to NITS-Only PODs

Avangrid is generally unaware of this as a problem and would welcome more discussion with NITS customers to better understand their concerns with this issue but is likely to oppose requiring NITS customers to submit PTP requests absent a more compelling justification. Permitting NITS customers to invalidate other customers' TSRs seems inconsistent with the current open-access policy. Moreover, as a practical matter, requiring NITS customers to submit PTP requests would add new complexity to otherwise routine business transactions. In addition to contractual issues, there are also system requirements to consider. Rather than create new, unique tariff provisions and/or OASIS rules that would be inconsistent with Bonneville's contract rights, Avangrid would suggest Bonneville work with customers informally to resolve any isolated planning issues as incidents may arise.

3. Resources and Load Outside Bonneville's BAA

Avangrid appreciates Bonneville's statements that nothing in the Winter Workshops presentation was new or intended to change the current requirements for load and/or generation that is located outside the Bonneville BAA. Comparing requirements for resources and load within Bonneville's BAA with those outside of the agency's BAA is helpful and much appreciated. Avangrid asks Bonneville to please confirm that nothing in the

⁶ *Id.* at 126 (describing the Commercial Technical Panel ("CTP") role in offering Interim Service).

⁷ *See id.* at 56-64.

presentation materials is intended to change those requirements, e.g., whether customers currently provide evidence of transmission to demonstrate how the generation will get to Bonneville's system.⁸

4. Battery-to-Battery

Avangrid generally agrees with Bonneville that a customer is unlikely to connect two batteries without also connecting to generation and/or load and is unaware of any such examples.⁹ Yet just as with the NITS-only POD issue described above, requiring this information feels out of step with best practices and may not be necessary. Rather than amend the tariff to address something that appears nonsensical, however, Avangrid would encourage Bonneville to either work informally with customers when situations arise or establish a more robust policy on batteries so that all customers with batteries are treated comparably.

5. Proposal to Allow Bonneville to Collect Additional Information

Avangrid is not conceptually opposed to providing additional information when needed for planning but is concerned about how parties might decide what is relevant for transmission planning and/or justifies invalidating a TSR.¹⁰ To that end, Avangrid would recommend maintaining the status quo. Alternatively, if Bonneville feels this language is absolutely necessary then a dispute resolution process should also be adopted.

6. Mid-C/NWHub

Avangrid is unclear why the status quo for virtual transactions was established, what precisely the current issues are that are impacting Bonneville's planning efforts, and/or what exactly is expected to be gained by the proposal and thus hesitant to weigh in on any of these alternatives.¹¹ As a general matter, however, allowing some customers to continue to utilize flexible virtual transmission options and not allowing others to do so does not appear to offer comparable service to all customers. This is especially true if existing customers are not using the transmission as communicated to Bonneville.

III. CONCLUSION

Avangrid appreciates Bonneville's consideration of these comments and the recommendations contained herein and looks forward to working with stakeholders to reform Bonneville's transmission expansion. Nothing in these comments constitutes a waiver or relinquishment of any rights or remedies provided by applicable law or under Bonneville's tariff or otherwise under contract.

Signed,

/s/ Tashiana Wangler

Tashiana Wangler
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⁸ Compare Winter Workshops Slide Deck at 66 ("This requirement is not different from what we already do today") with Winter Workshops Slide Deck at 67 ("the customer must provide supporting evidence of the transmission transaction to demonstrate how the generation is getting to/from BPA's POR or POD").

⁹ Winter Workshops Slide Deck at 76.

¹⁰ *Id.* at 81-5.

¹¹ *Id.* at 86-98.