



January 20, 2026

***VIA ELECTRONIC FILING***

Abbey Nulph  
Project Manager, GAT  
Bonneville Power Administration

**Re: Joint Oregon PUC and Washington UTC Comments Regarding BPA TC-27 Tariff Proceeding**

Dear Ms. Nulph,

The Oregon Public Utility Commission and the Washington Utilities and Transportation Commission would like to thank the Bonneville Power Administration for the opportunity to comment on the TC-27 Tariff Proceeding as part of the Grid Access Transformation (GAT) project. Oregon and Washington have chosen to make joint comments as our states find alignment in our mutual desired goals and outcomes for this proceeding.

Modification of the terms and conditions of Bonneville's Open Access Transmission Tariff provides an opportunity to address issues and challenges around Network Integration Transmission Service (NITs) forecasting, evaluation criteria used to assess the adequacy of the transmission system's capacity and resources, Long-Term Firm (LTF) queue management to ensure efficient use of transmission capacity, and interim service provision evaluation to ensure they are fair and efficient for all customers.

We view the GAT project and the TC-27 Tariff Proceeding as an opportunity to help the region solve multiple challenges related to transmission and interconnection which can provide opportunities for the utilities serving Oregon and Washington customers to meet multiple state goals and policies.

The Oregon PUC and Washington UTC provide the following comments in support of the policies and goals of both states:

- The Commissions generally support BPA's problem statement and agree that a long-term solution to create a study-able queue is critical. The status quo processes are not meeting affordability and reliability needs in ways that serve the public interest.
- Oregon and Washington feel urgency around meeting their 2030 climate and energy policy goals. This means prioritizing options that facilitate cost-effective transmission buildouts to meet that deadline.

- The Commissions of Oregon and Washington sees the improvement of processing requests in Bonneville's Transmission Service Request (TSR) queue as a positive development for the energy economy of the Pacific Northwest. The removal of the significant delays currently experienced in the TSR process would allow Bonneville to better facilitate interconnections of both generation and load, while identifying prudent locations for transmission buildout. Such improvements could enable utilities to hold more competitive procurement processes that would ultimately benefit ratepayers. As this process continues, conditional firm products offered by Bonneville may be a suitable option to enable faster interconnection.
- The Commissions recognize that workable solutions to the TSR queue backlog will require changes from both Bonneville and its customers, including utilities regulated by the Commissions. The Commissions welcome process changes that allow Bonneville to lead in its role as a transmission operator and developer in the Northwest. As Bonneville moves forward, the Commissions will be following how the potential changes proposed in the TSR/GAT efforts will affect utility procurement efforts with the goal of effectively addressing affordability, reliability, and state policy.

Oregon and Washington will continue to stay engaged in and monitor the TC-27 pre-proceedings and the larger Grid Access Transformation process. We appreciate Bonneville Power Administration's efforts and focus on improving outcomes for the region by addressing recognized challenges presented by our current and future energy demands.

Respectfully submitted,



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Chair, Oregon Public Utility Commission



Brian Rybarik  
Chair, Washington State Utilities and  
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