

TC-27 Alternatives | Dec. 17-19, 2025

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			Brookfield Renewable recommends adding an additional requirement to further screen GI projects in late stage or bypass. Brookfield Renewable recommends that projects be required to have executed engineering and procurement (EPC) agreements and committed capital to their projects, thus indicating a commitment to move forward and complete their projects.		
□	✓	□	EC-SM-ALT-2		LGIA executed			While Brookfield Renewable supports milestones, like LGIA execution, as a measure of a project's commercial readiness, per the existing BPA process, LGIA execution occurs too late in the process (e.g., after permitting) and thus would unnecessarily delay securing TSRs.		
□	□	✓	EC-SM-ALT-3		Issuance of the GI Facilities Study Report					
□	□	✓	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					
□	□	✓	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					
□	□	✓	EC-SM-ALT-8		Completion of Phase One of the GI study					
□	□	✓	EC-SM-ALT-9		Consultant GI Study					
□	□	✓	EC-SM-ALT-10		Minimal GI Criteria					
□	□	✓	EC-SM-ALT-11		Incent LSE Engagement by Providing POR Flexibility					

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Like	Okay	Dislike	Load Maturity (EC-LM)		
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	EC-LM-ALT-1	Must be in execution phase (agreements signed/funded)	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	EC-LM-ALT-2	Facilities Study required to be completed	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	EC-LM-ALT-3	System Impact Study required to be started or completed	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	EC-LM-ALT-4	Feasibility Study required to be completed	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	EC-LM-ALT-5	LLIR must be submitted, but no study required	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-LM-ALT-6	No requirement for LLIR submittal	Brookfield Renewable supports this option for PTP customers. Per BPA's problem statement, this issue appears to be primarily related to NITS customer load growth. Thus, imposing LLIR-related requirements on non-loading serving customers would unnecessarily constrain securing TSRs for point-to-point customers.
Like	Okay	Dislike	RAS Resource (EC-RAS)		
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	EC-RAS-ALT-1	Require upon TSR/FTSR submittal	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	EC-RAS-ALT-2	Require prior to preliminary engineering	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	EC-RAS-ALT-3	Require prior to environmental study	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	EC-RAS-ALT-4	Require prior to decision to build the relevant project(s)	Brookfield Renewable supports BPA's use of RAS and other SPS to both maintain reliability and TTC. Brookfield Renewable does not have a final position on this issue, but it is unclear to Brookfield Renewable why such issues cannot be addressed on a case-by-case basis through any adjoining BAA's "affected system" tariff provision. Brookfield Renewable is concerned that individual transmission customers may not have the resources/flexibility to address BPA concerns and that ideally these are addressed through BAA-to-BAA discussions.
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	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	
Like	Okay	Dislike	Requirements for Gen/Load Outside of the BPA Balancing Authority Area (EC-OB)		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	

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Like	Okay	Dislike	PTP requests to NT PODs (EC-PTP)		
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	EC-PTP-ALT-1	Require demonstration of interest from NITS customer upon submittal	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	EC-PTP-ALT-2	Require demonstration prior to execution of contract	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	EC-PTP-ALT-3	Only NITS Customers Allow to Submit PTP TSRs to serve their load	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-PTP-ALT-4	Status Quo	Brookfield Renewable does not have a position on this issue, but supports retaining the status quo since this appears to a limited circumstance.
Like	Okay	Dislike	Battery-to-Battery (EC-B2B)		
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	EC-B2B-ALT-1	Disallow battery-to-battery LTF F/TSRs	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	EC-B2B-ALT-2	Allow battery-to-battery F/TSRs if Customer can provide reasonable scenarios	Brookfield Renewable does not have a position on this issue, but supports letting customers support specific business cases.
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	EC-B2B-ALT-3	Allow LTF battery-to-battery F/TSRs	
Like	Okay	Dislike	Additional Information (EC-ADD)		
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	EC-ADD-ALT-1	Modify section 17.2(x) and 29.2(ix) to read "Attachment K and other BPA transmission planning processes"	Brookfield Renewable does not object to the proposed language. Brookfield Renewable understands that BPA functions on this basis today.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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)		
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	EC-VHUB-ALT-1	Remove Mid-C Remote only - see Sub-Alternatives (SUB)	Per Brookfield Renewable's earlier comments, Brookfield Renewable does not oppose BPA removing MidC Remote as a long-term POR/POD TSR option and to conforming outstanding TSR requests to MidC Remote to NWHUB or one of the nearby transmission systems.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<i>EC-VHUB-ALT-1-SUB-A</i>	Remove Mid-C Remote Only	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<i>EC-VHUB-ALT-1-SUB-B</i>	Conform to NW Hub	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	EC-VHUB-ALT-2	Offer Reassessment Only	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	EC-VHUB-ALT-3	Mix of Firm and CF	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	EC-VHUB-ALT-4	Remove both from the LFT market	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	EC-VHUB-ALT-5	Require TSR pairing at NW Hub	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-VHUB-ALT-6	Actively support LFT use of NW Hub	See above.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	EC-VHUB-ALT-7	Status Quo	No issue with status quo.

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Like	Okay	Dislike	Delivering/Receiving Party Validation (EC-PV)		
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	EC-PV-ALT-1 Require confirmation of Delivering/Receiving Party; if not remove from queue	Consistent with its earlier comments, Brookfield Renewable supports some form of delivering party validation, but that BPA should not rely exclusively on executed contracts. Brookfield Renewable also supports, as noted below, also permitting a financial demonstration and/or relying a FERC market-based rate authority demonstration (perhaps supporting marketer needs).	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	EC-PV-ALT-2 Utilize contingent validation; remove from queue if deal not executed		
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	EC-PV-ALT-3 If unable to provide required bilateral demonstration, provide only Reassessment CFS or Interim Service		
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	EC-PV-ALT-4 Allow financial demonstration in lieu of required bilateral demonstration; if not provided remove from queue		
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	EC-PV-ALT-5 Require FERC marketer registration if no bilateral demonstration; if not remove from queue		
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	EC-PV-ALT-6 Short-term market only if bilateral demonstration unavailable; remove from (LTF) queue		
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	EC-PV-ALT-7 Only Offer Up to 4 years, 11 months		
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	EC-PV-ALT-8 Use points system for validation		
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	EC-PV-ALT-9 Contingent Validation with Financial Option to Retain TSR		
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	EC-PV-ALT-10 Allow a Dispute Mechanism – Only request verification when another party suggests that the information was incorrectly supplied		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-PV-ALT-11 Status Quo, take information at face value without any further validation or confirmation		
Like	Okay	Dislike	Minimum Cap Requirements (EC-MCAP)		
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	EC-MCAP-ALT-1 Minimum capitalization requirement scaled based on level of transmission service request activity in study.	Brookfield Renewable supports minimum capitalization requirements based on level of transmission service, with exemptions, as proposed by BPA. While Brookfield Renewable generally supports BPA's proposal, Brookfield Renewable does not oppose maintaining the status quo.	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	EC-MCAP-ALT-2 Flat minimum capitalization requirement regardless of level of transmission service request activity in study.		
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	EC-MCAP-ALT-3 Status Quo – do not have a minimum capitalization requirement.		

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Interim Service (IS)									
Ranking			Alternative Code		Description			Notes	
Like	Okay	Dislike				Product Options (IS-POPT)			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	IS-POPT-ALT-1			Seasonal Firm NITS			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	IS-POPT-ALT-2			Long Term 6-NN			
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	IS-POPT-ALT-3			NITS LT 6-NN and PTP LT Priority 5 Non-Firm Service			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	IS-POPT-ALT-4			CFS - PTP vs NITS - see Sub-Alternatives (SUB)			Brookfield Renewable supports BPA providing conditional firm service based on a combination of system conditions or a number of hours analysis to commercially ready projects. This appears to be perhaps a combination of Alternatives 4 and 5. Brookfield Renewable supports these options as it may provide both BPA and customers greater flexibility in awarding and receiving CFS. Consistent with Brookfield Renewable's earlier comments, Brookfield Renewable requests additional info regarding to extent to which the "new" CFS differs from the CFS offered today.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	IS-POPT-ALT-4-SUB-A			PTP CFS			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	IS-POPT-ALT-4-SUB-B			NITS CFS			
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	IS-POPT-ALT-5			CF on the BPA Network - see Sub-Alternatives (SUB)			
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	IS-POPT-ALT-5-SUB-A			for Ready PTP TSRs			
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	IS-POPT-ALT-5-SUB-B			for Ready NITS F/TSRs			
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	IS-POPT-ALT-6			Planning Redispatch			
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	IS-POPT-ALT-7			Firming up 6-NN in ST			
Like	Okay	Dislike	Mandatory-Voluntary (IS-MV)						
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	IS-MV-ALT-1			Mandatory for early access			
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	IS-MV-ALT-2			Not mandatory until POS has been developed			Brookfield Renewable supports this option, as it should award CFS to those customers most ready to take service, yet also provide customers with needed certainty regarding a path to firm service.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	IS-MV-ALT-3			Status Quo - Not Mandatory			
Like	Okay	Dislike	Curtailment Type (IS-CT)						
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	IS-CT-ALT-1			Systems conditions only.			
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	IS-CT-ALT-2			System condition and/or x% number of 8760 hours of the year.			See above.

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Queue Management (QM)											
Ranking			Alternative Code		Description			Notes			
Like	Okay	Dislike	Applying Evaluation Criteria to the Queue (QM-ECQ)								
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	QM-ECQ-ALT-1		Keep existing queue.	Brookfield Renewable supports this two-part option (applying evaluation criteria, as modified above, to the existing queue) as a means to mostly quickly un-pause the queue and move to provide service to those most ready to need service.					
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	QM-ECQ-ALT-2		Empty existing queue.						
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	QM-ECQ-ALT-3		Apply the new requirements through an agreement.						
Like	Okay	Dislike	Collecting New Evaluation Criteria (QM-CEC)								
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	QM-CEC-ALT-1		Start where we are.						
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	QM-CEC-ALT-2		Customers submit a new data form.						
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	QM-CEC-ALT-3		Combine ALT-1 and ALT-2	Brookfield Renewable supports BPA working with existing information and having customers supplement their information, as necessary. Brookfield Renewable believes that this is the most expeditious way to un-pause the queue and apply the new evaluation criteria.					
Like	Okay	Dislike	Structuring the Queue for Study (QM-SQS)								
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	QM-SQS-ALT-1		No Transition Study						
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	QM-SQS-ALT-2		Batch Studies - see Sub-Alternatives (SUB)	Brookfield Renewable strongly supports conducting a transition study as a means to quickly award available firm or conditional firm transmission service to requests/products most ready to meet the region's clean energy and capacity needs. Brookfield Renewable believes that by applying the proposed evaluation criteria, as modified, to the existing queue, that the study size will be manageable/studiable. Brookfield Renewable also supports, as necessary, prioritizing the study based on source/load maturity, so as to expedite the process for those					
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	QM-SQS-ALT-2-SUB-A		Queue order						
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	QM-SQS-ALT-2-SUB-B		Geographic						
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	QM-SQS-ALT-2-SUB-C		POR/POD						
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	QM-SQS-ALT-2-SUB-D		LSE vs. Non-LSE						
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	QM-SQS-ALT-2-SUB-E		NITS vs. PTP						
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	QM-SQS-ALT-2-SUB-F		Resource/Load maturity						
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	QM-SQS-ALT-2-SUB-G		Options						
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	QM-SQS-ALT-3		Cap the LTF Queue						

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Like	Okay	Dislike	Handling New (F)TSR Submissions (QM-HNS)		
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	QM-HNS-ALT-1	Decline All (F)TSRs submitted after 12pm 8/15/24	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	QM-HNS-ALT-2	Study (F)TSRs in Proactive Planning Program (Future State)	Brookfield Renewable supports studying all TSRs submitted after August 15, 2024, as part of the future state.
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	QM-HNS-ALT-3	Include in 2025 TSEP CS Group	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	QM-HNS-ALT-4	Second Transition Study	
Like	Okay	Dislike	Firm Service Prioritization (QM-FSP)		
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	QM-FSP-ALT-1	Status Quo	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	QM-FSP-ALT-2	Prioritizing Service Readiness	Brookfield Renewable supports firm service prioritization based on readiness.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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)
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	PP-TS-ALT-1	Main Grid SIS, with Full POS After SIS Decision Point		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PP-TS-ALT-2	Full SIS with Decision Point, prior to full POS	Brookfield Renewable supports conducting a feasible transition study, prioritizing the study of commercially ready requests/projects. Thus, Brookfield Renewable does not support moving directly to future state studies and not unpausing and studying the existing queue. Based on what Brookfield Renewable understands of the study options, this eliminates alternatives 3, and 4 (with 3 and 4 characterized as pilot studies for future state). Brookfield Renewable also does not support one-off/specialized studies, such as alternatives 6 and 7. Brookfield Renewable therefore supports alternative 2, primarily because it is focused on a limited queue size (which could be achieved through application of the evaluation criteria to the existing queue). Alternative 5 is also attractive since it addresses the sub-grid constraints that block the offer of CES to commercially ready projects. Finally, Brookfield Renewable	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	PP-TS-ALT-3	Long-Term Planning Study + Partial Commercial Study		
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	PP-TS-ALT-4	Long-Term Planning Study + Full Commercial Study		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PP-TS-ALT-5	Study to Resolve Interim Service Ineligibility	See above.	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	PP-TS-ALT-6	Distribution Factors		
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	PP-TS-ALT-7	10- & 20-Year Transition Study		
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	PP-TS-ALT-8	Wait for Future State Process		