



January 16, 2026

Bonneville Power Administration
By e-mail to: techforum@bpa.gov

Re: NIPPC/RNW Comments on BPA's GAT Future State and TC-27 Workshops

The Northwest & Intermountain Power Producers Coalition (“NIPPC”) and Renewable Northwest (“RNW”) submit the following comments in response to the Grid Access Transformation (“GAT”) Future State and TC-27 workshops in December 2025 and January 2026 (“the Workshops”), together with the accompanying Alternatives Worksheet outlining our reactions to the alternatives presented at the Workshops based on information available to date.

I. BACKGROUND

NIPPC and RNW appreciate the work of BPA staff in identifying a comprehensive set of alternatives for stakeholder feedback and pulling together the detailed, thoughtful, and well-organized materials presented in the Workshops. We very much appreciate that BPA has included (and identified) the options responsive to our previous comments in TC-27 and the GAT process. We also appreciate that BPA staff shares the sense of urgency that our members have in quickly developing a process that will allow BPA to resume processing of transmission service requests (“TSRs”).

NIPPC and RNW have previously submitted extensive comments through the GAT process and following the initial TC-27 workshop. This cover letter and the selections identified in the attached spreadsheet build upon those earlier comments.

II. TIMELINE

NIPPC and RNW continue to support BPA’s effort to adhere to an aggressive timeline for the TC-27 process. Such a timeline is important in meeting the region’s reliability and resource adequacy needs, as well as helping BPA’s customers comply with clean energy

requirements. We also support a narrow window of time for BPA and customers to discuss settlement. Some parties, however, have signaled strong support for status quo positions that we are not likely to support. If parties are still far apart when settlement discussions begin, it may be more productive for BPA to abandon the settlement process and move quickly to the formal tariff revision process.

III. COMMENTS

a. BPA Should Resume Processing *De Minimis* Redirects Immediately

NIPPC and RNW encourage BPA to resume processing *de minimis* redirects under its existing Business Practices as soon as possible until more durable transmission reforms are developed. We make this strong recommendation with the understanding of the implication that if BPA resumes processing and awarding large volumes of redirect requests, there is a possibility that aggregate impacts could end up encumbering transmission capacity that might no longer be available to satisfy pending TSRs with superior queue positions. NIPPC and RNW recognize that BPA's existing *de minimis* redirect policies are a deviation from the *pro forma* Open Access Transmission Tariff, but have historically provided significant benefits to the region. We encourage BPA to resume this long-standing regional deviation as soon as possible. We also encourage BPA to address treatment of future redirect requests in Future State workshops in order to arrive at a more permanent approach to the issue.

b. Grid Access Transformation

NIPPC and RNW appreciate BPA's efforts to expand its execution capacity and develop a robust customer build option. The Transmission Infrastructure Delivery & Execution Strategy ("TIDES") appears to promise benefits to customers. We particularly appreciate that TIDES will allow BPA to build a pool of contractors which will then be able to compete based on timelines and costs. As the TIDES program gets underway, we encourage BPA to confer with customers regarding their preferences in prioritizing cost and timelines – particularly for interconnection upgrades or other projects with costs which BPA directly assigns to a discrete set of customers.

We also continue to encourage BPA to rapidly enhance the customer self-build option. We urge BPA to provide stakeholders with a more detailed process timeline for the development and implementation of the customer build option at the next GAT workshop.

c. TC-27 Principles and Alternatives

As requested, we have attached the TC-27 Alternatives Worksheet matrix (the “Matrix”) identifying our preferences and brief comments for each of the specific topics and alternatives discussed in the Workshops.

The preferences in the Matrix reflect an effort to balance between competing objectives. Among the criteria and principles we have considered in completing the Matrix are the following:

- Understanding the urgency for BPA to get “off pause” and resume processing TSRs;
- Recognizing that revolutionary action is necessary for BPA to support customers and the region in meeting clean energy and reliability targets and timelines, including but not limited to Oregon’s House Bill (“HB”) 2021, Washington’s Clean Energy Transformation Act (“CETA”), and resource adequacy needs including those met by the Western Resource Adequacy Program;
- Respecting the Federal Energy Regulatory Commission’s non-discriminatory open access principles while acknowledging that some deviations may be necessary in the near term to resolve the massive queue backlog and meet the region’s needs;
- Recognizing that for the short term and absent process reforms, BPA will likely be limited to offering only conditional firm service (“CFS”) to new TSRs due to the combination of new generation resource preferences, significant growth in load forecasts driven by electrification, and growing data center demand coupled with the current high utilization of the existing grid;
- Bolstering the integrity of the queue by verifying that requests are submitted for legitimate business purposes;
- Ensuring that BPA has the ability to develop plans of service by requiring customers to meet stricter evaluation criteria in submitting TSRs, while also providing mechanisms for marketers and traders to submit valid requests; and
- Incorporating minimum capitalization requirements to avoid cost shifts in the region potentially triggered when undercapitalized customers abandon projects and leave BPA with no recourse.

d. Commercial Business Model

BPA's Commercial Business Model is the process by which BPA responds to eligible long-term firm TSRs for Point-to-Point ("PTP") and above-threshold Network Integration Transmission Service ("NITS") requests on its Network. BPA presented new material regarding its Commercial Business Model during the January Workshops. NIPPC and RNW generally support BPA's proposed future state as laid out in the Commercial Business Model Matrix. We provide these initial reactions to the specific sections as follows:

- Commercial Study Window — For the transition, include all pending TSRs provided that customers meet the strict evaluation criteria as described below and in the Matrix;
- Evaluation Criteria — Support development of more stringent evaluation criteria, including minimum capitalization requirements;
- Cost of Study — Support Option A (per MW study costs with a non-refundable processing fee);
- Term of Transmission Service — Would consider longer minimum terms of service to qualify for rollover rights. Would support award of Conditional Firm Reassessment Service for terms of less than five years;
- CFS/Interim Service — For transition, would support Option A (offers made after CF subgrid study);
- Preliminary Engineering Agreement ("PEA") Costs — Support Option B (non-refundable PEA study processing fee, plus upfront funding of estimated study costs subject to true-up);
- Environmental Study Costs — Support Option A (100% of unspent study funds available for refund); would also consider supporting a non-refundable study processing fee;
- Ongoing Evaluation Criteria Requirement — Support maintaining existing requirement: customer retains opportunity to cure if data exhibit becomes invalid but TSR becomes invalid if not cured;
- Project Cost Security - PTP — Support maintaining status quo security requirements; would support aligning timing of security posting and release based on decision points made in other elements of TC-27;
- Firm Contract Timing — Support contingent service offer upon execution of either PEA or environmental study agreement to align with interconnection in-service dates. Must discuss contingencies in event BPA decides not to proceed with build or determines an incremental rate is appropriate;

- Third Party Impacts — Support for status quo process whereby customer must work with third-party transmission provider and meet their requirements;
- Deferral Rights — Provisional support for proposals to limit number of deferrals subject to further discussion; status quo deferral rights seem inconsistent with shift to prioritizing access to transmission to customers who are ready to take service; customer should be allowed to defer commencement of service in the event of specifically defined delays in interconnection process.

e. Seattle City Light Proposal

At the customer-led workshop on January 15, 2026, Seattle City Light proposed to quickly implement proactive planning without a transition study by offering all customers with TSRs in the pending queue awards of conditional firm transmission service. While neither we nor our members have fully digested the proposal, it appears that the proposal may meet some of our objectives. We would be interested in further exploring this option as a potential solution to the region's challenges.

IV. CONCLUSION

Thank you for the opportunity to submit these comments. NIPPC and RNW appreciate BPA's continued engagement with stakeholders on tackling these complex issues that are critical to the region's energy future. We look forward to collaborating further with BPA and other stakeholders on settlement or other productive resolution of these transmission reform issues.