

TC-27 Tariff Proceeding Workshops
Summary of Written Comments Received and BPA Staff's Responses

Last Updated: December 12, 2025

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I. Comments Received in Response to the October 28, 2025 TC-27 Pre-Proceeding Workshop

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| 1 | NIPPC and RNW | NIPPC and RNW support the overall timeline for the TC-27 workshops. While the proposed timeline is aggressive, BPA and its stakeholders have already discussed many of the issues posed in TC-27 in the GAT process. Given the ongoing pause in processing transmission service requests, NIPPC and RNW continue to support rapid resolution of the issues in scope for TC-27. | Thank you for your comment. |
| 2 | NIPPC and RNW | NIPPC and RNW support the proposed scope of TC-27. This support is based on BPA's representations that proposals to reform BPA's planning processes and reforms that will allow BPA to accelerate its expansion of the grid (including enhanced customer build opportunities) will proceed in parallel outside of the formal TC-27 process. NIPPC and RNW appreciate that carving planning and self-build reforms out of the scope of TC-27 will allow BPA and the parties to continue to discuss those issues even after ex parte triggers for the formal TC-27 process. To date, however, BPA has not announced any separate stakeholder processes related planning or self-build reforms. NIPPC and RNW encourage BPA to announce the kick-off date, scope and overall timelines for those parallel processes. | <p>Thank you for your comment. BPA will initiate a parallel customer engagement process for the Accelerate Expansion aspect of the Grid Access Transformation (GAT) Project in the spring of 2026. We will share the vision, approach and timeline for the Accelerate Expansion Future State Program on Dec. 17.</p> <p>The Proactive Planning Future State solutions under the GAT Project will be addressed in future workshops in early 2026. The timeline for the Proactive Planning workshops is still being discussed and will be set considering the impacts of TC-27 decisions. We will provide an update on this timeline in January 2026.</p> |
| 3 | NIPPC/RNW | NIPPC and RNW appreciate the additional information BPA has provided regarding the challenges BPA faces in completing cluster studies under the current paradigm. NIPPC and RNW also appreciate the additional insights related to the problems associated with proposals to "batch" transmission service requests in smaller cluster studies. NIPPC and RNW are particularly concerned that batching would not resolve the queue processing issues BPA has articulated; rather, batching would result in inefficient plans of service that would need to be constantly modified as subsequent batch studies were completed, likely substantially delaying upgrades needed to meet the needs of customers in early batches. | Thank you for your comment. |

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| 4 | NIPPC/RNW | <p>In continuing to consider the solutions BPA proposed as part of the GAT, NIPPC and RNW have identified specific scenarios that a comprehensive TC-27 package will need to address. These scenarios assume that BPA will propose to adopt an approach to processing transmission service requests like that proposed in the GAT (i.e., BPA will immediately award interim conditional firm service to customers who submit a completed application for transmission service in anticipation of BPA being able to firm that service within 5-6 years):</p> <p>A. What options will a customer have when, after accepting an award of interim conditional firm service, BPA determines that the plan of service needed to firm the customer's service will require an incremental rate? NIPPC and RNW suggest that in this circumstance, the customer should have the option to 1.) terminate the service, 2.) elect to continue to take conditional firm service without a bridge to firm, or 3.) elect to continue on the path to firm at an incremental rate.</p> <p>B. The timeline BPA establishes to complete a plan of service to firm a customer's conditional firm service may not meet that customer's needs. In this situation, customers should have an ability to accelerate completion of the plan of service needed to firm their service. The solution could consist of a self-build option at the customer's cost and risk.</p> | <p>Thank you for your feedback.</p> <p>A. NIPPC/RNW brings up a reasonable point regarding options for Conditional Firm Bridge service should a Customer's plan of service require an incremental rate. This will be included in the alternatives for consideration.</p> <p>B. We are evaluating how to accelerate the expansion of the transmission system, including an exploration of how customers could build transmission to be owned and operated by BPA. We view the Accelerate Expansion aspect of the Grid Access Transformation Project as outside of the scope of the TC-27 proceeding. We are sharing the vision, approach and timeline for the Accelerate Expansion Future State Program in the Dec. 17 meeting.</p> |
| 5 | NRU | <p>Overall, NRU supports BPA's proposed scope for its TC-27 proceeding, as outlined at the Workshop. BPA's proposal to include the Evaluation Criteria, Long-Term Firm Queue Management, and Interim Service topics within the TC-27 proceeding appears reasonable as these elements will very likely significantly affect the terms and conditions of its transmission products and services. Moreover, these topics are complex, will affect a wide cross section of transmission customers, and are sufficiently impactful to justify the additional time and regional engagement provided through the TC-27 proceeding. It is critical that a robust record be developed to support these proposals, given the durable nature of tariff reforms and the necessary time and burden to later modify them.</p> | <p>Thank you for your comment. We remain open to adding workshops as necessary to the pre-proceeding period.</p> |

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| | | As such, and to ensure that the TC-27 proceeding can be as expeditious as possible, we encourage BPA to be open to holding any additional stakeholder engagements as necessary during the pre-proceeding period to build consensus before the commencement of ex parte communications. We specifically appreciate BPA’s recent addition of a third day to its mid-December 2025 workshop and recognize this is a direct response to feedback from interested stakeholders on increased discussion on the GAT reforms. | |
| 6 | NRU | <p>Additionally, we generally support BPA’s intent to exclude the NITS Forecasting topic from the TC-27 proceeding. As explained in the Workshop, BPA proposes to adopt an annual new large load threshold through revisions to relevant NITS business practices on a shorter timeline than that of the TC-27 tariff proceeding. Although we remain uncertain whether a bright-line value is an appropriate permanent solution, we agree with BPA that this should allow it to begin responding to and encumbering transmission capacity for a significant quantity of load and resource forecasts – i.e., a foundational tariff obligation to its NITS customers – in the near term. Additionally, and equally importantly, maintaining these policies in business practices will enable their timelier adjustment or, if necessary, elimination in the future more easily than if they are maintained in BPA’s tariff. This is a critical aspect given the uncertainties remaining in the NITS Forecasting topic, as described below.</p> <p>BPA noted that certain NITS Forecasting elements will neither be clarified through near-term revisions to business practices nor through the TC-27 proceeding. Specifically, BPA stated that both the treatment of forecasts that exceed the annual large load threshold as well as BPA’s application of its “70% Probability” screen to new load forecasts will both be addressed within the Proactive Planning topic – a topic currently lacking a discrete implementation timeline and critical detail. As a result, it is appropriate and necessary to codify any near-term NITS Forecasting policies through relevant business practices while BPA develops and shares additional details on the holistic impact to NITS customers of load forecasts in excess of an annual large load threshold. Along this line, we are encouraged by</p> | <p>Thank you for your comments. We agree and anticipate adjusting the Network Integration Transmission Service (NITS) Business Practice (BP) to reflect changes to forecasting rules. We may update the NITS BP at an earlier timeframe than other business practice updates necessary to implement the record of decision in the TC-27 proceeding but the NITS Forecasting topic is still a part of the scope of the TC-27 pre-proceeding workshops.</p> <p>We intend to hold an engagement process on future state topics of Accelerate Expansion and Proactive Planning, in parallel with the TC-27 process in the spring of 2026. We are sharing the vision, approach and timeline for the Accelerate Expansion Future State Program in a Dec. 17 meeting. The timeline for the Proactive Planning workshops is still being discussed and will be set considering the impacts of TC-27 decisions. We will provide an update on the Proactive Planning workshops in January 2026. We do intend to address “70% Probability” as part of the future state workshops.</p> |

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| | | and greatly support BPA’s apparent intent to continue conducting stakeholder engagement for the Proactive Planning and Accelerate Expansion topics in parallel with the TC-27 proceeding, rather than deferring these to a later proceeding. BPA cannot delay developing these concepts given the significant and complementary role these elements will play in meeting NITS load and resource forecasts on a long-term basis. | |
| 7 | NRU | <p>BPA acknowledged at the Workshop that certain aspects of BPA’s annual large load staff leaning required additional discussion and analysis, such as whether any annual large load threshold would be applied on a per-Point of Delivery (POD) or instead a per-Facility basis, how it might affect forecasted new resources without a corresponding load increase, and how the policy would apply to Contracted-For/Committed-To loads. NRU agrees that these aspects require additional discussion.</p> <p>BPA’s presentation also solicited from customers other outstanding aspects that would be important to discuss. In this vein, an additional aspect not described by BPA but that also requires additional discussion is any impact of a large load threshold on NITS customers located outside of BPA’s service territory (i.e., Transfer Service customers). This is a critical set of BPA transmission customers that may justify nuanced consideration of the new large load policies, particularly in the implementation of any such policies. To the extent that BPA determines load growth above a specific threshold requires a modified planning process, it must ensure that such policies do not unnecessarily harm those NITS customers with loads outside of BPA’s service territory and who may already face large load requirements imposed by their host utility, or who do not interconnect directly to a BPA POD.</p> | <p>Thank you. A revised staff leaning will be provided in the Dec. 17-19, TC-27 pre-proceeding workshops where additional discussion on these aspects of the NITS forecasting proposal can take place.</p> <p>To date, we have not identified transfer service implications of the load forecasting proposal but will evaluate unforeseen impacts moving forward.</p> <p>BPA is not able to guarantee service on other transmission providers’ systems. Customers with Transfer Service are responsible for working with BPA’s transfer services group through the Regional Dialogue contract, or Provider of Choice (POC) contract, to deliver power from the Scheduling Points of Receipt (POR) to the customer’s loads. In BPA’s POC contract if the third-party transmission provider is unable to provide firm transmission services for the customer’s Network Load or Resource, we will not be obligated to serve the Network Load or Resource until the transmission provider has built or expanded facilities to accommodate the resource or load growth. We are continuing to improve coordination of forecasted load increases between BPA and other transmission providers. We are working to develop an annual meeting with transmission providers to discuss BPA’s transfer service customer forecasts.</p> |

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| 8 | NRU | <p>Finally, NRU urges BPA to consider modifying its NITS Forecasting staff leaning from a threshold of 13 MW to a minimum of 20 MW. As BPA is undoubtedly aware, the Department of Energy’s recent directive to the Federal Energy Regulatory Commission (FERC) to establish standardized load interconnection procedures proposed that such large load interconnection policies should apply only to loads greater than 20 MW. Additionally, a 20-MW threshold would align with the threshold contained in the definition of a large generator under FERC’s Large Generator Interconnection Procedures, to which BPA already adheres.</p> <p>Further, BPA previously presented in its July 2025 GAT deep dive workshop that its leaning was to require NITS customers to submit a Line & Load Interconnection Request for any addition of 20 MW or more at an existing POD. To the extent that BPA believes it must implement a MW threshold for large loads, NRU encourages it to at least align its planning thresholds across its various transmission services: Generator Interconnection, transmission network, and Line & Load Interconnection. Doing so would establish a consistent planning framework and prevent otherwise avoidable confusion.</p> | <p>Generator Interconnection, transmission service, and Line & Load Interconnection are planned for through separate processes and have different requirements and business needs, some of which are specified in BPA’s OATT or transmission business practices. As a result, at this time there will not be a consistent threshold across all planning processes. As the industry continues to define different requirements we will monitor the relationships between planning processes.</p> |
| 9 | Seattle City Light | <p>City Light asks BPA to consider that the “Pause” in processing TSRs and long-term redirects is causing real harm and further uncertainty to customers that need to acquire new resources for load growth and resource adequacy. Additionally, the delay of the Generation Interconnection transition cluster study is exacerbating resource acquisition and resource adequacy challenges.</p> | <p>We are considering a partial reopening of the queue for original and redirect transmission service requests with <i>de minimis</i> impacts and discussing this in the December workshops. We will seek feedback on this during the December workshop.</p> |
| 10 | Seattle City Light | <p>City Light generally supports BPA staff leanings presented July 29th during the Grid Access Transformation process. City Light understands BPA’s decision to shift from reforming transmission planning through business practice changes to a tariff process while encouraging BPA to not unnecessarily delay the process.</p> | <p>Thank you for your comment.</p> |

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| 11 | Seattle City Light | City Light suggests BPA maintain their focus on the future state where customers making a new TSR are granted non-firm interim service with rollover rights that will be firmed up within five to six years. | Thank you for your feedback. We will be sharing alternatives for interim service options at the Dec. 17-19, TC-27 pre-proceeding workshops, where we will provide opportunity for customer feedback. |
| 12 | Seattle City Light | City Light encourages BPA to be bold with additional concepts in reforming area of transmission planning. City Light supports BPA making changes that necessarily involve risk of those changes being challenged. | Thank you for your comment. |
| 13 | Seattle City Light | City Light requests that BPA add a fourth day to the December 2025 GAT / TC-27 Pre-Proceeding Workshops to provide time for reflective questions and in-person responses to each of the topics from previous days. Seattle City Light suggests BPA have both technical experts and executives in the fourth day meeting to provide direct answers to customers regarding if an idea is in scope, is possible, and is something BPA would consider or not. This addition to the agenda would greatly help customers understand the bounds of issues and topics that would be helpful to present in the January customer-led workshop. | We have scheduled additional workshops on Jan. 6-7, 2026 in response to Seattle's request for this discussion, or any other additional discussion necessary, following the three-day Dec. 17-19, TC-27 pre-proceeding workshops. |
| 14 | Seattle City Light | Proactive Planning - City Light supports BPA's position to maintain flexibility in how they document their transmission planning processes. City Light believes it is necessary for BPA to use probabilistic analysis to proactively plan for future transmission needs. City Light requests BPA commit to a series of public meetings to engage customers in discussing the assumptions, study process, and risk decisions involved in proactive planning. Accelerate Expansion – City Light supports BPA being able to grant firm transmission for new requests in 5-6 years. City Light is in favor of providing additional resources to BPA to achieve this goal if BPA is clear how it is reforming processes to achieve this goal and is reporting continual progress. | Thank you for the support. We agree and we are committed to a robust customer engagement process as we progress our proactive planning methodology. More will be shared as the process develops. Thank you for your support of Accelerate Expansion program. |

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| 15 | Seattle City Light | City Light supports BPA awarding a non-firm level of service to TSRs in 90 days or less. The product should be equal for both PTP and NITS customers in implementation. City Light suggests this product remaining at a NERC level less than 7F protects the current long-term TSRs including existing CFS. The new non-firm temporary service would be eligible for rollover rights and would be firmed up to long-term firm when BPA completes the needed transmission expansion. | We will be sharing alternatives for interim service at the Dec. 17-19, TC-27 pre-proceeding workshops where we will provide opportunity for customer feedback. While we will work to address requests as quickly as possible once we are off pause, we cannot commit to the proposed timeframe due to yet to be determined implementation needs and supporting timeline. |
| 16 | Seattle City Light | <p>City Light supports BPA applying evaluation criteria to reduce duplicative requests and requests that do not support clear utility business needs. City Light suggests BPA consider that PTP customers have business needs that lead to requesting TSRs that are not from a new generation resource to serve a specific load. These include balancing resources and loads, maximizing transmission portfolio usage, and region-wide market activity.</p> <p>City Light supports BPA's position that neither batch processing nor capped cluster study approach could address the current challenges of queue size with existing BPA resources and processes.</p> | Thank you for sharing your perspective on these issues. |
| 17 | Seattle City Light | <p>City Light supports BPA having a bright line test for NITS load growth that will be commercially studied. City Light suggests that BPA needs to explore ways to implement this bright line where the bright line is applied to an entity regardless of the number of PODs, remote loads, or interconnection facilities involved.</p> <p>City Light suggest BPA consider developing a policy in coordination with customers where new large loads are included in transmission planning when they meet site control and commercial readiness requirements. City Light additionally suggests BPA consider policies and options to reduce the financial risk associated with new large load projects being canceled.</p> | <p>We appreciate your support for a bright line for new network load. We will provide a revised staff leaning for the NITS Forecast pathway at the Dec. 17-19, TC-27 pre-proceeding workshops.</p> <p>Line and Load Interconnection and Generation Interconnection are out of scope for TC-27, but we would like to clarify that BPA does not have commercial readiness or site control requirements in its line and load interconnection process. We will discuss a number of alternatives related to evaluation criteria including line & load maturity at the Dec. 17-19, TC-27 pre-proceeding workshops. We are also considering financial and contractual constructs for our business model proposals that we intend to share at the newly added Jan. 6-7, TC-27 pre-proceeding workshops.</p> |

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| 18 | PPC | <p>We understand that BPA staff is working internally to develop materials for future workshops and being deliberate in completing its six-step customer engagement process; however, we are concerned that the current pace of discussions will not allow sufficient vetting of issues prior to the formal TC-27 proceeding. This is not to suggest that BPA add time to its planned schedule, as the current planning “pause” is having significant impacts to its customers and continuing to progress towards solutions on the current timeline is important. Instead, PPC would like to see BPA use the time available as efficiently and effectively as possible to explore and vet alternatives with customers.</p> <p>In order to do so, PPC requests that BPA take several actions in advance of or as part of the next workshop:</p> <ul style="list-style-type: none">• Provide additional background information that has been requested in written comments submitted by stakeholders, including PPC.• As part of steps 3 and 4 which will be discussed at the December workshops, clearly define the objective related to each identified “problem.” Additionally, the agency should identify the specific criteria that it is using to evaluate identified alternatives. This will help customers understand the tradeoffs that BPA is considering in making its recommendations.• Commit to a specific timeframe and forum for developing the future state as conceptualized in the Grid Access Transformation (GAT) process.• Include time for a customer led workshop immediately following the BPA led meetings in December to allow for customers to provide initial feedback and potentially test ideas for additional alternatives. For this meeting to be effective, BPA staff must be able to engage with and respond to customer proposals and concepts – (identify if alternatives are worth exploring, has already been considered, or is off the table and explain why). This will require the right mix of subject matter expertise at the meeting as well as individuals who have the authority to offer initial thoughts on behalf of the agency. | <p>Thank you for your feedback, we will take your comments into consideration and are addressing some of PPC’s comments as explained below.</p> <p>We intend to share objectives and criteria we are using to evaluate alternatives during the December workshop.</p> <p>We will share the vision, approach and timeline for the Accelerate Expansion Future State Program on Dec. 17. The Proactive Planning solutions under GAT Project will be addressed in future workshops in early 2026. The timeline for the Proactive Planning workshops is still being discussed and will be set taking into consideration the impacts of TC-27 decisions. We will provide an update on this timeline in January 2026.</p> <p>We have scheduled additional TC-27 pre-proceeding workshops on Jan. 6-7, 2026 to allow more time to continue the December workshop content review and discussion, and provide customers time, ahead of the Jan. 15, 2026 TC-27 Customer-Led workshop, to provide feedback. Finally, regarding the customer led workshop, that meeting is an opportunity for customers or other participants in our TC-27 pre-proceeding process, to ask further questions on materials previously presented or to provide a presentation or information related to a topic. BPA staff will not create new content or provide written responses to customer presentations. We will endeavor to engage with information or material shared within a customer-led workshop as possible, including having the correct BPA staff available to attend presentations, based on the information provided to us by presenters ahead of the customer-led workshop. And, we will consider any information or material shared as we refine our proposals.</p> |

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| 19 | PPC | PPC understands the importance of keeping future state issues out of scope for the TC-27 process so that they are not impacted by ex parte. We also acknowledge that there are many important details regarding the transmission planning “future state” which require much more evaluation and discussion. However, not addressing the future state at all in TC-27 provides little certainty for customers that the changes being adopted in this proceeding will eventually culminate in a future state where their needs are met more quickly by BPA through proactive planning and enhanced project execution. The TC-27 process is building a bridge to that future state, and without any commitment to the general concept or an estimated timeline, this process has the potential to be a bridge to nowhere. PPC appreciates the opportunity to brainstorm with BPA on ways that a high level commitment to reaching the future state can be included as part of TC-27, along with a draft timeline, and a potential back stop process if the agency is unable to achieve the future state as envisioned (or if stakeholders and BPA collectively determine that is no longer the best outcome). | BPA understands the importance of engagement on future state details. As shared above, we are sharing the vision, approach and timeline for the Accelerate Expansion Future State Program in the Dec. 17 meeting and as the Proactive Planning team pivots from transitional efforts, more work will be done on the future state methodology. As the transitional plan becomes clear, a timeline for the Proactive Planning future state will follow. |
| 20 | PPC | PPC is working with BPA on several fronts to improve the transmission service it provides to its customers and can appreciate the ongoing challenges with staffing multiple initiatives. At the same time, undertaking these efforts is critical for continuing to modernize BPA’s systems and processes to meet the needs of its customers amidst a quickly changing regional energy landscape. It will be critical that the agency works across functions to ensure that all the proposals being advanced in the TC-27 and GAT processes are consistent with other key priorities such as implementing the Provider of Choice contract, preparing for binding participation in the Western Resource Adequacy Program (WRAP), and joining Markets+. A cross functional agency perspective is also necessary for understanding policy change impacts to business operations and practices and must be clearly addressed in BPA’s evaluation of alternatives. | Thank you for your comment. We will continue to incorporate a cross-functional review of all TC-27 and GAT proposals. |

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| 21 | Grant PUD and Tacoma Power Joint Comments | <p>We support BPA's efforts to modernize its transmission planning framework, particularly the mechanisms proposed to be implemented to clear the existing transmission queue and enable timely and effective transmission studies, so long as those steps are implemented equitably and do not favor one class of queued projects over another. These steps are critical to facilitating the development of new transmission infrastructure and ensuring reliable service across the region.</p> <p>However, stakeholders require and are requesting additional information regarding the proposed Conditional Firm (CFS) Interim Service product before we can offer full support. Understanding how this product aligns with WRAP obligations is essential for utilities participating in the WRAP program assuring Resource Adequacy for all the customers we serve. While BPA has stated that it does not intend to reduce the ability of CFS service to deliver transmission consistently, it is difficult to accept at face value as BPA has announced a plan that would not "firm up" CFS awards. Additionally, BPA appears to indicate an intent to award more CFS at the expense of firm transmission service.</p> | <p>Thank you for your feedback and questions. In the Dec. 17-19, TC-27 pre-proceeding workshops, the presentation on interim service will provide more information and details about alternative proposals for interim service, data and information on our existing Bridge CFS, and analysis of our queue. For example, we will share that one of the goals, or decision criteria, for interim service is to provide a path to long-term firm service.</p> <p>In regard to your questions regarding how interim service may align with WRAP requirements, it is our understanding that under WRAP, a participant can meet their obligations by demonstrating transmission service that is at either NERC 6 or 7 priority. Almost all of our alternatives would qualify for WRAP, with one limited exception. We would appreciate it if you share any additional feedback or concerns you may have regarding our alternatives and WRAP requirements in your comments following the Dec. 17-19, TC-27 pre-proceeding workshops, so we can address those concerns.</p> |
| 22 | Grant PUD and Tacoma Power Joint Comments | <p>We also seek clarity on redispatch protocols, particularly given the potential scale of interim service—up to 60 GW of requests in the current queue. The increased likelihood of redispatch raises concerns about operational reliability and cost implications, which must be addressed transparently. Traditionally PTP service has not been subject to redispatch protocols, so we would like to better understand how it would work operationally.</p> | <p>There are three types of BPA-provided redispatch: discretionary redispatch, emergency redispatch and NT redispatch. Discretionary redispatch is utilized less frequently now that there is an energy imbalance market. Emergency redispatch will remain a tool as necessary. The third type is NT redispatch and is only used to meet the relief obligation for firm NT service. There is not a PTP redispatch protocol. If there are curtailments, then the loads must resupply the lost imports via redispatch of their own generation or purchase actions.</p> |
| 23 | Grant PUD and Tacoma Power Joint Comments | <p>Finally, while stakeholders recognize the distinct roles of Network Integration Transmission Service (NITS) and Point-to-Point (PTP) service, we are increasingly concerned about the growing lack of parity between the two. BPA should consider measures to ensure equitable treatment and access across service types to maintain fairness and system integrity. At the end of the day, we are all in this together with</p> | <p>Thank you for your comment. We agree that PTP and NITS are different services and have distinct attributes. BPA is working to find solutions that may yield service opportunities for both NITS and PTP customers.</p> |

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| | | customers needing certainty to avoid cost impacts, Load Serving Entities (LSE) needing certainty to enter long-term PPA's, developers needing certainty to obtain financing. | |
| 24 | Grant PUD and Tacoma Power Joint Comments | 1. How does BPA incorporate PTP load forecasts into its reliability planning? | The PTP load forecasts are incorporated through the WECC submittals. BPA adopts these submittals into the base cases. |
| 25 | Grant PUD and Tacoma Power | 2. Does BPA forecast regarding shrinkage in its interconnection and TSR queues due to changes in federal policies? Does that shrinkage help us manage the queue? Does it change any of BPA's thinking regarding Interim Service for PTP customers? | We do not forecast changes to the volume of requests in BPA's interconnection or transmission queues based on changes to national or regional policies. We recognize that there are many external factors that could impact the volume of our interconnection and transmission queues. We post information about our queues on the BPA's interconnection and transmission availability webpage. |
| 26 | Grant PUD and Tacoma Power Joint Comments | 3. Regarding Interim Service for PTP customers, what information is BPA relying on regarding the expected frequency, duration (hours) and magnitude (MWh) of redispatch due to new PTP service offers? What happens if BPA or the PTP customer needs to redispatch a non-federal resource? That is, how will NITS and PTP remain non-discriminatory if NITS customers are paying pro forma redispatch costs as a class but PTP customers are incurring actual redispatch costs individually? Is that "comparable" and "not unduly discriminatory"? | BPA does not have a forecast of congestion due to new PTP service offers because the amount of that service is not yet known. Consistent with the Redispatch and Curtailment Procedures Business Practice, BPA currently does not redispatch non-federal resources. BPA is not involved with PTP customers redispatching non-federal resources. PTP and NITS are different services and their differences are not unduly discriminatory. |
| 27 | Grant PUD and Tacoma Power Joint Comments | 4. What additional tools or processes should BPA put into place to help PTP customers manage what is reasonably expected to be more frequent and longer curtailment of Interim Service? Does BPA expect to request redispatch of non-federal resources in order to manage curtailments of Interim PTP? Should the choice of resources to redispatch attempt to minimize the cost to the region of all such redispatch? | We do not rely on customers managing curtailment on BPA's system. At this time, under the Redispatch and Curtailment Procedures Business Practice, BPA does not redispatch non-federal resources. |

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| 28 | Grant PUD and Tacoma Power Joint Comments | We are also requesting an additional day as part of the December TC-27 Workshop process for an open discussion about topics as part of the planned activities. We appreciate BPA's leadership and look forward to continued collaboration and consideration of these requests as we partner to ensure a robust and reliable transmission system is available for the region. | Thank you for your comments. We have extended the December workshops by one day to allow additional time for material related to TC-27 and GAT Future State. We have also scheduled additional workshops on Jan. 6-7, 2026, which may be utilized, as necessary, for continued discussion or feedback. |
| 29 | Avangrid | <p>As a threshold matter, Avangrid strongly recommends that any reforms adopted in this proceeding should promote parity between customer classes and service types. At a minimum, we recommend that any tariff updates should align with FERC open access principles and the recent U.S. Department of Energy ("DOE") directive to provide nondiscriminatory access to the federal transmission system. It also means, however, that if staff is going to implement a new BP that benefits one customer group, it should take care that the BP does not disadvantage any other customer groups. And if TC-27 concludes with a clear process for Network Integration Transmission Service ("NITS") customers to increase their load forecasts and utilize more of Bonneville's transmission capacity, there should also be a clear process for Point-to-Point ("PTP") customers to address their load increases and to utilize more of Bonneville's transmission capacity as well. Although transmission expansion is technically paused for both customer groups, Avangrid is concerned that normal NITS load growth might be un-paused (and awarded any capacity made available through the Evolving Grid projects) while PTP and NITS customers with new large single load requests are left to reform an over-burdened study process.</p> <p>To that end, although Proactive Planning was not included in the scope for the TC-27 proceeding, Avangrid nevertheless encourages staff to begin considering ways to put in place a paradigm to evaluate load growth for all customers more holistically, which ideally would be commensurate with any reforms to the agency's planning paradigm for load growth for NITS customers.</p> | BPA is committed to provision of transmission service on a non-discriminatory basis consistent with BPA's tariff and FERC's open access principles. We note that BPA's obligation to plan for reasonably forecasted load growth for NITS customers, who must supply 10-year load and resource forecasts to BPA annually, is different from our obligations to PTP customers, who must secure additional transmission service to accommodate load growth. |

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| 30 | Avangrid | <p>A. Bonneville Should Strive to Provide Parity Between Customer Groups</p> <p>When considering product parity, Avangrid focuses mainly on the difference between NITS and PTP customers, both of which take transmission service under Bonneville's Open Access Transmission Tariff ("OATT").</p> <p>1. FERC Requires Transmission Expansion for Both NITS and PTP Customers Avangrid agrees with Bonneville that FERC's pro forma tariff obligates transmission providers to plan for and accommodate NITS load growth, however it also requires transmission providers to plan for and accommodate PTP service. Because nothing requires Bonneville to prioritize either service above the other, it is incumbent upon Bonneville to ensure that any reforms adopted in this proceeding maintain parity between the two foundational pro forma transmission products.</p> <p>As Bonneville staff has explained in previous workshops, Section III of the OATT obligates NITS customers to provide load and resource forecasts, which Bonneville must acknowledge and use reasonable efforts to provide service to accommodate as soon as practicable.³ A missing element, however, is that Section II of the OATT also obligates Bonneville to offer a PTP agreement when PTP service is requested, and expressly states that if Bonneville is incapable of providing any Firm PTP service requested, the agency is "obligated to expand or upgrade its Transmission System" to do so.</p> <p>Avangrid could not find anything in Bonneville's OATT that directs the agency to prioritize either NITS or PTP in transmission planning, and thus, Avangrid recommends the agency continue to address system needs without preference to any subset of customers, and to increase transparency regarding the need and timing of funds necessary to meet its obligations to provide reliable transmission service to all of its customers. In particular, we strongly recommend that Bonneville must not adopt any reforms that elevate the needs</p> | <p>BPA is committed to provision of transmission service on a non-discriminatory basis consistent with BPA's tariff and FERC's open access principles. FERC has been clear that NITS and PTP are distinct offerings, with different attributes. NITS customers are required to forecast loads and resources annually, and these forecasts are foundational to BPA's ability to plan the transmission system.</p> <p>We note that BPA's obligation to plan for reasonably forecasted load growth for NITS customers is different from BPA's obligations to PTP customers, who must secure additional transmission service to accommodate load growth. One of the core elements of FERC's open access policies is the ability of transmission providers to include protections to ensure reliable service to network load customers, including the reservation of existing transmission capacity for reasonably foreseeable network transmission load growth. Our proposals seek to balance the need to meet network load service obligations and the need for other entities to obtain service to meet their own obligations.</p> |

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| | | associated with NITS load growth (native or otherwise) above those of PTP customers, even on a temporary or interim basis. | |
| 31 | Avangrid | <p>2. DOE Requires Nondiscriminatory Access to Transmission Systems, Despite Unprecedented New Load Growth</p> <p>The recent DOE initiative underscores the obligations discussed above in FERC's pro forma tariff. DOE's Advanced Notice of Proposed Rulemaking ("ANOPR") sets out clear guidance prohibiting discrimination based on unprecedented new load demands, which makes clear that all entities seeking service on the federal transmission system must be treated in a nondiscriminatory manner. We believe it therefore behooves Bonneville to align with DOE, along with any FERC guidance issued in the rulemaking opened to consider the ANOPR, to ensure that any policies and/or tariff revisions considered in the instant proceeding conform with federal open-access standards.</p> | Our proposed treatment of NITS forecasts may be viewed as more restrictive for NITS customers than the 20 MW threshold presented for comment in the current FERC proceeding regarding the interconnection of large loads, but it is intended to increase the transparency and efficiency of BPA's NITS load and resource forecasting processes. We will continue to monitor FERC proceedings and as the industry continues to define different thresholds, we will evaluate whether any change is necessary in our planning processes. |
| 32 | Avangrid | <p>3. Bonneville Should Consider Issuing a New BP to Resume Processing Redirects as Comparable to the Anticipated BP Allowing Limited Load Growth for NITS Customers</p> <p>[See Avangrid comments for their complete comment on this topic]</p> <p>...Based on staff's explanation that allowing redirects with even a <i>de minimis</i> impact on capacity might undermine outstanding NITS requests, it seems logical that allowing NITS customers to increase their load forecasts 13 MW per POD (or potentially per facility) before the pause is lifted could similarly impact the ability of potential redirect requests to be granted. Avangrid asks Bonneville to consider whether there is a way to permit some level of redirects to provide more parity between customer groups, and if not, to explain how issuing the BP on limited load growth for NITS customers while redirects with even <i>de minimis</i> impacts remains paused does not constitute the same "nickel and diming" problem in reverse.</p> | <p>We continue to explore timing to implement the NITS "line" to begin processing "below the line" NITS load and resource forecasts. We are seeking feedback on this in the December workshop.</p> <p>In addition, we are considering a partial reopening o the queue for original and redirect transmission service requests with <i>de minimis</i> impacts, which we are discussing in the Dec. 17-19 TC-27 pre-proceeding workshops. We will also seek feedback on this during the December workshops.</p> |

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| 33 | Avangrid | <p>B. Bonneville Must Maintain Nondiscriminatory Access to its Transmission System, and Especially Between Business Lines</p> <p>When considering, designing, and administering reforms in a manner consistent with open-access principles to ensure nondiscriminatory treatment among customers, Avangrid notes these issues are equally applicable to distinctions between NITS and PTP customers, but perhaps more significant when considering the difference between customers of Power Services (“PS”) and Transmission Services (“TS”).</p> <p>1. Interim Service Should Be Offered Consistent with Open-Access Principles</p> <p>The Draft Business Practices contemplate scenarios in which certain customers might be offered interim service while other similarly situated customers may not. The relationship between Bonneville’s previously proposed readiness criteria, security provisions, and the ultimate offer of interim service lacked key details, which raised questions about compliance with open-access obligations that could undermine stakeholder confidence if left unaddressed in the TC-27 proceeding.</p> <p>Furthermore, while some customers were permitted to decline interim service without penalty, others were not afforded the same flexibility—creating inequities and potential disputes over disparate treatment. Avangrid therefore strongly urges Bonneville to clarify the criteria for interim service offers, apply those criteria consistently across all customer groups, and reconsider allowing unstudied TSRs the same opportunity to decline interim service as studied TSRs, consistent with fundamental notions of fairness and nondiscriminatory principles.</p> | <p>Thank you for your comments. We are considering alternatives on the issue of whether a customer may decline an interim service offer. At the Dec. 17-19, TC-27 pre-proceeding workshops we will provide an in-depth breakdown of the alternatives being considered. We will consider your feedback as well as comments we receive both during the workshop or in writing in evaluating the alternatives.</p> |

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| 34 | Avangrid | <p>2. Capacity Made Available from Evolving Grid Projects Must Be Awarded Consistent with Open-Access Principles</p> <p>As briefly noted above, Bonneville's prior intention to allocate capacity from the Evolving Grid Projects before evaluating all pending TSRs for interim service could result in an uneven playing field. The sequencing employed by Bonneville could inadvertently disadvantage certain projects or customer groups, particularly if interim capacity is awarded prior to a comprehensive evaluation of all eligible TSRs. Avangrid therefore recommends Bonneville revisit its approach to sequencing to ensure that all interim service opportunities are distributed in full alignment with open-access requirements.</p> | <p>We recognize the timing of certain activities could have unintended consequences and will consider your feedback as we develop proposals and information to share in the TC-27 pre-proceeding workshops.</p> |
| 35 | Avangrid | <p>C. Bonneville's Scope for TC-27 Appears Workable but May Invite Inefficiencies That Could Be Avoided</p> <p>Avangrid continues to believe that the proposed interim service concept, with some changes to better align with transmission customer needs, could serve as a valuable tool for optimizing existing system capacity while longer-term solutions are pursued. As discussed in more detail above, this belief is premised on the assumption that the various reform concepts will work together to provide nondiscriminatory access to the transmission system consistent with open-access principles. By continuing to bifurcate between near-term and longer-term solutions, however, Avangrid is concerned that the TC-27 proposals may inherit some of the uncertainty from the prior BP proposals. To that end, Avangrid provides the following general recommendations.</p> <p>1. Bonneville's TC-27 Interim Service Proposal Should Include a Clear Path to Firm Service that Aligns with Project In-Service Dates</p> <p>While the interim service concept has merit, it is difficult to see how it can be applied to the existing queue without providing clarity about the remaining path to firm transmission</p> | <p>Thank you for your feedback. At the December 17-19, TC-27 pre-proceeding workshops we will provide an in-depth breakdown of the alternatives being considered for interim service. We will consider your comments, including deferrals, as part of our evaluation of the alternatives.</p> |

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| | | service. Bonneville’s previous proposal focused primarily on the near-term transition with the intention to figure out the remaining proposals afterwards. This approach makes sense from a transmission planner’s perspective, because it allows Bonneville to resume processing quickly by focusing on a much smaller portion of mostly mature TSRs that could be awarded interim service without requiring a study. But this approach makes less sense for customers that are being asked to put money at risk to remain in the queue without any clarity about when their (potentially unnecessary) interim service may be offered, whether additional studies and/or construction may be needed, and if so, what kinds of additional costs may be needed to reach an eventual award of firm transmission service. Furthermore, the interim service model appears to be predicated on aligning with project build schedules and does not contemplate deferral opportunities to ensure alignment with actual project in-service dates. We strongly recommend considering proposing an interim service product that includes deferrals to ensure customers are not paying for service prior to need. | |
| 36 | Avangrid | <p>2. Bonneville’s TC-27 Proposal Should More Fully Develop the Security Mechanisms for Supporting an Eligible TSR, and Include Decision Points and Offramps Where Financial Obligations Are Commensurate With Anticipated Costs and Risk</p> <p>Avangrid recommends Bonneville provide a crosswalk between the current TSR Study and Expansion Process (“TSEP”) using the example previously provided by staff, which illustrates each form of financial commitment needed for a hypothetical 100 MW TSR requiring three separate \$200 million expansion projects, to the proposed process so that customers can better understand when all refundable deposits, non-refundable fees, security requirements, plus any other costs, rates, or milestone payments that may reasonably be anticipated. This crosswalk is important because it will help customers understand which costs are knowable, when any initially unknowable costs are expected to become knowable, and when offramps are available throughout.</p> | Thank you for the suggestions. We will consider your suggestion of developing a crosswalk as we develop proposals and information to share in future TC-27 pre-proceeding workshops. |

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| | | For example, will TSR deposits and application fees remain the same? If some limited number of batched studies are needed, will study costs be required? If construction is required, will a Preliminary Engineering Agreement or Environmental Study Agreement be needed, and if so, will there be costs associated? If at the end of a (potentially unnecessary) five-year interim service agreement the construction expansion needed is not yet complete, will the customer have to keep paying interim service to stay in the queue? If any key components are left unaddressed when TC-27 concludes, it is difficult to understand how customers can possibly weigh the financial risk to remain in Bonneville's queue. | |
| 37 | Avangrid | In addition to the familiar decision points from the current TSEP, Avangrid asks Bonneville to consider any overall process points that would be specific to the new reformed process. For example, are there any situations where firm service cannot reasonably be rewarded but Bonneville will still provide a guaranty of delivering power from a project to support project financing? Does Bonneville have any willingness to consider decision points that would allow customers to transfer pending TSRs, e.g., if construction funding moves to a flat fee rather than a pro-rata allocation? | Thank you for the suggestions. We will consider your feedback, we anticipate discussing some of these topics such as "decision points" in the newly scheduled Jan. 6-7, TC-27 pre-proceeding workshops. |
| 38 | Avangrid | In closing, Avangrid stresses that financial obligations should escalate so that they are commensurate with risk. If Bonneville is going to do a study, it makes sense that there be a decision point before that study that includes a reasonable estimate of the study costs. If Bonneville is going to design and construct transmission facilities, it makes sense that there be a decision point before that begins that includes reasonable securitization. Avangrid remains confused as to what the initial security requirements for commercial readiness and interim service are securitizing and asks that Bonneville reconsider whether these "pay to stay" charges need to be fully at risk before a plan of service is available or whether they should be partially refundable based on the project's potential path to firm service. If Bonneville maintains a model where the initial securitization remains fully at risk, it seems reasonable that the agency might also commit to eventually awarding firm service. | Thank you for the suggestions. We will consider your feedback as we develop proposals and information to share in the TC-27 pre-proceeding workshops. In particular, BPA intends to review business model options in the newly scheduled Jan. 6-7, TC-27 pre-proceeding workshops. |

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| 39 | Avangrid | <p>3. Bonneville Should Provide Additional Details to Allow Stakeholders Throughout the Region to Weigh the Risk Associated with a New Conditional Firm Product</p> <p>Finally, Avangrid requests Bonneville provide additional information so that stakeholders can better evaluate potential risk associated with using Bonneville's new less-than-firm product. By way of example, Bonneville has provided very clear information about when and how the current Conditional Firm Service ("CFS") product can be curtailed, rules regarding deferral and renewal opportunities, the amount of reassessment that has been offered to date compared to the amount of bridge that has been offered, when the agency anticipates current bridge offers will be offered firm service, and the amount of CFS curtailment that has occurred to date. This kind of information helps stakeholders in the region better understand the product and how reliable it has been to date.</p> <p>Details like this will also be needed for the new CFS product to enable developers to finance new projects that will rely on the new service. It would be helpful if Bonneville could confirm its expectations about whether the new interim CFS product would be awarded conservatively with the goal of maintaining the same quality of service CFS has historically maintained, or liberally with the anticipation that the new product will experience increased curtailment. To date, the information provided about interim service has been too nebulous, with too much uncertainty risk for contracting and/or financing purposes. To the extent practicable, Avangrid encourages Bonneville to host a workshop with utilities and regulators to openly discuss how interim service might impact procurement requirements.</p> | <p>Thank you for your feedback. At the Dec. 17-19, TC-27 pre-proceeding workshops we will provide additional data. We will also discuss the role of Right of First Refusal in Interim Service at that workshop. Deferral discussion is forthcoming as part of the business model proposal we intend to share at the newly added Jan. 6-7, TC-27 pre-proceeding workshops.</p> |
| 40 | Brookfield Renewable | <p>Readiness Criteria – Brookfield Renewable generally supports BPA's adoption of readiness criteria for firm transmission requests to eliminate more speculative, less mature, firm transmission requests. Among other details, Brookfield Renewable supported the adoption of readiness criteria that included a requirement that any new generation have an established plan of service and that, for bilateral transactions, the customer must provide</p> | <p>Thank you for your comment. We will discuss these areas further during the Dec. 17-19, TC-27 pre-proceeding workshop.</p> |

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| | | evidence of transaction maturity. Such evidence could include a power purchase agreement; a letter of intent; a notice of award; or security. | |
| 41 | Brookfield Renewable | Conditional Firm Service (CFS) – Brookfield Renewable supports BPA’s plan to immediately offer CFS to customers before they can provide long-term firm service. Brookfield Renewable noted that BPA’s proposed CFS will be potentially curtailable in all 8760 hours and under certain defined system conditions. Thus, it appears, the proposed CFS will be potentially less firm than the CFS offered today. In its comments, Brookfield Renewable urged BPA to continue to provide curtailment data that can be analyzed and risk-assessed by customers. | Thank you for your comment. In the Dec. 17-19, TC-27 pre-proceeding workshop, we will be presenting CFS alternatives that will be curtailable less than the initial 8,760 hour proposal. |
| 42 | Brookfield Renewable | Self-Build Option – Brookfield Renewable urged BPA to immediately address this issue. Brookfield Renewable recommends that BPA quickly develop and adopt a business practice based on: off-the-shelf generic design and equipment specifications; a list of approved engineering and construction companies (EPCs) and environmental consultants; where EPCs complete the work subject BPA’s approval. | We are evaluating how to accelerate the expansion of the transmission system, including an exploration of how customers could build transmission to be owned and operated by BPA. We are considering Brookfield’s suggestions as part of that effort. We are sharing the vision, approach and timeline for the Accelerate Expansion Future State Program during the Dec. 17 GAT Future State Update meeting. |
| 43 | Brookfield Renewable | Brookfield Renewable supports the overall timeline for the TC-27 workshops and proceeding. As noted above, Brookfield Renewable, BPA staff, and stakeholders have already discussed and commented on, in the GAT process, the issues in scope in TC-27. As such, as Brookfield Renewable has previously stated, it is imperative that BPA resolve these issues and un-pause its existing transmission queue so that commercially viable and ready projects can proceed. | Thank you for your feedback. |
| 44 | Brookfield Renewable | Brookfield Renewable supports the proposed and more limited scope of TC-27. Brookfield Renewable’s support is based on its understanding that, in parallel with the TC-27 proceeding, BPA will continue its efforts – started in the GAT process - to reform BPA’s long-term transmission planning processes and to accelerate its expansion of the grid (including, as noted above, customer self-build options). | Thank you for your feedback. |

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| 45 | Brookfield Renewable | Brookfield Renewable supports BPA's need for quality data exhibit information to appropriately evaluate firm transmission service requests. As noted above, Brookfield Renewable previously supported, and continues to support, application of appropriate readiness criteria so that BPA can process commercially viable and ready transmission service requests, i.e., requests that meet BPA's information requirements and for which BPA can perform solvable studies from which it can develop clear and workable plans of service. | Thank you for your comment. We appreciate Brookfield's indication of support for these requirements and look forward to any additional specific feedback Brookfield might want to provide as these issues are further discussed. |
| 46 | Brookfield Renewable | Brookfield Renewable also appreciates the information presented by BPA regarding the challenges of capped cluster studies and/or batching studies, both of which could result in inefficiencies where BPA may not be able to identify inter-generational (between study group) needs. Brookfield Renewable reasserts that application of appropriate readiness criteria – including, as previously stated, re-application of perhaps more stringent criteria - could result in a set of firm transmission requests – both near-term and long-term – that could be feasibly studied. | Thank you for your comment. We will discuss options at the Dec. 17-19, TC-27 pre-proceeding workshops. We also recognize there is an interplay between the stringency of evaluation criteria and how to structure a queue for study and will consider your feedback as we develop proposals and information to share in the TC-27 pre-proceeding workshops. |
| 47 | Brookfield Renewable | As noted above and in its previous comments, Brookfield Renewable supports BPA's provision of CFS until a long-term firm plan of service can be put in place. Brookfield Renewable once again urges BPA to ensure that both load-serving entities and financial institutions are part of the ongoing dialogue and education process so that they can have confidence that BPA is providing a "firm" transmission service; a service that will ensure that related generation projects and/or contract deliveries are both deliverable and, as applicable, financeable. To that end, Brookfield Renewable renews its request that BPA provide further historical curtailment information (including forced outage and congestion-related curtailment info) and information on the total amount of CFS that can be provided without reducing the service level below firm. Can BPA reasonably provide CFS to the 60 GW in the existing queue? Likely not. More information is needed so that participants can make a risk-assessed evaluation of any proposed CFS service. | Thank you for your feedback. In the Dec. 17-19, TC-27 pre-proceeding workshops we will provide data used to help illustrate volume. |

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| 48 | Umatilla Electric Cooperative | <p>Umatilla Electric Cooperative (UEC), along with Clatskanie People’s Utility District, and Harney Electric Cooperative, hosted a customer-led workshop for the BP-26 rate proceeding. The goal of that effort was to further encourage locating resources close to load by modifying BPA’s Short-Distance Discount and reduce the transmission service costs applied to resources that use little, or in some cases none, of the BPA Transmission main grid (Network Segment). While we still support this effort, we recognize that it is a rate-related topic and not appropriate to discuss in the TC-27 proceedings.</p> <p>However, we remain optimistic that BPA can move ahead toward a more formal and comprehensive approach to encouraging resource location close to load through the TC-27 proceeding. To this end, we recommend BPA consider two topics:</p> <ol style="list-style-type: none">1. Modifying the OATT definition of Network Load; and2. Including in the NITS Forecast process, distinct processing of Behind-the-Meter resources for transactions that do not involve use of BPA Transmission (Network Segment). <p><u>The OATT definition of Network Load</u> The OATT definition of Network Load is out of date. The existing definition results in charging Network Integration Service customers for transmission service not used. This is because the Network Load billing determinant is based on load plus Network Resource generation. While this is in keeping with BPA’s traditional notion that it “stands by, ready to serve” when resources experience unplanned outages, that theory does not universally apply to current operations.</p> <p>Charging service based on gross load even when generation is operating Behind-the-Meter and is serving load at the same electrical location undermines efforts to encourage efficient transmission expansion and upgrades. Additionally, charging for services that are not used is arguably contrary to current industry standards. Finally, these arrangements can be</p> | <p>As part of the BP-26 Transmission Rates Settlement Agreement, BPA will hold at least one public workshop during FY 2026 to discuss the short distance discount and the billing determinant for Network Integration Transmission Service as related to behind-the-meter resources. Umatilla is encouraged to bring its perspectives and ideas to that discussion. A workshop announcement will be sent out by Tech Forum well before the workshop date and it will be added to the external events calendar.</p> <p>At this time, we do not consider modifications to the definition of Network Load or development of a bypass process for load interconnection to be in scope for TC-27. However, we will continue to consider your feedback and suggestions and may propose changes if they align with staff proposals for the upcoming tariff proceeding.</p> |

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| | | <p>designed to ensure that resource operations are prevented from unauthorized use of BPA Transmission.</p> <p>The goal of siting resources close to load has been embraced by BPA since TR-08 and the goal remains valid. In fact, given the current demand for BPA transmission service, and the need to pause processing load forecasts and service requests justifies prioritizing this goal. BPA and its customers benefit from siting resources close to load by reducing or in some cases avoiding Transmission upgrades and expansion. Moreover, there are power flow limiters, system protection facilities, and load shedding schemes that BPA can require to ensure that resource operations are prevented from unauthorized use of the BPA transmission system.</p> <p><u>NITS Forecast Processing</u> BPA has indicated that its NITS Forecasts will be included in the scope of TC-27. Such as identified in BPA's Generation Integration Services Business Practice, where Large Generator requests may bypass Phase One and Phase Two Cluster Studies if specific criteria are met, we encourage BPA to separately process requests for resources forecast to serve load that do not impact the BPA Network Segment or cause Network Segment upgrades. By doing so, efficiencies are gained by both the Bypass Generators as well as those Large Generators that impact or require Network Segment upgrades. We also suggest that BPA clarify what we understand to be the criteria discussed in Section B.2.b.v., i.e., to allow customers to include in Large Generator resource design the necessary equipment to ensure that resource operations are prevented from unauthorized use of the transmission system, without imposing that investment or management of such on BPA. This approach would also negate the need for Transmission Service Requests (TSRs) for transactions that do not use BPA Transmission, which would bring additional efficiencies to the management of BPA's LTF Transmission Queue.</p> | |