

Submitted to techforum@bpa.gov on January 16, 2026

RE: PPC Comments on BPA's December 2025 and January 2026 TC-27 Workshops

The Public Power Council (PPC)¹ is supportive of BPA's efforts to improve its planning policies to be more responsive to customer needs which will allow utilities to facilitate regional economic growth in their communities and enable compliance with state policies. We are optimistic that a reenvisioned "future state" planning process will be able to achieve these goals. PPC acknowledges the transition state that is the focus of TC-27 is necessary; however, this process will not result in the type of transformative changes that BPA has committed to pursuing and is not designed to result in the creation of substantial new infrastructure to serve future needs. For that reason, we recommend that BPA work quickly to resolve the transition issues that are within scope for the TC-27 process and immediately upon resolution of the TC-27 case begin work with customers to develop and implement a reformed transmission planning "future state."

The TC-27 Process, PPC Objectives, and Prioritizing Issues to Get Off Pause

As a general matter, PPC appreciates the amount of workload that is involved for BPA staff in conducting the TC-27 process including preparing for customer workshops and discussions. We want to thank BPA for its responsiveness in informing customers of the full suite of alternatives that it is considering in this process and commend its efforts to be transparent about the evaluation criteria that will be used to determine the agency's ultimate direction. As stated above, we encourage BPA to work as quickly as possible, while still providing due consideration and process, to resolve the TC-27 case and develop a plan to "get off pause" and move forward with future state development.

As we develop these "transition" policies, it will be important that BPA clearly communicate its proposals. There have already been several examples of misunderstandings during the process that have hampered customers' ability to provide BPA with helpful feedback in a timely manner. PPC anticipates that communication on potential policies will improve as BPA narrows its focus to a more limited range of alternatives. As we move into the next phase of discussion, we encourage BPA to develop draft Business Practice language to help clearly

¹ PPC is the umbrella trade association representing the interest of the Northwest's non-profit, public power utilities that have preference rights to the output of the federal system. PPC's members rely on BPA for wholesale power and transmission services to provide economic, reliable, and environmentally responsible power supply for the communities and businesses they serve at cost. PPC's members fully subscribe the firm output of the Federal Columbia River Power System (FCRPS) and a large portion of the capability of BPA's transmission system. The ability to access BPA's transmission system to deliver federal and non-federal generation to their communities is critical for PPC members.

communicate with customers, and internally across the agency how its proposed approaches would be implemented.

In addition to clearly communicating its proposals, BPA should – to the best of its ability – define the duration of the “transition” period to help inform customer positions. As discussed in more detail below, this could take the form of a specific commitment in TC-27 for when BPA would institute a proactive planning approach. A shorter duration period and higher level of commitment from BPA on specific aspects of the future state could help customers be more comfortable with taking some additional risk during the transition period.

Currently, it is difficult to provide comprehensive feedback on TC-27 with so many issues in flux. Understanding the top concerns for BPA and preferred approaches related to those topics could help inform other preferred alternatives. Because of this challenge, these comments focus primarily on PPC’s objectives and priorities for the TC-27 process. Included as an attachment is some initial feedback on select specific issues based on our current understanding of various alternatives.

PPC TC-27 Objectives

As BPA considers the suite of alternatives that it will propose in the TC-27 process, PPC recommends that following objectives:

- 1) Proceed with the development and implementation of the future proactive planning process as quickly as possible.**

While we understand that the details of proactive planning are out of scope for TC-27, the decisions made in TC-27 will directly affect when BPA can begin developing and implementing a future proactive planning process and whether a pilot proactive planning process can be used. PPC would also like to explore with BPA what commitments *can* be made in the TC-27 process with regards to the proactive planning process (e.g. principles, timing, etc.) to give customers some level of certainty about the future, which could inform some of their positions in the TC-27 case. Specifically, BPA should ensure Load Serving Entities (including PPC members) that they will have an effective path to have their transmission needs met through the future proactive planning paradigm.

- 2) Ensure that there is an avenue for both NT and PTP customers that are prepared to take service in the next 1-3 years to receive interim service.**

Interim service will not be an effective product if those entities needing it the most are unable to access it due to subgrid or other constraints that are not consistent with BPA’s current conditional firm policies. An approach must be adopted that allows entities ready

to take service to do so and provides comparable interim service benefits to both PTP and NT customers. PPC has appreciated the discussions around interim service during the December and January workshops and will continue to evaluate the alternatives developed by BPA.

Recommended Prioritization of Issues to Get BPA “Off Pause”

As has been discussed extensively during the stakeholder process, BPA’s planning “pause” has real impacts for PPC members and other customers with near-term transmission needs. Ongoing redesign conversations also create significant uncertainty for PPC members who are working to meet future demand in their communities including enabling economic development opportunities, resource planning consistent with implementation of their Provider of Choice contracts, and preparations for BPA’s participation in Markets+.

To allow BPA to quickly resume processing requests for both PTP and NT customers PPC recommends that the agency pursue an alternative that does the following:

- Adopts a proposed NT load threshold on a per facility basis so that it can resume processing NT customer LaRCs.
- Implement an interim service policy that allows BPA to offer service to entities in the queue that are prepared to take service.
- Review requests eligible for the 2025 TSEP and identify any requests that would be grantable upon the energization of the current GERP projects.
- At the conclusion of that review begin development of the proactive planning approach or a pilot version of such a study.
- As part of concluding the TC-27 process, the agency should include a commitment to certain principles related to access to capacity for load service as part of the proactive planning development.

Thank you for the opportunity to comment,

Lauren Tenney Denison
Chief of Staff and Strategic Initiatives
Public Power Council

Attachment:

PPC’s Initial Comments on Specific Topics Based on Discussion in December and January Workshops

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Resuming Processing of Requests

PPC is supportive of beginning to process requests with de minimus impacts. We are also supportive of a timely resolution on BPA's NT forecasting policy so that it can start processing LaRCs.

NITS Forecast

We understand that BPA views resolving the NITS forecast issue as a requirement before it resumes processing customers' LaRCs. Because of this, PPC had hoped to provide BPA with a clear recommendation on this issue; however, confusion around BPA's proposal has prevented us from providing a recommendation in these comments.

The additional examples provided at the January 15 meeting were helpful and we appreciate BPA working quickly to compile numerical examples with additional narratives to help stakeholders better understand the intended proposal. There are still numerous outstanding questions about how the proposal would be applied. Given that the agency has developed a proposal on this issue and given the length of time this topic has been discussed with stakeholders, we are hopeful that BPA can hold an additional workshop prior to the planned March TC-27 workshop to continue to clarify the details of its proposal. Developing draft business practice language could be one way to provide customers with more concrete details. Some specific questions that PPC would like to see addressed:

- Will BPA apply the 13 MW threshold to resources? If so, which business practice would this be captured in?
- How will the length of resource designation impact how resources are evaluated under this policy?
- BPA has stated that once a facility is deemed "above the line" that designation continues "forever." How does BPA envision applying that designation once the facility is in service?
- BPA appears to be applying the proposed facility check to facilities already in service. Can BPA further describe how this will be implemented?

Evaluation Criteria

PPC is interested in working with BPA and other customers to develop evaluation criteria that will best enable customers to receive service in a timely manner. Any evaluation criteria adopted will need to balance the need that BPA has for information to accurately study requests and the need that customers may have for some level of flexibility in the use of the system. Achieving the right balance of these interests will also be influenced by choices that BPA makes on other topics, such as its interim service policies and its approach to processing the queue.

Source Maturity – During the workshop, BPA expressed a leaning towards EC-SM-ALT-5 (Completion of GI Phase One Cluster Study AND Execution of GI Phase Two Cluster Study Agreement). PPC’s initial leaning is that generally this option appears to strike the right balance of getting some customer commitment while moving forward quickly enough that GI and transmission projects can move forward in parallel. Because of the delay in the first GI cluster study, should a restudy be required, entities should be able to sign a contingent Phase Two agreement to be deemed “mature” with the understanding that that Phase Two agreement would be considered eligible for termination if the restudy resulted in a x% cost increase or y # of months increase to the timeline.

Load Maturity – PPC’s initial leaning is that either EC-LM-ALT3 (SIS) is started or completed or EC-LM-ALT4 (feasibility study is completed), could be appropriate options that balance the need for BPA to have additional information while not preventing customers from requesting transmission until too late in the process.

PTP Delivery to NITS PODs – PPC supports BPA seeking to prevent situations where speculative requests to a NITS POD, not initiated by the NITS customer or a confirmed counterparty, are blocking access to capacity needed to serve load at that location. At this time, we seek additional discussion on whether a faster move proactive planning or adoption of other proposed criteria would negate the need for a new policy on this issue specifically.

Additional Information – BPA should be as clear as possible about the types of data that it will need to request. PPC does not oppose the proposed change to the tariff but would like to further clarify if BPA believes this is an authority that exists today under the current OATT.

Mid-C/NW Hub – PPC recommends that BPA *remove* EC-VHUB-ALT-4 (Remove both Mid-C and NW Hub from LTF Market Access) and EC-VHUB-ALT-5 (Require paired TSR requirement from consideration). Depending on BPA’s approach in other areas (particularly interim service), other alternatives may be viable. Customers should be able to secure priority 6 or higher service from a market hub that will allow them to adequately hedge their position through congestion allocation once BPA joins Markets+.

Delivering/Receiving Party Validation – PPC understands the issue that BPA is trying to address and shares concerns about parties speculatively requesting transmission in a manner that blocks a resource developer pursuing a project or A Load Serving Entity from directly procuring needed transmission from BPA. However, we are concerned about BPA establishing itself as an arbiter of this information under the current planning structure. We would like to explore whether a more rapid adoption of proactive planning and other evaluation criteria or approaches being considered could address this issue

sufficiently. Of the alternatives presented, EC-PV-ALT-10 (Adopt Dispute Mechanism) is likely the most defensible approach.

Interim Service

As a general matter, PPC appreciated the information provided around existing and potential future conditional service offers. BPA's willingness to continue to evolve its proposal is apparent, and while helpful, the continued evaluation also makes it somewhat difficult to provide specific feedback at this time.

A more robust discussion around risk tolerance is needed to inform the continued evaluation of these alternatives. We understand that BPA is seeking feedback from customers on what level of risk they are willing to accept, and it would be helpful to more specifically understand how to characterize that risk tolerance (high/medium/low, a certain # of hours a year interruption, etc.)? It is also somewhat unclear to PPC, what impacts BPA is expecting to current service as a result of different versions of interim service.

PPC appreciates BPA's continued work to identify an interim service approach that could be adopted to provide service for requests that are not currently eligible for CF, including those that have constraints on non-monitored or subgrid paths. Some outstanding questions on this issue:

- Could a # of hours product be used to allow such offers to be made?
- Could BPA identify a specific amount of MW of interim service that could be made on non-monitored paths?

Product - We hope there are potential opportunities to discuss other alternatives that could allow NT service to receive congestion rent in Markets+ without having to sacrifice adoption of NITS on OASIS Phase 2. CF PTP that converts to NT service as is envisioned in new alternative IS-PO-ALT-5-SUB-C is a good example, and we appreciate BPA continuing to develop that alternative. It seems that creation of a function that allows customers to designate LT 6 NN service could also achieve this goal. It would be helpful to hear from BPA whether this is another option worth exploring.

Mandatory – With a relatively quick move to proactive planning, IS-MV-ALT-1 (Mandatory for early access) is preferred. Absent a quick adoption of proactive planning additional discussion is required as the potential harm resulting from being removed from the queue is more significant.

Curtailed type – It appears that IS-CT-ALT-2 (# of hours and systems conditions) would give BPA the most flexibility in offering interim service and potentially allow for interim service to be offered on paths that are not currently monitored making them currently ineligible for systems conditions CF and we encourage BPA to further pursue this alternative. PPC has not had as much time to consider the new alternative IS-CT-

ALT-3 (System Condition or 8760 Hours of the Year) and is interested in further discussing that option.

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Queue Management

Applying Evaluation Criteria – It seems prudent that BPA should do several things before clearing the remaining queue: 1) make offers for interim service consistent with the policies adopted in this process, 2) identify whether any of the currently queued requests would be enabled with the existing GERP projects, and 3) determine whether a queue will play an role in the allocation of capacity in the future state.

Structuring the Queue for Study – At this time there is not enough information to make a recommendation on this topic.

Handling New Submissions – PPC encourages BPA to focus on further developing QM-HNS-ALT-2 (Study in the future state) and QM-HNS-ALT-3 (Study in the 2025 Cluster Study) for further development. Choices in other areas may preclude one or the other of these options.

Establishing Service Readiness – This is an important topic but seems more appropriate to explore in the future state.

Transition Studies – PPC is supportive of moving forward with a combination of a proactive planning process and an at least partial processing of the remaining queue. PP-TS alternatives 3, 4 or a hybrid alternative of 8 are most attractive currently, but additional information is needed. Specifically:

- We would like to have a better understanding of the pilot proactive planning approach that would be used under options 3 & 4.
- PPC would like to see more information about the timeline for two hybrid alternatives related to alternative 8 (wait for future state process).
 - How would an assessment of which requests could be granted with the energization of the current GERP process affect the timeline?
 - How would an alternative that combines alternative 8 and alternative 5 (study to resolve interim service ineligibility) impact the timeline?

Commercial Business Model

The commercial business model is an important aspect of ensuring the right allocation of risk among customers in the commercial planning process. Generally, PPC agrees with BPA that the right timing for requesting customers to commit to service is likely somewhere in between Network Open Season (NOS) approach where customers were asked to commit immediately after the cluster study and TSR Study Expansion Process (TSEP) paradigm where customers commit after all studies have been completed. Better understanding of where BPA is ending up in other aspects of its transmission planning reform will better inform perspectives related to the CBM. It would also be helpful to understand when and how BPA plans on making decisions associated with project costs in the future (i.e. is BPA or the customer funding studies, will the project be offered under “rolled-in rates” or an incremental rate).

Future State

PPC is supportive of BPA’s effort to improve its ability to meet customer needs through undergoing a reform of its planning and execution policies and practices. PPC supports the stated objectives associated with enhancing its project execution as presented in December. We are particularly supportive of advancing a customer build option.

PPC recommends that transparency be added to principles for this effort. BPA currently reports to customers on the number of projects moving through the Secondary Capacity Model (SCM), which is helpful, but customers don’t have a lot of insight into the cost comparison between SCM and BPA or other options. We will also be interested in lessons learned after BPA has some experience with its new contractor pool process. For example, are there certain types of projects where BPA’s new approach of working with a contracting pool works better than others, how does BPA build the right size of contractor pool, etc.

PPC strongly recommends that BPA move forward the customer build at least in a testing concept to 2026.

We thank BPA for taking on this work to make the agency efficient and effective. Given the need for new infrastructure, improvements will be critical.