

January 16, 2026

To: [techforum@bpa.gov](mailto:techforum@bpa.gov)

Re: PacifiCorp Comments related to the BPA TC-27 Pre-Proceeding Workshops, held December 17-19, 2025 and January 6-7, 2026, and the BPA TC-27 Customer-Led Workshop held January 15, 2026.

### **Summary**

In response to the material presented by BPA during the TC-27 Pre-Proceeding Workshops held on December 17, 18, and 19 and January 6 and 7 and the TC-27 Customer-Led Workshop held on January 15, 2026, PacifiCorp provides here general and issue-specific comments for BPA's consideration. PacifiCorp requests that BPA (1) move off pause and begin processing its Transmission Service Request ("TSR") queue; (2) provide firm, conditional firm service with bridge to firm, or other interim services where possible; and (3) implement processes to reduce the TSR queue backlog to enable BPA to complete needed planning studies. Further, BPA should complete the initiatives identified in the Grid Access Transformation Project that it has identified as outside of scope for the TC-27 proceeding, so that new regional transmission facilities can be planned and constructed as quickly as possible. Without the ability to plan and receive transmission service, the Northwest region is in jeopardy of missing state-mandated carbon compliance requirements. Further, BPA transmission customers may not be able to accurately plan for customer growth as required under integrated resource plans and the region could face reliability challenges related to the inability to plan for and receive transmission service from BPA. PacifiCorp stresses the need for additional transmission capacity to be available to customers as soon as possible to meet regional requirements. PacifiCorp submits these comments requesting that BPA offer holistic options that prioritize providing interim transmission service as soon as possible.

### **General Comments**

Although PacifiCorp appreciates BPA's attention to addressing its TSR queue backlog, unfortunately, the agency's process for identifying priorities and distilling alternative solutions is administratively burdensome for customers to sufficiently address within the current short comment period. Accordingly, PacifiCorp submits the enclosed limited general comments and certain issue-specific comments to emphasize PacifiCorp's overall concerns with BPA's stalled TSR process and to highlight core solutions for BPA to consider in the TC-27 process. To elicit more actionable and useful feedback from stakeholders, PacifiCorp requests that BPA reissue an updated list of TC-27 alternatives and clarify how the various options would work together, as well as identify any options that are mutually exclusive or non-viable in BPA's view. PacifiCorp reserves the right to provide additional responses to BPA's various TC-27 alternatives documents as these issues develop.

BPA plays a critical role in the Northwest region by operating critical transmission pathways. PacifiCorp and other utilities in the region depend on BPA to manage, plan, and develop needed transmission pathways to enable the utilities to meet carbon compliance programs in Oregon and Washington, as well as support customer load growth in the region. Oregon House Bill 2021

mandates that large investor-owned utilities decarbonize their retail electricity sales in Oregon by 2040, including interim emissions reduction targets of 80 percent and 90 percent below baseline emissions level by 2030 and 2035, respectively. Similarly, Washington’s Clean Energy Transformation Act mandates that electric utilities’ Washington retail electricity sales achieve greenhouse gas neutrality by 2030, and that 100% of all such sales come from non-emitting or renewable resources by 2045. In addition, Washington’s Climate Commitment Act requires electric utilities to submit allowances to cover reported greenhouse gas emissions. BPA’s current TSR pause impacts the ability of regional utilities to plan for, and meet, these requirements.

With the volume of requests received as part of the 2025 TSR Study and Expansion Process (“TSEP”) cluster study, BPA stated that the volume of requests exceeded its ability to complete its planned cluster study. As a result, BPA paused the processing of its TSR queue and identified changes to streamline the request process and accelerate transmission builds. BPA identified six initiatives—(1) NITS Forecast, (2) Evaluation Criteria, (3) Interim Service, (4) Queue Management, (5) Proactive Planning, and (6) Accelerated Expansion—in support of this transition, and later determined that the first four of those initiatives would require a tariff proceeding, TC-27, to support implementation.

The remaining two initiatives—Proactive Planning and Accelerated Expansion—are being developed in parallel in BPA’s Grid Access Transformation (“GAT”) initiative. Although the bulk of the comments here focus on the remaining four TC-27 initiatives, PacifiCorp urges BPA to advance these GAT initiatives in parallel to the TC-27 proceeding, so that new regional transmission facilities can be planned for and constructed as quickly as possible.

As BPA explained, the goal of the remaining four initiatives in TC-27 is to improve the “maturity” of received requests and improve BPA’s ability to process such requests and construct related transmission facilities. In December 2025 and January 2026, BPA held five pre-proceeding workshops in which the agency provided over 100 alternatives under the four initiatives for customers to comment on to assist BPA in developing a proposal for interim service and revised procedures. PacifiCorp participated in all of the TC-27 workshops, the GAT workshops, and the Transmission Planning Reform workshops predating GAT. PacifiCorp appreciates the tremendous amount of work behind these workshops and the walk-through of alternatives. However, PacifiCorp is extremely concerned that extensive development of these alternatives, including those that BPA staff conceded in the workshops were non-viable,<sup>1</sup> simply delays unpausing the TSR queue and enabling mature requests to proceed through the process.

In these workshops, BPA acknowledged the importance of choosing the correct combination of alternatives to improve the maturity of requests received and efficiently process the queue. BPA stressed that its ability to complete required planning, offer service, and determine required enhancements may not be achieved if the correct combination of alternatives is not deployed. Despite the critical nature of this information, however, BPA did not provide any insight into how the different alternatives presented for NITS Forecast, Evaluation Criteria, Interim Service and Queue Management worked together, making it difficult for PacifiCorp to evaluate the different alternatives presented. Moreover, stakeholders were given only a short period of time over the

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<sup>1</sup> For instance, during the December 19th workshop, BPA staff indicated that one or both of the IS-POPT-ALT-5 options (CF on the BPA Network) may not be viable due to technical constraints, and that PP-TS (Option 6 – Distribution Factors) was not preferred by BPA staff.

holidays to digest the extensive materials provided by BPA and prepare comments, adversely impacting stakeholder ability to provide thorough feedback. Accordingly, instead of responding to each individual alternative in the spreadsheet provided by BPA, which is unduly burdensome for stakeholders on such a short comment timeline, PacifiCorp submits the enclosed general and issue-specific comments to help guide BPA's decision-making in this proceeding.

Finally, to enable more comprehensive review and thorough stakeholder feedback, PacifiCorp requests that BPA revise its TC-27 alternatives list to clarify how the various options would work together and note which are mutually exclusive and/or non-viable in BPA's view.

### **Specific Comments**

As discussed further below, PacifiCorp believes that BPA can effectively reduce the existing queue by processing De Minimis TSRs and offer firm, conditional firm service with bridge to firm, or other interim services where appropriate within the queue. In addition, BPA should immediately determine and study key system constraints, such as the Portland sink, which are preventing interim service offers (such as conditional firm service) from being provided. BPA should also implement processes and requirements to eliminate speculative TSRs from the remaining queue, so that more mature requests can utilize available transfer capability. PacifiCorp believes that the below reforms in particular help achieve these ends and, accordingly, the Company suggests that BPA further develop these proposals within the TC-27 process.

#### Processing De Minimis TSRs

*Slide 11 of TC-27 Pre-Proceeding Workshop Dec 17-19, Jan 6-7 Presentation*

PacifiCorp supports the immediate processing of De Minimis TSRs—i.e., those TSRs that BPA determines to have a *de minimis* impact on the transmission system. PacifiCorp is a party in the PTP Coalition that requested that BPA immediately begin processing De Minimis TSRs.

#### Processing NITS Load and Resource Consolidated Data Collection Tool ("LaRC"): Timeframe for Implementation of LaRC

*Slide 17 of TC-27 Pre-Proceeding Workshop Dec 17-19, Jan 6-7 Presentation*

PacifiCorp supports the processing of trended load growth upon the completion of TC-27. PacifiCorp believes it is important to have updates to the commercial planning process identified in TC-27 completed before beginning this process.

#### Evaluation Criteria

*Slides 28-122 of TC-27 Pre-Proceeding Workshop Dec 17-19, Jan 6-7 Presentation*

PacifiCorp believes BPA is in the best position to determine what requirements are needed from customers to ensure that BPA receives mature, ready-for service requests. PacifiCorp supports the implementation of additional Evaluation Criteria as a requirement for submitting TSRs and for proceeding through the existing TSR queue.

#### Interim Service

*Slides 123-182 of TC-27 Pre-Proceeding Workshop Dec 17-19, Jan 6-7 Presentation*

PacifiCorp believes BPA should offer customers firm, conditional firm service with bridge to firm, or other interim services where appropriate within the queue. To address its load service needs, PacifiCorp requires firm service, bridge conditional firm service, or comparable interim service offerings that would provide a pathway for firm service. PacifiCorp believes that BPA should

perform studies to provide interim service to those requiring analysis. Lastly, as noted above, BPA should look at key system constraint areas, such as Portland, that may be preventing conditional or interim service offers from being provided at all. BPA needs to identify quick fixes that could alleviate such known congestion points. As BPA continues to develop the various interim service options, PacifiCorp stands ready to provide additional feedback.

#### Queue Management

*Slides 183-239 of TC-27 Pre-Proceeding Workshop Dec 17-19, Jan 6-7 Presentation*

BPA sought input on how BPA should collect and apply the evaluation criteria to the queue, and how the queue should be structured to support studies. PacifiCorp believes that BPA should collect and apply the Evaluation Criteria being developed in the TC-27 process to the BPA TSR queue. Customers failing to provide the required criteria in the timeframe requested should be removed from the queue. To be fair to customers that have already started the process, PacifiCorp believes BPA should request that all new TSRs meet the new Evaluation Criteria, and that these new requests be placed after those in the existing queue. Queue order should be used to develop clusters of TSRs for study. Aside from these considerations, PacifiCorp underscores that BPA is otherwise in the best position to determine how to structure the queue to ensure sufficient studies.

#### Commercial Business Model

On January 6 and January 7, BPA presented proposals to modify its “commercial business model” by focusing on increased cost recovery and proposing deposits for future studies. From a process standpoint, workshop materials for this discussion were presented less than one hour prior to the workshop, which adversely impacted the ability of PacifiCorp and other stakeholders to provide considered feedback and engage with BPA staff during the workshops. From a substance standpoint, PacifiCorp understands the desire to capture costs and ensure that customers pay for the services that they use, consistent with cost causation principles. However, BPA’s proposal to add such cost causation considerations to the already substantial scope of TC-27 simply detracts from the goal of restarting the TSR queue as soon as possible. PacifiCorp recommends that these items be postponed for a future tariff proceeding.

For ease of review, enclosed with these comments are copies of the December and January workshop materials.<sup>2</sup>

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<sup>2</sup> The December 2025 and January 2026 pre-proceeding workshop presentation can be found on the BPA website at [https://www.bpa.gov/-/media/Aep/rates-tariff/TC-27/TC27-workshop\\_Dec17-19-updated.pdf](https://www.bpa.gov/-/media/Aep/rates-tariff/TC-27/TC27-workshop_Dec17-19-updated.pdf); the Commercial Business Model Presentation presented at the BPA January 6-7, 2026 pre-proceeding workshops can be found on the BPA website at [https://www.bpa.gov/-/media/Aep/rates-tariff/TC-27/TC27-workshop\\_Jan6-7\\_Commercial-Business-Model.pdf](https://www.bpa.gov/-/media/Aep/rates-tariff/TC-27/TC27-workshop_Jan6-7_Commercial-Business-Model.pdf); the BPA Clarifying Presentations presented at the January 15, 2026 customer-led workshop can be found on the BPA website at [https://www.bpa.gov/-/media/Aep/rates-tariff/TC-27/TC27-Customer-led-workshop\\_Jan15\\_BPA-Clarifications\\_updated.pdf](https://www.bpa.gov/-/media/Aep/rates-tariff/TC-27/TC27-Customer-led-workshop_Jan15_BPA-Clarifications_updated.pdf).