



July 1, 2026

Bonneville Power Administration
By e-mail to: techforum@bpa.gov

Re: NIPPC/RNW Comments on BPA's GAT Future State and TC-27 Workshops

The Northwest & Intermountain Power Producers Coalition ("NIPPC") and Renewable Northwest ("RNW") submit the following comments in response to the Grid Access Transformation ("GAT") workshop in June 2026 ("the Workshop").

I. BACKGROUND

NIPPC and RNW support the rapid implementation of BPA's transmission planning reforms. We agree that a fundamental shift in planning methodologies is necessary to move away from a reactive planning process based primarily on transmission customer service requests to a more proactive process based on forecast loads and resources in the region. We recognize the challenges posed by a 65GW transmission queue and support these planning reforms, which we recognize are planned to occur in parallel with the interim transmission service request process under development in TC-27.

II. COMMENTS

a. Sensitivities v. Scenarios

We appreciate that BPA is moving forward with its initial cycle of expansion planning and has already begun to collect data to support that study. In Phase 1 of the initial cycle, BPA proposes to conduct a 10-year study of high-probability loads, transmission topology, and generation resources. We note that for the 10-year study, BPA proposes to conduct limited sensitivities to load and generation. For the 20-year study, however, BPA proposes to develop scenarios exploring different potential futures. For purposes of this process, BPA differentiates between sensitivities and scenarios. Sensitivities adjust a single variable from the base case; scenarios, however, explore potential futures that adjust multiple variables.

For the initial cycle, NIPPC and RNW support the proposal to apply load and generation sensitivities to the 10-year base case. We recognize that load and generation are the most significant variables in identifying the need for transmission expansions. We also recognize that a robust stakeholder process to develop consensus on future scenarios can take a significant amount of time. In future expansion planning cycles, we recommend BPA consider developing and applying scenarios to the 10-year planning study; although even in scenarios that adjust multiple variables, load forecasts and generation locations are likely always to be the most significant elements. So while we encourage BPA to apply scenario planning to the 10-year study in the future, for this initial cycle we are supportive of the proposal to limit the 10-year study to studies of sensitivities in load and generation. We do recommend that the 10-year study include a sensitivity that explores load growth significantly higher than the forecast in the base case.

We also suggest that BPA provide stakeholders with more information on sensitivities for the 10-year study and the scenarios for the 20-year study at the next GAT update. We would like BPA to indicate how many sensitivities it will apply for the 10-year study and how many scenarios it will develop for the 20-year study. For the 10-year study, BPA should be prepared to provide stakeholders with a recommendation for the number of sensitivities as well as recommendations of the sensitivities BPA believes will be most useful in achieving the goal of identifying least regrets transmission upgrades. Stakeholders should have the opportunity to provide comment and advice on the sensitivities that BPA will apply to the initial 10-year study. BPA should also provide a specific timeline to develop scenarios for the 20-year study.

b. Data Development and Data Review

NIPPC and RNW support BPA's decision to use existing data sets from BPA, WECC and WestTEC. We recognize that significant work has already been completed to collect and review WECC data for the WestTEC studies; there is no real reason to duplicate that effort outside of WestTEC. We also support the proposal to replace generic generation in the WestTEC model with specific generation participating in BPA's interconnection transition cluster; these projects are those most likely to be operational within the 10-year time frame. At the next update, BPA should be prepared to make recommendations for how it proposes to choose locations for the additional generation (above what is in the interconnection transition cluster) that needs to be added for the 10-year study and sensitivities.

We also recommend that BPA be more precise in identifying which stakeholders in the region should review the data BPA will use in these studies. In its presentation, BPA

encouraged “customers” to request and review the load, generation, and transmission topology that BPA intends to use in these studies. Certainly, BPA’s network transmission service customers (most of whom are BPA’s power customers) should have an opportunity to review their load and resource forecasts (and modify them as appropriate). The request is more confusing, however, when considering BPA’s point to point transmission service customers. Some of BPA’s point to point customers are the merchant function of load serving entities that use BPA transmission to serve their own load – but also use BPA transmission for marketing purposes. The employees of those merchant functions, however, may not have direct access to the load, resource, and transmission topology information that their transmission function maintains for long-term planning purposes. Some BPA customers are primarily interconnection customers who request transmission service from BPA to deliver their resources to their customers. If BPA truly wants these interconnection customers to review their data and identify which of their generation projects have a high-probability of being energized within the 10-year time frame, then BPA should be prepared to conduct a training session to explain the criteria that define a “high-probability” project (and still be prepared for inconsistencies in how customers make that determination).

NIPPC and RNW recommend that BPA be more specific in identifying who should review data for the studies. We suggest that the relevant participants in the data validation stage are transmission planning entities in the region – not BPA “customers”. BPA could also remind (or encourage) its network transmission customers to review the load and resource forecasts. We also question whether there is value in asking BPA’s point to point customers to request and review their data, given the challenge of asking point to point customers to determine which of their generation projects have a high probability to be online in ten years.

We also recommend that BPA consider developing a formal mechanism to solicit transmission planning entities in the region to review their data BPA that uses in this planning process. We recognize that – for this cycle – much of that data validation has already been conducted as part of WestTEC. While we hope that the WestTEC process is repeated in the future, there is no guarantee that it will be. There is also no certainty that the timeline of any future WestTEC studies will align with BPA’s transmission planning process in the future the way those studies align at this moment. For this proposal to be effective, BPA needs a mechanism to ensure that all transmission planning entities in the region (whether they are BPA customers or not) not only have an opportunity to review their WECC data – but that they actually do. Or if they do not, then BPA must be aware that it needs to look at that data more closely itself. Ideally, BPA and other transmission planning

entities in the region would mutually agree to full participation in a data validation process similar to that recently used in WestTEC.

III. CONCLUSION

Thank you for the opportunity to submit these comments. NIPPC and RNW appreciate BPA's continued engagement with stakeholders and look forward to collaborating further with BPA and other stakeholders as we develop and implement transmission planning reforms for the region.