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January 16, 2026

To: techforum@bpa.gov
Re: Comments related to BPA's TC-27 Pre-Proceeding workshops on Dec. 17-19, 2025, Jan. 6-7 &15, 2026.

Portland General Electric appreciates the opportunity to provide comments in Bonneville Power Administration's (BPA's) TC-27 process and commends BPA for engaging stakeholders on a set of difficult but critical policy and implementation choices. PGE views the identified issues as interrelated and believes they should be evaluated through a common lens: how best to restore forward progress in offering transmission service while maintaining reliability and compliance and minimizing rate impacts to customers. In that context, PGE encourages BPA to pair its near-term process and planning decisions with a more explicit commitment to deploying grid-enhancing technologies and modernizing operational practices to safely unlock additional usable capacity on the existing system. Integrating these tools alongside the policy and programmatic choices under consideration can materially improve BPA's ability to get off pause, offer additional service sooner, and support proactive planning outcomes without sacrificing compliance or system reliability.

PGE's comments seek to be responsive to BPA's identified topics for stakeholder feedback in addition to transition alternatives:

A. NITS forecast revised staff leaning, including timing of implementation.
B. Proposal to restart processing *de minimis* transmission service requests.
C. Grid Access Transformation (GAT) Planning Program Transition alternatives presented. Please see PGEs attached "Alternatives Worksheet."
D. What objectives are your greatest priority (i.e., get off pause as soon as possible, offer as much service as soon as possible, initiate a commercial cluster study, focus on Proactive Planning, etc.)?
E. PGE feedback regarding the PP-TS Alternatives laid out on slide 239
F. Workshop and implementation timeline.
G. Explore Alternative Transmission Solutions including Grid Enhancing Technologies, leverage AI, and evaluate operating procedures, which may be too conservative

A. NITS forecast revised staff leaning, including timing of implementation.

Under BPA's proposal new Network Integration Transmission Service (NITS) requests with a 10-year average forecast below 13 MW would not be treated as Large Load Facilities (LLF) and would instead be evaluated through the system assessment process. For NITS requests that qualify as LLFs, BPA proposes a probability-based framework under which loads exceeding a 70% probability threshold would be incorporated into both the system assessment and commercial planning studies, while loads below that threshold would be evaluated solely

through the system assessment process. BPA further proposes that existing NITS requests in the queue that exceed the 70% probability threshold and 13 MW growth would remain in the queue, except where impacts are *de minimis*.

Consistent with PGE's June 11, 2025, comments, PGE supports this staff leaning and appreciates BPA's efforts to more clearly distinguish between trended, incremental load growth and large, discrete new load additions—particularly data center-driven demand. Establishing a clear threshold preserves timely access to transmission service for modest load growth that is reasonably expected to materialize, while appropriately directing new large loads above 13 MW into the commercial planning framework where their scale, uncertainty, and system impacts can be more rigorously evaluated. This approach promotes fairness, transparency, and efficient use of planning resources while reducing unnecessary friction for smaller customers.

With respect to implementation timing, PGE recommends that these changes not take effect prior to the conclusion of the TC-27 process and establishment of fully defined commercial planning processes. Aligning implementation with the completion of TC-27 ensures consistent treatment of Point-to-Point (PTP) and NITS requests under the commercial assessment framework and avoids introducing interim processes that could create confusion, inequities, or rework. This sequencing will provide stakeholders with clarity and confidence while supporting BPA's broader objective of restoring forward progress in transmission service offerings.

B. Proposal to restart processing de minimis transmission service requests.

In TC-27, BPA proposes a targeted reopening of the Transmission Service Request (TSR) process to allow evaluation of Long-Term Firm (LTF) redirect requests that result in *de minimis* system impacts. This proposal follows BPA's July 2024 decision to pause TSR processing, under which even redirect requests with no material system impacts have not been evaluated. As a result, customers are seeking to optimize existing contractual rights have been unable to move forward despite the absence of reliability or congestion concerns.

PGE strongly supports BPA's proposal to immediately resume processing *de minimis* redirect requests in queue order. Prompt implementation of this change would deliver near-term, tangible benefits to customers by enabling more efficient use of existing transmission rights and reducing avoidable congestion in the queue. While this step alone will not resolve the broader structural challenges underlying the pause, it represents a practical, low-risk action that can meaningfully alleviate the backlog without compromising reliability or planning integrity. Advancing *de minimis* redirects now is consistent with BPA's stated objectives of restoring forward progress, improving customer outcomes, and making better use of existing system capability while longer-term planning reforms are implemented.

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C. GAT Planning Program Transition alternatives presented.

Please see PGEs attached "Alternatives Worksheet."

D. What objectives are your greatest priority (i.e., get off pause as soon as possible, offer as much service as soon as possible, initiate a commercial cluster study, focus on Proactive Planning, etc.)?

In response to BPA's request to identify priority objectives under TC-27, PGE believes the highest priority should be restoring access to transmission service as quickly and efficiently as possible while longer-term proactive planning reforms are implemented but start on proactive planning now.

A. First and foremost, BPA should offer broadly available interim or conditional service until proactive planning is fully in place. PGE was disappointed to see that, under the current approach, none of PGE's Long-Term Firm transmission service requests would qualify for Conditional Firm service due to sub-grid constraints at MIDCREMOTE, WOG West-to-East capacity, and sinks in the Portland/Troutdale area. During the July 2025 workshops, stakeholders, including PGE, expressed concern that widespread Conditional Firm offers could degrade existing firm service. The current outcome, however, reflects an overly conservative application that effectively precludes Conditional Firm service altogether for certain constrained areas, undermining the product's intended purpose.

   PGE encourages BPA to recalibrate the Conditional Firm construct by offering a more clearly differentiated, more curtailable interim service product and deploying improved operational tools to manage congestion when it arises, in queue order. Doing so would allow customers to access Conditional Firm by their TSR service date, while acknowledging and managing congestion risk, rather than denying access entirely. PGE recommends BPA return to the framework presented in the July 2025 workshops, make Conditional Firm offers broadly to all queued requests and require customers to accept Conditional Firm bridge service that would start with their TSR service/start date to remain in the queue. This market-based approach would quickly identify which customers are prepared to move forward and unlock near-term utilization of existing system capability. PGE is not interested in taking a CF reassessment product, our business model more aligns with CF-Bridge. BPA should prioritize the CF-Bridge product since it's a path to LTF service.

B. Provide access to new long-term firm transmission service as soon as practicable, and at the lowest reasonable cost, as a core objective of TC-27. Interim measures should be designed

to support, not delay, this outcome by enabling customers to progress while proactive planning and longer-term system upgrades are developed.

C. Third, consistent with PGE's comments under Item B, BPA should prioritize getting off pause by immediately resuming processing of de minimis transmission service requests. This represents a low-risk, high-value step that can be implemented without delay and provides immediate customer benefit while broader reforms are underway.

D. Fourth, PGE emphasizes the importance of establishing a repeatable, transparent process for accessing transmission service. Customers need confidence that transmission access will be evaluated through a consistent framework that supports long-term planning, investment decisions, and regional economic development. PGE supports the overall BPA timeline from TSR submission to start taking service within 5-6 years.

E. Finally, PGE encourages BPA to prioritize transmission service requests that are demonstrably ready to move forward, where buyers and sellers have executed or are prepared to execute agreements, rather than strictly tendering contracts based solely on queue position. Prioritizing commercial readiness would accelerate utilization of available capacity, reduce speculative queue activity, and better align BPA's processes with real-world market needs.

E. Regarding the PP-TS Alternatives laid out on slide 239 (table screenshot below)

- **Preferred Alternative – Option 8:** Option 8 represents the fastest and most viable pathway for PGE to obtain transmission service. Under this approach, BPA would complete a system study and identify projects of least regret based on regional needs by March 2030, followed by execution of commercial study, to assign commercial plans of service by March 2031. Relative to other options, this sequence most directly supports timely access to transmission service.
- **Options 1-4 Not Selected:** PGE did not select options 1 – 4 because the maximum queue size under these options may exclude PGE's existing queued requests and, in all cases, these alternatives require longer timelines to reach plans of service compared to the Future State Process.
- **Option 5 – Delayed Conditional Firm Access:** Option 5 would not provide Conditional Firm plans of service until 2033, approximately 2 years later than the Future State Process, making it materially less responsive to near-term transmission access needs.
- **Option 6 - Distribution Factors:** Option 6 is not a study-based option and relies solely on Power Transfer Distribution Factor (PTDF) flags. This approach carries significant risk, may

not yield reliable or accurate plans of service, and reflects the legacy methodology BPA has already moved away from due to its limitations. As such, PGE does not view this as a viable option.

- **Option 7 – Insufficient Information:** Option 7 lacks sufficient detail to evaluate its merits, with key elements identified as "not available" across the proposal. Without additional information, PGE is unable to assess its feasibility, timeline, or impacts.

  Need for Additional Detail on the Future State Process: We need to plan for the future now. Why have engineers focus on a commercial study for a transition period, rather just focus on the future state. Don't focus on various methods and tinkering of the existing queue to try and clear out the existing queue, just move to the new future state. While PGE supports Option 8, but additional clarity is required to enable informed stakeholder support. Specifically, PGE requests further detail on how the Future State Process functions in practice, how existing TSRs will be assured access to transmission capacity, and how BPA will ensure adherence to the proposed timelines. PGE requests that this information be presented and discussed March 2026 workshops.

PP-TS Alternatives | Timelines Assumes BPA staff complete study

#	Option	≈ Max Queue Size (GW)	Transition Study Timeframe (Off Pause)	Resume Proactive Planning Designing	Start Proactive Planning Customer Engagement	Complete 1st Proactive Planning Study	Complete Post-Proactive Planning Commercial Study
1	Main Grid SIS, with Full POS After SIS Decision Point*	25	Oct. 2026 – June 2030	Oct. 2029	April 2030	Oct. 2033	Oct. 2034
2	Full SIS with Decision Point, prior to full POS	15	Oct. 2026 – Oct. 2029	Feb. 2029	Aug. 2029	Feb. 2033	Feb. 2034
3	Long-Term Planning Study + Partial Commercial Study*	Project Limited	March 2026 – March 2029	July 2028	Jan. 2029	July 2032	July 2033
4	Long-Term Planning Study + Full Commercial Study	15	March 2026 – Nov. 2029	March 2029	Sept. 2029	March 2033	March 2034
5	Study to Resolve Interim Service Ineligibility	TBD	Oct. 2026 – April 2029	Aug. 2028	Feb. 2029	Aug. 2032	Aug. 2033
6	Distribution Factors	TBD	TBD	TBD	TBD	TBD	TBD
7	10- & 20-Year Transition Study	N/A	N/A	TBD	TBD	TBD	TBD
8	Wait for Future State Process	N/A	N/A	March 2026	Sept. 2026	March 2030	March 2031

Pre-decisional

F. Workshop and implementation timeline

With respect to the March 2026 workshops, PGE encourages BPA to consider dedicating time to structured, in-person settlement discussions in the Rates Hearing Room. Once customer comments are submitted by January 16 and posted publicly by BPA, stakeholders will be in a position to clearly identify areas of alignment as well as the limited set of issues requiring focused discussion

to close remaining gaps. Using the March workshops for settlement-oriented collaboration would allow customers and BPA staff to efficiently converge on solutions rather than re-litigate well-understood positions.

This approach is particularly important given the current schedule, which anticipates publication of the *Federal Register* Notice in the April - June timeframe. The March window represents the most practical opportunity for meaningful settlement discussions on discrete issues before BPA finalizes its Staff Leaning and advances to the *Federal Register* process.

Assuming there is no settlement reached, BPA should hold another workshop after they issue the staff proposal in March/April to walk customers through their staff leaning and what led to that conclusion. Customers would then be afforded the opportunity to ask questions and clarify their understanding. BPA should hold a 15-day comment period on the proposal, collect final feedback and incorporate that into their final Federal Register Notice.

Finally, PGE would like to reiterate the concerns expressed by other stakeholders during the TC-27 customer-led workshop held on January 15. During that session, BPA presented new NITS scenarios, introduced new additional alternatives on conditional firm service, and updated transition studies timelines that were not accompanied by sufficient detail and were presented in a forum intended to be led by customers. Introducing new proposals between formal comment periods limits stakeholders' ability to fully review the information, ask clarifying questions, and provide well-considered feedback. In addition, this approach effectively shifts the responsibility for documenting and evaluating these alternatives to stakeholders on a compressed timeline.

G. Explore Alternative Transmission Solutions including Grid Enhancing Technologies, leverage AI, and evaluate operating procedures, which may be too conservative

PGE encourages BPA to use the TC-27 process, in coordination with the Grid Expansion and Reinforcement Program (GERP), to more fully explore opportunities to maximize usable capacity on the existing transmission system. Given the time and cost associated with traditional expansion, incremental capacity gains achieved through advanced technologies and modernized operations represent a critical complement to longer-term capital investments.

- PGE recommends that BPA explicitly evaluate Grid Enhancing Technologies (GETs), including dynamic line ratings, advanced conductors, power flow control devices, topology optimization, and enhanced situational awareness tools, as part of its foundation reliability studies. These technologies are increasingly proven to increase transfer capacity and can be deployed to mitigate constraints prior to, or in parallel with, evaluation of TSRs. Incorporating GETs earlier in the planning and study process would allow BPA to more accurately assess true system capability and reduce unnecessary conservatism embedded in static assumptions.
- PGE encourages BPA to continue advancing the use of automation, AI, and advanced analytics in transmission system analysis and operations. Entities across the industry are leveraging AI-enabled contingency screening, real-time decision support, and predictive analytics to improve

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operator visibility, accelerate study timelines, and more precisely identify safe operating opportunities. Evaluating the system with greater operational flexibility, similar in concept to non-firm service under the OATT, can unlock additional capacity while preserving reliability. Adoption of these tools can also materially improve the efficiency and scalability of BPA's planning and operational processes.

- PGE fully recognizes BPA's obligation to comply with all applicable NERC reliability standards and strongly supports BPA's commitment to maintaining compliance. At the same time, PGE encourages BPA to pursue risk-informed operational practices that appropriately balance reliability and efficiency, particularly where legacy assumptions or practices may exceed minimum reliability requirements without delivering commensurate reliability benefits. Re-examining operational margins, study assumptions, and outage practices, supported by improved monitoring, controls, and automation, may allow BPA to safely reduce unnecessary conservatism while remaining fully compliant with NERC standards.

In closing, PGE notes that these preliminary comments are based on the proposals currently available in the record. PGE maintains the right to supplement, clarify, or modify its position as the record develops during this proceeding.

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