TC-27 Pre-Proceeding Workshop

Dec. 17-19, 2025

Jan. 6-7, 2026

TC-27 Workshop Schedule & Agenda

Schedule

Dec 17

- 10:30 am: Meeting Start
- 12 pm to 1 pm: Lunch
- 4 pm: Workshop Conclusion
- Schedule will include regular breaks, as necessary.

Dec. 18-19; Jan. 6-7

- 9 am: Meeting Start
- 12 pm to 1 pm: Lunch
- 4 pm: Workshop Conclusion
- Schedule will include regular breaks, as necessary.

**Dec. 18-19 and Jan. 6-7 will resume with topics per the agenda where discussion was concluded on the previous day.*

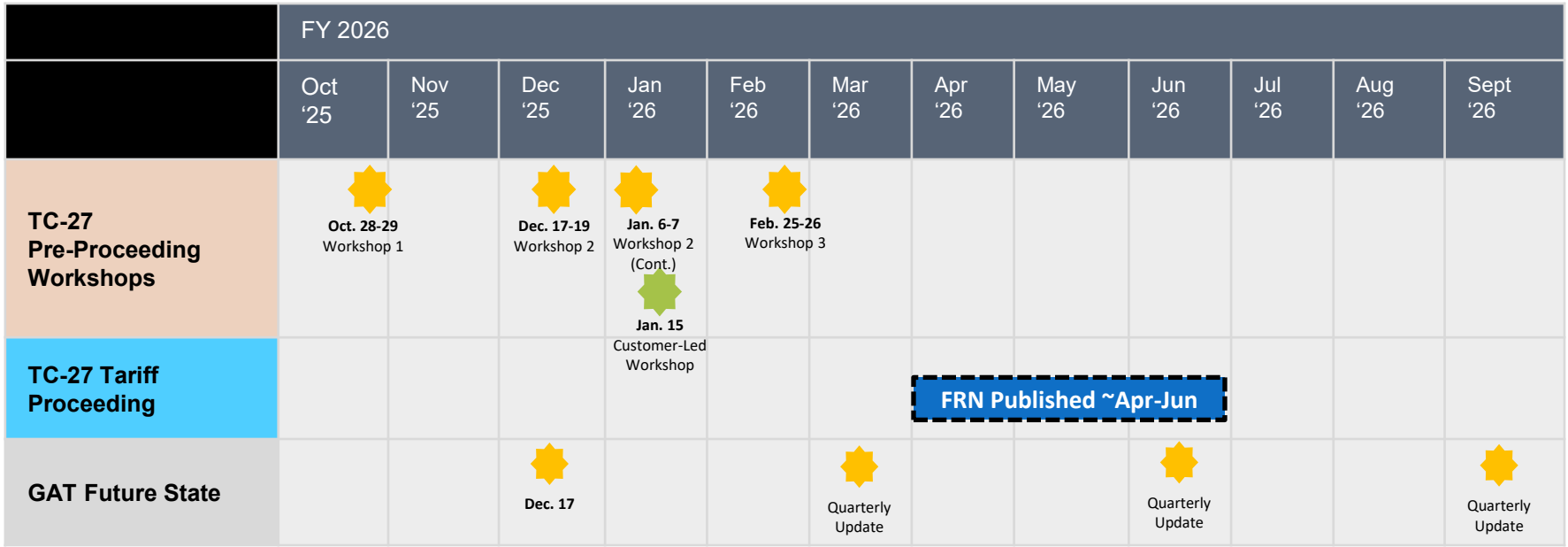
Agenda*

- Norms and Principles Reminder
- Schedule reminders
- Dec. 17:
  - Problem Statement reminder
  - NITS Forecasts
    - Revised Staff Leaning
    - Forecasts Scenarios
  - Grid Access Transformation Planning Program Transition (Steps 3 & 4: Analysis and Alternatives) of Evaluation Criteria
- Dec. 18-19; Jan. 6-7: Grid Access Transformation Planning Program Transition (Steps 3 & 4: Analysis and Alternatives)
  - Evaluation Criteria (cont.)
  - Interim Service
  - Queue Management
  - Transition Studies
  - Commercial Business Model, as time allows
- Next Steps

Workshop Norms

- Participants are encouraged to speak respectfully, be mindful of the limited time for discussions, and allow other participants and BPA staff to share their feedback.
- Participants are required to use the “raise hand” feature and chat in Webex to provide comments.
- Participants are encouraged to limit their speaking time to 3 minutes per topic.
- BPA will facilitate the conversation to ensure all participants have the opportunity to provide their input in a timely manner.
- Participants will refrain from discussing prior positions or comments submitted by other participants.

Engagement Schedule



- Workshop dates are subject to change.
- All workshops will be held in the BPA Rates Hearing Room with a virtual option.
- TC-27 Federal Register Notice (FRN) publish date depends on when workshops conclude.
- Draft TC-27 procedural schedule will be shared no later than the last workshop.

Jan. 15 TC-27 Customer Led Workshop

- Participants may request time to discuss a topic at the Jan. 15 TC-27 Customer Led workshop **no later than Jan. 7.**
  - Requesters must provide the topic and estimated time needed for discussion.
  - BPA will not create new content or provide written responses to customer presentations – this is an opportunity to ask further questions on materials previously presented or for participants to provide a presentation or information related to a workshop topic.
- Requesters must provide BPA with their presentation or notify BPA they intend to ask further questions on BPA materials **no later than Jan. 12**.
- If a customer does not provide a presentation or notice to BPA by Jan. 12, the customer will be removed from the agenda for the Jan. 15 Customer Led workshop.

Process for Responding to Comments

- Responses to comments from the Oct. 28 TC-27 pre-proceeding workshop are posted to the TC-27 Tariff Proceeding webpage.
- For the TC-27 pre-proceeding workshops, BPA is using the same comment tracking and response process used in the past several rate and tariff proceedings, which includes the following:
  - All comments will be posted to the TC-27 Tariff Proceeding webpage.
  - BPA will create a consolidated response document for each workshop that will be posted/updated at the same time as other workshop materials.
  - The consolidated response document is organized to address comments listed by the workshop date where the comments were received.
  - The consolidated response document will provide direct responses or identify other forums or future TC-27 workshops where BPA expects to provide a response.
    - To the extent possible, BPA will endeavor to provide responses prior to the next workshop in the Comments section on the TC-27 webpage (updated consolidated response document will be posted with workshop materials).
    - All comments will have a response.

Problem Statement

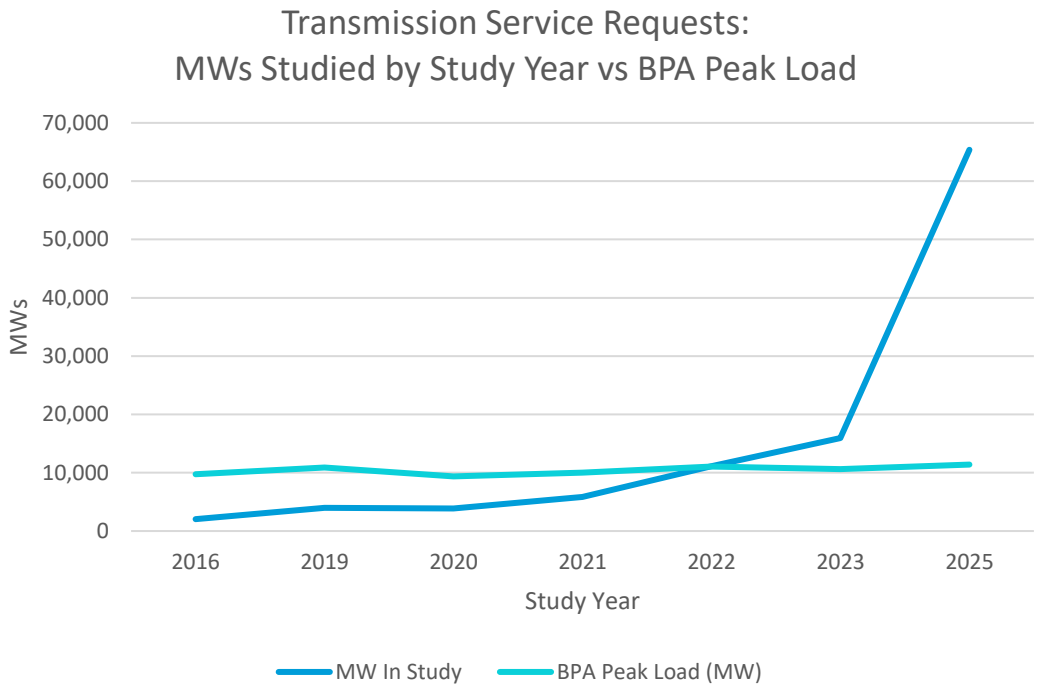
Problem Statement

(shared during Oct. 28 TC-27 pre-proceeding workshop)

- BPA's current means of processing its rapidly growing transmission service request queue no longer leads to solutions that support the region's economic needs.
- An actionable 60+ GW study of BPA's transmission system is not currently possible due to:
  - Having many TSRs with insufficient data to accurately define a plan of service and/or assess capability for Conditional Firm Service; and
  - Unintended consequences of modeling unrealistic load increases or unrealistic generation dispatch patterns to achieve load/resource balance necessary to perform a power flow study; or
  - Inability, using BPA's current processes, to conduct scenario analysis on the scale required to reflect generation dispatch uncertainty; or
  - 7-8 years required to batch TSRs into smaller MW studies.

Background | Queue Overview

Year	MW In Study	BPA Peak Load (MW)
2016	2,042	9730
2019	3,993	10892
2020	3,871	9369
2021	5,842	10005
2022	11,118	11035
2023	15,925	10628
2025	**65,385**	11396



Pre-decisional

Impact Overview

(shared during Feb. 11 Transmission Planning Reform workshop)

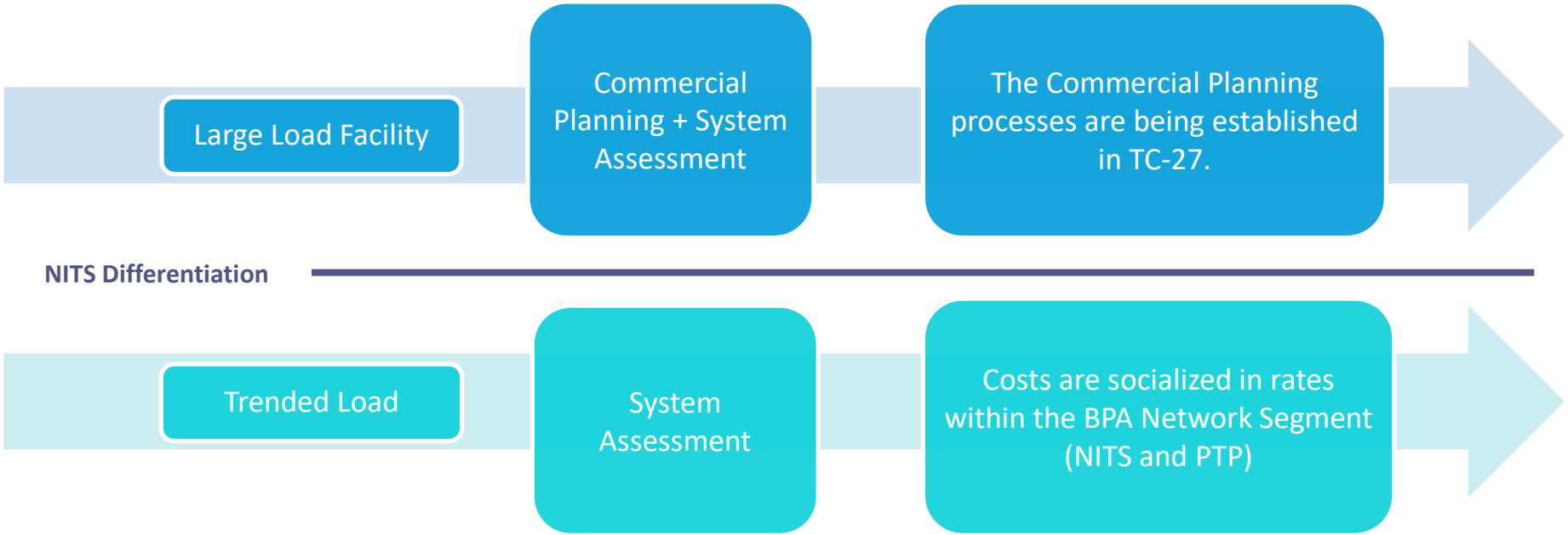
- While BPA works with stakeholders to consider planning reforms, a number of processes will be temporarily paused, including but not limited to:
  - 2025 TSR Study and Expansion Process (TSEP) Cluster Study.
  - Transmission Service Request (TSR) Evaluation Process (for any new TSRs requesting new or modified capacity).
  - TSR Data Exhibit Evaluation Process.
  - Network Integration Transmission Service (NITS) Load. and Resource Forecast Evaluation and Closeout Process.

Processing *De Minimis* TSRs

- BPA received several comments from customers asking BPA to process *de minimis* TSRs and FTSRs.
- BPA is requesting customer feedback on whether and when to process the queue for TSRs and FTSRs with *de minimis* impacts, as follows:
  - All requests would be evaluated in queue order.
  - All Original TSRs and FTSRs with *de minimis* impacts would be evaluated for an offer of service.
  - Because of significant system constraints, and to minimize a flood of requests, the partial reopening will subject Redirects to certain proposed limitations:
    - Only *de minimis* Redirect TSRs would be evaluated for an offer of service.
    - Only one Redirect allowed per Original: customers may only have one Redirect TSR processed against the TSR with the same Related AREF. This means that Original TSRs cannot be broken down into multiple smaller increments.

NITS Forecasts

NITS Transmission Planning Differentiation



Revised Staff Leaning

Concept: Any 13MW or more forecast increase annually attributed to a single facility that passes a facility check is considered a Large Load Facility (LLF) and must participate in commercial planning.

- BPAT will make the LLF determination for transmission planning purposes only.
- The entire forecast increase associated with a LLF receives a queue time, and the transmission needs are planned for in commercial planning and system assessment.
  - At this time, the Agency Load Forecast fed to the system assessment only includes 70% likelihood forecasts. System assessment may include other loads at BPA planning discretion.

Load Forecast Increase	Load Under 13MW Threshold	Load Above 13MW Threshold
Threshold	Non-LLF Load growth	Any LLF Facility
TX Planned for in	System Assessment	Commercial Studies*
Queue Time	n/a	Receipt of forecast
Service Awarded	7-FN Upon DNR	6NN** until 7-FN is available

*Includes commercial studies and system assessment
**6NN or potential interim service offering

Facility Check for LLF

- The following criteria are meant to be indicative of a LLF and not absolute. The decision of whether a load is or is not a LLF is made by BPA.
- Criteria
  - A facility load forecast increase equal to or over 13 MW in any fiscal year.
  - Load is for a single consumer's operations including subsidiaries and affiliates.
  - Load is at a single location or in a single building.
  - Load results from producing a single product or a using a single process.
  - Load is separately metered from other loads on the Network Customer's system.
  - Loads are contracted for, served, and/or billed as a single load under a Network Customer's customary bill.
  - Consideration of the facts from previous similar situations.
  - Any other factors identified by BPA or proposed by the Network Customer and accepted by BPA.

NITS Business Practice Update

- BPA intends to update the NITS Business Practice to reflect the Large Load Facility policy as a further definition of New Network Load.
  - Other transmission providers have taken similar approaches.
  - This update could occur earlier than other TC-27 related BP updates.

Processing NITS LaRCs

- BPA is requesting customer feedback on when to start processing LaRC forecasts.
  - BPA is considering processing trended load growth earlier than the conclusion of TC-27.
  - Alternatively, all LaRC forecasts (trended and LLF) could wait until the conclusion of TC-27 when commercial planning processes are in place.

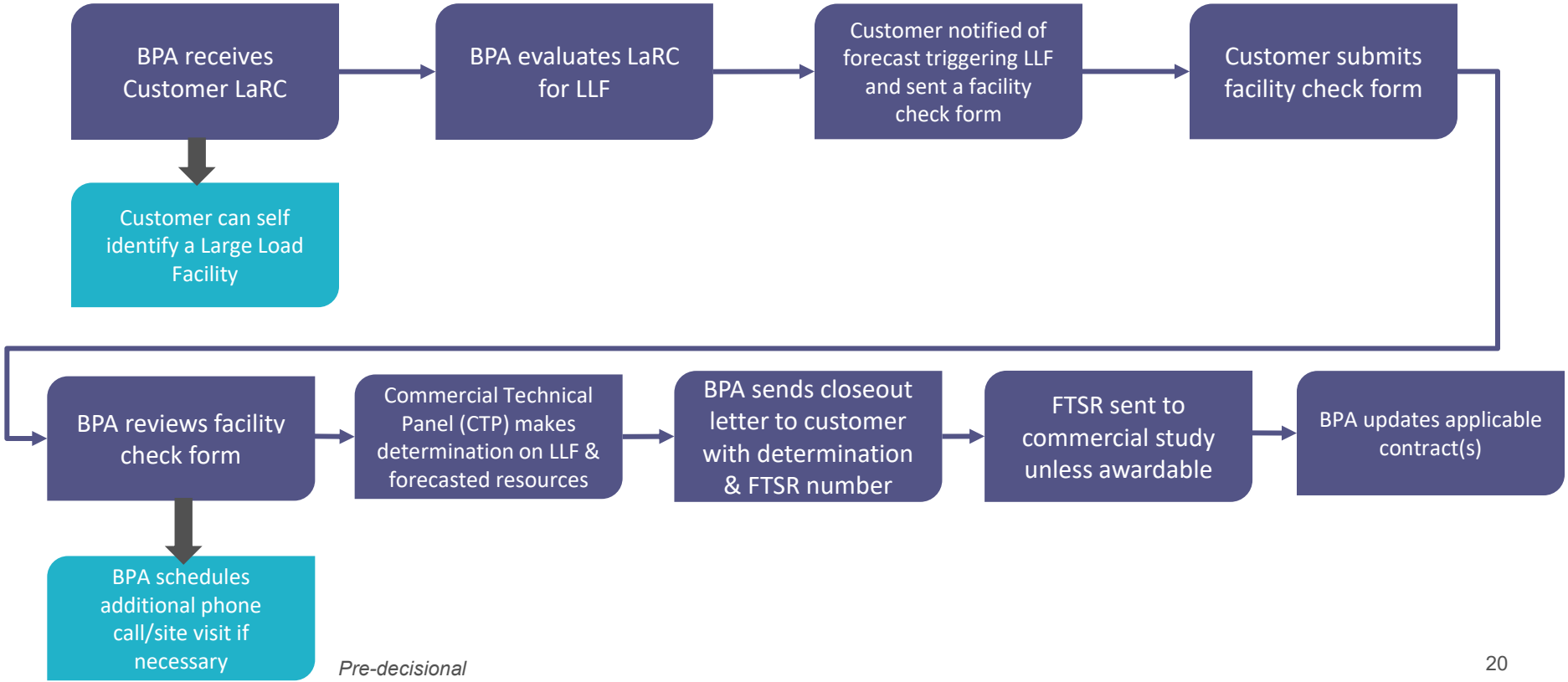
Resource Evaluation

- BPA will continue to review customer forecasted resources and determine if a commercial study is necessary for the request, as it has historically done.
- This is necessary if customers consider changing to resources that are not already Designated Network Resources (DNR) or are attributed to a Large Load Facility.

NITS Forecast Utilization

- Trended Load
  - The Agency Forecast, which includes loads that are ≥ 70% likelihood in the LaRC, are used for system assessment planning. No commercial evaluation is required.
    - *System assessment may use less than 70% likelihood load forecasts.*
- Large Load Facility (LLF)
  - LLF that are included in the LaRC regardless of the forecast likelihood are evaluated for commercial planning.
  - LLF that have a ≥ 70% likelihood in their LaRC will be included in the Agency Forecast and used for system assessment planning.
    - *System assessment may use less than 70% likelihood load forecasts.*

Steps to Large Load Facility (LLF) Determination & Forecasted Resources



Future State LLF Evaluation

Compare In-Cycle LaRCs

X = Fiscal Year

FY(X) LaRC

Customer provided LaRC forecast for a specific facility in FY(X)

(9/1/X-9/30/X)

FY(X+1) LaRC

Customer provided LaRC forecast for a specific facility in FY(X+1)

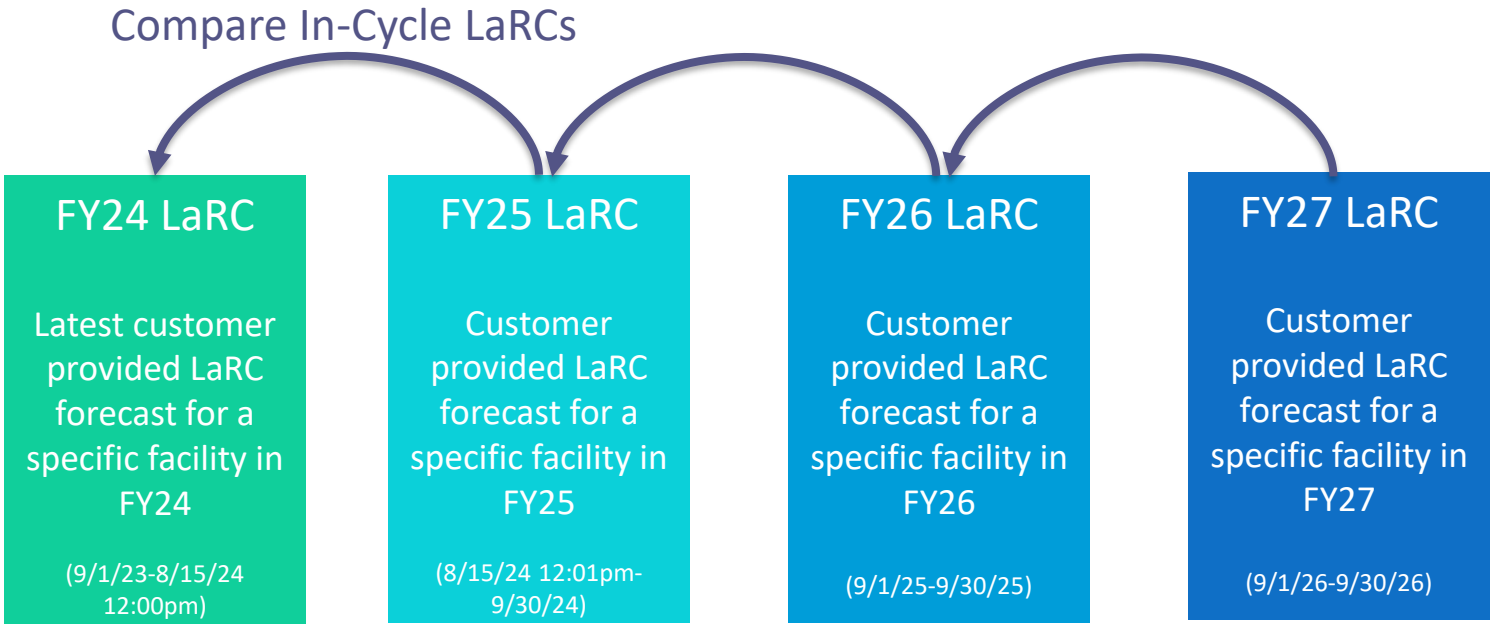
(9/1/X+1 - 9/30/X+1)

Example facility comparison:

FY (X)	2030	2031	2032	2033	2034	2035	2036
Annual Peak	0	0	0	0	0	0	0
FY (X+1)		**2031**	**2032**	**2033**	**2034**	**2035**	**2036**
Annual Peak		0	50	230	590	650	700
Comparison		0	50	230	590	650	700

Facility amount that is evaluated

Transition Baseline Calculation



- If a LaRC triggers the Large Load Facility threshold during the comparison, the first LaRC that identifies the increase becomes the queue time for that facility for that increase.

Evaluation Steps

- BPA evaluates the facility forecasts provided in the LaRC to initially determine if a facility check is necessary, based on the previous LaRC.
  - BPA validates the facilities and POD forecasts for alignment.
- BPA will utilize the Possible New & Growing Loads tab to determine the nature of the growth. How Large Load Facilities are identified and forecast information is provided in the LaRC may change in the future.
- If a facility triggers 13MW of growth from the previous LaRC a facility check form may be sent.

Scenario #1: Trended

1 Facility

Accepted Facility Forecast Baseline	
FY	FY24 Annual Peak
2024	7.00
2025	7.00
2026	8.00
2027	8.00
2028	8.00

FY25 Facility Forecast	
FY	FY25 Annual Peak
2025	7.00
2026	8.00
2027	9.00
2028	9.00

Forecasted Increase FY25 LaRC - Baseline Year (FY24)	
FY	Comparison
2025	0.00
2026	0.00
2027	1.00
2028	1.00

Large Load Facility for Commercial Planning
Increased load minus the Large Load Facility threshold. Provides MWs by year for each POD that may have a facility of 13 MW of more which requires commercial evaluation.

FY	Max per year	MW for Com Planning
2025	13.00	0
2026	13.00	0
2027	13.00	0
2028	13.00	0

2 Facility

Accepted Facility Forecast Baseline	
FY	FY24 Annual Peak
2024	1.00
2025	1.00
2026	4.00
2027	4.00
2028	6.00

FY25 Facility Forecast	
FY	FY25 Annual Peak
2025	1.00
2026	4.00
2027	6.00
2028	6.00

Forecasted Increase FY25 LaRC - Baseline Year (FY24)	
FY	Comparison
2025	0.00
2026	0.00
2027	2.00
2028	0.00

Large Load Facility for Commercial Planning
Increased load minus the Large Load Facility threshold. Provides MWs by year for each POD that may have a facility of 13 MW of more which requires commercial evaluation.

FY	Max per year	MW for Com Planning
2025	13.00	0
2026	13.00	0
2027	13.00	0
2028	13.00	0

Results:

System Assessment

- *The Agency Forecast will be evaluated in system assessment. A Corrective Action Plan (CAP) may be identified.*

Interconnection

- *BPA will let the customer know if a Line Load Interconnection Request (LLIR) is needed and if a plan of service is required.*

Commercial Planning

- *Scenario Outcome – No commercial planning needed.*

Scenario #2: Trended & Non-Trended

1 Facility

Accepted Facility Forecast Baseline	
FY	FY24 Annual Peak
2024	20.00
2025	20.00
2026	20.00
2027	25.00
2028	25.00

FY25 Facility Forecast	
FY	FY25 Annual Peak
2025	20.00
2026	22.00
2027	25.00
2028	30.00

Forecasted Increase FY25 LaRC - Baseline Year (FY24)	
FY	Comparison
2025	0.00
2026	2.00
2027	0.00
2028	5.00

Large Load Facility for Commercial Planning
Increased load minus the Large Load Facility threshold. Provides MWs by year for each POD that may have a facility of 13 MW of more which requires commercial evaluation.

FY	Max per year	MW for Com Planning
2025	13.00	0
2026	13.00	0
2027	13.00	0
2028	13.00	0

2 Facility

Accepted Facility Forecast Baseline	
FY	FY24 Annual Peak
2024	0.00
2025	0.00
2026	0.00
2027	0.00
2028	0.00

FY25 Facility Forecast	
FY	FY25 Annual Peak
2025	0.00
2026	50.00
2027	230.00
2028	590.00

Forecasted Increase FY25 LaRC - Baseline Year (FY24)	
FY	Comparison
2025	0.00
2026	50.00
2027	230.00
2028	590.00

Large Load Facility for Commercial Planning
Increased load minus the Large Load Facility threshold. Provides MWs by year for each POD that may have a facility of 13 MW of more which requires commercial evaluation.

FY	Max per year	MW for Com Planning
2025	13.00	0
2026	13.00	50
2027	13.00	230
2028	13.00	590

Results:

System Assessment

- *The Agency Forecast will be evaluated in system assessment. A CAP may be identified.*

Interconnection

- *A Line Load Interconnection (LLI) request will likely be necessary for Facility 2, and a plan of service may be required.*

Commercial Planning

- *Scenario Outcome – Load forecast increase for Facility 2 (590MW) will receive a queue time and be in Commercial Planning.*

Planning for Transfer Services

- BPA is not able to guarantee service on another transmission provider's system for trended or Large Load Facilities and is only capable of guaranteeing transmission to the point of interchange with other transmission providers.
- BPA is continuing to improve coordination of load increases between BPA transmission, BPA transfer services and other transfer service transmission providers.

Future NITS Policy Decisions

- BPA is reconsidering the 70% load forecast likelihood criteria that is used for Transmission Planning purposes.
  - This will be discussed as part of the GAT Future State.
- Policy for Load Forecast Decreases
  - This policy will be addressed at a later date as BPA considers priorities.
- Penalty/Forecast Lookback
  - BPA may consider development of a penalty or forecast lookback to assess problematic inaccuracies in forecasts. Any penalty would likely need to coincide with a rate case.

Evaluation Criteria (EC)

Foundation for Evaluation Criteria Alternatives

- Sections 17.2 and 29.2 of the OATT and OASIS require basic information about applications for transmission service. (transmission service requests or (F)TSRs)*
- This information support requests and transmission system expansion.

Evaluation Criteria Principles & Problem Statement

- Define/receive “Studiable” TSR/FTSR
- Determine manageability for CFS/Interim Service
- BPA needs information beyond that required on OASIS to enter a TSR/FTSR into the queue to support its efforts to process long-term firm transmission service requests.

The purpose of this presentation is to describe all the alternatives for your feedback and comment.

Outline of Evaluation Criteria Slide

- EC-SM (D1): Maturity of plan of service for Source
- EC-LM (D2): Maturity of plan of service for Load
- EC-RAS (D3): RAS Resource
- EC-PTP (D4): PTP Request to NITS POD
- EC-OB (D5): Requirements for Resources/Load Outside of BPA BAA
- EC-B2B (D6): Battery to Battery
- EC-ADD (D7): Additional Data if Needed for Planning
- EC-VHUB (D8): MIDCRemote/NWHub
- EC-PV (D9): Sending/Receiving Party Validation
- EC-MCAP (D10): Minimum Capitalization

Source Maturity

EC-SM

EC-SM: Source Maturity

- History
  - Has evolved over time, BPA has largely been requiring some study to define the plan of service at some level. In 2023, BPA started requiring a certain level of "maturity" for the cited source in the "generator supply characteristics" which included the model for "applicable POR infrastructure upgrade" (i.e., plan of service). This was in contrast to BPA's requirements in 2022 in which some parties were allowed to be included in the study without a plan of service.
- Problems
  - When the plan of service to connect the cited resource within BPA BAA to the transmission system is not defined, the electrical location of the cited generation source is not actually known. Use of assumptions can result in incorrect analysis of transmission system impacts.
  - When the plan of service to connect the cited resource within the BPA BAA to the transmission system is not defined, BPA's ability to determine whether CFS/interim service is negatively impacted.
- Objective
  - Ensure sufficient information regarding the electrical location of the Source generation seeking transmission service to support assessment of existing system capability, study for interim service offer, and study for plan of service development if system expansion is needed to enable long-term firm service. Appropriately consider how to respond to long-term transmission needs for requestors who function in a Marketer model, as relevant.

OATT Reference: Sections 1.25, 17.2 (iv), (v) and (vi); 29.2 (v)
BPA could clarify Section 17.2 (v) to add "and technical information about any associated resource".

EC-SM: Source Maturity Alternatives

- EC-SM-ALT-1: For transition, only accept GIs that are late stage or bypass
- EC-SM-ALT-2: LGIA executed
- 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

EC-SM-ALT-1: For Transition, Late Stage or Bypass GIs

To be eligible for the transmission study, for F/TSR with a within BAA resource must be for an existing resource, or a resource that is in the late stage or bypass GI level of maturity.

Pros

- Allows TSRs associated with new generation to access transmission plans of service and likely scarce CFS/IS first.
- Allows resources from outside the BPA balancing authority to receive transmission to deliver to loads inside the BPA balancing authority (or through the BPA balancing authority) as well as resources within the BPA balancing authority to receive transmission to move generation outside the BPA balancing authority.
- Assures high degree of GI plan of service maturity for TSRs/FTSRs that would be in transition study
- Little risk that the TSR will become invalid due to GI not moving forward.

Cons

- Customer dissatisfaction likely high.
- Likely eliminates a large number of TSRs that are in the queue today
- May result in the withdrawal of interconnection requests included in BPA's first Transition Cluster Study as part of its TC-25 generator interconnection reforms.
- May still result in a queue that is too large to study, thus triggering the cons of batching or capping.
- Rough scan, of the 248 TSRs/FTSRs that are NEWPOINT, 73 TSRs have late stage or bypass generation interconnection level of maturity, resulting an approximately a 70/30 split of TSRs/FTSRs that would be ineligible/eligible. When including TSRs that source outside the BPA BAA, about 25,000 MW eligible without taking into account other data exhibit validation criteria.
- Transmission needs not associated with late-stage or bypass generation sources will likely need to wait for a long period of time prior to next transmission study opportunity.
- Give priority to FTSRs/TSRs associated with more mature generators.

EC-SM-ALT-2: LGIA Executed

To be eligible for the transmission study, for F/TSRs for a resource within the BPA BAA, must be for an existing resource or a resource that has all GI studies completed and LGIA executed.

Pros
- The GI plan of service is defined.
- Customer has an executed LGIA.
- Project for construction of the facilities is moving forward.
- NEPA decision is done.
- Essentially no risk that the TSR will later become invalid due to GI not moving forward.

Cons
- Customer dissatisfaction likely high.
- This is very late in the generation development process - Losing time to get the transmission studies and builds done prior to getting the generation on-line.
- May be a difficult business model for customers to work with, as they would have to reach this stage without any relevant transmission information.
- Likely eliminates a large number of TSRs that are in the queue today.
- May result in the withdrawal of interconnection requests included in BPA's first Transition Cluster Study as part of its TC-25 generator interconnection reforms.
- Transmission needs associated with generation sources that have not reached LGIA will likely need to wait for a long period of time prior to next study opportunity.

EC-SM-ALT-3: Issuance of the GI Facilities Study Report

To be eligible for the transmission study, for F/TSRs for a resource within BPA's BAA, must be an existing resource or have received the GI Facilities study report. Would not require that the LGIA be executed.

Pros

- Site visits have occurred.
- Better schedule information available.
- High certainty regarding the GI plan of service.
- Ensures constructability of the facility (pending NEPA).
- Relatively high level of Customer commitment.
- Low risk that the TSR will become invalid due to GI not moving forward.

Cons

- Customer dissatisfaction may be high
- Lengthy timeline for the GI plan of service to mature to this point.
- Customer ability to line up GI and transmission timelines quite challenging.
- Customer working to move to design and construction, and if the FTSR/TSR identifies a large build that will take a long time, they wouldn't really have that picture to support decision-making – and costs start to get pretty high (multiple millions).
- Does not yet provide certainty that the interconnection plan of service for the source generation seeking transmission service will be constructed.

EC-SM-ALT-4: Completion of GI Phase Two Cluster Study

To be eligible for the transmission study, for F/TSRs for a resource within the BPA BAA would require completion of Phase Two of the GI study for the resource. Would not require execution of LGIA.

Pros

- Higher degree of certainty that the identified plan of service to interconnect the cited generation will be the final plan of service. (assuming that plan of service is constructed)
- Higher degree of certainty regarding the costs of the identified plan of service.
- Plans of service will be more detailed and have better schedules associated with them.
- Some risk of TSR becoming invalid due to GI not moving forward.

Cons

- Will take significantly longer for a generation project to mature to this point.
- Need for restudies still possible (though lower likelihood than at less mature stages).
- “Constructabilty” of the GI plan of service not assured.
- Cited generation/GI interconnections may not be constructed.

EC-SM-ALT-5: GI Phase One Cluster Study and Execution of Phase Two Cluster Agreement

To be eligible for the transmission study, for F/TSRs for resources within BPA's BAA BPA would require completion of Phase One of the GI study, any necessary restudy, and execution of the Phase II study agreement. Would not require completion of FAS, or execution LGIA agreements.

Pros

- Relevant restudies are complete providing higher POI certainty.
- Customer has a significant financial commitment to their GI project due to the penalties (capped at $10M) for withdrawal beyond this point in the GI process.
- Interconnection POS for new FTSR/TSR source generation would be relatively unlikely to change.
- May be the lowest maturity risk that could be viable from a planning perspective.
- Won't allow as much clogging of the queue by parties
- Meaningful risk that the TSR will become invalid due to GI not moving forward.

Cons

- Timing is uncertain on when this would occur due to possibility of restudies of Phase One GI Cluster Study.
- Subsequent study phases can still modify GI POS; need process for dealing with changes.
- "Constructabilty" of the GI plan of service not assured (lacks site visits, environmental study, etc.).

EC-SM-ALT-6: Completion of Phase One of the GI Study Including any Needed Restudy

To be eligible for the transmission study, for F/TSRs for resources within BPA's BAA would require completion of Phase One of the GI study and any required restudies. Would not require completion of Phase II GI study or execution LGIA agreements.

Pros

- Phase One Cluster Study is complete, providing more certainty of POI.
- Plan of service restudy modifications are known
- Interconnection plans of service for new FTSR/TSR source generation less likely to change.
- Likely the lowest maturity risk that could be viable from a planning perspective
- Won't allow as much clogging of the queue by parties.
- Better supports parties that are well-positioned to come online in the nearer term.

Cons

- Essentially closes the transmission queue for FTSR/TSR submission related to new GIs for a period of time.
- May take substantially longer to reach this stage than just completion of the Phase I study.
- Does not provide a high degree of assurance that the generation interconnection facilities will be constructed.
- Unexpected results, environmental study could still change the POS (transient stability, voltage stability study findings).
- Need to define a process for when the POI is subsequently moved.
- Schedule still not well understood; Costs not refined.
- Parties can still drop out without financial penalties.
- "Constructabilty" of the GI plan of service not assured (lacks site visits, environmental study, etc.).
- Significant risk of the TSR becoming invalid due to the GI not moving forward.

EC-SM-ALT-7: Completion of Phase One GI Study Report

To be eligible for the transmission study, for F/TSRs for resources with BPA's BAA, would require completion of Phase One of the GI study. Would not require completion of any needed restudy, Phases II GI study, or execution of LGIA agreements.

Pros

- FTSR/TSRs citing resources under development would have a fairly early ability to obtain valid Data Exhibits (for the GI maturity element).
- The plan of service for the cited generator has been studied at a minimal level.
- BPA is aware (or will shortly know) of any needed restudies for the cited generation and knows which cited generators POS do not require restudy.

Cons

- Significant potential for change to the cited generator's plan of service remains.
- Customer's level of financial commitment to the cited undeveloped generation is fairly low.
- Estimates of cost of the GI plan of service and the schedule is relatively low quality.
- Significant uncertainty regarding whether the GI plan of service (and the associated generation) will be constructed.
- Significant risk of the TSR becoming invalid due to the GI not moving forward.

EC-SM-ALT-8: Completion of Phase One of the GI study

To be eligible for the transmission study, for F/TSRs for a resource within the BPA BAA, would require completion of Phase One of the GI study. Would not require completion of restudy, Phase II GI study, or LGIA agreements.

Pros

- BPA generation interconnection study plan of service.
- It is not unusual for the generation point of interconnection that results from Phase I of the study to hold i.e., fairly closely reflect the infrastructure plan of service that will be constructed to enable the generator to be interconnected.
- At the end of the study phase, the customer must make a choice of whether to proceed with the generation interconnection based on the BPA studied results.
- TSRs/FTSRs citing generation that is under development would have a very early ability to pass Data Exhibit Validation (for the generation maturity element).

Cons

- BPA expects that withdrawal from the GI queue may result in need for restudy, which could change POIs for relevant Gis.
- Restudy could result in moving the POI.
- Information on cost and timeline is subject to change
- There are no GI penalties for withdrawal of the GI at this stage of the study process.
- Does not provide a high degree of assurance that the generation interconnection facilities will be constructed
- “Constructabilty” of the GI plan of service not assured (lacks site visits, environmental study, etc.
- Subsequent phases of the study could change the electrical plan of service for the cited source generation.
- Significant risk of the TSR becoming invalid due to the GI not moving forward.

EC-SM-ALT-9: Consultant GI Study

This involves having a consultant rather than BPA, complete required outputs for the GI plan of service to support transmission planning modeling.

Pros

- Some customers have liked this model as it has allowed them to overcome lack of a BPA GI study in certain cases.

Cons

- Consultant cannot know what other requests will be in the cluster with any specific request.
- In the cluster studies, BPA is moving the clusters around to define efficient plans of service, consultant cannot know what the relevant clusters would be (misleading POI plan of service).
- Customer has no information on actual GI cost or timeline.
- Would result in transmission plans of service for essentially unstudied generation location.
- There are no GI penalties for withdrawal of the GI (since there isn't one).
- Provides no assurance that the defined GI plan of service will be constructed (highly unlikely).
- "Constructabilty" of the GI plan of service unlikely (lacks site visits, environmental study, etc.).
- Significant risk of the TSR becoming invalid due to the GI not moving forward.

EC-SM-ALT-10: Minimal GI Criteria

For F/TSRs for resources within BPA's BAA to be eligible for the transmission study, no plan of service for interconnection of the generator would be required. May require submittal of the GI request.

Pros
- Some customers appeal.
- Customers flexibility regardless of GI maturity (ever)
- No impediment to marketer business model.

Cons
- Electrical location of the GI POI may be in substantially different location.
- Unprecedented, inconsistent with the NEWPOINT
- Would likely force BPA transmission study to include GI studies as a sub-component of the TSR/FTSR study process, thereby slowing studies for participants with mature Gis.
- Assumptions made regarding generation interconnection plans of service for TSRs may not actually be correct when studied in the appropriate process later, requiring process to clean up differences.

Cons (continued)
- Risks awarding transmission service without any clarity regarding whether there will be a new resource at that location – could result in the offer of, essentially, unstudied transmission service.
- Allowing award of essentially unstudied transmission service requests pushes curtailment risk onto other customers who provide generation interconnection electrical plan of service at sufficient level.
- Customer has no information on GI cost or timeline
- There are no GI penalties for withdrawal of the GI (since there isn't one).
- Not consistent with the OATT.
- Provides no assurance that the yet-to-be defined GI plan of service will ever be constructed.
- May allow for "redirects" on TSRs to areas of system that have not been studied through the conformance process (i.e. when NEWPOINT is conformed to a POR).

EC-SM-ALT-11: Incent LSE Engagement by Providing POR Flexibility

If submitted by a LSE, for F/TSRs for resources within BPA's BAA to be eligible for the transmission study, require only a general indication of the geographic area in which the party is interested in acquiring a resource.

Pros
- If effective, could incent increased LSE engagement in BPA's transmission queue
- Might help BPA increase its focus on transmission that is needed to serve load in the region
- May be perceived as beneficial by some LSEs

Cons
- Not consistent with current OATT.
- Potential dissatisfaction of non-LSE entities.
- Unclear if it would be successful in increasing LSE engagement.
- Does not provide clear generation maturity information for study.
- Would require a mechanism to address the potentially (likely) incomplete infrastructure identification occurring due to lack of specificity; i.e., may not result in faster access to transmission service.
- Defining "zones" would be a significant undertaking.

Load Maturity

EC-LM

Load Maturity

- History
  - BPA has largely not needed to deal with this issue in the past. Transmission needs related to substantial NITS load growth has driven recognition of this issue. Note that this criteria would only be applied to commercial study of transmission requests for NITS needs above the 13 MW threshold. It also needs refinement to reflect that NITS transfer customer LLIRs are subject to other transmission provider's process which can look somewhat different than BPA's processes.
- Problem
  - When the plan of service to connect the cited load within the BPA BAA to the transmission system is not defined, the electrical location of the cited load is not actually known. Use of assumptions can result in incorrect analysis of transmission system impacts.
  - When the plan of service to connect the cited load within the BPA BAA to the transmission system is not defined, BPA's ability to determine whether CFS/interim service is negatively impacted.
- Objective
  - Ensure sufficient information regarding the electrical location of the load seeking transmission service to support assessment of existing system capability, study for interim service offer, and study for plan of service development if system expansion is needed to enable long-term firm service. Appropriately consider how to respond to long-term transmission needs for requestors who function under a Marketer model.

OATT Reference: Sections 17.2(iv); 29.2(iii)

Maturity of Line Load Interconnection Plan of Service

- Problem
  - When the plan of service to connect cited new load to the transmission system is not defined, the electrical location of the cited load is not actually known. Use of assumptions can result in incorrect analysis of transmission system impacts.

- Objective
  - Ensure sufficient information regarding the electrical location of the load seeking transmission service to support assessment of existing system capability, study for interim service offer, and study for plan of service development if system expansion is needed to enable long-term firm service.
  - Appropriately consider how to respond to long-term transmission needs for requestors who function under a Marketer model.

EC-LM Alternatives: Load Maturity

If an LLIR is needed associated with the FTSR/TSR, alternatives are:

- EC-LM-ALT-1: Must be in execution phase (agreements signed/funded)
- EC-LM-ALT-2: Facilities Study required to be completed
- EC-LM-ALT-3: System Impact Study required to be started or completed
- EC-LM-ALT-4: Feasibility Study required to be completed
- EC-LM-ALT-5: LLIR must be submitted, but no study required
- EC-LM-ALT-6: No requirement for LLIR submittal

EC-LM-ALT-1: In Execution, Agreements Signed/Funded

For relevant FTSRs/TSRs associated with substantial load growth, require that the LLIR studies be completed and associated agreements signed and funded.

Pros

- Would not support speculative requests by customers who have aspirations of growing, but don't have potential end-use customers who are seeking to locate in their service territory.
- The plan of service for interconnection of the load being serviced by the requested transmission service is known and construction project has been initiated.
- Customer is serious enough to fund (typically doesn't happen at prior stages).

Cons

- Would not support speculative requests by customers who have aspirations of growing, but don't have potential end-use customers who are seeking to locate in their service territory.
- Would not support speculative requests by customers who have aspirations of growing, but don't have potential end-use customers who are seeking to locate in their service territory.
- Forces efforts to obtain transmission to very late stage of line/load interconnection process – must be proceeding with the construction of the point of interconnection prior to determining what the transmission plan of service would be for any generation to service the load.

EC-LM-ALT-2: Facility Study Must be Started or Completed

For relevant FTSRs/TSRs associated with substantial load growth, require that the LLIR facilities study be completed. Do not require that the System Impact Study or Feasibility study be completed or that any needed agreements be executed/funded.

Pros

- LLIR cost and timeline become less preliminary.
- Most customer that enter facilities study have historically taken their projects through execution.
- If customer is interested in proceeding, they can fund preliminary engineering/scoping to move forward more quickly.
- At completion of Facility Study, there is a consultation with the customer regarding next steps.
- Delivery of the FAS to the customer provides customer receipt of the proposed scope, schedule, and budget for the project.
- Once the Facilities Study is completed, a separate agreement if Scoping will be done in parallel may be required involving financial commitment for NITS customers.

Cons

- NITS customer may or may not have provided any funding for the facilities (in some cases, funding for long-lead time items is provided during Facilities Study stage).
- Late in the LLIR study process, not allowing as long a lead time for TSR plan of service development.
- Timeline for facility study (FAS) is variable and depends on the project and execution method.

EC-LM-ALT-3: System Impact Study Must be Started or Completed

For relevant FTSRs/TSRs associated with substantial load growth, require that the LLIR system impact study be completed. Do not require that the LLIR feasibility study be completed or execution of any needed study agreements.

Pros

- At the start of this study, customer must select which POD to further pursue.
- At completion of the study, there is a preliminary plan of service to interconnect the load.

Cons

- Cost of plan of service and timeline are preliminary.
- NITS customer is not required to fund the study, so has not demonstrated financial commitment. (PTP customer pays for study).
- Timeline for System Impact Study generally takes 6 months to complete, combined Feasibility study and System Impact Study about 1 year.

EC-LM-ALT-4: Feasibility Study Must be Completed

For relevant FTSRs/TSRs associated with substantial load growth, require that the LLIR Feasibility Study be completed. Do not require execution/funding of any needed agreements.

Pros

- Clear information available regarding the multiple POIs studied.
- Very early in the LLIR study process, creating a lot of lead time for TSR study.
- Timeline for Feasibility study is not all that long.

Cons

- Customer has not yet selected which POI they are going to pursue for the interconnection plan of service.
- Typically, NITS customer has not paid for this study/is not financially committed (PTP customer must pay for LLIR study).
- Timeline for Feasibility study generally takes 6 months to complete.

EC-LM-ALT-5: LLIR Submittal, but no Study Requirement

For relevant FTSRs/TSRs associated with substantial load growth, require that an LLIR be submitted, but do not require completion of any studies or agreements.

Pros

- At least indicates some level of seriousness regarding determining line/load system expansion to serve the new load
- Provides some data regarding the intentions of the customer (i.e., size of load, maturity of potential new load…).
- Provides a degree of information per the submitted line/load interconnection request application about what additional capability the customer is wanting to study.
- Typically, a POI and Load amount is known when a LLIR does not require study. Additional info can be gathered during the kickoff meeting while making study determination.
- Could enable a significant number of speculative requests by customers who have aspirations of growing, but don't have potential end-use customers who are seeking to locate in their service territory
- PTP customers are charged for LLIR studies; NITS customers are only rarely charged for LLIR studies.

Cons

- Provides no information about the electrical plan of service, application allows for vetting of multiple points of interconnection in the first phase of the study.
- Could enable a significant number of speculative requests by customers who have aspirations of growing, but don't have potential end-use. customers who are seeking to locate in their service territory (essentially could cause the commercial study to look more like a proactive planning study in certain elements). Notably, NITS LLIR studies are not charged to the customer.

EC-LM-ALT-6: No requirement for Line/Load Interconnection

For relevant FTSRs/TSRs associated with substantial load growth, do not have any requirements as precursors to participate in the transmission study.

Pros

- Does not limit customers' ability to submit an FTSR/TSR consistent with developing line/load capability.
- Supports customer's ability to request transmission service for marketing activities. (i.e., with the intent to subsequently redirect the service to wherever they need to use it to support shorter-term transactions..
- Allows LLIR and FTSR/TSR processes to be completely independent.

Cons

- Does not limit customers' ability to submit an FTSR/TSR
- May mis-represent customer's intended use of the transmission service (i.e., while the FTSR/TSR provides some reflection of the path-based rights that they are seeking, it does not necessarily reflect expected uses of the transmission system).
- Provides no information about the electrical plan of service associated with the POD for which the requested MW are to be delivered if expansion is needed
- Does not provide information to support accurate modeling of the electrical location of the load to support ability to accurately study.
- Could enable a significant number of speculative requests by customers who have aspirations of growing, but don't have active end-use customers who are seeking to locate in their service territory (essentially could cause the commercial study to look more like a proactive planning study in certain elements). Notably, most NITS line/load interconnection studies are not charged to the customer.

RAS Resource

EC-RAS

RAS for Sources originating Outside of BPA BAA

- History
  - This issue has been a challenge since Network Open Season; BPA has asked for the information, not necessarily received it, not created an effective way to address the issue
- Problem
  - RAS is used extensively in the NW to achieve and maintain total transfer capability. Transmission plans of service to move out-of-region resources into/through the BPA BAA may require RAS, but the relevant generator interconnection on which to apply RAS is not on the BPA system
- Objectives
  - Define process to address process/planning issues when RAS is required on a resource that is outside of the BPA BAA and cannot be obtained through the generation interconnection procedures
  - Avoid degrading TTC if RAS is necessary for the plan of service
  - Avoid building plan of service for which new TTC cannot be realized

OATT Reference: Sections 17.2 (iv) and 29.2(v)

Background: RAS Issue for Source Outside of BPA BAA

- In transmission system planning and design, industry practices acknowledge the use of Special Protection Schemes (SPS) such as Remedial Action Schemes (RAS) that trip generation in response to certain system conditions (such as unplanned or forced outages) to maintain reliable system performance
- On the main part of the BPA transmission system (not referencing interties or external interconnections), BPA relies on an extensive network of 500 kV and 230 kV main grid facilities and has access to a diversity of generating resources that can support the RAS needs that BPA uses to maintain reliable system operation (by enabling and maintaining higher total transfer capability).
- Issue Example – TSRs seeking transmission for resources located in or transmitting through Montana. Current path rating is 2200. Without RAS, the rating would be substantially lower, possibly in the range of 800 MW.

EC-RAS Alternatives: RAS Resource

- EC-RAS-ALT-1: Require upon TSR/FTSR submittal
- EC-RAS-ALT-2: Require prior to preliminary engineering
- EC-RAS-ALT-3: Require prior to environmental study
- EC-RAS-ALT-4: Require prior to decision to build the relevant project(s)
- 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

EC-RAS-ALT-1: Require RAS Resource Upon TSR Submittal

For an F/TSR involving a path that requires inclusion of a resource on a remedial action scheme, require that the resource be identified upon TSR submittal to enable participation in the transmission study.

Pros

- Certainty that the TSR(s)/FTSR(s) being studied can provide a RAS resource.
- Development of plan of service for the RAS component can proceed in tandem with rest of plan of service.
- Very clear that RAS resource is required for the plan of service to be effective.

Cons

- Least flexibility of timing for RAS resource specification.

EC-RAS-ALT-2: Require Prior to Preliminary Engineering

For an F/TSR involving a path that requires inclusion of a resource on a remedial action scheme, allow the TSR to be studied for a plan of service without identifying the resource to be put on RAS, but require identification of the resource for RAS prior to allowing execution of a preliminary engineering agreement. If resource is not identified at that time, decline the TSR from the queue.

Pros

- Some additional time to specify RAS resource.
- Plan of service for RAS resource element can almost proceed in tandem remainder of plan of service.

Cons

- BPA is developing project(s) for TSR for which customer may not be able to provide a RAS resource.
- Potentially requires BPA to study TSRs/FTSRs that cannot come to fruition.

EC-RAS-ALT-3: Require RAS Resource Prior to Environmental Study

For an F/TSR involving a path that requires inclusion of a resource on a remedial action scheme, allow the TSR to participate in the study and proceed with preliminary engineering, but require identification of the resource for RAS prior to start of environmental study. If the resource is not identified at that time, decline the TSR from the queue.

Pros

- Provides substantial time for the customer identify the RAS resource.

Cons

- BPA is developing project(s) for TSR for which customer may not be able to provide a RAS resource.
- Design and environmental study of the RAS communication paths cannot begin until RAS resource is specified.

EC-RAS-ALT-4: Require RAS Resource Prior to Decision to Build the Relevant Project

For an F/TSR involving a path that requires inclusion of a resource on a remedial action scheme, allow the TSR to participate in the study and proceed with preliminary engineering and environmental study, but require identification of the RAS resource prior to BPA making a decision to build the relevant project(s). If the resource is not identified at that time, decline the TSR from the queue.

Pros

- Very substantial flexibility in timing for customer to provide the RAS resource.

Cons

- Business case for the project will lack clarity about the ability of the customer to utilize and pay for the project capacity.
- Potential to delay decision to build.
- Development of plan of service for the RAS resource component may significantly lag rest of the plan of service development.
- Environmental study for plan of service could become stale and need to be redone.
- TSR/FTSR may need several projects; lack of clarity about whether the TSR will be able to support those plans of service.
- Lengthy hold on capacity on this plan of service and any other impacted plans of service; capacity unavailable to others in the meantime.

EC-RAS-ALT-5: Timing Flex but Contractual Obligation

Allow the F/TSR to be studied, and to receive offer of service, but when upon requested start date or energization (whichever is later), require the customer to pay for the service regardless of whether they have supplied a RAS resource, which would be a requirement for the customer to use the service.

Pros

- Maximum flexibility for when RAS resource can be specified.

Cons

- Likely requires unique contractual process for data exhibit validation and TSR/FTSR entry into queue.
- Potential for construction of project that will not enable capacity for the TSR (if no RAS resource specified).
- Potentially involves construction of incomplete plan of service.
- Potential for the TSR/FTSR to hold capacity on multiple projects that will not be available for long-term uses of the system.
- Creates significant consequences for failing to manage the development of the plan of service for the required RAS element of the plan of service with the rest of the plan of service.
- Requires foregoing deferral rights.

Outside BPA BAA Requirements for Resources & Loads

EC-OB

Requirements for Gen/Load Outside of the BPA Balancing Authority Area

- History:
  - BPA has been requiring this information in necessary instances for a substantial period of time (Intertie has not been a concern, for example).
- Problem:
  - BPA has different information needs to support analysis and study of TSRs sourcing from or sinking to a balancing authority area (BAA) other than BPA's.
- Notes:
  - This requirement is not different from what we already do today.
  - This requirement must be included in any alternative portfolio
- Objectives:
  - Ensure that TSRs/FTSRs seeking to transmit generation from resources and to loads outside of the Bonneville balancing authority area are electrically connected to the points of connection on BPA's transmission system that they are requesting service from/to. Ensure the ability to study requested transmission service citing resource and/or load outside of the BPA balancing authority area effectively.
  - Clearly define the requirements for TSRs sourcing from or sinking to BAA's other than BPA's

OATT Reference: Sections 17.2(iii), (iv); 29.2 (v)

EC-OB: Requirement Specification

1) The generator or load location must be electrically connected to BPA's POR/POD (i.e., BPA needs clear identification of where and how the generation is entering /existing the BPA system).
2) Where applicable, the customer must provide supporting evidence of the transmission transaction to demonstrate how the generation is getting to/from BPA's POR or POD. The information must reflect electrical feasibility.
3) The upstream or downstream FTSR or TSR, if needed, must be submitted on or before the day of the FTSR/TSR submittal into BPA's queue. The timeframe must match (or extend beyond) the timeframe for the FTSR/TSR on BPA's system and the path must be electrically valid in BPA's determination.
4) Validity of the TSR/FTSR on BPA's system is subject to continuing validity of the upstream/downstream transmission request/reservation up to award of service.

Note that TSRs seeking service connecting with NWACI, the DC intertie, Northern Intertie, Reno-Alturas are exceptions for these needs (unless for transfer service). BPA seeks specific information for transfer into/out of Idaho. BPA needs to understand where the generation is coming into BPA's system or leaving BPA's system.

PTP TSR to NITS POD Requirements

EC-PTP

PTP TSRs Delivering to NITS POD

- History
  - This problem is recent. Ongoing and increasing recognition that it creates a conundrum. No effective way to address it currently.
- Problem
  - NITS customer use of PTP service is highly unusual. PTP customers submission of TSRs delivering to NITS PODs appears to be out-of-sync with NITS customers' indications of how they will serve their loads.
- Objective
  - Ensure sufficient information for valid planning of transmission service to NITS customers' loads. Avoid planning for uses of the transmission system that are inconsistent with the indicated LSEs intentions.

OATT Reference: Sections 17.2 (iii), (iv), (vi); 29.2, 30

EC-PTP Alternatives: PTP TSRs Delivering to NITS PODs*

- EC-PTP-ALT-1: Require demonstration of interest from NITS customer upon submittal
- EC-PTP-ALT-2: Require demonstration prior to execution of contract
- EC-PTP-ALT-3: Only NITS Customers Allow to Submit PTP TSRs to serve their load
- EC-PTP-ALT-4: Status Quo

* Expect that BPA would provide a form for this that would need to be executed.

EC-PTP-ALT-1: Require Demonstration of Interest from the NITS Customer for Submittal

For PTP TSRs with a POD of on a NITS customer's system, require a signed indication from the NITS customer that they are considering serving a portion of their load with PTP service. NITS customer to make one-time determination regarding whether it would pay both NITS and PTP billing determinant or seek to electrically separate the load. If the later, would need to start working with BPA re: electrical separability assessment. Resource may need to be in LARC. If so, FTSR would remain valid only if resource remains in LARC.

Pros

- Would be consistent with requirement that Sending Party and Receiving Party agree that they are exploring the transaction.
- Opportunity for BPA and NITS customer to define whether work need to occur to determine whether portion of load of interest can be electrically separated.
- Would ensure that PTP Customers are not mistakenly submitting PTP requests that sink to NITS PODs without being aware of the ramifications of that particular POD.
- Would limit PTP Customers' ability to submit PTP requests to NITS PODs with the intent of redirecting that service to other nearby PTP points
- Would minimize planning issues that arise due to uncertainty regarding what load would actually be served by the PTP request.
- Likely to result in early clarification of whether the NITS customer is actually contemplating serving a portion of their load with PTP service.
- Initiates and hopefully provides time for conversation with the NITS customer regarding whether a portion of their NITS load is electrically separable from the remainder of their load.
- Could support or be associated with a requirement that the resource must be in/remain in the NITS customer's LARC to enable the PTP TSR to remain valid.

Cons

- New requirement.
- If Sending and Receiving Party agreement demonstration is not required for other TSRs/FTSRs, would create a unique element in these instances.
- Creates a limitation on the PODs for which PTP customers can request service.
- Likely would not be able to be an OASIS limitation, but rather would be a Data Exhibit validation limitation.

EC-PTP-ALT-2: Require Demonstration Prior to Contract Execution

Allow a PTP TSR to be studied/proceed without indication from the NITS customer. However, the PTP contract execution would be contingent on indication of use from the NITS customer.

Pros

- Allows a substantial amount of time for a PTP customer to endeavor to convince a NITS customer to purchase the resource and utilize PTP transmission to move the generation to their load.

Cons

- Requires plan of service to be fully developed (and depending on the business model) to complete the environmental study before the TSR is required to meet the requirement.
- Could result in a late-stage need to decline the TSR/FTSR.
- Does not support planning clarity.

EC-PTP-ALT-3: Only NITS Customers Allowed to Submit PTP TSR for their POD

Require that any PTP TSR involving a NITS POD be submitted by the NITS customer.

Pros

- Strongest clarity regarding transmission planning for NITS customers.
- Would be expected to align with NITS customer's LARC submittal.
- Would clearly indicate need to work with NITS customer to determine if they are seeking "electrically separable" load.

Cons

- Decreases flexibility for PTP customers to seek transmission for their resource will serve NITS load on PTP transmission
- Could not be effectuated on OASIS as NITS PODs can also be PORs for generation interconnected within the NITS customers service territory.

EC-PTP-ALT-4: Status Quo

Do not place any specific requirement on PTP TSRs involving NITS PODs.

Pros

- Maximum flexibility for PTP customers.
- Does not require a change in TSR submittal Validation.

Cons

- Does not trigger BPA to work with the NITS customer to determine whether the target load can be electrically separated.
- Potentially unable to verify that plan of service is complete without knowing what load it will serve and therefore may be unable to award the service until specified.
- Potential for PTP customer mistakenly use of NITS POD
- Does not limit PTP customer's ability to submit TSRs to NITS load in hopes of redirecting to another PTP POD later.
- Does not provide any opportunity to connect NITS customer's LARC information to the PTP TSR.

Battery to Battery

EC-B2B

Battery to Battery Requests

- History
  - This is a very recent challenge that wouldn't previously have occurred to BPA.
- Problem
  - Planning for long-term firm service from to charge a battery from a battery does not appear to be based on reasonable assumptions of long-term firm service use
- Objective
  - Ensure that BPA's long-term firm transmission planning is based on reasonable assumptions and enables appropriate determination of scenarios in which service should expect to be utilized

OATT Reference: 17.2 (iii), (iv), (vi); 29.2 and 30

EC-B2B Alternatives: Battery to Battery F/TSRs

- EC-B2B-ALT-1: Disallow battery to battery LTF F/TSRs
- EC-B2B-ALT-2: Allow battery to battery F/TSRs if Customer can provide reasonable scenarios
- EC-B2B-ALT-3: Allow LTF battery to battery F/TSRs

EC-B2B-ALT-1: Disallow Battery to Battery LTF F/TSRs

LTF F/TSRs from a battery source to a battery sink are not valid.

Pros

- LTF for to charge a battery with a battery doesn't appear to provide a reasonable scenario to model in a planning study.
- Charging a battery from a battery during a congested period may be a highly undesirable use of the transmission system.

Cons

- Constrains LTF requests.

EC-B2B-ALT-2: Allow Battery to Battery F/TSRs if Customer can provide reasonable scenarios

Allow F/TSRs from a battery to a battery only if there is a reasonable scenario for study

Pros

- LTF for to charge a battery with a battery doesn't appear to provide a reasonable scenario to model in a planning study.
- Wouldn't completely disallow such requests if there was a compelling case for why LTF transmission was needed to support such an arrangement.
- Could require that the batteries both physically exist.

Cons

- Would require BPA to make a judgement regarding whether the scenario seemed reasonable.
- Charging a battery from a battery during a congested period may be a highly undesirable use of the transmission system.

EC-B2B-ALT-3: Allow LTF Battery to Battery TSRs/FTSRs

Do not place any limitation on F/TSRs from a battery to a battery.

Pros

- Flexibility for Customer TSR/FTSR submittals.

Cons

- Identification of scenarios in which the battery would charge another battery.
- May allow for fudging of meeting the requirements for Completed Application (degree to which depends on the maturity requirements associated).

Additional Data

EC-ADD

Additional Info for Completed Application

- History
  - OATT provides a partial solution but seems incomplete.
- Problem Statement
  - It is challenging to foresee all of the information that may be necessary to analyze and study a particular TSR.
- Objective
  - Ensure that BPA has the clear right to require any information to analyze and study all TSRs/FTSRs.

OATT Reference: Sections 17.2(x) and 29.2 (ix)

EC-ADD Alternatives

- EC-ADD-ALT-1: Modify section 17.2(x) and 29.2(ix) to read “Attachment K and other BPA transmission planning processes” (highlighted language is the proposed 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

EC-ADD-ALT-1: OATT Change Proposal

Modify the OATT language to be clear that BPA can require additional needed information to support all of BPA's transmission planning processes.

Pros

- Clearly allows BPA to require information needed for BPA commercial study processes.
- Does not constrain BPA's ability to obtain needed information under circumstances that it did not foresee.

Cons

- May be interpreted as a broadening of BPA's ability to seek information to support commercial transmission planning studies.

EC-ADD-ALT-2: Status Quo (Existing BPA Tariff Language)

Do not modify the OATT language to be clear that BPA can require additional needed information to support all of BPA's transmission planning processes.

Pros

- Clarifies that additional information can be requested to support some planning processes.

Cons

- Does not clearly state that BPA can require information needed for BPA commercial study processes.
- Could constrain BPA's ability to obtain needed information under circumstances that it did not foresee.

MIDCRemote/NWHUB

EC-VHUB

MIDCRemote/NWHUB PORs/PODs in LT Market

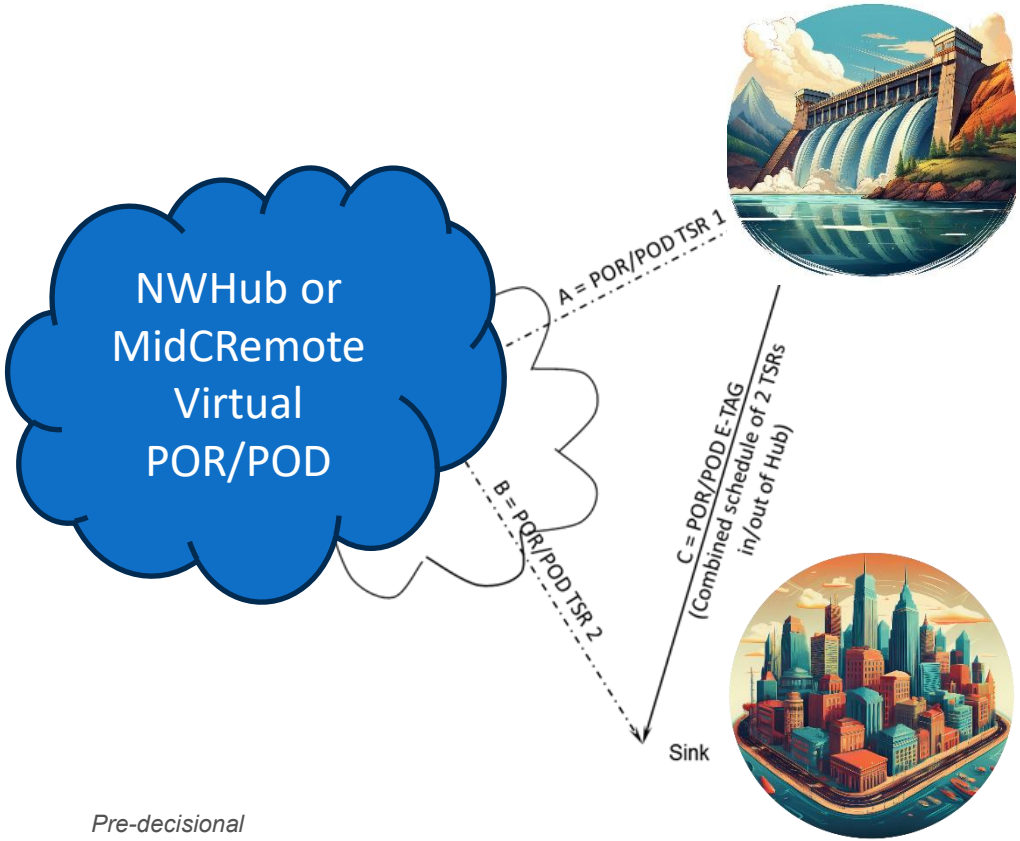
- History
  - This is a long-standing challenge that BPA has tried to address in a variety of ways that have so far not really been satisfactory. Team previously spend about a year trying to define how to address data exhibit validation criteria for these kinds of requests, which resulted in some of the content that is reflected here. Status quo for TSEP 2025 without changes was pretty close to paralyzed.
- Problem
  - Developing plans of service for virtual transactions requires use of assumptions that are unlikely to have high validity.
- Objective
  - Assess whether and how BPA can continue to provide LTF access to flexible virtual transmission in a manner that:
  - Supports customer needs.
  - Ensures that infrastructure expansion is based on sound planning assumptions.
  - Minimizes misdirection of capital investment in the transmission system.
  - Supports fairness in transmission scheduling curtailment priorities between customers who need specific paths and those who seeking path flexibility.

OATT Reference: Sections 17.2 (iii), (iv), (vi); 29.2 (v)

MIDCRemote/NWHUB PORs/PODs in LT Market: Additional Context

- Note 1 – These alternatives do not impact existing reservations and requests with studied plans of service with PORs or PODs of MIDCRemote or NWHUB.
- Note 2 – tried to slightly limit number of alternatives by focusing on leaving NWHUB alternatives and removing MIDCRemote, but could do the reverse as well.
- Note 3 – Due to the history of MIDCRemote, it is presumed to involve other parties' transmission systems; transactions must continue outside of BPA's BAA. However, it appears that at least some customers are trying to use it as a hub.

Virtual Point Issue Visualization



Leg A and Leg B do not reflect the resultant Leg C which is not a studi-able request

As illustrated in this simple example, the bulk of the actual flow is represented by the solid arrow, as opposed to the two dotted paths that comprise the contractual transaction and appear on the reservations and e-tag . As a result, the flows in this example do not necessarily closely resemble the analyzed impacts on which the plans of service development would be based.

EC-VHUB Alternatives

- EC-VHUB-ALT-1-SUB-A: Remove Mid-C Remote Only
- EC-VHUB-ALT-1-SUB-B: Conform to NW Hub
- EC-VHUB-ALT-2: Offer Reassessment Only
- EC-VHUB-ALT-3: Mix of Firm and CF
- EC-VHUB-ALT-4: Remove both from LTF market
- EC-VHUB-ALT-5: Require TSR pairing at NW Hub
- EC-VHUB-ALT-6: Actively Support LTF use of NW Hub
- EC-VHUB-ALT-7: Status Quo

EC-VHUB-ALT-1-SUB-A: Remove Only MIDCRemote from the LTF Market

Remove MIDCRemote from the LTF market, but leave LTF market access to NWHUB (For TSRs currently using this point, see subsequent option).

Pros

- Continue to provide access to NWHUB in the LTF market and continue to develop plans of service for transmission requests that seek POR or POD of NWHUB.
- Clarifies the transmission access that Customers are seeking
- Removes uncertainty about assumptions of impacts to other parties' systems in the MIDC area
- Includes latitude to CONFORM existing unstudied requests to NWHUB, Grand, Chelan, or Douglas per subsequent alternative

Cons

- Involves a change from the status quo
- Requires development of plans of service for transmission system expansion based on assumptions of path use

EC-VHUB-ALT-1-SUB-B: Conform to NW Hub +

This alternative would involve requiring Customers with unstudied TSRs that involve MIDCRemote to modify that POR/POD to NWHUB, or in the case of the POR, NWHUB or Grant, Chelan, or Douglas, depending on the customer's needs.

Pros

- Continue to provide access to NWHUB in the LTF market and continue to develop plans of service for LTF for transmission requests that seek POR or POD of NWHUB.
- Accurately identify transmission needs associated with moving generation that is physically located in the MIDC area to load elsewhere on the system.

Cons

- Involves TSR modification work on the part of BPA and customer staff
- TSRs involving NWHUB continue to require BPA to define relationship to plans of service for transmission system expansion that are not necessarily associated with how the transmission will be used.

EC-VHUB-ALT-2: Offer Reassessment CFS at MIDCRemote and/or NWHUB

For any virtual, flexible point that remains active in the long-term firm market, stop offering 7F or 7FN long-term firm and offer only Reassessment CFS/interim service. Stop developing plans of service to support TSRs/FTSRs that involve virtual points.

Pros

- Continues to allow Customers to obtain long-term reservations for virtual point(s)
- Does not result in defining projects for TSRs that aren't accurate.
- PTP CFS currently qualifies for congestion rents.
- Customers who are seeking specific transmission paths are curtailed later than customers who are seeking flexible, virtual paths.

Cons

- Does not provide a path to firm (7-F or 7-FN) transmission.
- Conditions could change over time for reliability reasons.
- Risk that PTP CFS may not always have access to congestion rents.
- Some regulators may not allow parties to accept reassessment CFS due to lack of bridge to firm service.
- WRAP may not allow use of Reassessment CFS – TBD.

EC-VHUB-ALT-3: Mixed Firm and Reassessment CFS

Provide firm service (including plan of service development) for transmission system requests from NWHUB to load; provide reassessment CFS (no plan of service development) for TSRs/FTSRs from resource to NWHUB.

Pros

- NWHUB to load leg would have a path to firm 7-F or 7-FN.

Cons

- BPA would continue to do some development of plans of service based on assumptions associated with virtual path.
- On the network, tag curtailment is based on the lowest priority tag, so transaction would still be curtailed based on the 6-CF or interim service tag priority.
- Some regulators do not allow parties to accept reassessment CFS due to the lack of a bridge to firm service.
- WRAP may not allow use of Reassessment CFS - TBD.

EC-VHUB-ALT-4: Remove both MIDCRemote and NWHUB from LTF Market Access

Remove LTF market access to MIDCRemote and NWHUB but retain them in the short-term market. BPA would not develop plans of service to support transmission associated with virtual points, nor would CFS/interim service be available to/from them.

Pros

- Allows BPA to stop defining plans of service to support system expansion for flexible, virtual transactions.
- Short-term market remains available to support flexible, virtual transactions.

Cons

- Would remove ability for Customers to obtain long-term firm transmission to support flexible, virtual transactions.
- Would only provide PTP customers access to congestion rents to the degree that they could obtain short-term firm transmission.
- BPA would need to define how to treat existing request for LTF with POR or POD at either MIDCRemote or NWHUB.

EC-VHUB-ALT-5: Require Paired TSR Requirement

At one time, BPA required the customer to specify the additional TSR for the other leg of a NWHUB transaction. Subsequent use of that pair was not required. BPA could return that a requirement.

Pros

- Customer pairing would define assumption for the full path.
- Continued PTP access to congestion rent.

Cons

- No requirement that the specified pair would actually be used for scheduling.
- Does not provide sound assumptions for system planning.
- Essentially defeats purpose of virtual point
- Customers may be incented to cite a path that has less congestion than path(s) that they actually want.

EC-VHUB-ALT-6: Actively Support LTF Use of NWHUB

- Recognize that many customers who are seeking long-term firm don't know what paths they are going to use and provide other; focus efforts on identifying other inputs to define plans of service for these TSRs/FTSRs and continue to offer firm service for them
- ALL* main grid projects from that study cycle will be applied to the plan of service development in addition to any sub-grid plan of service associated with the physical POR or POD.

*BPA study process may be able to determine that certain main grid projects would not be required in certain instances.

Pros

- Provides Customers continued flexibility to seek firm service for NWHUB transactions.
- Creates opportunity/obligation for customers seeking transmission to/from the HUB per BPA's business model.
- Customers who don't support development of the projects for the plan of service could use reassessment conditional firm service (but may require participation in subgrid project to obtain reassessment CFS).

Cons

- Requires BPA to define plans of service for virtual requests – makes that POS definition very broad.
- Requires BPA to encumber firm capacity for virtual requests (during planning and after award of service) – encumbrance of firm may need to occur on all main grid paths; need to define how much capacity on each path – challenging.
- Does not increase quality of information on which BPA is planning transmission system expansion
- May be uncomfortable to continue to provide path to firm service for virtual path.
- No clarity on amount of capacity to encumber on a specific path.

EC-VHUB-ALT-7: Status Quo

- BPA provides access to MIDCRemote and NWHUB and endeavors to plan system expansion for associated requests based on assumptions.
- Substantial uncertainty regarding assumptions.
- Substantial uncertainty regarding Data Exhibit validation.

Pros

- Continues past practice.
- Minimizes Customer need to adapt to any changes.
- Allows access to congestion rents for these firm reservations for PTP customers.
- Provides same level of curtailment risk for customers with defined path v. customers seeking path flexibility.

Cons

- Substantial uncertainty regarding request validity.
- Substantial uncertainty regarding planning assumptions for system expansion.
- Risk of building both too much and/or not enough physical system capability.
- Only provides access for PTP customers to congestion rents for tag priority 6 transactions.
- Would require a lot of staff time to try to define ways to work with the uncertainty.

Delivering/Receiving Party Validation

EC-PV

Delivering/Receiving Party Validation

- History
  - BPA accepts this information at face value; only requires that the sending/receiving party be located at the POR/POD.
- Problems
  - In some instances, OATT-required information supplied regarding Sending and Receiving party appears to be incorrect.
  - Leaving TSRs in the queue that are not selected in regional acquisition processes continue to encumber capacity that could be used by other mature and/or eligible requests.
- Objectives
  - Increase veracity of information regarding sending and receiving party.
  - Increase ability to discern/end requests that will not come to fruition.
  - Provide reasonable support for optimizing economic transactions.
  - Ensure that sending and receiving party are both aware of the potential transaction.
  - Minimize transmission speculation.

Tariff Reference: Sections 17.2 (iii) & 29.2 (v)

Delivering/Receiving Party Alternatives

- EC-PV-ALT-1: Require confirmation of Delivering/Receiving Party; if not remove from queue
- EC-PV-ALT-2: Utilize contingent validation; remove from queue if deal not executed
- EC-PV-ALT-3: If unable to provide required bilateral demonstration, provide only Reassessment CFS or Interim Service
- EC-PV-ALT-4: Allow financial demonstration in lieu of required bilateral demonstration; if not provided remove from queue
- EC-PV-ALT-5: Require FERC marketer registration if no bilateral demonstration; if not remove from queue
- EC-PV-ALT-6: Short-term market only if bilateral demonstration unavailable; remove from (LTF) queue
- EC-PV-ALT-7: Only Offer Up to 4 years, 11 months
- EC-PV-ALT-8: Use points system for validation
- EC-PV-ALT-9: Contingent Validation with Financial Option to Retain TSR
- EC-PV-ALT-10: Allow a Dispute Mechanism – Only request verification when another party suggests that the information was incorrectly supplied
- EC-PV-ALT-11: Status Quo, take information at face value without any further validation or confirmation

EC-PV-ALT-1: Require Confirmation of Delivering/Receiving Party Information

For a TSR to be eligible for study, require either Executed Term Sheet, Documentation of Active Negotiation (i.e., attestation from both parties of negotiation), or Executed Contract or (preferably) attestation thereof.

Pros

- Significant improvement in quality of TSRs in the transmission planning process.
- Somewhat parallel to information required in the generation interconnection process.
- Allows for (and prefers) attestation from the parties over provision of contract information for BPA to interpret.
- Allows for documentation of active negotiation
- Decreases speculation in the transmission request queue.
- Does not put BPA in the position of mediating disputes between parties.

Cons

- May be a fairly high bar for customers to meet.
- Does not provide for steps to be taken if the active negotiation does not come to fruition.
- Does not provide mechanism for marketer business model to obtain additional long-term firm transmission.

EC-PV-ALT-2: Utilize Contingent Validation

BPA would allow/utilize “contingent” validation of Delivering/Receiving Party information for parties who are in active negotiation, but if the deal did not conclude successfully, the TSR/FTSR would not remain valid and the party would be obligated to withdraw it from the queue

Pros

- Continues to allow regional parties to require a transmission story in their RFP/negotiation processes.
- Provides useful assessment of CFS/interim service capability for use in RFP/negotiation processes.
- Allows BPA to remove TSRs that are not associated with a winning RFP/negotiation processes from the queue, thereby managing the queue and providing more valid information for subsequent studies.
- With some time lag, allows existing CFS/firm capacity to be encumbered ONLY by parties who have a need for it, mitigating false contractual constraints of scarce transmission system capability.
- Does not solve the marketer model need for transmission access (since they typically don’t have a buyer on the other end of the transmission request) – that problem still needs to be addressed in a different way.
- Removes ability of FTSRs/TSRs that aren’t elected in an RFP/negotiation to continue to define assumptions in planning studies, thereby limiting BPA’s ability to provide CFS to parties who could use it and “filling up” capacity on defined projects by parties who may never use it – thereby making that capacity available to parties who will use it.
- Provides some limitations on customers’ ability to speculate on transmission.

Cons

- Not the way that BPA traditionally has done business.
- Continues to allow regional parties to require a transmission story in their RFP/bid processes.
- Requires tracking and future communication with parties who have a “contingent” Data Exhibit validation in place to be informed of outcome and ensure TSRs/FTSRs are processed accordingly.
- Lower level of increase in quality of information to support transmission system expansion planning.

EC-PV-ALT-3: Only Provide Reassessment CFS/Interim Service

For TSRs that cannot provide demonstration of bilateral intent of the delivering/receiving party, provide access to Reassessment CFS/interim service, but do not develop plans of service to enable to TSR to bridge to firm service.

Pros

- Allows BPA to avoid driving transmission expansion project definition based on TSRs that are sought to enable flexible transmission rather than for the path being requested.
- Continues to allow marketers with access to long-term firm transmission.
- Currently would allow marketers with access to congestion rents.

Cons

- Does not provide marketers with a path to firm (7-F) service.
- Access to congestion rents could be lost if CFS lost access to congestion rents.
- Increases the amount of reassessment studies.
- Cannot overcome sub-grid issues without necessary sub-grid plan of service.

EC-PV-ALT-4: Allow Financial Demonstration in Lieu of Bilateral Demonstration

Allow Party to provide a financial commitment to the service (1 – 2 years revenue?). When a contract is subsequently offered, if customer doesn't execute the contract, BPA would retain the financial assurance funding.

Pros

- Provides a means for marketers' TSRs/FTSR to be validly submitted.
- May increase the probability of TSRs being executed.
- Provides additional hurdle to transmission speculation.
- Simple to ascertain whether the financial demonstration has been provided.

Cons

- Does not provide information to support quality analysis and study for transmission system expansion.
- Must be tracked/administered.

EC-PV-ALT-5: Require FERC Marketer Registration if no Bilateral Demonstration

For TSR submitter who is unable to provide demonstration of bilateral intent of the delivering and receiving party, require demonstration that they are registered with FERC as a Marketer.

Pros

- Might provide some level of limitation on parties that could submit requests without a bilateral demonstration of intent
- Would allow parties who are marketers to continue to seek long-term firm transmission from BPA, including initiating plan of service encumbrance and development for paths that the marketers believe have value for them.

Cons

- Does not provide an indication of a transaction that is expected to occur.
- May provide weak or incorrect signals about what transmission expansion is needed.
- Not consistent with OATT requirements.
- Does not support increasing quality of TSR information for planning expansion of the transmission system.

EC-PV-ALT-6: Short-Term Market If Delivering/Receiving Party Demonstration Unavailable

For TSR submitter who is unable to provide demonstration of bilateral intent of the delivering and receiving party, long-term firm service would not be available. Acquisition of transmission for these transactions would be enabled only in the short-term market.

Pros

- Simple to administer
- Does not require BPA to assign plans of service to requests that sending/receiving party do not both confirm.
- Minimizes ability to speculate on transmission.
- Marketers could continue to provide input to proactive planning which my indirectly improve access to short-term service.
- Places focus of transmission expansion and long-term access on long-term service from generation to load.

Cons

- Removes ability for parties using marketer business model to acquire LTF transmission to support flexibility use of the transmission system through redirects.
- Minimizes ability to speculate on transmission.

EC-PV-ALT-7: Only Offer up to 4 Years, 11 Months

For TSR submitter who is unable to provide demonstration of bilateral intent of the delivering and receiving party, offer no more than 4 years, 11 months of service – no Reservation Priority (ROFR) would be available. Note that BPA typically has been unable to provide plans of service to enable requests without ROFR.

Pros

- Would enable BPA to constrain unlimited transmission commitment for use of parties who cannot demonstrate ability to define both the sending and receiving party for the requested transaction.
- BPA typically does not provide plans of service for TSRs that do not have rollover rights, so would not need to develop plans of service for expansion.

Cons

- Does not provide information to support quality analysis and study for transmission system expansion.
- Does not provide marketers with access to long-term firm service with rollover rights.

EC-PV-ALT-8: Use Points System for Validation

For all LTF TSRs, develop a points system to assess the validity of the data provided. Define a cut-off point for which TSRs would be valid, and below which the TSRs would not be valid for access to LTF and inclusion in transmission studies.

Pros

- Could provide an opportunity for marketers to demonstrate quality of their request to enable validation for development of plan of service for 7-F.
- Allows consideration of a breadth of information to determine validity to try to improve quality of information for expansion of the transmission system.

Cons

- Complicated.
- May not provide increased substantially increased quality of information for planning transmission system expansion.
- May have some element of arbitrariness associated with it.
- Requires BPA to exercise judgement/discretion regarding the information.
- May be unclear to customers.

EC-PV-ALT-9: Contingent Validation with Financial Option to Retain TSR

Under the Contingent Validation approach, if submitted TSR/FTSR was not associated with a successful negotiation, customer could provide financial demonstration of commitment to the TSR to allow the TSR/FTSR to maintain queue position. If Reassessment CFS was adopted, would be for Reassessment CFS.

Pros

- For TSR/FTSR endeavoring to deliver from a resource to a load, would retain initial requirement to demonstrate sending/receiving party agreement without financial commitment.
- Markets could enter queue via financial commitment.
- Party endeavoring to deliver to a particular load could retain TSR via making financial commitment (additional flexibility).

Cons

- Would need to track financial commitment needs and funds.
- Lower level of increase in quality of information to support transmission system expansion planning.

EC-PV-ALT-10: Adopt Dispute Mechanism

Do not require increased validation of delivering/receiving party information. If a relevant party complains that the information is invalid, address the situation at that time, with the potential for the TSR to be found invalid and need to be removed from the queue, regardless of its status in the process (unless a contract had been executed).

Pros

- Little needs to be done during the data exhibit validation process other than to verify that the sending/receiving party are reasonably mapped to the POR/POD.
- Customers don't need to supply additional information beyond that previously supplied for data exhibits (i.e., fill in the blank).
- Potentially more supportive of marketer model of transmission acquisition.
- Provides a mechanism for generation owner/load serving entity to disagree that a TSR/FTSR requestor is the sending/receiving party.

Cons

- Does not substantially improve the quality of planning information.
- A TSR could be well into the planning process before a dispute is brought by another party.
- The submitting party could have spend funds towards study/PEA/ESA and depending on business model, security prior to identification of an issue.
- Having BPA mediate disputes between customers may be unappealing.
- Does not limit ability for TSR/FTSR requestors to cite another party's resource without their knowledge.
- Does not ascertain whether both sending and receiving party is aware of the request.

EC-PV-ALT-11: Status Quo - Take Information at Face Value

Do not increase requirements for delivering/receiving party information.

Pros

- Simpler data exhibit validation.

Cons

- TSRs/FTSRs that.
- Parties whose generation/load are referenced in TSRs/FTSRs may be unaware of the service request.
- Does not meet objectives for this validation.

Party Validation Alternatives Matrix

Alternative	Additional Data or Validation Required	Financial Requirements	No LTF or ROFR	Alternative Pairing
EC-PV-ALT-1: Bilateral confirmation	X	If Alt 4 pair		Alt 3, 4, 5 or 6
EC-PV-ALT-2: Contingent validation	X	If Alt 4 pair		Alt 3, 4, 5 or 6
EC-PV-ALT-3: Reassessment CFS	X			Alt 1 or 2 and Alt 5
EC-PV-ALT-4: Financial demonstration in lieu	X	X		Alt 1 or 2
EC-PV-ALT-5: Marketer registration	X			Alt 1 or 2 and Alt 3 or 4
EC-PV-ALT-6: No LTF/ST only	X		X	Alt 1 or 2
EC-PV-ALT-7: No ROFR (4 years, 11 mo)			X	N/A
EC-PV-ALT-8: Point system	X	X	X	TBD
EC-PV-ALT-9: Contingent Validation / Financial Option	X	X		Alt 2 and 4
EC-PV-ALT-10: Dispute Mechanism Only	X			N/A
EC-PV-ALT-11: Status Quo	X			N/A

Minimum Capitalization

EC-MCAP

Minimum Capitalization

- Problem
  - Modes cost to submit unlimited transmission service requests, potentially allow parties to substantially impact BPA's transmission planning process (BPA's creditworthiness standards are only relevant to upcoming receivables) without regard to the parties' financial strength or capitalization. These minimum requirements do not support transmission planning integrity/stability well.
- Objectives
  - Ensure that requestors in BPA's transmission queue have financial strength to be sound partners to drive development of expansion projects and to encumber transmission capacity on both the existing system and projects under development by BPA.
  - Reduce ratepayer risk.
  - Reduce risk of transmission project identification/development that won't have follow-through.

Minimum Capitalization Applicability

- The following customer types would be exempt:
  - A load serving entity with a specified service territory and ability to raise its rates.
  - An entity with investment grade credit rating of BBB- or better.
  - An entity with a parental guarantee that has an investment grade credit rating of BBB- or better.

Minimum Capitalization Parameters

- Audited financial statements would be required.
- TSR MW will be aggregated for all MW requested in study status for each entity.
- Customer could use either Tangible Net Worth or Assets to make demonstration.
- Tangible Net Worth or Assets would be based on entity (Eligible Customer) submitting the TSR.

EC-MCAP Alternatives

- EC-MCAP-ALT-1: Minimum capitalization requirement scaled based on level of transmission service request activity in study.
- EC-MCAP-ALT-2: Flat minimum capitalization requirement regardless of level of transmission service request activity in study.
- EC-MCAP-ALT-3: Status Quo – do not have a minimum capitalization requirement.

EC-MCAP-ALT-1: Scaled Minimum Capitalization Draft

Develop a scaled requirement for minimum capitalization level associated with different levels of TSR MW submittals for all TSRs that require study/plan of service development.

Pros

- Allows BPA to adopt a standard for financial strength of Customers who are influencing BPA's transmission planning processes.
- Similar to standards adopted by CAISO and PJM (possibly other large entities in the industry).
- Allows BPA to consider the financial strength of TSRs associated with a project when developing the relevant business case.
- May be viewed positively by some customer groups
- Could help mitigate risk of further circumstances that drove PTSA reform.
- Could help mitigate somewhat unrestrained enthusiasm for substantially speculating on BPA's transmission system.
- Reflects the degree to which the service a Customer is seeking will impact BPA's transmission planning processes.

Cons

- Likely to be unpopular with Customers with lower levels of financial strength.

EC-MCAP-ALT-1: Scaled Minimum Capitalization Table

Peak Level of Long-Term Firm Transmission Request Activity Requiring Transmission System Expansion (inc. Bridge CFS) and Not Yet in Confirmed State	**Capitalization Eligibility Requirement** (to be demonstrated annually based on audited financial statements)
Up to 100 MW	Tangible Net Worth of $5M or Assets of $10M
100 MW up to 300 MW	Tangible Net Worth of $50M or Assets of $100M
300 MW up to 1,000 MW	Tangible Net Worth of $100M or Assets of $200M
1,000 MW or more	Tangible Net Worth of $500M or Assets of $1 billion

Note: TSR MW calculated based on adding all MW for TSRs in study status (including previously studied); DECLINES applied only to those not yet studied. Thinking evaluation would be at point of submittal or after initial evaluation determines study required, but if offered would make room for additional TSRs.

If customer dropped into lower net worth or asset category in a subsequent year, customer could choose to withdraw TSRs to drop within limit but if they did not, BPA would decline TSR(s) of BPA's choice.

EC-MCAP-ALT-2: Flat Minimum Capitalization Requirement

Define a flat requirement for minimum capitalization requirement. A customer who meets that requirement has no limitation on the amount of MW of TSRs that they can have in study/plan of service development.

Pros

- Allows BPA to adopt a standard for financial strength of Customers who are influencing BPA's transmission planning processes.
- Similar to standards adopted by CAISO and PJM (possibly other large entities in the industry).
- Allows BPA to consider the financial strength of TSRs associated with a project when developing the relevant business case.
- May be viewed positively by some customer groups
- Could help mitigate risk of further circumstances that drove PTSA reform.
- Could help mitigate somewhat unrestrained enthusiasm for substantially speculating on BPA's transmission system.

Cons

- Likely to be unpopular with Customers with lower levels of financial strength.
- Does not reflect the degree to which the service a Customer is seeking will impact BPA's transmission planning processes.

EC-MCAP-ALT-3: Status Quo – No Min Cap Requirement

Do not add a requirement for customers seeking long-term firm service that requires transmission system expansion to demonstrate any level of minimum capitalization.

Pros

- Familiar to regional stakeholders.
- Does not require any change in financial requirements to have a TSR in study status
- Customer satisfaction.

Cons

- Allows Customers with lower financial strength to influence BPA's transmission planning processes on par with Customers who are financially strong.
- Depending on the subsequent business model, it may continue to require BPA to make project-related decisions without a sense of the validity of revenue assumptions associated with supporting TSRs.
- May leave BPA's planning modeling with significant uncertainties regarding assumptions used.

Interim Service (IS)

Interim Service (IS) Scope

- Interim Service option will explore possibilities that may allow long-term service offers for transmission requests during planning reform work.
  - BPA is seeking to provide Interim Service capacity to parties who would be ready and able to use that service within 3 years. (Seeking feedback on timeline).
- Interim Service focuses on:
  - Unstudied requests
  - Future requests
  - Previously studied requests seeking Conditional Firm Service (CFS) reconsideration
- Note: There are possible Reassessment only options being discussed as alternatives in the Evaluation Criteria.
  - Service with POR/POD of NWH or MIDCREMOTE are being discussed separately.
  - Service to parties who are unable to provide confirmation of sending receiving party are being discussed separately.

IS Decision Criteria

- Can the alternative enable some long-term firm service offers?
- Is the alternative *pro forma* or does it meet BPA's criteria for a deviation?
- Can the alternative be used to bridge BPA to proactive planning?
- Can the alternative be used to *bridge the customer to Long-Term Firm Service*?
- Can the alternative be implemented?

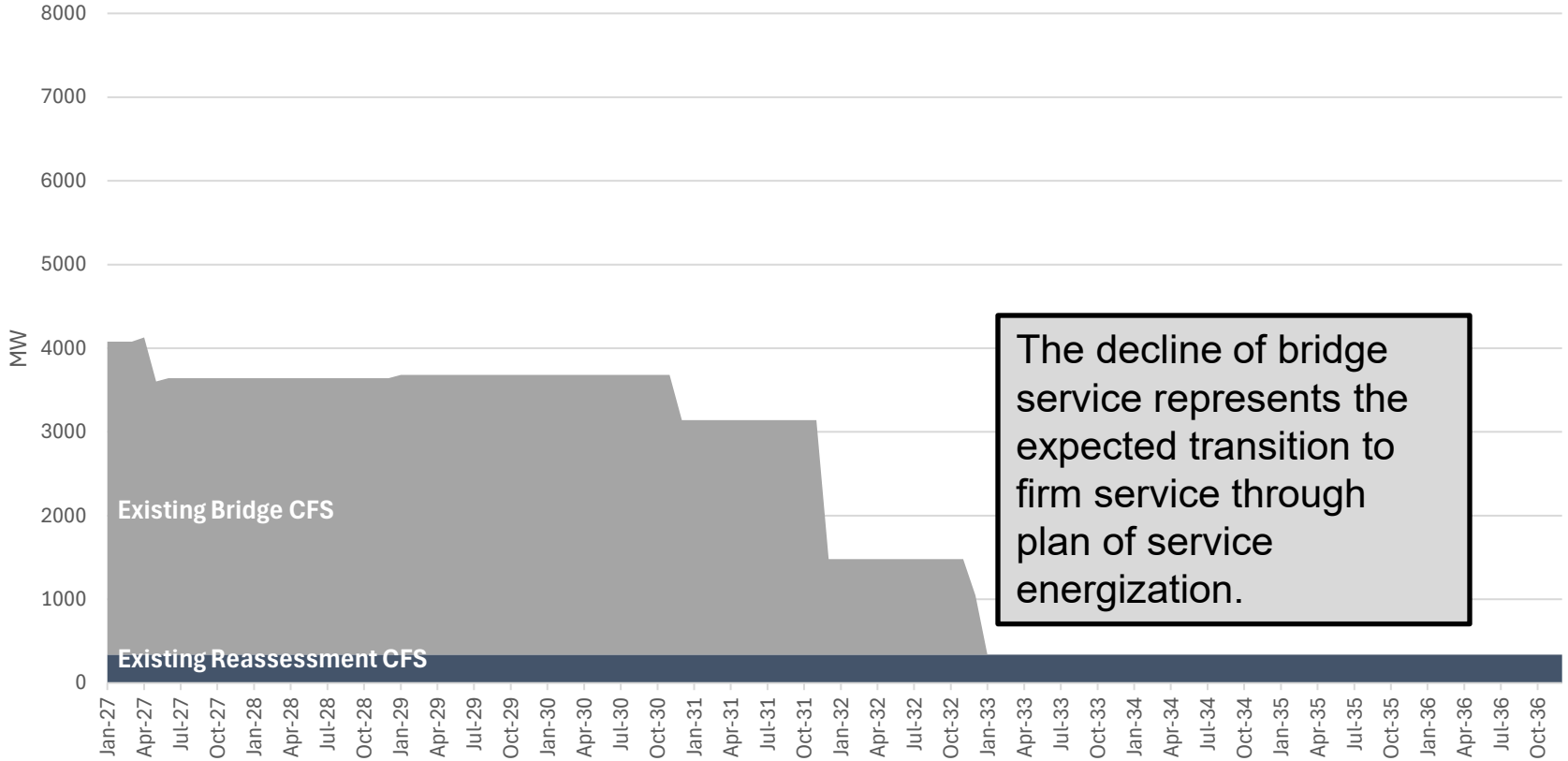
Offering Interim Service

- All offers are reviewed and must be approved by an internal team comprised of transmission long-term planning engineers, operations, and sales called the Commercial Technical Panel (CTP).
- Subject matter experts provide support and analysis as needed to facilitate discussion.
- *System reliability is always a consideration when determining service offers*.

Markets+ and Congestion Rent

- Congestion rent or revenue occurs in the organized market when more expensive generation must be dispatched to meet load demand. The price separation results in a financial overcollection that must be distributed by the Market Operator (MO).
- Under the current Markets+ protocols and tariff Firm PTP and NITS, Conditional Firm PTP, and legacy rights that span monthly or longer (and are not opted out of the market) are eligible for congestion rent.
- 6-NN is not directly eligible for congestion rents because it does not have a designated network resource (DNR) that can be mapped to the load for the MO to verify a congestion rent eligible (F)TSR. In the future the NITs on OASIS will be heavily used by the markets to pull data and confirm congestion rent eligibility.
- The Congestion Rent Task Force, a public stakeholder group in Markets+, is ultimately responsible for any future modifications to the design and determining which products are eligible for congestion rent. BPA and other funding entities in Markets+ have voting roles and can bring forward issues, but any changes to the design must be proposed and approved by the stakeholder group.
  - The inclusion of CF PTP in the congestion rent eligibility was identified as an aspect of the design that the task force would monitor and review to determine if it should continue to be eligible.
  - CF NT was not part of the discussions surrounding congestion rent eligibility.

CFS Demand Over Time Integrating Estimated Energization Date



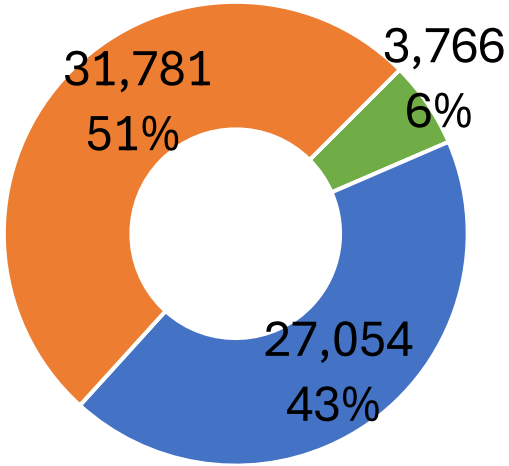
The decline of bridge service represents the expected transition to firm service through plan of service energization.

Volume Expectations for Offers

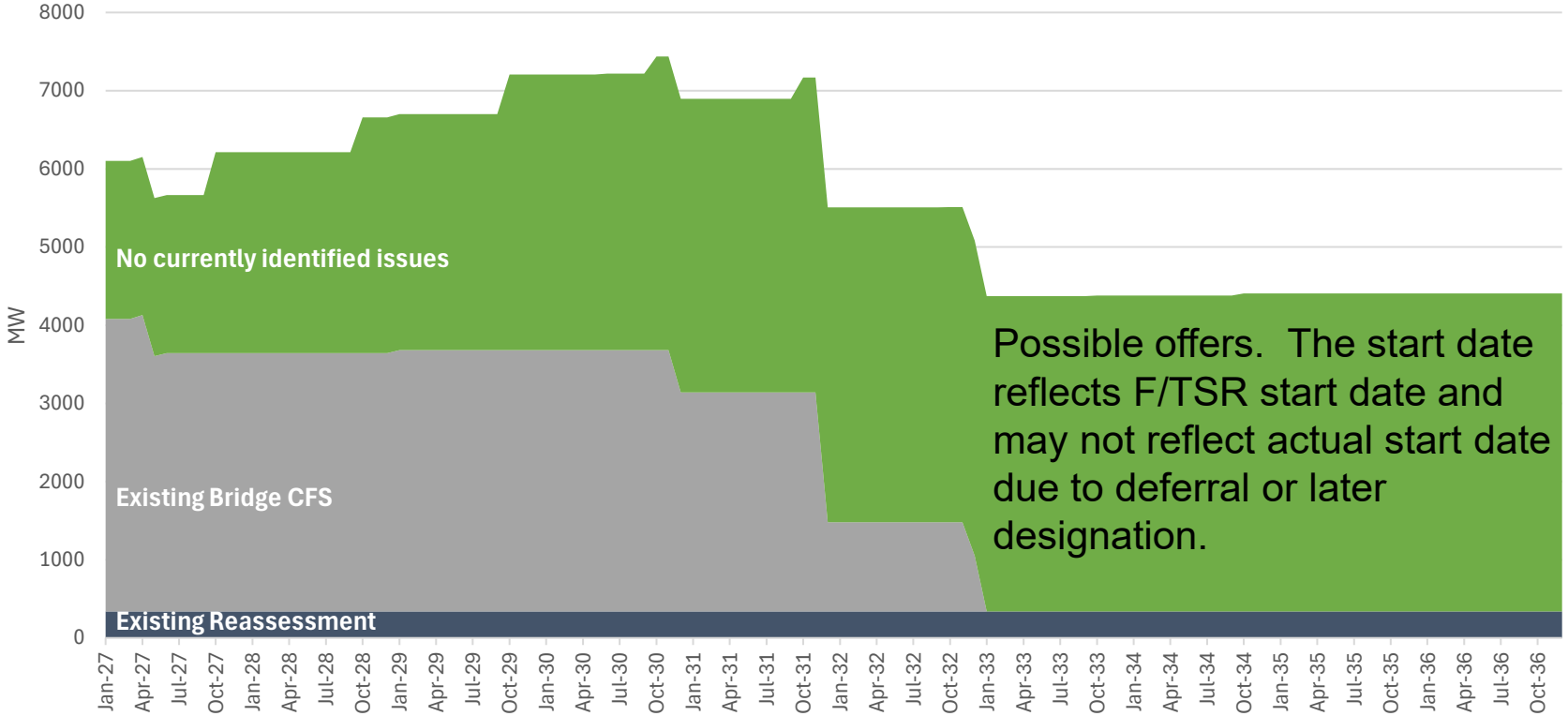
(Analysis focused on 2025 Eligible (F)TSRs)

- There are 62,664 GW in the long-term pending queue.
  - *3,766 MW have no currently identified subgrid constraints or other issues*
    - *Note that some of these are FTSRs, which are only scheduled after the Customer designates the resource*
  - *27,054 MW would require additional work to find possible CFS management path*
    - *(F)TSRs with subgrid constraints will be further reviewed by the CFS Study team to see if there is a path that could reliably manage the constraint*
    - *BPA does not expect all of these will be offerable.*
  - *31,844 MW is not currently eligible for CFS*
- Analysis is on current 2025 queue and does not take into account other policy being explored as part of this TC-27 process.

CFS in Current Unstudied Queue: No issues currently identified, Areas that can be explored further, and Currently ineligible for CFS



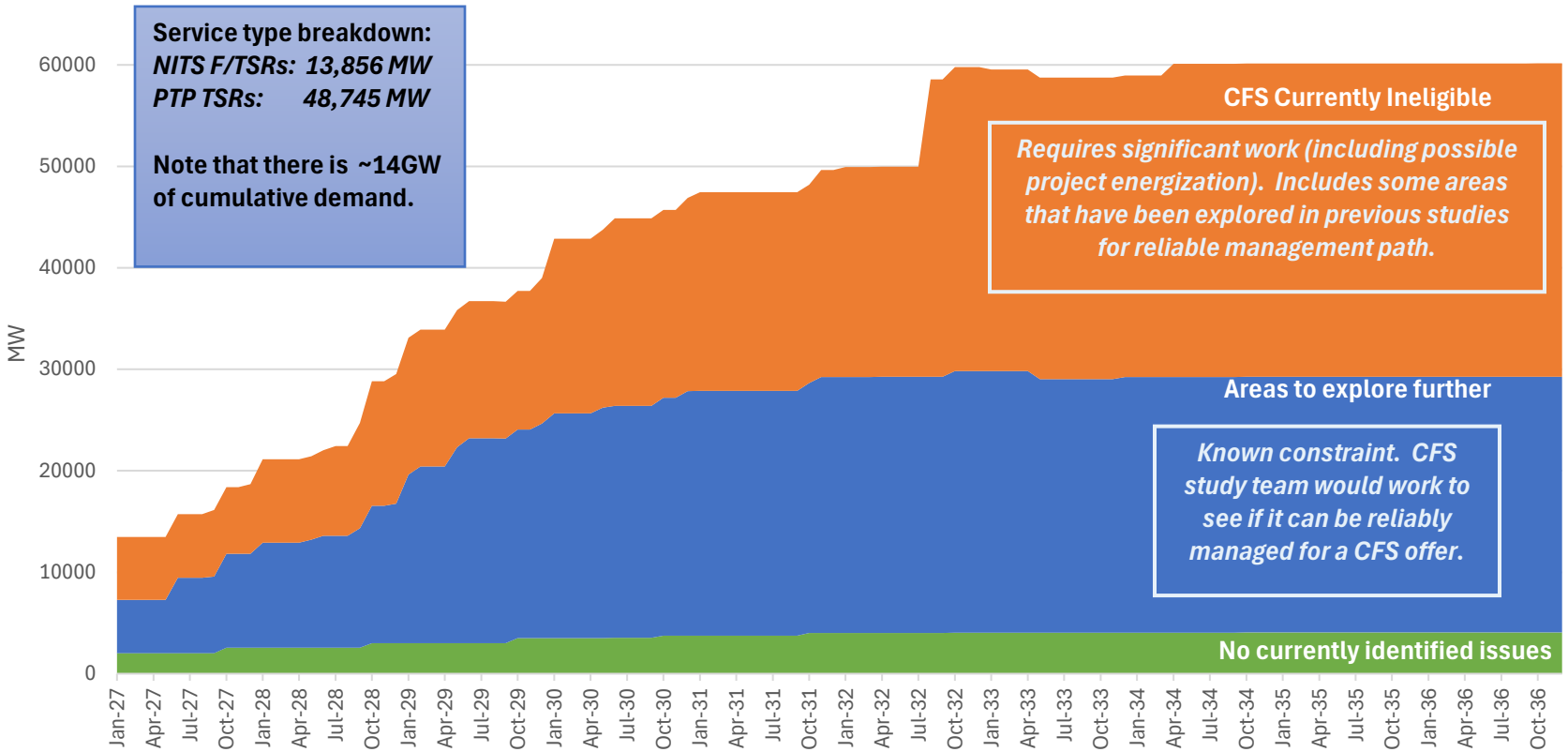
CFS Demand Over Time Integrating Estimated Energization Date and Potential New CFS Offers



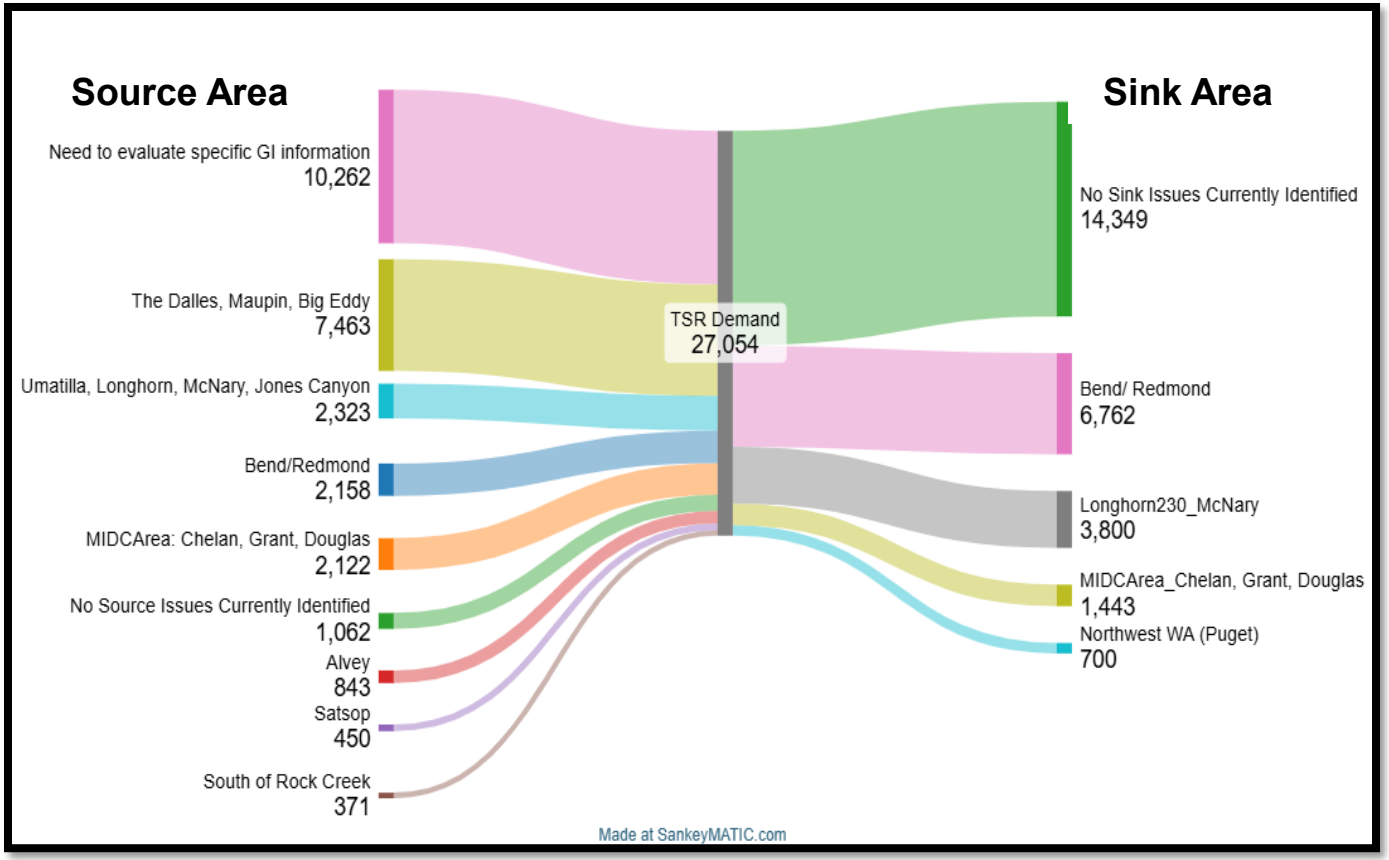
2025 Eligible Queue Analysis

- The following analysis is a high-level view of the 2025 Eligible TSRs.
- The analysis mostly uses known subgrid areas to create high-level buckets of potential offer volume.
- The analysis provides high-level indication of areas that an internal team would need to further work to see if constraint can be managed or overcome.
- This is *not* a substitution for individual TSR review by internal teams.

Long-Term Pending Queue Breakdown of 2025 Study Window F/TSRs

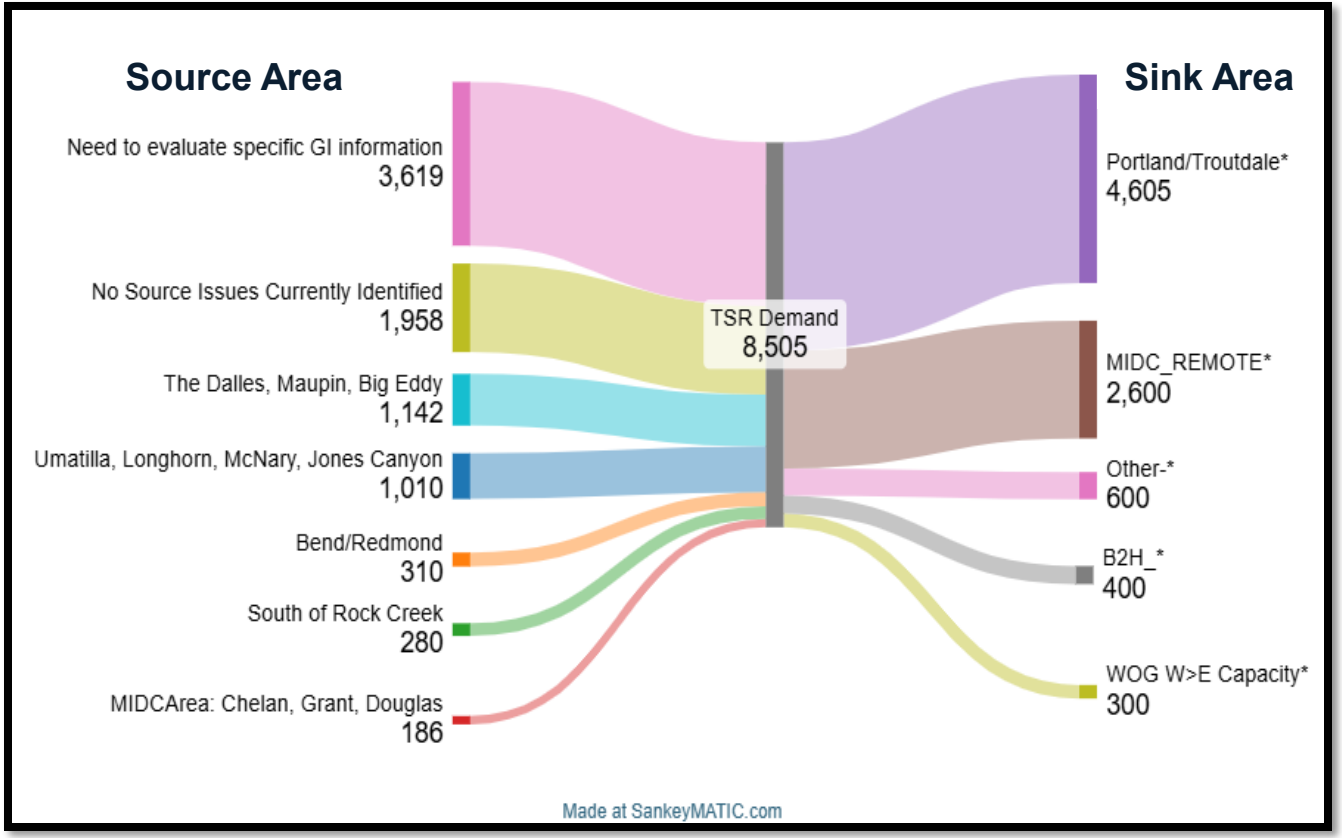


Areas Requiring Additional Analysis to see if CFS Offer is Possible



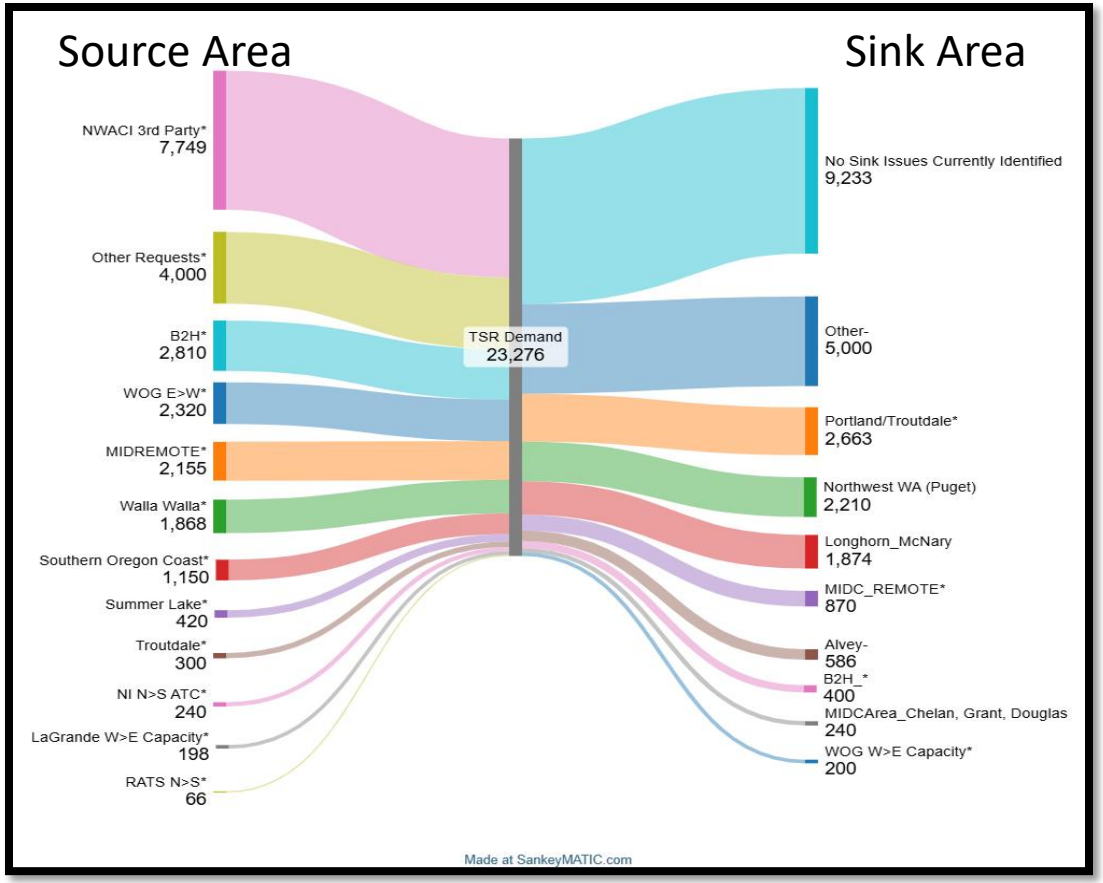
Not Currently Eligible for CFS

- 8,505MW/31844MW
- **Asterix indicates ineligible area.**
- MIDCREMOTE requests may be updated in future, depending on final policy, which could potentially make the requests eligible.



Not Currently Eligible for CFS

- 23,339MW/31,844MW
- ***Asterix indicates ineligible area.***
- MIDCREMOTE requests may be updated in future, depending on final policy, which could potentially make the requests eligible.



Interim Service | Decisions

- IS-POPT (D11): Product Options
- IS-MV (D12): Mandatory-Voluntary
- IS-CT (D13): Curtailment Type

Product Options

IS-POPT (D11)

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IS-POPT Alternatives (ALT)

ALT Code	Description		
IS-POPT-ALT-1	Seasonal Firm NITS		
IS-POPT-ALT-2	Long Term 6-NN		
IS-POPT-ALT-3	NITS LT 6-NN and PTP LT Priority 5 Non-Firm Service		
IS-POPT-ALT-4	CFS - PTP vs NITS	***IS-POPT-ALT-4-SUB-A***	PTP CFS
		IS-POPT-ALT-4-SUB-B	NITS CFS
IS-POPT-ALT-5	CF on the BPA Network	***IS-POPT-ALT-5-SUB-A***	for Ready PTP TSRs
		IS-POPT-ALT-5-SUB-B	for Ready NITS F/TSRs
IS-POPT-ALT-6	Planning Redispatch		
IS-POPT-ALT-7	Firming up 6-NN in ST		

IS-POPT-ALT-1: Seasonal Firm NITS

- Offer NITS firm service when available for one or more seasons.
  - Service may be offered for at least two years unless the pending (F)TSR has less than 24 months left in duration.
- The product would provide a bridge to firm service for offers with RoFR and require a placeholder in the long-term pending queue.
- Applicable to FTSR and TSR awards.

IS-POPT-ALT-1: Seasonal Firm NITS

Peaking Seasons from 2023 Cluster Study

- Key: Dark brown represents the seasons in which the 2023 commercial power flow studies resulted in flows exceeding the path's commercial TTC. Some paths have multiple TTCs, depending on the season. For paths where the 2023 study didn't show any TTC exceedances, a tan cell represents the season resulting in the highest flows.

- Note: Results are based on scenarios developed to study the overall worst-case condition for each path. Not every path was stressed in every season.

	Winter	Spring	Summer
South of Allston N>S			X
Cross Cascades North E>W	X		
West of Lomo E>W	X		
Cross Cascades South E>W	X	X	X
North of Grizzly N>S			X
North of Pearl S>N	X	X	X
North of Hanford N>S			X
Raver-Paul N>S			X
West of McNary E>W	X		
West of Slatt E>W	X		
West of John Day E>W			X
South of Custer N>S	X	X	X
West of Hatwai E>W		X	
North of Echo Lake S>N	X	X	

IS-POPT-ALT-1: Seasonal Firm NITS

Pros

- *Pro forma.*
- Offers bridge to firm service.

Cons

- Option does not manage subgrid constraints, which can impact ability to make offers.
- Firm may not be available for even one season, depending on the impacted constraint(s).
- Implementation set up may take around a year.

IS-POPT-ALT-1: Seasonal Firm NITS

- Implementation:
  - Pending placeholder would be created as a bridging vehicle to firm service.
  - LT Planning would need to design methodology, which could take 8-10 months.
  - Case setup may take 3-4 times as long as Needs Assessment.
  - Would require updates to NITS Forecast communication, since awards would be seasonal rather than the current Fiscal Year set up.

IS-POPT-ALT-2: Long Term 6-NN

- Allow NITS customers to request long-term 6-NN TSRs as a bridge to firm service.
  - Provides service option while awaiting firm plan of service.
  - TSR would reference pending firm TSR or FTSR in long-term pending queue.

(Note: 6-NN is a different product than CFS at priority 6)

IS-POPT-ALT-2: Long Term 6-NN

Pros

- Provides a long-term service option while customer awaits long-term firm service

Cons

- Option does not manage subgrid constraints, which can impact ability to make offers
- Requires extra lead time to implement as there is not a current method of assessment and award for non-firm in the long-term horizon.
- Deviates from pro-forma as 6-NN is a short-term product and not a long-term product.
- Deviates from FERC Order 890 P1606 and 890-A notes that secondary service is on an “as available” basis and, therefore, network customers should not be allowed to lock in such service in advance of other non-firm uses of available transmission.

IS-POPT-ALT-2: Long Term 6-NN

- Implementation
  - Would need to address *pro forma* deviation.
  - Need to determine a methodology to assess and award 6-NN in the long-term market.
  - Product update in OASIS.
  - Need to create automation in Long-Term Management Tool to manage service requests.

IS-POPT-ALT-3: LT 6-NN and PTP LT Priority 5 Service

- Allow NITS customers to request long-term 6-NN TSRs as a bridge to firm service.
- Allow PTP customers to request long-term priority 5 non-firm TSRs.

IS-POPT-ALT-3: LT 6-NN and PTP LT Priority 5 Service

Pros

- Provides a long-term service option while customer awaits long-term firm service.
- Allows both NT and PTP access to a long-term non-firm product.

Cons

- Option does not manage subgrid constraints, which can impact ability to make offers
- Deviates from *pro forma* as both products are short-term products and not long-term products
- Requires extra lead time to implement as there is not a current method of assessment and award for non-firm in the long-term horizon

IS-POPT-ALT-3: LT 6-NN and PTP LT Priority 5 Service

- Implementation:
  - Would need to address *pro forma* deviation.
  - Need to determine a methodology to assess and award LT 6-NN and LT 5 PTP NF in the long-term market.
  - Product update in OASIS.
  - Need to create automation in Long-Term. Management Tool to manage service requests.

IS-PO-ALT-4-SUB-A: PTP Conditional Firm Service*

- Provide the opportunity for customers to receive early access for a CFS offer.
  - Requests eligible for RoFR would be offered bridge service with RoFR, provided conditions could be managed.
  - Requests not eligible for RoFR would be offered reassessment service, provided conditions could be managed.
- Determine whether CFS offer is mandatory for early access, mandatory with a plan of service or not mandatory.
- Determine scope of Systems Conditions and/or X% Number of Hours (8760 hrs/yr)
- Service into/out of NWHub or MIDCREMOTE would be subject to data requirements under the evaluation criteria for market hubs (EC-2).
- Consider whether to allow option for bridge termination with or without movement to reassessment service should the plan of service be determined to include a project at an incremental rate.

IS-POPT-ALT-4-SUB-B: NITS Conditional Firm Service*

- Provide the opportunity for customers to receive early access for a CFS offer.
  - Requests eligible for RoFR would be offered bridge service with RoFR, provided conditions could be managed.
  - Requests not eligible for RoFR would be offered reassessment service, provided conditions could be managed.
- Determine whether CFS offer is mandatory for early access, mandatory with a plan of service or not mandatory.
- Determine scope of Systems Conditions and/or X% Number of Hours (8760 hrs/yr)
- Service into/out of NWHub or MIDCREMOTE would be subject to data requirements under the evaluation criteria for market hubs (EC-2).
- Consider whether to allow option for bridge termination with or without movement to reassessment service should the plan of service be determined to include a project at an incremental rate.
- Requires a tariff deviation.
- *NITS CFS can only be implemented if NITS on OASIS Phase 2 is not implemented.*
  - Note that NITS Phase 2 does not change the way long-term service is analyzed and awarded.

IS-POPT-ALT-4-SUB-B: NITS Conditional Firm Service

Offer CF on the Network Specific to FTSRs

- Criteria on the previous slide must be met:
  - *A TBD (potentially cyclical) process would inform Customer of potential CFS offer candidate(s) with (X month) deadline to respond.*
    - *Customer would receive written notice of offer contingent on ability to designate by x date.*
    - *Resources associated with study FTSRs must be ready to Designate (meet attestation requirements) to receive CFS Offer by the X month deadline.*
    - Interim service capacity is made available to parties who are actually going to use it.

IS-POPT-ALT-4-SUB-B: NITS Conditional Firm Service

- NITS Phase 2 Considerations
  - Adopting OATI's OASIS functionality configured specifically for managing NITS service.
    - Scheduling Rights
    - Concomitant Requests
      - Functionality only in the short-term market
      - Similar to a PTP redirect
    - Secondary Service (6-NN)
  - The intent of NITS on OASIS is to align with the NAESB standards.

IS-POPT-ALT-4: PTP and NITS CFS

Pros

- Creates a service option for PTP and NITS during planning reform.
- BPA has over 15 years of experience implementing PTP CFS.
- Can manage subgrid if team can determine management path.
- Maintains the ability to bridge to firm service.

Cons

- Customers may not want CFS until they know their plan of service.
- NITS CFS is not pro-forma and would require a tariff deviation (**SUB-B only**).
- Implementation of NITS CFS would mean that BPA could not proceed with NITS. Phase 2 (**SUB-B only**).

IS-POPT-ALT-4: PTP and NITS CFS

- Implementation
  - Use Power Transfer Distribution Factor (PTDF) or Commercial Power Flow to determine network impacts.
  - Use ATC to determine 1-1 impacts.
  - Use known subgrid data in assessing request.
  - *Offers of service can only be made if all constraints can be managed.*
  - Offers of service are researched and crafted by the CFS study team that includes planning and ops engineers prior to introduction of the offer to the CTP for consideration.
    - Proposed offers still require passing a final subgrid review before an offer may be authorized.

IS-POPT-ALT-5-SUB-A: Offer CF on the BPA Network to Ready PTP TSRs

- This alternative focuses CFS offers on requests ready to take service.
  - Note that the reference to the alternatives below does not dictate a decision on Evaluability Criteria, rather for ease of understanding, it is using the previously explained concepts to note CF Eligibility Requirements in this alternative.
  - Consider whether to allow option for bridge termination with or without movement to reassessment service should the plan of service be determined to include a project at an incremental rate.

- To be eligible for CF, the TSR must meet all of the following criteria if applicable:
  - Start Date must be within 18 months
    - Open to Customer feedback
  - EC1-SM (D1a): Maturity of plan of service for Source
    - EC1-SM-Alt2: For transition, only accept GIs that are late stage or bypass
  - EC1-LM (D1b): Maturity of plan of service for Load
    - EC1-LM-Alt1: Must be in execution phase (agreements signed/funded)
  - EC1-RR (D1c): RAS Resource
  - EC1-NP (D1d): PTP Request to NITS POD
  - EC1-OB (D1e): Requirements for Resources/Load Outside of BPA BAA
  - EC1-BB (D1f): Battery to Battery Ineligible
  - EC1-AD (D1g): Additional Data if Needed for Planning
  - EC3-PV (D3): Sending/Receiving Party Validation
    - *CONFIRMATION required for CF*

IS-POPT-ALT-5-SUB-B: Offer CF on the BPA Network to Ready NITS F/TSRs

- This alternative focuses CFS offers on requests ready to take service.
  - Note that the reference to the alternatives below does not dictate a decision on Evaluability Criteria, rather for ease of understanding, it is using the previously explained concepts to note CF Eligibility in this alternative.
  - Consider whether to allow option for bridge termination with or without movement to reassessment service should the plan of service be determined to include a project at an incremental rate.

- To be eligible for CF, the F/TSR must meet all of the following criteria if applicable :
  - Start Date must be within 18 months
    - Open to Customer feedback
  - EC1-SM (D1a): Maturity of plan of service for Source
    - EC1-SM-ALT-2: For transition, only accept GIs that are late stage or bypass
  - EC1-LM (D1b): Maturity of plan of service for Load
    - EC1-LM-ALT-1: Must be in execution phase (agreements signed/funded)
  - EC1-RR (D1c): RAS Resource
  - EC1-OB (D1e): Requirements for Resources/Load Outside of BPA BAA
  - EC1-BB (D1f): Battery to Battery Ineligible
  - EC1-AD (D1g): Additional Data if Needed for Planning
  - EC3-PV (D3): Sending/Receiving Party Validation
    - *CONFIRMATION required for CF*

IS-POPT-ALT-5-SUB-B: Offer CF on the BPA Network to Ready NITS F/TSRs

- Criteria on the previous slide must be met:
  - *A TBD (potentially cyclical) process would inform Customer of potential CFS offer candidate(s) with (X month) deadline to respond.*
    - *Customer would receive written notice of offer contingent on ability to designate by x date.*
    - *Resources associated with study FTSRs must be ready to Designate (meet attestation requirements) to receive CFS Offer by the X month deadline.*
    - Interim service capacity is made available to parties who are actually going to use it.

IS-POPT-ALT-5: Offer CF on the BPA Network

- Offer Considerations:
  - CFS Study team would need to evaluate offer risk threshold
    - Possible Example: Sum of offer impacts on a path to not exceed all lines in service seasonal ST TTC.
  - 1-1 Paths ineligible at this time.
  - There are some areas which we may not be able to offer CFS due to ongoing technical constraints.

IS-POPT-ALT-5: Offer CF on the BPA Network

Pros

- Creates a service option for PTP and NITS during planning reform
- BPA has over 15 years of experience implementing PTP CFS
- Grants service to the most TSRs prior to POS(s) being identified
- Assumes a high level of ability for BPA to implement requirements for eligibility
- Proposed changes in requirements for CF eligibility may increase likelihood of meeting sub-grid requirements for those that qualify
- Maintains the ability to bridge to firm service

Cons

- Customers may not want CFS until they know their plan of service
- Need new process to determine future TTCs, future Existing Transmission Commitments (ETC), and TSR impacts.
- Inventory method (PTDF impact analysis) encumbers more than studies and clears less of the queue.
- NITS CFS is not pro-forma and would require a tariff deviation (**SUB-B only**)
- Implementation of NITS CFS would mean that BPA could not proceed with NITS Phase 2 (**SUB-B only**)

IS-POPT-ALT-6: Planning Redispatch

- Planning redispatch involves determining whether there is a 24/7 available resource that can be called upon in times when the service being requested needs to be decreased.
- Planning redispatch can be offered as either a bridging or reassessment product.
- Planning redispatch is different from NITS redispatch as it is a tool to both award service and manage congestion, whereas NITS redispatch is only an operational tool.

IS-POPT-ALT-6: Planning Redispatch

- History
  - During the PFGA effort, BPA identified a need to review how customers may request planning redispatch per 19.3 and 32.3 of the OATT.
  - In 2021 BPA scoped and identified internal processes related to the provision of planning redispatch, both from resources marketed by BPA Power Services and non-BPA resources within and outside of BPA's Balancing Authority Area.
    - Arrangements for congestion relief from non-BPA resources would be facilitated by the requesting Customer ***at their cost.***
  - In order for BPA to provide planning redispatch from resources marketed by BPA Power Services, BPA would need to establish terms and conditions and the applicable rate provisions related to the provision of planning redispatch.
    - These terms and conditions would need to be established through a future rate proceeding.
    - This item would be assessed in conjunction with other potential Transmission Rate Case issues.
  - Findings: Implementation was not pursued due to agreement the product was unlikely to be requested due to cost to secure resources and would be an intensive effort not worth the impact to other work streams.

IS-POPT-ALT-6: Planning Redispatch

Pros

- Offers a bridge to firm service.

Cons

- Expensive.
  - Requires paying for 24/7 gen and an extra leg of transmission.
- Finding a resource is likely to be a challenge.
  - Many non-federal resources are intermittent, which are not dispatchable
  - Recent E3 study shows the region in a 9 GW resource deficit by 2030.
- Implementation is a heavy lift.

IS-POPT-ALT-6: Planning Redispatch

- Implementation:
  - Additional transmission commercial system application functionality would need to be developed to implement this alternative
  - Power pricing construct would need to be designed
  - Would need to determine planning study methodology
  - Would require resources performing other high priority work (for potentially little to no gain)

IS-POPT-ALT-7: Firming up 6-NN in ST Market

- "Firming up" 6-NN service in the short-term market is not feasible.
  - There is not automation to support this as it is not a characteristic of NITS service and therefore not designed in NITS on OASIS.
    - Not firming up 6-NN is different from short-term firm up of CFS. For CFS, firm ups would occur equally for NITS and PTP, should that option be implemented.

Interim Service Alternative Comparison

ALT-#	Alternative	No Currently Identified Issues	Areas to Explore: Known constraint, but CFS study team would work to see if it can be reliably managed for a CFS offer.	CFS Currently Ineligible: Requires significant work (including possible project energization)
IS-POPT-ALT-1	Seasonal Firm NITS	Possible Offer	Potentially failing subgrid	Fail subgrid
IS-POPT-ALT-2	Long Term 6-NN	Possible Offer	Potentially failing subgrid	Fail subgrid
IS-POPT-ALT-3	NITS LT 6-NN and PTP LT Priority 5 Non-Firm Service	Possible Offer	Potentially failing subgrid	Fail subgrid
IS-POPT-ALT-4-SUB-A	PTP CFS	Possible Offer	Potential Offer if constraints can be reliably managed	Fail subgrid
IS-POPT-ALT-4-SUB-B	NITS CFS	Possible Offer	Potential Offer if constraints can be reliably managed	Fail subgrid
IS-POPT-ALT-5-SUB-A	CF on the BPA Network to Ready PTP TSRs	Possible Offer	Potential offer as CF requirements may increase chances of passing subgrid	Fail subgrid
IS-POPT-ALT-5-SUB-B	CF on the BPA Network for Ready NITS F/TSRs	Possible Offer	Potential offer as CF requirements may increase chances of passing subgrid	Fail subgrid
IS-POPT-ALT-6	Planning Redispatch	Possible Offer	Potentially failing subgrid	Fail subgrid
IS-POPT-ALT-7	Firming up 6-NN in ST	N/A	N/A	N/A

Mandatory-Voluntary

IS-MV (D12)

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IS-MV: Mandatory-Voluntary

- Background
  - In the July GAT workshop, BPA presented CFS options that required the customer to take service on CFS offers if available or be removed from the queue.
    - This included early access offers that may occur prior to knowing the plan of service and associated financial and timeline data points.
  - In response to customer feedback, 3 alternatives are being proposed for consideration.

IS-MV Alternatives (ALT)

- IS Mandatory-Voluntary (IS-MV-D12)
  - IS-MV-ALT-1: Mandatory for early access
  - IS-MV-ALT-2: Not mandatory until POS has been developed
  - IS-MV-ALT-3: Status quo – Not mandatory

IS-MV-ALT-1: Mandatory for Early Access

- All CFS offers would require the customer to accept service or their TSR would be removed from the Long-Term Pending Queue.
- This mandatory nature does not take into consideration whether a plan of service has been developed.

IS-MV-ALT-1: Mandatory for Early Access

Pros

- Potentially increases level of contracted service.
- Increases clarity on which TSRs are ready to commit to service.

Cons

- May encourage customer to take unneeded service.
- May require customer to commit to taking service prior to being selected by a Load Serving Entity (LSE).
- Customer TSR may be declined if service is not accepted.
- A Customer accepting would not yet know their plan of service, financial obligations, or path to firm timeline.

IS-MV-ALT-2: Not Mandatory until POS has been Developed

- Only CFS offers made after the development of the POS would require the customer to accept service or their TSR would be removed from the Long-Term Pending Queue.

IS-MV-ALT-2: Not Mandatory until POS has been Developed

Pros

- Customer has better information regarding associated financial obligations once POS is known.
- Customer has better information regarding estimated date to enable firm service once POS is known.

Cons

- May encourage customer to take unneeded service.
- May require customer to commit to taking service prior to being selected by a Load Serving Entity (LSE).

IS-MV-ALT-3: Status Quo – Not Mandatory

- Not accepting CFS service would not result in removal of a Customer's TSR from the Long-Term Pending Queue.

IS-MV-ALT-3: Status Quo – Not Mandatory

There could be additional pros and cons depending on other decisions made in the business model.

Pros

- Aligns with current policy.
- Higher level of customer satisfaction.

Cons

- Does not additionally increase level of contracted service.
- Does not increase clarity on which TSRs are ready to commit to service.

Curtailment Type

IS-CT (D13)

IS-CT: Product Options

- Background
  - In our July Customer workshop, BPA presented CFS conditions that only allowed 8760 # of hours for Interim Service.
  - In response to customer feedback, 2 alternatives for CFS conditions are being proposed for consideration.

IS-CT Alternatives (ALT)

- IS Curtailment Type (IS-CT-D13)
  - IS-CT-ALT-1:System Conditions Only.
  - IS-CT-ALT-2: System condition or x% number of 8760 hours of the year.

IS-CT-Alt1: System Conditions Only

- Only consider System Conditions for congestion management of CFS service.
- Many CFS offers do require System Conditions Only rather than # of hours to reliably manage service.

IS-CT-ALT-1: System Conditions Only

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 condition occurs.

Cons

- Risk of defining system conditions too narrowly.
- Risk of defining system conditions so broadly that it is unappealing from a customer perspective.

IS-CT-ALT-2: System Condition or x% Number of 8760 Hours of the Year

- In addition to Systems Conditions, allow for the possible use of a flat percentage of the # of hours for CFS offers
  - Note each offer can only have System Conditions OR # of hours.
  - This would not use the traditional extensive analysis to determine the # of hours.

IS-CT-ALT-2: System Condition or x% Number of 8760 Hours of the Year

Pros

- Increases optionality regarding conditions.
- Service is firmed up for the year once the # of hours is reached.

Cons

- 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.

Queue Management (QM)

Queue Management (QM) Alternatives

- QM-ECQ: Applying Evaluation Criteria to the Queue
  - QM-ECQ-ALT-1: Keep existing queue
  - QM-ECQ-ALT-2: Empty existing queue
  - QM-ECQ-ALT-3: Agreement
- QM-CEC: Collecting New Evaluation Criteria
  - QM-CEC-ALT-1: Start where we are
  - QM-CEC-ALT-2: Submit new Data Exhibit form
  - QM-CEC-ALT-3: Combination of ALT-1 + ALT-2
- QM-SQS-D16: Structuring the Queue for Study
  - QM-SQS-ALT-1: No transition study
  - QM-SQS-ALT-2: Batch studies
    - QM-SQS-ALT-2-SUB-A: Queue order
    - QM-SQS-ALT-2-SUB-B: Geographic
    - QM-SQS-ALT-2-SUB-C: POR/POD
    - QM-SQS-ALT-2-SUB-D: LSE vs. Non-LSE
    - QM-SQS-ALT-2-SUB-E: NITS vs. PTP
    - QM-SQS-ALT-2-SUB-F: Resource/Load maturity
    - QM-SQS-ALT-2-SUB-G: Options
  - QM-SQS-ALT-3: Cap the LTF queue
- QM-HNS: Handling New (F)TSR Submissions
  - QM-HNS-ALT-1: Decline all (F)TSRs
  - QM-HNS-ALT-2: Study in Future State
  - QM-HNS-ALT-3: 2025 TSEP Cluster Study
  - QM-HNS-ALT-4: Second Transition Study
- QM-FSP: Firm Service Prioritization
  - QM-FSP-ALT-1: Status Quo
  - QM-FSP-ALT-2: Prioritizing Service Readiness
  - QM-FSP-ALT-3: Accepting Contingent Offers of Service

Applying Evaluation Criteria

QM-ECQ

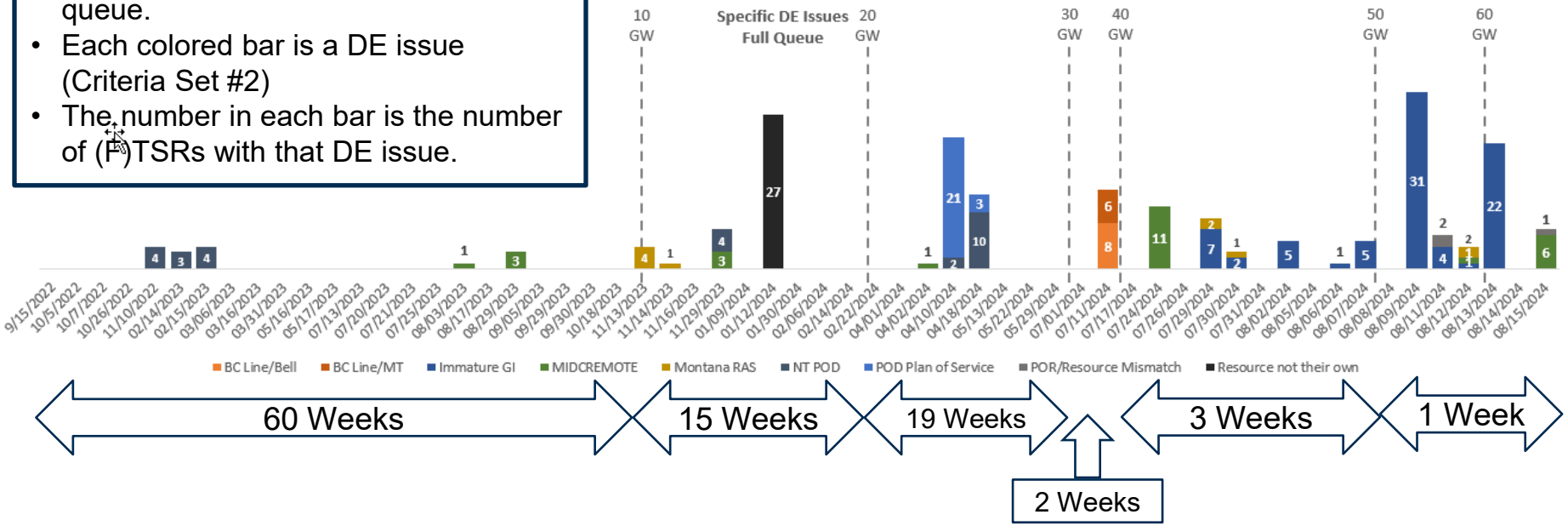
QM-ECQ: Applying Evaluation Criteria

- Problem
  - BPA needs to determine how to consistently apply Evaluation Criteria (Data Exhibit (DE) Validation rules) and how best to collect the information from customers.
- Objectives
  - BPA will apply a consistent set of eligibility requirements for all (F)TSRs in the queue.
  - Minimize redundant work on both internal and external resources.
  - Establish the study queue as quickly and efficiently as possible.

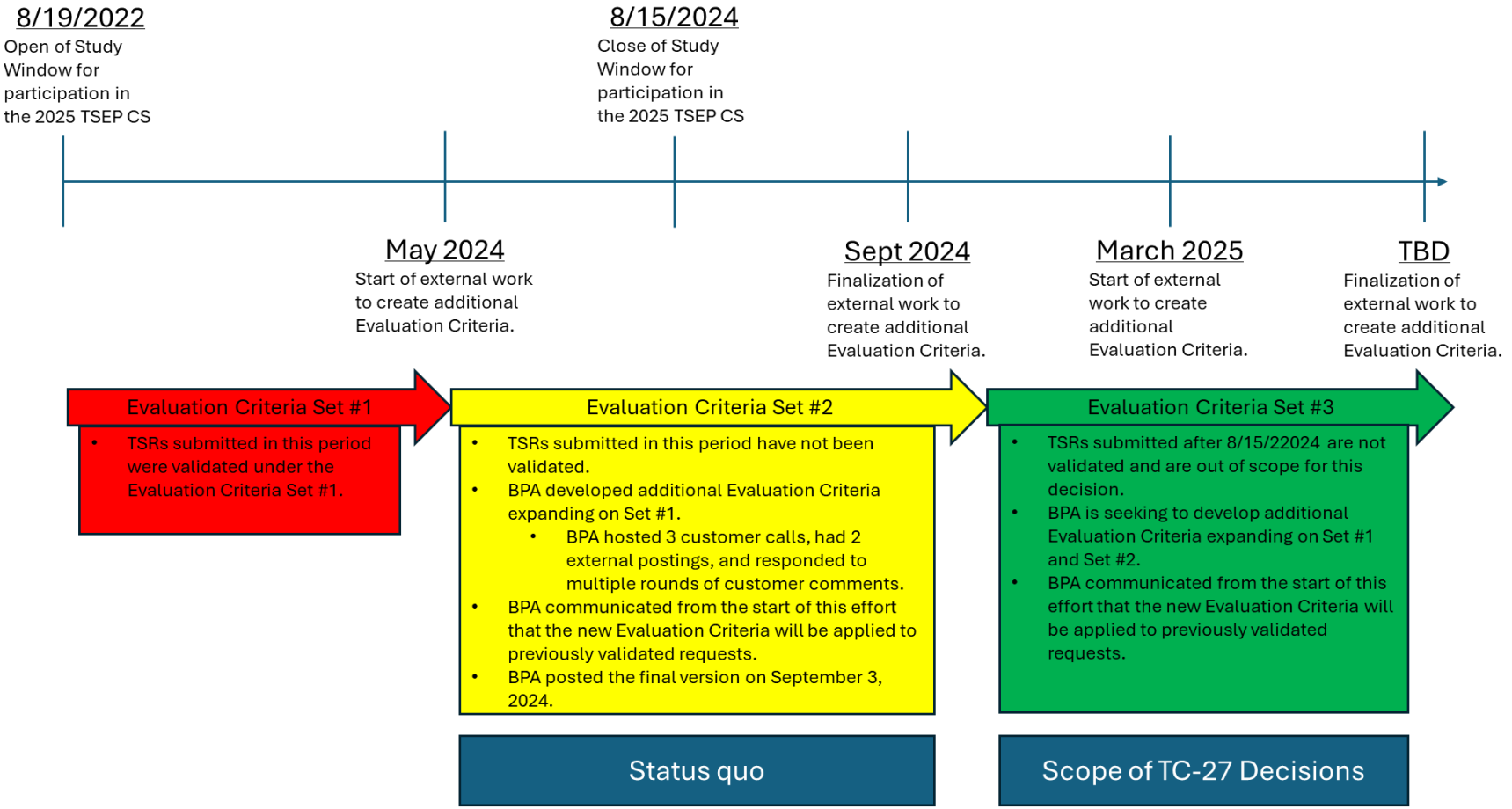
QM-ECQ: Applying Evaluation Criteria

- Assumptions
  - All Evaluation Criteria (DE Validation rules) established as of September 2024 and in this proceeding will be applied to the existing unstudied queue before an agreement is tendered
    - Including whether the (F)TSR was previously validated prior - as previously communicated to customers via Tech Forum on September 3, 2024 before an agreement is tendered.
  - These alternatives (QM-ECQ) apply to the unstudied queue (F)TSR submitted on or prior to 12pm August 15, 2024 (again, regardless of whether the (F)TSR has a previously validated Data Exhibit or not).
  - The Evaluation Criteria at issue in this proceeding will be documented and adopted in TC-27.
  - The alternatives for Applying the Evaluation Criteria (QM-ECQ) do not apply to (F)TSRs that entered the queue after 12 pm August 15, 2024. They are addressed separately (QM-HNS).

- Each date is the data one or more (F)TSRs were submitted for the 2025 TSEP CS – the 65 GW unstudied queue.
- Each colored bar is a DE issue (Criteria Set #2)
- The number in each bar is the number of (F)TSRs with that DE issue.



Key Take Away: As the deadline for submission approached the amount of request submitted for study grew exponentially and the quality of the data supporting the requests decreased exponentially.


8/19/2022
Open of Study Window for participation in the 2025 TSEP CS
8/15/2024
Close of Study Window for participation in the 2025 TSEP CS
May 2024
Start of external work to create additional Evaluation Criteria.
Sept 2024
Finalization of external work to create additional Evaluation Criteria.
March 2025
Start of external work to create additional Evaluation Criteria.
TBD
Finalization of external work to create additional Evaluation Criteria.
Evaluation Criteria Set #1
TSRs submitted in this period were validated under the Evaluation Criteria Set #1.
Evaluation Criteria Set #2
TSRs submitted in this period have not been validated.
BPA developed additional Evaluation Criteria expanding on Set #1.
BPA hosted 3 customer calls, had 2 external postings, and responded to multiple rounds of customer comments.
BPA communicated from the start of this effort that the new Evaluation Criteria will be applied to previously validated requests.
BPA posted the final version on September 3, 2024.
Evaluation Criteria Set #3
TSRs submitted after 8/15/22024 are not validated and are out of scope for this decision.
BPA is seeking to develop additional Evaluation Criteria expanding on Set #1 and Set #2.
BPA communicated from the start of this effort that the new Evaluation Criteria will be applied to previously validated requests.
Status quo
Scope of TC-27 Decisions

QM-ECQ-ALT-1: Keep Existing Queue

Apply the Evaluation Criteria Set #3 (to be established in TC-27) to the existing requests in the existing queue order before an agreement is tendered. It does not require BPA to decline the unstudied (F)TSRs and it does not require customers to submit their requests again.

Pros

- Customers maintain their queue positions.
- Quickest approach to start processing the queue.
- Provides the same queue for study as *ALT-2 – Empty the Queue* without any additional work.
  - No staff time spent declining (F)TSRs
- Customers do not have to use their staff time to resubmit (F)TSRs they already submitted.

Cons

- New Criteria would appear to be back cast since not all (F)TSRs came in under the same rules at the same time.

Relationship with Collecting the New Evaluation Criteria Information(QM-CEC): All three QM-CEC alternatives will work with this alternative.

QM-ECQ-ALT-2: Empty the Queue

Apply the new evaluation criteria to a new queue. It requires BPA to decline the unstudied (F)TSRs (regardless of whether the (F)TSR has a validated Data Exhibit) and requires customers to resubmit their requests before BPA issues a study agreement.

Pros

- New Criteria would not be back cast if all (F)TSRs came in under the same rules at the same time.

Cons

- Customers lose their existing queue position.
- All other things being equal, this alternative filters the queue the same as Alternative 1 – Empty the Queue with significant additional work.
  - Staff time is spent declining (F)TSRs
- This alternative takes the longest amount of time to establish the study queue than the other two alternatives – delays processing the queue.

Relationship with Collecting the New Evaluation Criteria Information (QM-CEC): QM-CEC-ALT-2 would be required to implement this alternative.

QM-ECQ-ALT-3: Apply the New Requirements through an Agreement

Put the new requirements into some kind of agreement. When (F)TSRs in the existing queue are tendered the agreement, the request will need to meet the new requirements to be eligible for the study.

Pros

- Customers maintain their existing queue positions.
- Provides the same queue for study as *ALT-2 – Empty the Queue* with less additional work.
  - No staff time spent declining (F)TSRs
  - Customers do not have to use their staff time to resubmitting (F)TSRs they already submitted.
  - Avoids a free-for-all rush to resubmit (F)TSRs with potential for slower, less sophisticated customers possibly being disadvantaged.
- Avoids back casting of rules to previously validated (F)TSRs

Cons

- Requires BPA to offer study agreements for (F)TSRs that may not be valid.
- Need to disconnect the timelines for study participation payments and submittal of the signed some kind of agreement (to allow time for data validation).

Relationship with Collecting the New Evaluation Criteria Information (QM-CEC): All three QM-CEC alternatives will work with this alternative.

Collecting New Evaluation Criteria

QM-CEC

QM-CEC: Collecting New Evaluation Criteria Information

- Problem
  - Establish how BPA will collect any of the data exhibit (DE) information for satisfying the new evaluation criteria.
- Objectives
  - BPA will apply a consistent set of eligibility requirements for all (F)TSRs in the queue.
  - Minimize redundant work on both internal and external resources.
  - Establish the study queue as quickly and efficiently as possible.

QM-CEC: Collecting New Evaluation Criteria Information

- Assumptions
  - All Evaluation Criteria (DE Validation rules) established as of September 2024 will be applied to the existing unstudied queue before an agreement is tendered
    - Including whether the (F)TSR was previously validated prior - as previously communicated to customers via Tech Forum on September 3, 2024 before an agreement is tendered.
  - These alternatives (QM-CEC) apply to the unstudied queue submitted on or prior to 12pm August 15, 2024 (again, regardless of whether the (F)TSR has a previously validated Data Exhibit or not).
  - There are changed or additional criteria, and they are documented and adopted in TC-27.
  - The alternatives for collecting the new Evaluation Criteria(QM-CEC) may apply to the (F)TSRs that entered the queue after 12pm August 15, 2024 (QM-HNS), depending on what that separate decision is.

QM-CEC-ALT-1: Start Where We Are

Use the current data exhibit (DE) validation cure process of resolving evaluation criteria deficiencies through email exchanges with the customer. BPA will review the current DE information and the new criteria for each (F)TSR. Customers will be sent an email describing any deficiencies and provided 5 days to cure the deficiencies. All new evaluation criteria will be emailed as a deficiency because it was not on the original form. BPA will keep the email exchange as a record of evaluation criteria validation. Any (F)TSR that is unable to satisfy the deficiency within the established timeframe will be declined on OASIS.

Pros

- Validation work can start immediately following evaluation criteria adoption in TC-27.
- Allows BPA to piggy-back on validation work already done.
- Email exchange/structure is already established
- Shortens processing time of customers compared to QM-CEC-ALT-2: *Customers Submit a new Data Exhibit Form*.

Cons

- 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 Exhibit Form

BPA will create a new data exhibit form, including instructions, that will include all required evaluation criteria. The new form will replace the data exhibit validation forms that accompanied original (F)TSR submission. Customers will be required to download the new form then complete and submit one for each (F)TSR they have in the queue by the submission deadline. BPA will then engage in the cure process via email to work with the customer to satisfy deficiencies. BPA will keep the form and email exchange as a record of evaluation criteria validation. Any (F)TSR that is unable to satisfy the deficiency or misses any deadline will be declined on OASIS.

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.

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.

QM-CEC-ALT-3: Combination of Alternatives #1 & #2

BPA will review the current DE information and the new criteria for each (F)TSR. Customers will be sent an email describing any deficiencies and attach the new DE form to the email. Customers will be expected to complete the deficiencies in the new form and return the form within the 5-day cure period. BPA will keep the form and email exchanges as a record of evaluation criteria validation. Any (F)TSR that is unable to satisfy the deficiency or misses any deadline will be declined on OASIS.

Pros

- Customers will be required to address the deficiencies in the new form
- Customers will not have to supply information already provided, i.e. they do not have to complete the whole form.
- Validation work can start as soon as the evaluation criteria are adopted.
- Allows BPA to piggy-back on validation work already done.
- Email exchange/structure is already established
- Shortens processing time of customers compared to QM-CEC-ALT-2: *Customers Submit a new Data Exhibit Form* by identifying what specifically needs to be completed in the form.

Cons

- It will take time for BPA to create a new form and corresponding instructions.
- BPA would either have (F)TSR information in two separate forms or need to prepopulate the new form with the information already provided by customers,
- Provides a stronger record of DE validation that QM-CEC-ALT-1: – *Start Where We Are* but not as strong as QM-CEC-ALT-2: – *Customers Submit a new Data Exhibit Form.*
- Customer response time is short given that customers have not had an initial opportunity to provide the information.

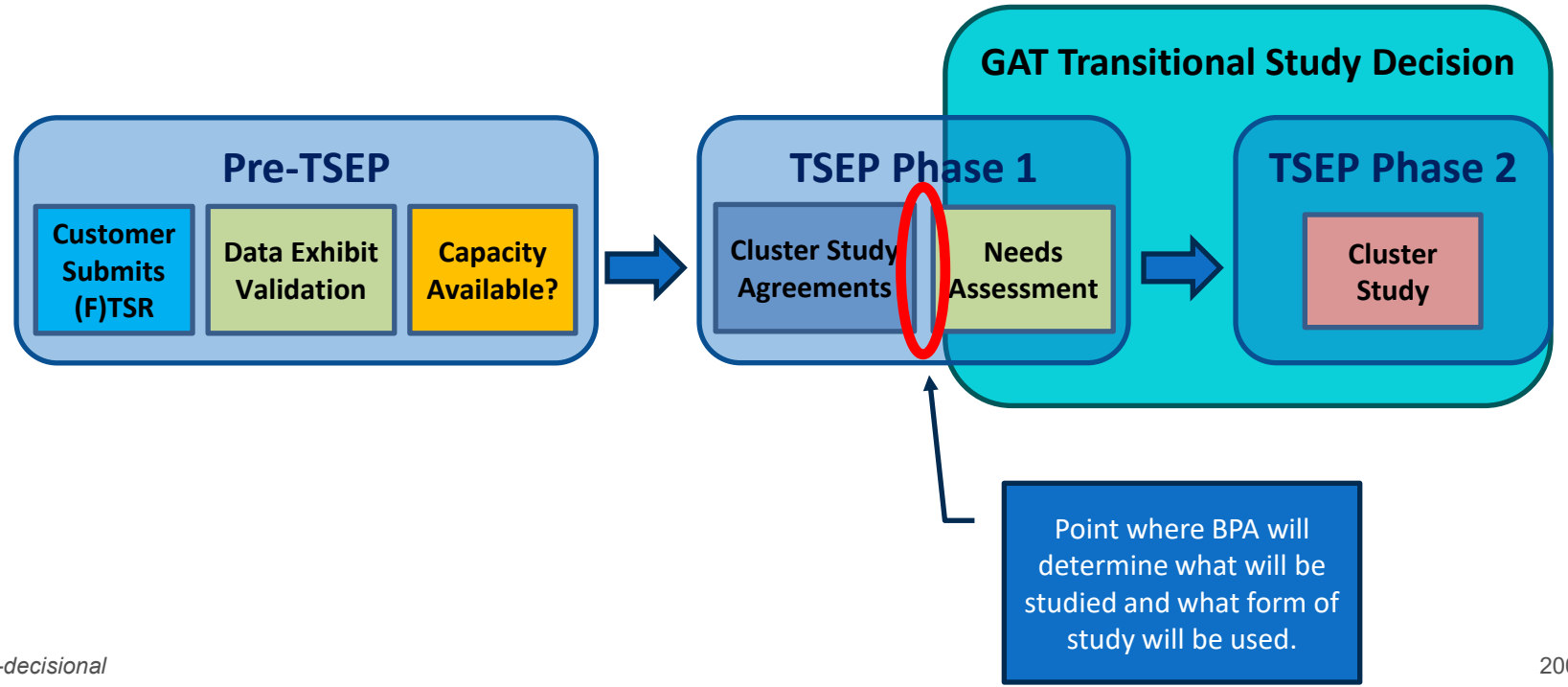
Structuring the Queue for Study

QM-SQS

QM-SQS: Structuring the Queue for Study

- Problem
  - If after application of the Evaluation Criteria the queue is still too large to be studied in one batch then BPA will need to establish what the structure of the queue will be when it is handed off to the planning engineers for scenario development and study.
- Objectives
  - All studied (F)TSRs are under a post study agreement when BPA cuts over to the Proactive Planning Program (Future State).
  - Clear communication of what (F)TSRs are excluded from transition and will be included in the Proactive Planning Program (Future State).

QM-SQS: Structuring the Queue for Study



QM-SQS-ALT-1: No Transition Study

Decline all existing (F)TSRs in the unstudied LTF transmission queue and decline any newly submitted (F)TSRs when BPA determines the request cannot be served on the existing system until after implementation of the Proactive Planning Program (Future State).

Pros

- There are no (F)TSRs to study for transition to the Proactive Planning Program (Future State).

Cons

- Requests removed from the queue will not know the transmission requirements to enable firm service for years.

Relationship with Handling New (F)TSR Submissions QM-HNS: Could be made to align with QM-HNS-ALT-1 – Decline All (F)TSRs submitted after 8/15/24.

QM-SQS-ALT-2: Batches

Establish “batches” of (F)TSRs for study based on a defined set of criteria. BPA will study each batch until the point in time it is determined the next (F)TSR will be studied in the Proactive Planning Program (Future State). Types of Batches:

- QM-SQS-ALT-2-SUB-A: Queue order
- QM-SQS-ALT-2-SUB-B: Geographic
- QM-SQS-ALT-2-SUB-C: POR/POD
- QM-SQS-ALT-2-SUB-D: LSE vs. Non-LSE
- QM-SQS-ALT-2-SUB-E: NITS vs. PTP
- QM-SQS-ALT-2-SUB-F: Resource/Load maturity
- QM-SQS-ALT-2-SUB-G: Options

Depending on the volume of (F)TSRs Whatever the batch is, the quantity that could be studied may still be limited by the total volume of the batch itself. In those cases, a study model limit would be necessary to further limit the size of each batch.

Outside of Queue Order Batches:

- The simplest implementation does not honor queue order.
- To honor queue order a complicated plan of service development process would need to be designed

Batching Pros:

1. Provides a manageable volume for study

Batching Cons:

1. The more batches the longer it will take to process the queue
2. Some Batches require new processes to establish the batch

Relationship with Evaluation Criteria Decisions: If BPA clears the existing queue (QM-AEC-ALT-2) and has customers resubmit their (F)TSRs under the new criteria (QM-CEC-ALT-2) then BPA could either take all requests at once or use submission windows for the (F)TSRs eligible for each planned batch.

QM-SQS-ALT-2-SUB-A: Batch the Queue in Queue Order

- Starting at the top of the queue study down to reaching the study model limit in successive “batches.” For instance, first batch is x GW, second batch y GW, etc. until all requests have been studied.
- Key points:
  - Processes the queue in queue order.
  - Avoids access to capacity and cost allocation issues.
  - Assuming a study model limit of 15-20 GW this would likely result in the fewest batches, i.e. the fastest “study.”

QM-SQS-ALT-2-SUB-B: Batch the Queue by Geographic Area

- Establish geographic zones, such as eastern Oregon or western Washington, and study the (F)TSRs that source/sink into those zones. Study one zone at a time working through all requests in the queue.
- Key points:
  - Batching would remove queue order of (F)TSRs.
  - Provides a better network understanding of each area, i.e. a clearer set of expansion projects.

QM-SQS-ALT-2-SUB-C: Batch the Queue by POR, POD, or the Combination of Them

- This is a more granular approach than geographic area. Each batch is either a specific POR, POD, or a POR/POD combination. Study all the (F)TSRs in a priority of the batched (F)TSRs. Priority could be based on volume or technical needs/difficulties of the POR/POD.
- Key points:
  - Batching would remove queue order of (F)TSRs.
  - Provides a better network understanding of each area, i.e. a clearer set of expansion projects.
  - There would be a high number of batches, i.e. a longer period of time to study all the requests.

QM-SQS-ALT-2-SUB-D: Batch the Queue by LSEs vs non-LSEs

- Run a study of requests from all LSEs only first then move to the request from non-LSEs.
- Key points:
  - Batching would remove queue order of (F)TSRs.
  - The non-LSE batch would likely be too large for a single study and could be capped for a single batch or broken into multiple batches (apply QM-SQS-D15-Options).
  - There is a 10x multiple of the amount of load requests in the current unstudied queue as compared to previous TSEP CSs. An LSE study would provide valuable insights into load needs.

QM-SQS-ALT-2-SUB-E: Batch the Queue by NITS vs PTP

- Batch the queue by the products taking service. This is a slightly nuanced batching from the LSE batch because some LSEs are taking PTP service.
- Key points:
  - Batching would remove queue order of (F)TSRs.
  - The non-NITS batch would likely be too large for a single study and could be capped for a single batch or broken into multiple batches (apply QM-SQS-D15-Options).
  - There is a 10x multiple of NITS requests in the current unstudied queue as compared to previous TSEP CSs. A NITS study would provide valuable insights into load needs.

QM-SQS-ALT-2-SUB-F: Batch the Queue by Resource and Load Maturity

- For each request, review whether the resource or the load is commercially operational. Study those requests:
  - where the load is commercially operating or the Facility Study is complete and the resource is either commercially operating, late stage, or bypass first,
  - then move to load that is commercially operating or the Facility Study is complete,
  - then study generation that is either commercially operating, late stage, or bypass.
  - Determine what to do with the remainder.
- Key points:
  - Batching would remove queue order of (F)TSRs.
  - Prioritizes those requests most ready to take service and moves down to the requests from resources less ready.

Note: Using Resource (EC1-SM) and Load Maturity (EC1-LM) for evaluation criteria achieves the same purpose as this alternative.

QM-SQS-ALT-2-SUB-G: Options to Manage the Batch Sizes

The following options to manage batch size would be an independent decision applied to whatever alternative is chosen.

- If after sorting the queue into batches, it is determined that a specific batch exceeds the study modeling limits there are several options:
  - Option 1 – Chunk through in queue order – chunks up to the study model limit
  - Option 2 – decline all remaining (F)TSRs
  - Option 3 – study the remaining (F)TSR in one or more other types of batches. Each batch subject to the study model limit.
  - Option 4 - Cap the remaining batch at the study model limit and decline the remaining (F)TSRs (QM-SQS-ALT-3)
- Example (Assuming a 40 GW queue):

  Batch by Geographic Area (QM-SQS-ALT-2-SUB-B) – the 13 GW of requests in geographic area A can be studied in one batch, however, the 27 GW batch in geographic area B cannot. BPA will need follow-on decisions for how to study the geographic area B batch and what is to happen with the TSRs that cannot be studied (QM-SQS: Options).

QM-SQS-ALT-3: Cap the Queue

Establish a MW limit that will be studied (study model limit). Any (F)TSRs not included in the limit will be declined on OASIS, including those submitted after the deadline. BPA will decline any newly submitted (F)TSRs when BPA determines the request cannot be served on the existing system until after implementation of the Proactive Planning Program.

Pros

- Limits the queue to an amount that can be studied at one time.
- Limits the amount of work to revalidate (F)TSRs.
- Removes the later submitted (F)TSRs which avoids a significant amount of data exhibit validation work on both BPA and customers.
- Allows planners to stay focused on development of the Proactive Planning Program (Future State).
- When requests reenter the queue, they will be in the Proactive Planning Program (Future State).
- Fastest approach to start queue processing.

Cons

- Requests removed from the queue will not know the transmission requirements to enable firm service for years.

Managing Batch Size Decisions: A cap could also be used in conjunction with some of the above batch options (QM-SQS-ALT-2) where any (F)TSRs outside of the study model limit of a batch would be declined.

Handling New (F)TSR Submissions

QM-HNS

QM-HNS: Handling New (F)TSR Submissions

- Problem
  - BPA cut-off possible participation in the 2025 TSEP Cluster Study (CS) on 12pm August 15, 2024. Since then, 3.3 GW of (F)TSRs have continued to enter the queue and more (F)TSRs will enter the queue as the GAT transition progresses. As BPA develops how to transition the queue that was eligible for the 2025 TSEP CS to the Proactive Planning Program (Future State) BPA will need to decide the approach for transitioning the (F)TSRs that would potentially be included in the next commercial study, i.e. the commercial study that would follow the 2025 TSEP CS.
- Objectives
  - All studied (F)TSRs are under a post study agreement when BPA cuts over to the Proactive Planning Program (Future State).
  - Clear communication of what (F)TSRs are excluded from transition and will be included in the Proactive Planning Program (Future State).

QM-HNS: Handling New (F)TSR Submissions (continued)

- Assumptions
  - Any remaining (F)TSRs in the queue, including under one of the Alternatives 1 – 3, will be under a post study agreement (whatever they are determined to be) after transition.
  - Any (F)TSRs that enter the queue after the implementation of this decision will be studied in the Proactive Planning Program (Future State).
  - The (F)TSRs being addressed with this decision will be subject to the Evaluation Criteria established in TC-27 and prior.

QM-HNS-ALT-1: Decline All (F)TSRs Submitted after 12pm 8/15/24

Decline all the (F)TSRs submitted after 12pm 8/15/24 and either close the queue until the Proactive Planning Program (Future State) is stood up or open the queue but decline (F)TSRs that BPA determines cannot be served on the existing system until after the implementation of the Proactive Planning Program (Future State).

Pros

- Efficiently address what (F)TSRs are studied in the transition and what (F)TSRs will be in the Proactive Planning Program (Future State).
- Decreases the amount of (F)TSRs to study in transition.
- Could support the reopening of the queue for evaluation of service on the existing system, LaRCs, and Redirects.

Cons

- Requests removed from the queue will not know the transmission requirements to enable firm service for years.
- A closed queue approach closes all queue processing (LaRC, Redirects, etc.) until the Proactive Planning Program (Future State) is implemented.

Relationship with Structuring the Queue for Study (QM-SQS): Could be made to align with QM-SQS-ALT-1: No Transition Study.

QM-HNS-ALT-2: Study (F)TSRs in Proactive Planning Program (Future State)

Notify customers that all (F)TSRs submitted after 12 pm 8/15/24 will be studied when the Proactive Planning Program (Future State) is implemented. The (F)TSRs will be subject to all evaluation criteria and any other changes implemented for the future state.

Pros

- Limits the amount to be studied in transition to those (F)TSRs that met the submission deadline for the 2025 TSEP CS. (The 65 GW unstudied queue.)
- Provides sufficient notice to customers under what rules and how their (F)TSRs will be studied.
- Honors the efforts of customer who submitted (F)TSRs by the 12pm 8/15/24 deadline.
- Supports the reopening of the queue for evaluation of service on the existing system.
- There is a clean cut-off between transition and Proactive Planning (Future State).
- Simple to implement.

Cons

- Delays when a customer will know the transmission requirements to enable firm service.

QM-HNS-ALT-3: Include in 2025 TSEP CS Group

Establish a new cut-off as the date the last (F)TSR was submitted to establish the potential participation in the transition study. This moves the (F)TSRs that were submitted after 8/15/24 into the group of the 65 GWs of (F)TSRs submitted between 8/15/22 and 12pm 8/15/24. (F)TSRs submitted after this new date are pushed to the Proactive Planning Program (Future State).

Pros

- BPA makes one set of decisions for all (F)TSRs that have entered the queue.

Cons

- During the period of time the queue is closed there will be no queue processing (LaRC, redirect, etc.).
- Exacerbates the challenge of how much can be studied in a single batch.
- Disregards those customers who took the time and effort to submit their requests by BPA's announced deadline of 12pm 8/15/24.

Relationship with all other Decisions: (F)TSRs grouped with the 2025 TSEP CS group will be subject to all the same decisions, criteria, and processes.

QM-HNS-ALT-4: Second Transition Study

Time the cutoff for a second transition study with the implementation of the Proactive Planning Program (Future State). BPA would establish a second cut-off in the future where the (F)TSRs submitted by that date would be subject to the transition process established in TC-27 used for the 65 GW unstudied queue. (F)TSRs that enter the queue after the future cut-off would be studied under the Proactive Planning Program (Future State);

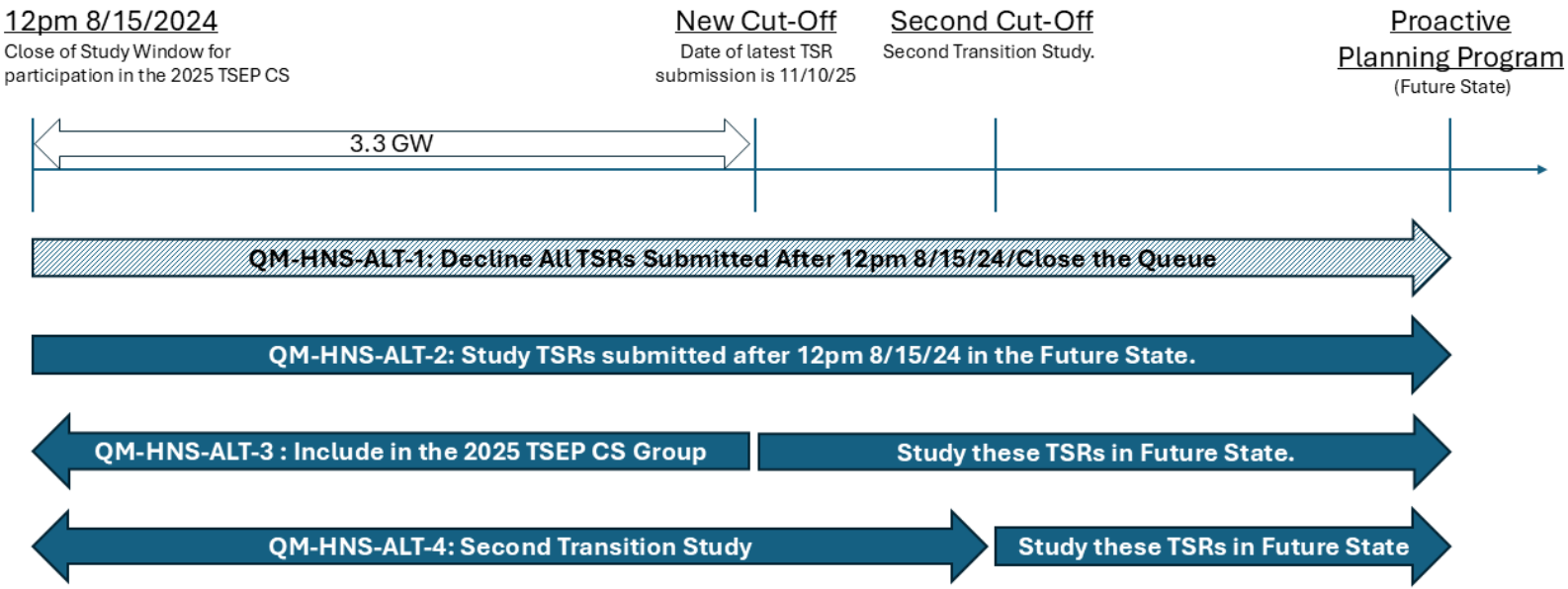
Pros

- Queue would remain open for business, including evaluation for service on the existing system, LaRC processing, and Redirects.
- Aligns the timing of the transitional studies with the timing of the implementation of the Proactive Planning Program (Future State).
- Provides sufficient notice to customers under what rules and how their (F)TSRs will be studied to establish a complete plan of service.

Cons

- Requires running two transitional studies. One for the (F)TSRs that met the deadline for the 2025 TSEP CS and one for (F)TSRs that entered the queue after that date.

Relationship with all other Decisions: (F)TSRs grouped with the 2025 TSEP CS group will be subject to all the same decisions, criteria, and processes.



- **QM-HNS-ALT-1 – Decline All TSRs:** Decline all TSRs submitted after 12pm 8/15/24. Close the queue until it opens for the Proactive Planning Program (Future State).
- **QM-HNS-ALT-2 – Study TSRs in the Proactive Planning (Future State):** All TSRs submitted after 12pm 8/15/24 will be studied in the Proactive Planning Program (Future State).
- **QM-HNS-ALT-3 – Include in the 2025 TSEP CS Group:** Establish a new cutoff as the date of the last TSR was submitted. This groups all TSRs submitted before this date together. TSRs submitted after this date will be studied in the Proactive Planning Program (Future State).
- **QM-HNS-ALT-4 – Second Transition Study:** A second cutoff date will be established for a second transition study. TSRs submitted after the second date will be studied in the Proactive Planning Program (Future State).

Firm Service Prioritization

QM-FSP

QM-FSP: Establishing Service Readiness Access to Capacity

- Problem
  - Establishment of who is first in line for service or access to project capacity.
- Criteria
  - Provide as much cost certainty as possible to enable firm service.
  - Provide as much schedule certainty as possible to enable firm service.
  - Clear communication of the requirements to enable firm service.
  - Efficient tracking and oversight of cost allocations.

QM-FSP-ALT-1: Status Quo

Following the study, capacity and costs for each identified project are assigned based on queue order. Then finally requests can begin transmission service on the latter of the energization of the plan of service or the start service date.

Pros

- Aligns with foundational FERC pro forma principles.
- Provides as clear of a plan of service to customers as is possible.
- Provides as much cost certainty to customers as is possible.
- Provides as much energization certainty to customers as is possible.
- Using requested demand is simple to administer.

Cons

- Request most ready to take firm service may not have the cheapest or shortest schedule to obtain the firm service.

Relationship with all other Decisions: Works with all business models.

QM-FSP-ALT-2: Prioritizing Service Readiness

- Establish a set of rules for application after a plan of service has been developed of what would give a request firm service priority over another, possibly higher queued, request.
- BPA would routinely run two analyses
  - First, review the changing priority nature of a request.
  - Second, review the flow impact of the requests to determine if the plan of service can be changed.
- When BPA determines that a lower queued (F)TSR is more ready for firm service than another higher queued (F)TSR then:
  - BPA could change the original plan of service for both requests so the lower queued, more-ready (F)TSR could assume the queue position of the higher queued (F)TSRs.
  - The lower queued (F)TSR would then use the higher queued (F)TSR's project capacity, i.e. the lower queued (F)TSR would be given firm service priority.

Example of Prioritizing Service Readiness (QM-FSP-ALT-2)

The (F)TSRs on the left are in queue order. There is a single path (WOS) that needs two upgrades (1 and #2) to enable firm service of all the request with flow impacts on the path (WOS). Project #1 adds 50 MWs of capability to the system. Any flows exceeding 50 MW will need project #2. Some (F)TSRs have a second project (CCN #2) in their plan of service.

Below is an example for ease of demonstration of the impact of this alternative. To simplify the demonstration, the only criteria for a request to be more service ready than another request is the commercial operation date of the resource delivering the power (Resource COD). There are many other factors that could be used to determine priority of a firm service request over a higher-queued request.

Build	WOS #1	WOS #2	CCN #2
Build Cost	$550M	$2B	$1B
PEA Cost	$110M	$400M	$200M
Energization	Oct-26	Jan-30	Jul-32

Build	WOS #1	WOS #2	CCN #2
Build Cost	$550M	$2B	$1B
PEA Cost	$110M	$400M	$200M
Energization	Oct-26	Jan-30	Jul-32

Queue Priorty Access to Lower Cost Capacity

TSRs	Flow Impact			Resource COD
	WOS #1	WOS #2	CCN #2	
TSR 1	20			Oct-26
TSR 2	30			Jul-28
TSR 3		35	15	Jul-28
TSR 4		20	20	Feb-27
TSR 5		10		Feb-27

Resource Ready Access to Lower Cost Capacity

TSRs	Flow Impact			Resource COD
	WOS #1	WOS #2	CCN #2	
TSR 1	20			Oct-26
TSR 5	10			Feb-27
TSR 2		30		Jul-28
TSR 3		35	15	Jul-28
TSR 4		20	20	Feb-27

Example of Prioritizing Service Readiness (QM-FSP-ALT-2)

- ***(F)TSR 1*** - Maintains its queue position and access to the cheaper WOS #1 project because of the resource's Commercial Operations Date (COD) and the WOS #1 energization date. LTF service will take effect at the later of the requested service start date or the energization of WOS #1.
- ***(F)TSR 2*** – Loses its queue position and access to the cheaper WOS #1 project because of the resource's COD is later than (F)TSR 5.
  - However, because WOS #1 has 50 MWs of capacity available and (F)TSR #1 and (F)TSR #5 together only use 30 MWs BPA would offer (F)TSR 2 the ability to split into two (F)TSRs. One that uses up the remaining capacity on WOS #1 and the second that has flows on WOS #2. Splitting a (F)TSR to maximize the capacity use on a smaller project and to provide customers with a chance to lower their costs is a status quo process. LTF service for (F)TSR 2a will take effect at the later of the requested service start date or the energization of WOS #1. LTF service for (F)TSR 2b will take effect at the later of the requested service start date or the energization of WOS #2, if the customer chooses to continue to pursue service on WOS #2.

  If this customer is taking CFS, BPA has not increased its revenue stream and has increased the costs for (F)TSR 2.
- **(F)TSR 3** - Loses its queue position because the resource's COD is later than (F)TSR 5 and (F)TSR 1. LTF service will take effect at the later of the requested service start date or the energization of CCN #2, the last project in the plan of service to be energized.
- **(F)TSR 4** - Loses its queue position because of the energization date of CCN #2 even it has the same COD as (F)TSR 5. If CCN #2s energization date was prior to WOS #1 or WOS #2 then it would also move up in queue position. LTF service will take effect at the later of the requested service start date or the energization of CCN #2, the last project in the plan of service to be energized.
- **(F)TSR 5** – Moves up in queue position to take over capacity created by WOS #1 because its resource has an earlier COD and it does not need CCN #2. If this (F)TSR is already taking CFS the queue position change has no revenue benefit to BPA. It simply swapped costs with (F)TSR 2.

QM-FSP-ALT-2: Prioritizing Service Readiness

Pros

- Sends a market signal to be ready as fast as possible.
- Any potential other benefits would only occur under specific rare circumstances, such as when there is only 1 project in a (F)TSR's plan of service, the (F)TSR is not taking CFS, the project driving the queue jumping is the last project in a plan of service to energize, etc.

Cons

- Does not align with foundational FERC pro forma principles that queue order is how capacity, and therefore costs, are allocated to service requestors.
- BPA will need to develop criteria that distinguishes service readiness between (F)TSRs and what to do as that information changes over time.
- Routinely tracking a dynamic set of variables to establish which (F)TSRs are more ready than other (F)TSRs is a poor use of staff time.

Cons (continued)

- Routinely tracking flow impacts of each (F)TSR on each project is a poor use of staff time
- Requires creating and maintaining a review process Lack of stability in the plan of service necessary to enable LTF service creates uncertainty for BPA and for the customer, from both a need and cost perspective.
- Even with clearly defined priority criteria there will be a perception of BPA picking winners and losers.
- Constantly changing the plan of service makes it…
  - Difficult to allocate and track project funding.
  - Difficult to track the shifting of customer pro rate share of costs between projects.
- If a customer is taking Conditional firm service, then any queue jumping to cheaper projects because one (F)TSR is more service ready than another does not change the revenue BPA is receiving.

Relationship with all other Decisions: There may be ways to make this work with all other decisions, but it significantly complicates them.

QM-FSP-ALT-3: Accepting Contingent Offers of Service

This alternative is the same as QM-FSP-ALT-2, except that before BPA would bump any higher queued (F)TSRs BPA would make a contingent offer of long-term firm service to the higher queued (F)TSRs. If the higher queued (F)TSRs signed the contingent service offer then they would maintain their queue position. If they did not, then they would be bumped.

Pros

- Same as QM-FSP-ALT-2.
- Customer is choosing to maintain its queue position, rather than BPA making a queue position decision unilaterally.

Cons

- Same as QM-FSP-ALT-2.
- Adds another layer of process over QM-FSP-ALT-2 for administering the First Right of Refusal service offer.

Relationship with all other Decisions: There may be ways to make this work with all other decisions, but it significantly complicates them.

Transition Studies (PP-TS)

Transition Studies (PP-TS) | Overview

- Problem
  - The implementation timeline for a Proactive Planning Program will depend on the characteristics of the program ultimately adopted.
  - BPA is considering alternatives for how to approach its study process during the period of transition to the future state.
  - In order to get off the TSR processing pause, the Proactive Planning team must pivot to perform additional transition analysis. Depending on the outcome of queue reform, the queue size will be a determining factor in which type(s) of transition analysis can be completed.
  - Additionally, the same team that does this transition analysis is also working to stand up Proactive Planning and achieve the future state. Essentially, more time dedicated to transition analysis will delay the future state.
- Objectives
  - To end the pause on TSR processing.
  - Establish Proactive Planning in the future state.

Overview of TS Alternatives (PP-TS-ALT-#)

#	Option	Description	Queue Size(s)*		
			S	M	L
1	Main Grid SIS, with Full POS After SIS Decision Point*	Main grid transmission System Impact Study (SIS) with customer decision point prior to Sub-grid analysis & full Plan-of-Service (POS) development.		X	X
2	Full SIS with Decision Point, prior to full POS	Main-grid & Sub-grid SIS with customer decision point prior to full POS development.	X	X	
3	Long-Term Planning Study + Partial Commercial Study*	Long-term planning study completed in 1-2 years followed by a commercial study to develop POS for TSRs whose main-grid constraints are addressed by GERP projects.	X		
4	Long-Term Planning Study + Full Commercial Study	Long-term planning study completed in 1-2 years followed commercial study to develop POS for all TSRs.	X		
5	Study to Resolve Interim Service Ineligibility	Study to resolve sub-grid constraints for interim service offers. Does not address main-grid constraints.	X		
6	Distribution Factors	Identify impacts and determine POS via distribution factor calculations.	N/A	N/A	N/A
7	10- & 20-Year Transition Study	Identify GERP projects via 10- and 20-year outlook studies leveraging WestTEC scenarios.	N/A	N/A	N/A
8	Wait for Future State Process	No transition study or POS. Hold to develop full Proactive Planning methodology.	N/A	N/A	N/A

* May require a tariff change to implement.

PP-TS-ALT-1 | TSP: Main Grid SIS, with Full POS After SIS Decision Point*

Queue Size(s)		
S	M	L
	X	X

Main grid transmission System Impact Study (SIS) with customer decision point prior to Sub-grid analysis & full Plan-of-Service (POS) development.

Pros

- Good for a large queue analysis. Possible for any size queue.
- Reduced queue size for sub-grid analysis. Early off-ramp.
- Potential decrease from 2 batches to 1 if on edge.
- Could be shorter overall.
- Would require fewer full POS to be developed to process queue.
- Interim Service offered if available

Cons

- Timeframe dependent on customer response times to main grid evaluation.
- Effectiveness reliant on sufficient usage of off-ramp.
- Could be longer overall.
- May not be feasible due to staffing & contracting constraints.
- Requires customer commitment before offer of a full POS.
- Interim Service offers very limited

* May require a tariff change to implement.

TSRs: Full POS

PP-TS-ALT-2 | Full SIS with Decision Point, Prior to Full POS

Main-grid & Sub-grid SIS with customer decision point prior to full POS development.

Queue Size(s)		
S	M	L
X	X	

Pros
- Provides earlier off-ramps.
- Can batch.
- Complete POS.
- Interim Service offered if available.

Cons
- Long process.
- Batching is time consuming.
- Labor intensive.
- Effectiveness reliant on sufficient usage of off-ramp.
- PP would be on hold until completed.
- May not be feasible due to staffing & contracting constraints.
- Interim Service offers very limited.

TSRs: Full POS

PP-TS-ALT-3 | Long-Term Planning Study + Partial Commercial Study*

Long-term planning study completed in 1-2 years followed by a commercial study to develop POS for TSRs whose main-grid constraints are addressed by GERP projects.

Queue Size(s)		
S	M	L
X		

Pros

- Provides full POS to a limited set of customers.
- Some main grid projects identified sooner.
- Faster, reduces the amount of POS that needs to be developed.
- Interim Service offered if available.

Cons

- Rushes process creation.
- No customer engagement before commercial study.
- May not give quality main grid projects.
- Possibly does not recommend full POS for all TSRs.
- Study before queue is ready so won't know queue size.
- Could only work for a small queue.
- May not be feasible due to staffing & contracting constraints.
- Interim Service offers very limited

* May require a tariff change to implement.

TSRs: Full POS for subset of TSRs

PP-TS-ALT-4 | Long-Term Planning Study + Full Commercial Study

Long-term planning study completed in 1-2 years followed commercial study to develop POS for all TSRs.

Queue Size(s)		
S	M	L
X		

Pros

- Provides full POS to all customers remaining in queue.
- Faster identification for subset of main grid projects.
- Interim Service offered if available.

Cons

- Rushes process creation.
- No customer engagement before commercial study.
- May not give quality main grid projects.
- Study before queue is ready so won't know queue size.
- Could only work for a small queue.
- May not be feasible due to staffing & contracting constraints.
- Longer than option with Partial Commercial Study.
- Interim Service offers very limited

TSRs: Full POS

PP-TS-ALT-5 | Study to Resolve Interim Service Ineligibility

Study to resolve sub-grid constraints for interim service offers. Does not address main-grid constraints.

Queue Size(s)		
S	M	L
X		

Pros

- Offers a path to additional Interim Service for eligible TSRs.
- Provides clarity on sub grid limitations.

Cons

- Heavy burden on operations.
- Difficult to find solutions to reliably monitor and manage offers.

TSRs: Full POS for subset of TSRs

PP-TS-ALT-6 | Distribution Factors

Identify impacts and determine POS via distribution factor calculations.

Queue Size(s)		
S	M	L
N/A	N/A	N/A

Pros
- Simplicity & speed.
- Option if there is no bandwidth to do studies.

Cons
- Low accuracy.
- High risks to Finance and Operations.
- Puts credibility with customers at risk.
- May change considerably upon further analysis.

TSRs: No full POS

PP-TS-ALT-7 | 10- & 20-Year Transition Study

Identify GERP projects via 10- and 20-year outlook studies leveraging WestTEC scenarios.

Queue Size(s)		
S	M	L
N/A	N/A	N/A

Pros

- Some main grid projects identified sooner.

Cons

- Would not produce complete POS.
- May not be quality main grid projects.
- Rushes the process creation.
- Does not include a commercial study.
- Lacks pre-study customer engagement.
- May not be feasible due to staffing & contracting constraints.

TSRs: No full POS

PP-TS-ALT-8 | Wait for Future State Process

No transition study or POS. Hold to develop full Proactive Planning methodology.

Queue Size(s)		
S	M	L
N/A	N/A	N/A

Pros

- More time for PP to stand up a quality process that is not rushed.
- Viable option if there is no bandwidth to do studies.
- Allows for robust customer engagement.

Cons

- Potentially a longer wait on processing current queue.

TSRs: No full POS

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

*May require a tariff change to implement.

Alternative Combination

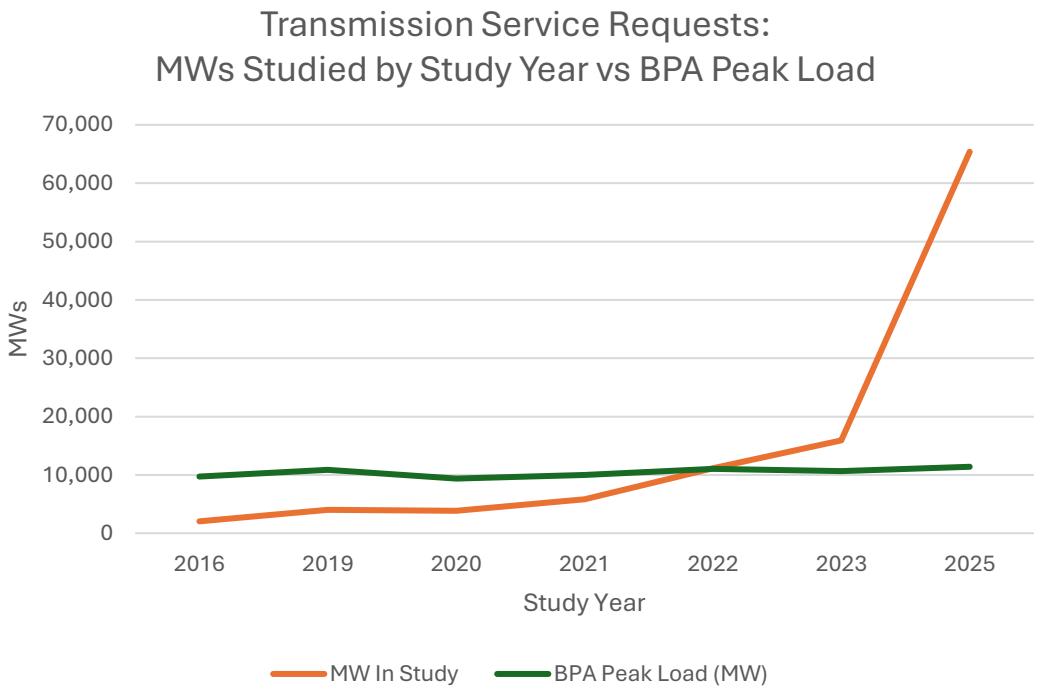
Problem Statement

(shared during Oct. 28 TC-27 pre-proceeding workshop)

- BPA's current means of processing its rapidly growing transmission service request queue no longer leads to solutions that support the region's economic needs.
- An actionable 60+ GW study of BPA's transmission system is not currently possible due to:
  - Having many TSRs with insufficient data to accurately define a plan of service and/or assess capability for Conditional Firm Service; and
  - Unintended consequences of modeling unrealistic load increases or unrealistic generation dispatch patterns to achieve load/resource balance necessary to perform a power flow study; or
  - Inability, using BPA's current processes, to conduct scenario analysis on the scale required to reflect generation dispatch uncertainty; or
  - 7-8 years required to batch TSRs into smaller MW studies.

Background | Queue Overview

Year	MW In Study	BPA Peak Load (MW)
2016	2,042	9730
2019	3,993	10892
2020	3,871	9369
2021	5,842	10005
2022	11,118	11035
2023	15,925	10628
2025	**65,385**	11396



How Alternatives Fit Together

- A solution will require selecting an alternative in each area, aware of how it affects the whole.
- Not all alternative combinations will work together.
- There are many combinations to consider but here are two examples.

Example Combination #1

- NITS Line – implement 13 MW per POD line
- Evaluation Criteria – most stringent
- Interim Service – Offer only mandatory Systems Conditions CFS to PTP Customers
- Queue Management – apply new Evaluation Criteria to all unstudied TSRs in the queue
- Transitional Studies – study only to identify plans of service necessary to grant Interim Service

Example Combination #2

- NITS Line – implement 13 MW per facility
- Evaluation Criteria – moderately stringent
- Interim Service – Offer Number of Hours and/or Systems Conditions CFS to PTP and NITS Customers after the SFS study is completed
- Queue Management – capped
- Transitional Studies – Main Grid with SIS off-ramp, will delay Proactive Planning by 3 years

Next Steps

Next Steps

- **Dec. 17-19:** TC-27 pre-proceeding workshop continues with Analysis and Alternatives of GAT Interim State topics
- **Jan. 6-7:** Continue discussion of December workshop materials and Customers to provide initial feedback.
- **Jan. 7:** Deadline to request time on the Jan. 15 Customer-Led Workshop.
- **Jan. 9:** Please send feedback on the Dec. 17-19 workshop content to techforum@bpa.gov, with a cc to your Account Executive.
  - Use the alternative codes to ensure clear reference and association in your comments.
  - Proposed combinations of alternatives are welcome.
- **Jan. 15:** Customer-Led Workshop.
- The next TC-27 pre-proceeding workshop will be held **Feb. 25-26**.

TC-27 Pre-Proceeding Workshop Schedule

	FY 2026											
	Oct '25	Nov '25	Dec '25	Jan '26	Feb '26	Mar '26	Apr '26	May '26	Jun '26	Jul '26	Aug '26	Sept '26
TC-27 Pre-Proceeding Workshops	**Oct. 28-29** Workshop 1		**Dec. 17-19** Workshop 2	**Jan. 6-7** Workshop 2 (Cont.)	**Feb. 25-26** Workshop 3							
				Jan. 15 Customer-Led Workshop								
TC-27 Tariff Proceeding							**FRN Published ~Apr-Jun**					

- Workshop dates are subject to change.
- All workshops will be held in the BPA Rates Hearing Room with a virtual option.
- TC-27 Federal Register Notice (FRN) publish date depends on when workshops conclude.
- Draft TC-27 procedural schedule will be shared no later than the last workshop.

Question

- Given the content we've covered so far and the remaining currently scheduled workshops, do you believe there is sufficient time for collaboration and engagement to begin settlement discussions in February?