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Evaluation Criteria (EC)

Ranking			Alternative Code	Description	Comments
Like	Okay	Dislike	**Source Maturity (EC-SM)**		
☐	☐	☑	EC-SM-ALT-1	For transition, only accept GIs that are late stage or bypass	Disfavor these alternatives due to duration between these late stage GI steps and when customer would receive corresponding transmission information. Unlikely interconnection customers will proceed this far into interconnection without having understanding of necessary transmission upgrades. Prefer interconnection and transmission service plans of service to be provided to customers without massive delays between them if possible, so customers can make informed choices. Morover, interconnection facilities are likely to be completed much sooner than transmission network upgrades, so forcing customers to proceed well into GI project development before understanding transmission needs seems potentially punitive since the transmission network upgrades are unlikely to be completed in short order.
☐	☐	☑	EC-SM-ALT-2	LGIA executed	
☐	☑	☐	EC-SM-ALT-3	Issuance of the GI Facilities Study Report	These alternatives may be preferable to Alts 1 and 2 given not as far into GI process, and the customer should by this time have signficant visibility into its interconnection plan of service. Though, like above, would continue to result in multi-year duration from when customer receives its interconnection plan of service and when it receives its transmission plan of service, which makes these alternatives less desirable.
☐	☑	☐	EC-SM-ALT-4	Completion of GI Phase Two Cluster Study	
☑	☐	☐	EC-SM-ALT-5	Completion of GI Phase One Cluster Study AND Execution of GI Phase Two Cluster Study Agreement	These alternatives appear to strike a reasonable balance between progress in the interconnection process and when the customer should be able to be studied for transmission. By this point the interconnection customer should have reasonable understanding of the scope, cost, and timeline for its plan of service, and the point at which it receives its final interconnection plan of service and the point at which it receives its transmission plan of service may not be unacceptably far apart.
☑	☐	☐	EC-SM-ALT-6	Completion of Phase One of the GI study plus any needed restudy	
☐	☑	☐	EC-SM-ALT-7	Completion of Phase One GI study report	Superior to Alternatives 8, 9, and 10 since the customer will have knowledge of a high level plan of service for interconnection, and can make a more informed decision about entering and proceeding through the transmission queue.
☐	☐	☑	EC-SM-ALT-8	Completion of Phase One of the GI study	Disfavor due to lack of meaningful progress in the interconnection queue to demonstrate maturity.
☐	☐	☑	EC-SM-ALT-9	Consultant GI Study	Disfavor due to various and numerous cons presented by BPA staff.
☐	☐	☑	EC-SM-ALT-10	Minimal GI Criteria	Disfavor since this option appears to be status quo and does not positively affect BPA's ability to maintain a reasonable transmission queue that contains "studiable" requests.
☐	☑	☐	EC-SM-ALT-11	Incent LSE Engagement by Providing POR Flexibility	Intriguing option. May be most useful in evaluating candidate transmission projects for cost allocation decisions (i.e., if an LSE indicates preference for in-state renewables only, or indicates no interest in offshore wind (as example only)). Can help inform BPA of which PORs are most likely to remain active and pursued by resource developers than others, which can help inform important cost allocation decisions or identify which projects are least regrets. In addition to LSEs, could also consider input from state PUCs that govern/approve specific investor-owned utility IRPs.

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Like	Okay	Dislike			
			Load Maturity (EC-LM)		
☐	☐	☑	EC-LM-ALT-1	Must be in execution phase (agreements signed/funded)	Disfavor due to similar reasons as the resource maturity above; requiring this level of progress would fail to deliver meaningful transmission plan of service information before load interconnection agreements and funding obligations would be required. The customer should be able to receive information about its full plan of service in relatively close proximity to make informed decisions.
☐	☐	☑	EC-LM-ALT-2	Facilities Study required to be completed	
☐	☑	☐	EC-LM-ALT-3	System Impact Study required to be started or completed	This alternative may be tolerable, but requires action on BPA's part to start (or complete?) a system impact study. To the extent BPA cotntinues to receive numerous large load interconnection requests, NRU is concerned with a requirement that is so reliant on BPA executing certain studies, especially if BPA continues to process and study load interconnection requests serially and on a first-come, first-served basis.
☑	☐	☐	EC-LM-ALT-4	Feasibility Study required to be completed	These alternatives appear to strike a reasonable balance between maturity and transmission service viability. Alternative 4 requires that BPA execute and complete its feasibility studies in a timely manner, which may become more difficult if its load interconnection queue grows at an increasing rate. Alternative 5 does not require BPA to execute any specific study by any specific timeline, which may be preferable both to customers and BPA. Additionally, as noted elsewhere in our comments, it is important to recognize that planning for load interconnections is less likely to cause BPA to misidentify network impacts or transmission upgrades, as compared to resource interconnection. Because customers can submit prospective GI requests sourcing from a wide geographic area, with vastly different impacts to BPA's network, additional care and rigor should be applied to ensure BPA can properly study the impacts of such GI requests. On the other hand, load interconnection requests are generally isolated to a single customer's load area or POD, and as such, the impacts to BPA's network are narrower and are less likely to be incorrectly evaluated. As a result, BPA should be able and willing to tolerate slightly less mature load interconnection requests and still be able to capture necessary network impacts. These alternatives should result in sufficient high-level information for the interconnecting load to understand the scope of interconnection plan of service, and whether to continue pursuing the associated transmission service.
☑	☐	☐	EC-LM-ALT-5	LLIR must be submitted, but no study required	
☐	☑	☐	EC-LM-ALT-6	No requirement for LLIR submittal	This alternative is tolerable, though we understand BPA's desire to conduct studies for more mature load requests. We generally agree, especially to the extent BPA's resource remain constrained, that BPA should use its resources efficiently and to study needs that are more likely to come to fruition.
Like	Okay	Dislike			
			RAS Resource (EC-RAS)		
☐	☐	☑	EC-RAS-ALT-1	Require upon TSR/FTSR submittal	Customer will not know when it submits a TSR whether RAS is required, as that is a determination only made by BPA, unless BPA were to make flowgate or path-specific TSR submittal requirements and ensure they are incorporated into relevant business practices and communicated.
☐	☐	☑	EC-RAS-ALT-2	Require prior to preliminary engineering	Requiring this following the cluster study but before preliminary engineering may be a difficult hurdle for any customer to satisfy given the timelines that BPA applies to offering Preliminary Engineering Agreements. If BPA awaits the customer's attempts to secure a RAS resource, it could delay moving forward with other plans of service needed by that customer (which could affect other transmission customers that require those same upgrades).
☐	☑	☐	EC-RAS-ALT-3	Require prior to environmental study	Given BPA will likely have notified the requesting customer of the need for the RAS resource well before this point (i.e., at the conclusion of the cluster study), these alternatives may be reasonable points to require the customer to provide it.
☐	☑	☐	EC-RAS-ALT-4	Require prior to decision to build the relevant project(s)	
☑	☐	☐	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	This option may be optimal, especially to the extent that the requesting customer is obligated to pay for its share of BPA costs (study costs and security related to the construction of upgrades). The cost to acquire RAS should not necessarily be a cost to BPA.
Like	Okay	Dislike			
			Requirements for Gen/Load Outside of the BPA Balancing Authority Area (EC-OB)		
☐	☐	☐	N/A	N/A	

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Like	Okay	Dislike			
			PTP requests to NT PODs (EC-PTP)		
☑	☐	☐	EC-PTP-ALT-1	Require demonstration of interest from NITS customer upon submittal	It appears reasonable for BPA to touch base with the NITS customer to ensure it doesn't end up encumbering transmission capacity for a transaction that has no foundation or support.
☐	☑	☐	EC-PTP-ALT-2	Require demonstration prior to execution of contract	Would prefer the demonstration be provided earlier, such as Alternative 1.
☐	☐	☑	EC-PTP-ALT-3	Only NITS Customers Allow to Submit PTP TSRs to serve their load	As discussed during the workshop, there may be valid reasons for PTP customers to submit TSRs to NITS PODs.
☐	☐	☑	EC-PTP-ALT-4	Status Quo	Disfavor the status quo since it would enable customers to encumber transmission capacity despite no meaningful intent or arrangement to deliver power to the specific NITS customer.
Like	Okay	Dislike			
			Battery-to-Battery (EC-B2B)		
☐	☐	☐	EC-B2B-ALT-1	Disallow battery-to-battery LTF F/TSRs	NRU has no specific feedback on these alternatives but Alt 2 seems most reasonable.
☑	☐	☐	EC-B2B-ALT-2	Allow battery-to-battery F/TSRs if Customer can provide reasonable scenarios	
☐	☐	☐	EC-B2B-ALT-3	Allow LTF battery-to-battery F/TSRs	
Like	Okay	Dislike			
			Additional Information (EC-ADD)		
☐	☑	☐	EC-ADD-ALT-1	Modify section 17.2(x) and 29.2(ix) to read “Attachment K and other BPA transmission planning processes”	This alternative appears reasonable, provided BPA requires information that is feasible for the requesting customer to have and be able to provide.
☐	☐	☑	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	

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Like	Okay	Dislike	Virtual Hubs | Mid-C and NW Market Hub (EC-VHUB)		
☐	☐	☐	**EC-VHUB-ALT-1**	Remove Mid-C Remote only - **see Sub-Alternatives (SUB)**	
☐	☑	☐	*EC-VHUB-ALT-1-SUB-A*	Remove Mid-C Remote Only	
☐	☑	☐	*EC-VHUB-ALT-1-SUB-B*	Conform to NW Hub	If BPA intends to eliminate MidCRemote, it seems reasonable to allow parties to conform their TSRs to NWHub (assuming it remains a reservable point).
☐	☑	☐	EC-VHUB-ALT-2	Offer Reassessment Only	This could be supportable, as it would enable long-term rights to/from these points, but would not confer an obligation to BPA to plan transmission upgrades to enable virtual transactions.
☐	☐	☑	EC-VHUB-ALT-3	Mix of Firm and CF	An assumption that a transaction from the virtual point to load will represent actual generation at the Mid-C is flawed, and unlikely to capture the true impacts of the transaction.
☐	☑	☐	EC-VHUB-ALT-4	Remove both from the LFT market	Could support exploring further, especially if BPA must identify transmission upgrades to support LTF rights to and from the virtual points. To the extent BPA is not obligated to construct to support these transactions, we may support retaining these points in the LTF market.
☐	☐	☑	EC-VHUB-ALT-5	Require TSR pairing at NW Hub	Relatively easy to game, and requiring pairing does not require that the paired set reflects the long-term use of the system. Also puts BPA in a difficult position to assess the validity of paired TSRs.
☐	☑	☐	EC-VHUB-ALT-6	Actively support LFT use of NW Hub	To the extent that BPA applies all identified main grid upgrades to new TSRs to/from virtual points, this could ensure that impacts of those TSRs are addressed.
☐	☑	☐	EC-VHUB-ALT-7	Status Quo	BPA should pivot toward planning based on long-term load growth of its transmission customers and other drivers of transmission demand; not, as it has historically done, by assuming all TSRs are valid and represent transmission need. Especially requests relying on virtual scheduling points. To the extent BPA does this, and no longer completely relies on TSRs as true and only identifiers of transmission need, then allowing virtual points and transactions may cause no harm, since BPA will be planning for actual loads and resources.

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Like	Okay	Dislike			
			Delivering/Receiving Party Validation (EC-PV)		
☐	☐	☑	EC-PV-ALT-1	Require confirmation of Delivering/Receiving Party; if not remove from queue	Though this alternative has certain appeal, requiring parties to be in active negotation or to have executed a term sheet is an incredibly high bar to set before BPA would allow the TSR to be studied for transmission service or understand BPA's plan of service, which can take up to a year in the best of times to study and determine. This could impede resource solicitation processes or RFPs that regional LSEs may conduct, because the BPA transmission requirements would be unknown. May be preferable to implement after BPA has identified its plan(s) of service, cost, timeline, and CF/Interim service abilities so that customer has full visibility into the required solution. In lieu of this strict hurdle, a potentially alternative approach could be one where BPA studies the needs of the LSEs first, to establish the size of the required transmission upgrades, and then subscribes the upgrades afterward based on which entities are selected through the RFP process or through similar validation criteria as considred by this alternative. This concept may be more applicable under Proactive Planning, however, but BPA should acknowledge that implementing this strict requirement, and allowing TSRs for which the LSEs have or are likely to execute a business deal preempts the necessary transmission upgrades that may be required. In other words, were BPA to only study those requests for which the LSE has agreed to purchase the output, the study could identify less cost effective transmission upgrades than if BPA studied the least-cost transmission solution based on the forecasted need of the LSE (which may be more efficiently served by a resource located elsewhere).
☐	☑	☐	EC-PV-ALT-2	Utilize contingent validation; remove from queue if deal not executed	Slightly more favorable than Alt 1, though it places more administrative burden on BPA staff to implement and presents similar issues as identified above.
☑	☐	☐	EC-PV-ALT-3	If unable to provide required bilateral demonstration, provide only Reassessment CFS or Interim Service	To the extent that BPA adopts either alternative 1 or 2, this alternative seems like a reasonable solution for TSRs where the customer cannot meet BPA's validation requirements.
☐	☐	☑	EC-PV-ALT-4	Allow financial demonstration in lieu of required bilateral demonstration; if not provided remove from queue	Financial demonstration in no way establishes validity to the receiving/delivering party relationship. Would encourage BPA to drop this alternative.
☐	☑	☐	EC-PV-ALT-5	Require FERC marketer registration if no bilateral demonstration; if not remove from queue	This seems acceptable for marketers, whose business models generally don't rely on long-term PPAs or long-term power supply contracts to specific loads.
☐	☑	☐	EC-PV-ALT-6	Short-term market only if bilateral demonstration unavailable; remove from (LTF) queue	Generally only support this alternative if no CF or Interim Service option exists (Alt 3).
☐	☑	☐	EC-PV-ALT-7	Only Offer Up to 4 years, 11 months	Because these transactions would not convey rollover, and because BPA would not be required to plan transmission upgrades to accommodate them, this option may be viable since it would not require the customer to provide planning-level information about the delivering/receiving party.
☐	☐	☑	EC-PV-ALT-8	Use points system for validation	Too frought with complexities and opens BPA up to challenge/litigation.
☐	☐	☑	EC-PV-ALT-9	Contingent Validation with Financial Option to Retain TSR	We oppose allowing financial demonstration in lieu of valid receiving/delivering party information.
☐	☐	☑	EC-PV-ALT-10	Allow a Dispute Mechanism – Only request verification when another party suggests that the information was incorrectly supplied	Does not appear to solve the issue of BPA receiving better transmission request information on which to plan its transmission system.
☐	☐	☑	EC-PV-ALT-11	Status Quo, take information at face value without any further validation or confirmation	This does not help address the planning challenge and should not be pursued.
Like	Okay	Dislike			
			Minimum Cap Requirements (EC-MCAP)		
☐	☑	☐	EC-MCAP-ALT-1	Minimum capitalization requirement scaled based on level of transmission service request activity in study.	Could explore alternative 1 further. Unsure of the need for a minimum capitalization requirement. Current understanding is that non-investment grade customers (or those that fail to qualify for unsecured credit from BPA) are already required to prepay for transmission service, mitigating payment risk. Understanding this, we also are under the impression the commercial planning participants provide funding and security for their share of BPA-incurred costs. Unclear what other risk would be mitigated by the application of a min cap requirement on top of existing requirements.
☐	☐	☑	EC-MCAP-ALT-2	Flat minimum capitalization requirement regardless of level of transmission service request activity in study.	
☑	☐	☐	EC-MCAP-ALT-3	Status Quo – do not have a minimum capitalization requirement.	Barring additional information regarding what risks a min cap requirement is intended to mitigate that BPA's existing financial policies fail to address, lean toward keeping status quo.

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Interim Service (IS)

Ranking			Alternative Code	Description	Notes
Like	Okay	Dislike	**Product Options (IS-POPT)**		
☐	☑	☐	IS-POPT-ALT-1	Seasonal Firm NITS	May be useful to better understand the details of the seasonal NITS product. Though, on its face it appears that it may be inferior to options where NITS would be paired with some form of CF to fill in the periods where LTF is not available.
☐	☐	☑	IS-POPT-ALT-2	Long Term 6-NN	Disfavor due to lack of congestion rent eligibility, lack of equal access to STF capacity as PTP CF. Inferior to a number of alternatives.
☐	☐	☑	IS-POPT-ALT-3	NITS LT 6-NN and PTP LT Priority 5 Non-Firm Service	Under this alternative, PTP customers would remain eligible for conditional firm service, whereas NITS customers would not. This would place NITS customers at a disadvantage as it relates to access to short-term firm capacity and it would also fail to qualify for congestion rent in Markets+.
☑	☐	☐	IS-POPT-ALT-4	CFS - PTP vs NITS - **see Sub-Alternatives (SUB)**	NRU supports NITS CF alternatives, and most favors the new alternatives 4C, 5C and 8C as described at January 15 workshop. These appear to (1) enable Congestion Rent for NITS customers, (2) provide equal access to short-term firm capacity, and (3) would avoid having to forego NITS on OASIS phase 2.
☐	☐	☐	*IS-POPT-ALT-4-SUB-A*	PTP CFS	
☑	☐	☐	*IS-POPT-ALT-4-SUB-B*	NITS CFS	
☑	☐	☐	IS-POPT-ALT-5	CF on the BPA Network - **see Sub-Alternatives (SUB)**	
☐	☐	☐	*IS-POPT-ALT-5-SUB-A*	for Ready PTP TSRs	
☑	☐	☐	*IS-POPT-ALT-5-SUB-B*	for Ready NITS F/TSRs	
☐	☐	☑	IS-POPT-ALT-6	Planning Redispatch	Likely a waste of BPA staff's and customers' time.
☐	☐	☐	IS-POPT-ALT-7	Firming up 6-NN in ST	
Like	Okay	Dislike	**Mandatory-Voluntary (IS-MV)**		
☑	☐	☐	IS-MV-ALT-1	Mandatory for early access	Favor this option for at least the transition phase. May not be appropriate for Proactive Planning/Future State.
☐	☑	☐	IS-MV-ALT-2	Not mandatory until POS has been developed	May also be a reasonable alternative for the transition phase. But, prefer as much service be offered as possible to ensure those in the queue are interested and willing to take requested service.
☐	☐	☑	IS-MV-ALT-3	Status Quo - Not Mandatory	Prefer, at least for transition period, that customers be required to accept offered CF service to ensure commitment to queue position.
Like	Okay	Dislike	**Curtailment Type (IS-CT)**		
☐	☑	☐	IS-CT-ALT-1	Systems conditions only.	

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☑	☐	☐	IS-CT-ALT-2	System condition and/or x% number of 8760 hours of the year.	Support having more options for Customers to consider. Also support CT-ALT-3 as discussed at January 15th workshop, which would broaden BPA's abilities to offer CF to as many customers as possible

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Queue Management (QM)

Ranking			Alternative Code	Description	Notes
Like	Okay	Dislike	**Applying Evaluation Criteria to the Queue (QM-ECQ)**		
☑	☐	☐	QM-ECQ-ALT-1	Keep existing queue.	Appears most defensible and applies consistent treatment to all parties who remain in BPA's queue.
☐	☐	☑	QM-ECQ-ALT-2	Empty existing queue.	Most likely to lead to litigation and likely continued delays to BPA's queueing and study efforts.
☐	☐	☑	QM-ECQ-ALT-3	Apply the new requirements through an agreement.	Unclear what agreement would be offered, what modifications may be required, and appears to present considerable implementation challenges.
Like	Okay	Dislike	**Collecting New Evaluation Criteria (QM-CEC)**		
☐	☐	☑	QM-CEC-ALT-1	Start where we are.	
☐	☐	☑	QM-CEC-ALT-2	Customers submit a new data form.	
☑	☐	☐	QM-CEC-ALT-3	Combine ALT-1 and ALT-2	Seems most defensible to pursue this option.
Like	Okay	Dislike	**Structuring the Queue for Study (QM-SQS)**		
☐	☑	☐	QM-SQS-ALT-1	No Transition Study	Unclear how this alternative aligns to the various PP-TS Alternatives that would contemplate some type of transmission study (I.e., Alternatives 1-4). This alternative appears only viable if BPA were to adopt Alt 8 of the Transition Studies topic (wait for Proactive Planning).
☐	☐	☑	QM-SQS-ALT-2	Batch Studies - **see Sub-Alternatives (SUB)**	Given numerous identified challenges by BPA staff and time required to batch studies, disfavor batching in general.
☐	☐	☐	*QM-SQS-ALT-2-SUB-A*	Queue order	
☐	☐	☐	*QM-SQS-ALT-2-SUB-B*	Geographic	
☐	☐	☐	*QM-SQS-ALT-2-SUB-C*	POR/POD	
☐	☐	☐	*QM-SQS-ALT-2-SUB-D*	LSE vs. Non-LSE	
☐	☐	☐	*QM-SQS-ALT-2-SUB-E*	NITS vs. PTP	
☐	☐	☐	*QM-SQS-ALT-2-SUB-F*	Resource/Load maturity	
☐	☐	☐	*QM-SQS-ALT-2-SUB-G*	Options	
☑	☐	☐	QM-SQS-ALT-3	Cap the LTF Queue	In general, support capping the queue of what will be studied (for transition studies only) to what can be accommodated via the existing GERP projects and other non-GERP projects that BPA has already identified.

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Like	Okay	Dislike			
Handling New (F)TSR Submissions (QM-HNS)					
☐	☐	☑	QM-HNS-ALT-1	Decline All (F)TSRs submitted after 12pm 8/15/24	This would appear to remove any opportunities for interim service in advance of Proactive Planning being implemented.
☐	☑	☐	QM-HNS-ALT-2	Study (F)TSRs in Proactive Planning Program (Future State)	Could potentially be a supportable alternative.
☐	☐	☐	QM-HNS-ALT-3	Include in 2025 TSEP CS Group	Unclear how these alternatives align to the Transition Study alternatives, especially if TS-PP Alt 8 is adopted.
☐	☐	☐	QM-HNS-ALT-4	Second Transition Study	
Like	Okay	Dislike			
Firm Service Prioritization (QM-FSP)					
☑	☐	☐	QM-FSP-ALT-1	Status Quo	In general, NRU would prefer to avoid needing to prioritize allocation of capacity as identified in these options (Alts 2 & 3), and instead capture many of the same benefits through adoption of certain evaluation criteria, as listed and described earlier. We believe that applying the evaluation criteria and requiring parties to have progressed to a meaningful point in the various interconnection queues can self-correct for this issue, and would lessen the need to shuffle the queue around at a later date. Our assumption is that service readiness may be better established through those evaluation criteria, which would avoid many of the risks of allowing parties to move around in BPA's transmission queue.
☐	☑	☐	QM-FSP-ALT-2	Prioritizing Service Readiness	It may be worth keeping these options on the table, but per comments immediately above, NRU believes these alternatives may not be necessary with adoption of certain evaluation criteria and ensuring "readiness" elsewhere/earlier in the process. We also believe that these options may not be necessary if BPA adopts certain validation requirements (such as being in negotiations or selected through RFP processes), as those alternatives would naturally filter out those that are not as ready.
☐	☑	☐	QM-FSP-ALT-3	First Right of Refusal	

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Proactive Planning (PP)

Ranking			Alternative Code	Description	Notes
Like	Okay	Dislike	**Transition Studies (PP-TS)**		
☐	☐	☑	PP-TS-ALT-1	Main Grid SIS, with Full POS After SIS Decision Point	From what we understand, these are too similar to the status quo and would unnecessarily delay the implementation of Proactive Planning.
☐	☐	☑	PP-TS-ALT-2	Full SIS with Decision Point, prior to full POS	
☑	☐	☐	PP-TS-ALT-3	Long-Term Planning Study + Partial Commercial Study	From what we understand of this alternative, would meaningfully accelerate certain important aspects of proactive planning, which is preferred. Would also provide a plan of service for TSRs that would at least subscribe the existing GERP projects. This seems like a very preferable alternative to process requests in the near-term but also move into proactive planning.
☐	☐	☑	PP-TS-ALT-4	Long-Term Planning Study + Full Commercial Study	All else being equal, would just prefer to adopt Alt 3 as a bridge to Alt 8.
☐	☑	☐	PP-TS-ALT-5	Study to Resolve Interim Service Ineligibility	Support Alternative 5 but concerned that it could unduly delay progress toward implementing Proactive Planning. To the maximum extent possible, would support pursuit of Alternative 5 in conjunction with Alternatives 3 or 8.
☐	☑	☐	PP-TS-ALT-6	Distribution Factors	To the extent BPA wishes to process existing TSRs quickly, this alternative has appeal. In addition, any over- or under-building resulting from use of distribution factors may be mitigated by the more refined Proactive Planning studies that would follow this.
☐	☐	☑	PP-TS-ALT-7	10- & 20-Year Transition Study	Does not seem viable or useful when compared with other alternatives.
☑	☐	☐	PP-TS-ALT-8	Wait for Future State Process	Though additional detail is needed on all of the activities that would be a part of Alt 8, initially appears to be supportable.