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Portland General Electric Feedback. **Evaluation Criteria (EC)** - Slide 32

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	PGE is amenable to evaluating criteria that could be applied to TSRs associated with a GI queue request. However, not all TSRs are tied to a specific resource. This is particularly true for utilities/LSEs seeking greater market access via multi-wheel delivery paths and increased participation in EDAM, Markets+, etc. For TSRs that are not associated with a specific resource or GI queue request, such criteria **should not apply**. For GI queue requests that are tied to a TSR submittal—for example, a generator bidding into PGE's RFP—PGE would be comfortable applying source maturity criteria to those TSRs. PGE also supports allowing varying levels of criteria, beyond what is currently required.
☐	☐	☑	EC-SM-ALT-2	LGIA executed	See above
☐	☐	☑	EC-SM-ALT-3	Issuance of the GI Facilities Study Report	See above
☐	☐	☑	EC-SM-ALT-4	Completion of GI Phase Two Cluster Study	Seems like this alternative strikes a balance to weed out speculative requests, but also study as many requests as possible. Still some risk in that you don't have site visits to know if a plan is feasible.
☐	☐	☑	EC-SM-ALT-5	Completion of GI Phase One Cluster Study AND Execution of GI Phase Two Cluster Study Agreement	Same comments as above, plus this alternative would require possible restudies on Phase One GI Cluster Study, which would slow down the GI queue even more.
☐	☐	☑	EC-SM-ALT-6	Completion of Phase One of the GI study plus any needed restudy	See above.
☐	☐	☑	EC-SM-ALT-7	Completion of Phase One GI study report	See above.
☐	☐	☑	EC-SM-ALT-8	Completion of Phase One of the GI study	BPA expects that withdrawal from the GI queue may result in need of restudy which could result in POIs changes for relevant GI projects.
☐	☐	☑	EC-SM-ALT-9	Consultant GI Study	What if BPA were to use a consultant for studies (with BPA oversight) and alleviate work for internal resources to speed up the process?
☐	☐	☑	EC-SM-ALT-10	Minimal GI Criteria	This alternative allows for a lot of speculative GI requests and TSRs to hang around, rather than a more realistic view of what may occur. That will eventually result in a lot of withdrawals and restudies.
☐	☐	☑	EC-SM-ALT-11	Incent LSE Engagement by Providing POR Flexibility	Not consistent with current OATT. Defining the "zones" would be a significant undertaking when there are already staffing constraints.

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Like	Okay	Dislike			
			Load Maturity (EC-LM) - Slide 45		
☐	☑	☐	EC-LM-ALT-1	Must be in execution phase (agreements signed/funded)	We support establishing new requirements and parameters that ensure readiness to take service before entering BPA's TSR queue.
☐	☑	☐	EC-LM-ALT-2	Facilities Study required to be completed	See above
☐	☑	☐	EC-LM-ALT-3	System Impact Study required to be started or completed	See above.
☐	☑	☐	EC-LM-ALT-4	Feasibility Study required to be completed	See above.
☐	☑	☐	EC-LM-ALT-5	LLIR must be submitted, but no study required	See above
☐	☐	☑	EC-LM-ALT-6	No requirement for LLIR submittal	PGE supports stricter requirements for holding a position in BPA's queue for Transmission.
Like	Okay	Dislike			
			RAS Resource (EC-RAS) - Slide 56		
☐	☐	☑	EC-RAS-ALT-1	Require upon TSR/FTSR submittal	BPA retains the right to require RAS on resources outside the BPA BAA - but not all instances. BPA should first study the TSR request before automatically requiring customers to add RAS to an existing or new generators.
☐	☐	☑	EC-RAS-ALT-2	Require prior to preliminary engineering	See above. No TSR submittal should go in assuming RAS is required. Need BPA to specify solutions that aren't always just RAS. Identify the actual issue - what is the contingency, what is the overload, that is causing the path TTC problem? If this can't be identified, shouldn't be requiring RAS. Let the requestor decide if they can help mitigate the issue.
☐	☐	☑	EC-RAS-ALT-3	Require prior to environmental study	See above.
☐	☐	☑	EC-RAS-ALT-4	Require prior to decision to build the relevant project(s)	See above.
☐	☑	☐	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	Allows more time for a utility like PGE to develop own operating plan to be flexible, and not always need a RAS when market actions are an appropriate way to mitigate issues.
Like	Okay	Dislike			
			Requirements for Gen/Load Outside of the BPA Balancing Authority Area (EC-OB)		
☐	☐	☐	N/A	N/A	

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Like	Okay	Dislike			
			PTP requests to NT PODs (EC-PTP) - 68		
☐	☑	☐	EC-PTP-ALT-1	Require demonstration of interest from NITS customer upon submittal	PGE supports stricter requirements for holding a position in BPA's queue for Transmission. We support the demonstration of interest between the PTP requestor and the NITS customer.
☐	☑	☐	EC-PTP-ALT-2	Require demonstration prior to execution of contract	See above.
☐	☐	☑	EC-PTP-ALT-3	Only NITS Customers Allow to Submit PTP TSRs to serve their load	This seemingly would force NITS customers to also get established with a PTP contract. This alternative has a high administrative burden.
☐	☐	☑	EC-PTP-ALT-4	Status Quo	If status quo doesn't work and BPA needs more information for valid planning of transmission service to serve NITS customers' loads, this shouldn't be an alternative.
Like	Okay	Dislike			
			Battery-to-Battery (EC-B2B) - Slide 75		
☐	☐	☑	EC-B2B-ALT-1	Disallow battery-to-battery LTF F/TSRs	PTP customers should be able to use their TX in a non-discriminatory fashion which includes being able to charge a battery from another battery.
☐	☑	☐	EC-B2B-ALT-2	Allow battery-to-battery F/TSRs if Customer can provide reasonable scenarios	See above.
☑	☐	☐	EC-B2B-ALT-3	Allow LTF battery-to-battery F/TSRs	See above.
Like	Okay	Dislike			
			Additional Information (EC-ADD) - 81		
☐	☐	☐	EC-ADD-ALT-1	Modify section 17.2(x) and 29.2(ix) to read “Attachment K and other BPA transmission planning processes”	BPA already has this authority to ask for other related information to study the request. This does not need a tariff change.
☐	☑	☐	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	See above.

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Like	Okay	Dislike	Virtual Hubs | Mid-C and NW Market Hub (EC-VHUB) - 86		
☐	☐	☑	**EC-VHUB-ALT-1**	Remove Mid-C Remote only - **see Sub-Alternatives (SUB)**	While PGE acknowledges the study challenges associated with virtual hubs such as MIDCREMOTE, it is unclear whether—or to what extent—these challenges are contributing to the broader queue backlog that BPA is examining under the TC-27 initiative. PGE maintains that BPA should prioritize topic areas that present the greatest obstacles to queue processing, rather than conducting a comprehensive review of every potential contributor. Further refinements/alternatives to virtual hubs can be explored at a later date.
☐	☐	☑	*EC-VHUB-ALT-1-SUB-A*	Remove Mid-C Remote Only	See above.
☐	☐	☑	*EC-VHUB-ALT-1-SUB-B*	Conform to NW Hub	See above.
☐	☐	☑	EC-VHUB-ALT-2	Offer Reassessment Only	We need a plan to 7F service for NWHUB at a minimum! Keep at least one virtual point (NWHUB) where BPA will still develop plans to firm service to support TSRs.
☐	☐	☑	EC-VHUB-ALT-3	Mix of Firm and CF	Provides firm service for requests from NWHUB to load; provides CF reassessment (no plan of service) for TSRs from a resource to NWHUB. Who is BPA targeting with this alternative not allowing a POS from a resource to NWHUB?
☐	☐	☑	EC-VHUB-ALT-4	Remove both from the LFT market	No longer allows for BPA to develop plans of service for virtual hubs. PGE would lose deliverability certainty for long-term PPAs and owned resources at or through this scheduling point and reducing geographic diversity in the supply portfolio.
☐	☐	☑	EC-VHUB-ALT-5	Require TSR pairing at NW Hub	Do not require customers to specify the additional TSR for the other leg of a NWHUB transaction, if there is no way to enforce whether that other pair was actually used. This alternative defeats the point of a virtual hub. This alternative needs futher clarification and more flushing out on what is the other leg PGE would have to pair - is to from the generator to NWHUB or from NWHUB to Load?
☑	☐	☐	EC-VHUB-ALT-6	Actively support LTF use of NW Hub	PGE needs BPA to plan to 7F service for NWHUB. If future transmission from NWH were only available as Reassessment CFS, PGE would lose deliverability certainty for long-term PPAs and owned resources at or through this scheduling point and reducing geographic diversity in the supply portfolio.
☑	☐	☐	EC-VHUB-ALT-7	Status Quo	This option give PGE a plan to firm service for MIDC and NWHUB and well as CF service.

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Like	Okay	Dislike			
			Delivering/Receiving Party Validation (EC-PV)		
☐	☑	☐	EC-PV-ALT-1	Require confirmation of Delivering/Receiving Party; if not remove from queue	This alternative allows for PGE to confirm that a TSR is associated with with a developer in an RFP. We can provide info from a RFP short list. However, not all PGE's TSR requests are related to RFP procurement efforts. Some TSR request are related to serving new load from market resources. For example we have TSRs in the queue requesting service from John Day to PGE Load, without a specific resource in mind.
☐	☑	☐	EC-PV-ALT-2	Utilize contingent validation; remove from queue if deal not executed	PGE could support this alternative as it allows BPA to remove TSRs that are not associated with a winning RFP/negotiation process from the queue. It eliminates speculative requests and helps BPA clear the queue. However, not all PGE TSR requests are associated with a PPA. The TSRs needed to gain access to markets shouldn't be required to make the same demonstrations.
☐	☐	☐	EC-PV-ALT-3	If unable to provide required bilateral demonstration, provide only Reassessment CFS or Interim Service	Unanswered questions, no vote. What does the study process look like for this option? Are the impacts being studied and shared with Affected Systems? Does BPA provide a number of hours or other criteria for when firm service may not be available? Not all PGE TSR requests are associated with a PPA. The TSRs needed to gain access to markets shouldn't be required to make the same demonstrations. A con with this alternative: It's not reducing the TSRs in the queue, rather it's increasing the CF studies required.
☐	☐	☑	EC-PV-ALT-4	Allow financial demonstration in lieu of required bilateral demonstration; if not provided remove from queue	Seems administratively burdensome for BPA. By proving a mechanism to allow requestors to stay in the queue through a financial deposit, you are not achiving your readiness and queue clearing objectives.
☐	☐	☑	EC-PV-ALT-5	Require FERC marketer registration if no bilateral demonstration; if not remove from queue	This alternative is not consistent with OATT requirements. How does registering as a FERC Marketer provide an effective means for queue clearing/readiness?
☐	☐	☑	EC-PV-ALT-6	Short-term market only if bilateral demonstration unavailable; remove from (LTF) queue	This alternative is not consistent with OATT Requirements. This alternative limits you to short term service if you can't pass the demonstration effort. No one is going to want to buy your project if the transmission is not longterm. Seems like this option takes away from operational flexibility per this: Removes ability for parties using marketer business model to acquire LTF transmission to support flexibility use of the transmission system through redirects.
☐	☐	☑	EC-PV-ALT-7	Only Offer Up to 4 years, 11 months	This alternative is not consistent with OATT Requirements. This alternative limits you to no rollover service. If you can't get rollover service, seems like this is a non-starter for lots of customers. How would this be studied? How would Affected Systems be notified and mitigations occur?
☐	☐	☑	EC-PV-ALT-8	Use points system for validation	Administratively burdensome to implement. Would also require a public process to develop the point system. Would BPA come up with this points system themselves? Customers need to be involved in any development of a points system.
☐	☐	☑	EC-PV-ALT-9	Contingent Validation with Financial Option to Retain TSR	Could provide some flexibility for PGE, but likely administrative burden for BPA. With limited resources, BPA should not take on new complicated processes that will not increase quality of information for planning transmisison expansion.
☐	☐	☑	EC-PV-ALT-10	Allow a Dispute Mechanism – Only request verification when another party suggests that the information was incorrectly supplied	Not too far off from status quo. Seems problematic for BPA to be in the middle of a dispute between two entities. Too burdensome to implement.
☐	☐	☑	EC-PV-ALT-11	Status Quo, take information at face value without any further validation or confirmation	Seems like we could weed out more speculative requests if we change the status quo.
Like	Okay	Dislike	**Minimum Cap Requirements (EC-MCAP)**		
☐	☐	☐	EC-MCAP-ALT-1	Minimum capitalization requirement scaled based on level of transmission service request activity in study.	PGE is exempt from this. We have no comment.
☐	☐	☐	EC-MCAP-ALT-2	Flat minimum capitalization requirement regardless of level of transmission service request activity in study.	PGE is exempt from this. We have no comment.
☐	☐	☐	EC-MCAP-ALT-3	Status Quo – do not have a minimum capitalization requirement.	PGE is exempt from this. We have no comment.

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Interim Service (IS)

Ranking			Alternative Code	Description	Notes
Like	Okay	Dislike	**Product Options (IS-POPT)**		
☐	☐	☐	IS-POPT-ALT-1	Seasonal Firm NITS	Creates a product for NITS customers as a bridge to firm service. Concern that case setup may take 3-4 times as long as Needs Assessment. Seems Administratively burdensome. If it's only available seasonaly and it takes a lot of work to administer, then recommend not moving forward with this product. Customers/stakeholders need to be able to provide input on BPA's design methodology.
☐	☐	☑	IS-POPT-ALT-2	Long Term 6-NN	Ability to request Non-firm service in the long term market. Would this require a Data exhibit validation process? There isn't a current methodology to make awards for non-firm in the long term market, would require a process to be established. Deviates from pro-forma and FERC Order 890. Would take time to implement the product in OASIS. Overall, we need to better understand the methology before we commit to this being a good alternative. Customers/stakeholders need opportunity to provide input.
☐	☐	☑	IS-POPT-ALT-3	NITS LT 6-NN and PTP LT Priority 5 Non-Firm Service	This product is also not pro-forma and would require a product update in OASIS. Would take some extra time to implement - concern about the administrative burden on BPA staff.
☐	☐	☐	IS-POPT-ALT-4	CFS - PTP vs NITS - **see Sub-Alternatives (SUB)**	BPA should provide more information on how they determined which areas are and aren't available for CFS. What does this mean: Can manage subgrid if team can determine management path?
☑	☐	☐	*IS-POPT-ALT-4-SUB-A*	PTP CFS	Ability to manage the path is the only thing different in this alternative. A PTP CF service. Allows the oportunity for customers to receive early access for a CFS offer. Could be a bridge service even though a study hasn't been completed. A request for ROFR would be offerred bridge service with ROFR provided conditions could be managed. For the NITS option it would require a tariff deviation.
☐	☐	☑	*IS-POPT-ALT-4-SUB-B*	NITS CFS	This is a non pro-forma option. BPA would NOT be adopting OATI's OASIS functionality configured specifically for managing NITS service. NITS phase II would not be implemented for this to work. NITS customers can use 6NN.
☐	☐	☐	IS-POPT-ALT-5	CF on the BPA Network - **see Sub-Alternatives (SUB)**	A lot of alternatives that must be in place for BPA to implement. PGE needs to evaluate each condition to see if we like a particular alternative or not. Seems overly restrictive. Customers/stakeholders need to be involved in the new process design and methodology for future TTCs, future ETC, and TSR impacts. The PTDF method doesn't actually indicate if there are network constraints.
☐	☑	☐	*IS-POPT-ALT-5-SUB-A*	for Ready PTP TSRs	Overall PGE supports this product, with further discussion on the criteria. We disagree that the following should be criteria for Ready PTP TSRs: battery-to-battery, requirements for RAS, and party validations.
☐	☐	☑	*IS-POPT-ALT-5-SUB-B*	for Ready NITS F/TSRs	Inconsistent with Pro-Forma. NITS customers can use 6NN as their equilivent product.
☐	☐	☑	IS-POPT-ALT-6	Planning Redispatch	Involves determining whether there is a 24-7 resource that could be called upoon in times when the service being requested needs to be decreased. This is an expensive product. You have to have a resource sitting ready and an extra leg of TX. Needs new technology. Pricing construct would need to be developed. Where would we find extra renewable resoures in the region that could be called upon 24-7.
☐	☐	☑	IS-POPT-ALT-7	Firming up 6-NN in ST	If it's not feasible, let's not consider it as an alternative.
☐	☑		IS-PO-ALT-8	Increased Operations Constraint Management - PTP CFS	PGE would support this new alternative as it appears it would allow PGE to take CF service immediately by accepting additional risk which would be managed through curtailment. We would request the ability for this to be eligible for RoFR bridge and would be transitioned to firm upon the energization of the project. Since this is offerred without a study - **how are NOH or systems conditions determined?** Currently a system impact study is required per the tariff, which would identify the CF risk assesslement, so how would BPA avoid changing the tariff? BPA said it's unknown whether PGE would qualify due to Portland area constraints. PGE doesn't support offerring NITS customers CFS, as they have the 6NN product, which PTP customers don't have access to.
☐	☑	☐	IS-PO-ALT-9	Allow Mid-Term Offers	Increased offering through Operations Constraint Management. Service commencement date must be less than or equal to 24 months. Service must be greater than 24 months and converted to RoFR. Newpoint is ineligibe. There are 1,434 MWs that would be eligible today. This option can be paird with other alternatives. PGE does have TSRs that would qualify. It's unknown whether PGE would qualify for this product due to Portland area constraints.
Like	Okay	Dislike	**Mandatory-Voluntary (IS-MV)**		
☐	☐	☑	IS-MV-ALT-1	Mandatory for early access	Customers are required to take service or removed from the queue. The fact that we wouldn't know the plan of service, cost, or timeline until after we take the transmission service is a non-starter. How many years would it take for BPA to determine this? You could end up paying for service for years that you can't actually use.
☐	☑	☐	IS-MV-ALT-2	Not mandatory until POS has been developed	A better alternative, but I doubt non-LSE's will vote for this.

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☑	☐	☐	IS-MV-ALT-3	Status Quo - Not Mandatory	Seems like the best option with the least risk.
Like	Okay	Dislike	**Curtailment Type (IS-CT)**		
☐	☑	☐	IS-CT-ALT-1	Systems conditions only.	Risk of defining system conditions so broadly that customers would not find this product appealing. Pros - allows for a broad definition of a set of one or more conditions. Scheduled as 7-F and only curtailed as priority 6 if the system conditions occurs.
☑	☐	☐	IS-CT-ALT-2	System condition and/or x% number of 8760 hours of the year.	Preferred. BPA would offer you either system of conditions or number of hours and we could choose. Pro - Increases the optionality. Service is firmed up for the year once the # of hours is reached. Con - Using X% of 8760 number of hours of the year is not based on as extensive of an analysis as would be the case with a Cluster Study. Based on analysis, BPA has been unable to make a number of hours for many requests. # of hours is scheduled as 6 unless firmed up in the short-term market or # of hours curtailed is reached for the year. Is there any flexibility to switch between the two (NOH and SC)? The number of hours could be overly conservative.

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Queue Management (QM)

Ranking			Alternative Code	Description	Notes
Like	Okay	Dislike	**Applying Evaluation Criteria to the Queue (QM-ECQ)**		
☐	☑	☐	QM-ECQ-ALT-1	Keep existing queue.	Con - New criteria would appear to be back cast since not all TSRs came in under the same set of rules. Pros -Customers maintain their queue positions. No staff time spent declining (F)TSRs. Customers do not have to use their staff time to resubmit (F)TSRs they already submitted.
☐	☐	☑	QM-ECQ-ALT-2	Empty existing queue.	Con- Customers lose their existing place in line. How would you empty the queue under the current tariff? Would it be voluntary?
☐	☑	☐	QM-ECQ-ALT-3	Apply the new requirements through an agreement.	Prior to proactive planning, customers would be required to sign some kind of agreement to meet the new Queue requirements to be elgible to be studied. This would be on a voluntary level, if you opted to not sign the agreement you would be removed from the queue.
Like	Okay	Dislike	**Collecting New Evaluation Criteria (QM-CEC)**		
☐	☐	☑	QM-CEC-ALT-1	Start where we are.	Con- Email is an acceptable record for data exhibit validation, however, it is not the strongest compared to other alternatives. Customer response time is short given that customers have not had an initial opportunity to provide the information
☐	☑	☐	QM-CEC-ALT-2	Customers submit a new data form.	Cons- It will take time for BPA to create a new form and corresponding instructions. Validation work cannot start until customers submit their forms. All validation work would be restarted. A cure period would still be needed. A new form and instructions create their own level of customer confusion. Customers will need a longer period of time to process and resubmit. Pros - Requiring customers to complete new DE form with all of the rules in one place creates the strongest and cleanest record of the evaluation criteria submitted for each (F)TSR. Places ownership on updating the (F)TSR data on the customer.
☐	☑	☐	QM-CEC-ALT-3	Combine ALT-1 and ALT-2	Seems like this strikes a good balance, but need to make sure that requests can move forward while BPA is spending time creating a new form (how long will this take?).
Like	Okay	Dislike	**Structuring the Queue for Study (QM-SQS)**		
☑	☐	☐	QM-SQS-ALT-1	No Transition Study	If we move to a proactive planning in the future state, this is the fastest way for PGE to obtain service. Decline all TSRs in the unstudied queue and decline any new TSRs until proactive planning state. However, if BPA decides to stay with batching queues, this would negatively impact PGE as our TSR requests have not been studied.
☐	☐	☑	QM-SQS-ALT-2	Batch Studies - **see Sub-Alternatives (SUB)**	PGE does not support continuing forward with batch studies due to the volume of the current queue and the added implementation complexity and process time that batch studies would introduce.
☐	☐	☑	*QM-SQS-ALT-2-SUB-A*	Queue order	See above.
☐	☐	☑	*QM-SQS-ALT-2-SUB-B*	Geographic	See above.
☐	☐	☑	*QM-SQS-ALT-2-SUB-C*	POR/POD	See above.
☐	☐	☑	*QM-SQS-ALT-2-SUB-D*	LSE vs. Non-LSE	See above.
☐	☐	☑	*QM-SQS-ALT-2-SUB-E*	NITS vs. PTP	See above.
☐	☐	☑	*QM-SQS-ALT-2-SUB-F*	Resource/Load maturity	See above.
☐	☐	☑	*QM-SQS-ALT-2-SUB-G*	Options	See above.

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☐	☐	☑	QM-SQS-ALT-3	Cap the LTF Queue	If BPA decides to continue with Batch studies, this alternative is is the fastest approach to start queue processing until we get to the future state.

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Like	Okay	Dislike			
			Handling New (F)TSR Submissions (QM-HNS)		
☐	☐	☑	QM-HNS-ALT-1	Decline All (F)TSRs submitted after 12pm 8/15/24	This alternative includes closing the queue which includes not processing de minimus redirects until the future state begins. That means closing the the queue for 6+ years. **PGE does not support this approach.**
☐	☑	☐	QM-HNS-ALT-2	Study (F)TSRs in Proactive Planning Program (Future State)	This alternative supports those customers, like PGE who met the 8/15/2024 deadline and those who are within the 65 GW queue. There is a clean cut-off between transition and proactive planning/future state.
☐	☐	☑	QM-HNS-ALT-3	Include in 2025 TSEP CS Group	PGE does not support an alternative that would disadvantage customers who met the original public deadline. Moreover, as noted by BPA staff, this only further excerbates the challenge of processing studies.
☐	☐	☑	QM-HNS-ALT-4	Second Transition Study	The queue is too large to continue studying it in batches. We need to move towards proactive planning. This alternative calls for when the 65 GW study is complete, then we would start this next second transition study. It would essentially just keep the queue in batches. BPA said if they studied the queue in batches the largest batch size is 25 MWs and that would not produce POS until Oct. 2033.
Like	Okay	Dislike			
			Firm Service Prioritization (QM-FSP)		
☐	☑	☐	QM-FSP-ALT-1	Status Quo	While PGE recognizes that maintaining the status quo ultimately fails to address the potential for more "ready" requests to take firm service, maintaining the status quo may be preferable if a clear and equitable alternative to establishing priority (as proposed in the second alternative) isn't identified. Stay Pro Forma and process requests in queue order. This is the least administrative burdensome alternative.
☐	☑	☐	QM-FSP-ALT-2	Prioritizing Service Readiness	At present, this alternative lacks the level of specificity needed for PGE to evaluate what readiness criteria would apply. PGE's support for this alternative is entirely dependent upon the criteria used to establish priority. Would allow a lower queued status to take the capacity of a higher queued request based upon, for example their POS energization date. This would establish a new set of rules. Would give the lower queued TSR access first. **This alternative requires a lot more administrative burden for planning to developing a new process and set of rules, and could be very complicated**. The higher queued request could get higher costs, because the later queued TSRs have larger construction builds and they might have to pay a larger share of the project since others have dropped out. First Ready/First Served. First ready meaning energization of the project.
☐	☐	☑	QM-FSP-ALT-3	First Right of Refusal	It's unclear how adding more evaluation (and thus additional administrative burden) to this process advances BPA's primary objective of enhancing processing speed. Same as alternative #2, again adds another layer of process. Contingent - A contract for service being offerred earlier and some requirements of the customer to meet beforeBPA proceeds. The higher queued TSR has the right to keep their position or to let a lower queued TSR take the capacity first.

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Proactive Planning (PP)

Ranking			Alternative Code	Description	Notes
Like	Okay	Dislike	**Transition Studies (PP-TS)**		
☐	☐	☑	PP-TS-ALT-1	Main Grid SIS, with Full POS After SIS Decision Point	Downside with this alternative is you don't have a complete picture of all the regional infrastructure needs when only studying 25 GWs at a time. At 25 GWs that will take until 2034, therefore to get through the whole queue it could be another 10-15 years. Interim Service offers are very limited.
☐	☐	☑	PP-TS-ALT-2	Full SIS with Decision Point, prior to full POS	Downside of this alternative is it only studies 15 GWs of the queue. POS aren't available until 2034. Batching is time consuming. Same con as above. To get through the whole 68 GW queue could be 10-15 years out at least. This alternative look at main grid and subgrid at the same time, and then make an informed decision.
☐	☐	☑	PP-TS-ALT-3	Long-Term Planning Study + Partial Commercial Study	This alternative uses only a limited queue size based upon a pilot project using WestTEC scenarios. Go forward with projects identified as least regrets. Will leave some uncertainity, do we want to do more, or go forward with those projects. BPA would be progressing with GERP 1&2 and the results of the pilot, then compare that to the TSRs in the queue. The pilot is not based upon TSRs, it's based upon scenarios. PGE concern is that there is no guarantee that the pilot and proposed projects would include PGE needs. The WestTEC study added a lot of conceptual resources through the E3 capacity expansion model. What will BPA's process be to clean up the models? Will customers/stakeholders have input?
☐	☐	☑	PP-TS-ALT-4	Long-Term Planning Study + Full Commercial Study	Same as before, this alternative only studies a batch size of 15 GWs, so it only works for small queues, it doesn't take care of everyone in the queue. It also provides POS for those 15 GWs by 2034, which would mean PGE may or may not recieve a POS for another 10-15 years. This alternative also runs a pilot of proactive planning, using WestTEC scenarios and moving forward with projects identified as least regrets. Do we want to do more or go forward with those projects. This alternative is not ideal, but the best of several bad alternatives that continue studying request in batches in queue order.
☐	☐	☑	PP-TS-ALT-5	Study to Resolve Interim Service Ineligibility	This alternative would provide a study to identify sub-grid issues preventing interim service offers. Downside it does not address main-grid constraints. It also doesn't mitigate for those impacts and the study would not be done until Aug. 2033. Instead, could have Proactive planning implemented by 2031.
☐	☐	☑	PP-TS-ALT-6	Distribution Factors	Identify impacts and determine POS via distribution factor calculations. This has low accuracy. Agree with BPA's slide that this has lower accuracy and do not recommend. Distribution Factors should not determine a plan of service.
☐	☐	☑	PP-TS-ALT-7	10- & 20-Year Transition Study	Would not get off the ground. Any option that doesn't provide a plan of service and identify the best projects is not a good idea.
☐	☑	☐	PP-TS-ALT-8	Wait for Future State Process	This alternative leads to the fastest outcomes for customers with the study being done in March 2030 and POS and contracts signed in March 2031. This alternative also plans for the entire queue, pluse more future need - so batch sizes are no longer a concern. Downside is this will take a tariff change so most likely timelines will slip. Also, there's not a white paper describing how Future State Processes will work, so you are voting for something really without enough detail. COMMENT: Since we don't have enough detail on how future state would work, we voted this as okay, and not a like. We would like more information on how BPA will ensure all TSR needs are met though this Future State Process.