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Submitted: techforum@bpa.gov

BPA Staff & Grid Access Transformation Team,

Grant County PUD appreciates the opportunity to submit formal comments on the Commercial Business Model (CBM) matrix prepared by BPA for workshops in December 2025 and January 2026. Attached to this narrative is the matrix with Grant's recommendations for near-term transitional changes in BPA's CBM and preferences regarding changes in the TC-27 process, aimed at allowing BPA to process Transmission Service Requests (TSR) in a timely manner and manage the queue for long-term transmission service. This narrative provides an explanation of Grant's basic interests and objectives in forming the recommendations.

Two factors underlie Grant's recommendations. **First**, Grant has executed a Provider of Choice (POC) power purchase agreement (PPA) with BPA, providing for delivery of a Slice/Block of federal power starting October 1, 2028, for which Grant does not yet hold transmission rights. BPA's one-customer/one-product/one-contract policy also means that Grant requires new load-following transmission rights to deliver power from the Grant Balancing Area to Grant's retail loads in Grand Coulee, Washington. Grant currently does not hold the transmission service rights required to support the transition to the POC contract period, and requests that BPA recognize its obligations under federal law (e.g., §837e of the *Pacific Northwest Consumer Power Preference Act*) to provide new long-term transmission service to Grant beginning on October 1, 2028. This obligation extends beyond the power supply itself to include providing transmission service consistent with BPA's unique federal status and FERC's principles of non-discriminatory transmission access. During the workshop on January 15, 2026, BPA staff suggested that Interim Service (both NITS and PTP) could be provided when a modified Open Access Transmission Tariff is effective, projected for October 1, 2026. Given the new POC contract, the new non-federal power supplies for Grand Coulee, and multiple dependent decisions by Grant and BPA regarding managing load growth and state carbon mandates, Grant asks BPA for a commitment to offer Interim Service as soon as possible after October 1, 2026. Grant is seeking assurance that the required Agreements for Interim PTP and NITS Service, effective October 1, 2028, will be executed in early 2027.

Second, based on (a) the TC-27 workshops and (b) Grant's and BPA's recent decisions regarding joining the Southwest Power Pool's Markets+ day-ahead market, Grant is interested in offering to BPA the redispatch of certain non-federal power resources of Grant as tools to help BPA manage congestion on the federal transmission system. Redispatch of non-federal

resources, with appropriate compensation, may be helpful to BPA in managing both Main Grid congestion and Sub-Grid limitations. Redispatch may be less costly than construction of new transmission facilities and may be available much sooner than new infrastructure. Redispatch may offer solutions that completely avoid or significantly defer large capital projects and may help BPA find solutions in transmission planning studies that allow transmission capacity to be offered to other customers, not just Grant. Grant also expects non-federal redispatch to help implement Markets+, which Grant and BPA have both committed to join by October 1, 2028. In combination with other actions, a redispatch agreement between Grant and BPA may enable a more rapid clearing of or reduction in the size of the queue that BPA faces and could also lead to similar solutions being enabled in other circumstances. Grant understands that redispatch of non-federal power is not currently a tool for managing power supplies, for various reasons, but believes that the Northwest can learn from the experience of other parts of the country in this regard and move forward to more efficient queue management based on more robust redispatch efforts. Given that redispatch of non-federal power could act as a substitute for building more transmission capacity, Grant concludes that non-federal redispatch should become a regular consideration in all studies of TSRs, no matter the type, duration, or location of such requests.

Although there are many details to work out, to help manage the current TSR queue and start the transition to the future state for transmission planning, Grant endorses the proposal outlined by Seattle City Light on January 15 for (a) starting the shift to Proactive Planning now, (b) reassigning internal resources to the Proactive Planning efforts and (c) offering Interim Service (i.e., Conditional Firm PTP and NITS) to all TSRs and FTSRs while also implementing LTF Queue Management based on Customer Choice. Such offers of Interim Service would be “mandatory” and based on Customer Choice, i.e., “if offered, either accepted as is or rejected”, and would have other terms and conditions necessary to enable transmission planning and expansion in the long run. Mandatory Interim Service will create more pressure on BPA’s existing operational management systems, which will need to be expanded, including but not limited to non-federal redispatch. Grant’s understanding is that BPA is interested in expanding its toolkit to include the redispatch of non-federal power and more load management. Grant strongly supports studies, contracting and investments in both areas, and looks forward to working with BPA on the redispatch of Grant’s non-federal resources to the benefit of both parties and to other BPA customers.

Thank you for the opportunity to provide these comments. Grant looks forward to collaborating with BPA to develop practical solutions that enhance system efficiency, reduce costs, and support regional market integration.

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