

Submitted to techforum@bpa.gov on June 30, 2026

RE: PPC Comments on BPA's Grid Access Transformation Future Planning Process

Overview

The Public Power Council (PPC)¹ is supportive of BPA's efforts to improve its planning processes to better meet the needs of its customers and to provide reliable, affordable load service to Northwest communities. We agree with the agency that BPA's current commercial planning process, which rely on transmission requests, is too reactive and should be updated. We thank BPA for undertaking this effort and look forward to working with the agency to develop solutions to this challenge.

As proposed to date, the future planning process contains several elements that will enhance BPA's planning efforts. In recent workshops describing the new "expansion planning" process element of the transmission future state, agency staff have described their intent to identify High Opportunity Transmission (HOT) projects through a use of 10- and 20-year analyses. Studying further into the future and identifying least regrets or HOT projects is an appropriate change to better meet the needs of the region.

In addition to including a 20-year look, BPA has explained that it will use a combination of planning tools including Long-Term Capacity Expansion (LTCE), Production Cost Model (PCM), and PowerFlow (PF) studies. Use of multiple study tools, and the evaluation of multiple scenarios which will be identified with customer input, will be significant enhancements to BPA's current planning process and PPC supports these improvements.

While PPC appreciates and supports these proposed changes – which will improve the current planning process – the "future state" vision that has been presented to date does not include transformative changes that are likely needed to help BPA meet its stated goal

¹ PPC is the umbrella trade association representing the interest of the Northwest's non-profit, public power utilities that have preference rights to the output of the federal system. PPC's members rely on BPA for wholesale power and transmission services to provide economic, reliable, and environmentally responsible power supply for the communities and businesses they serve at cost. PPC's members subscribe nearly the full firm output of the Federal Columbia River Power System (FCRPS) and a large portion of the capability of BPA's transmission system. The ability to access BPA's transmission system to deliver federal and non-federal generation to their communities is critical for PPC members.

of providing transmission service to requests 5-6 years after requests are made. Instead, the proposal includes an enhanced and additional study layer that will be added to BPA's existing web of separate but related planning processes. PPC would like to see the agency work towards a more holistic planning approach that can streamline the evaluation of interconnection (both line and load) and transmission needs in a more fulsome way.

The challenge of overwhelming demand for interconnection and transmission services is not limited to BPA; transmission providers and system planners across the country are grappling with this same challenge. PPC supports BPA benchmarking other transmission and interconnection planning approaches that are being adopted and reviewing recent FERC orders and rule makings to pursue a more holistic approach to transmission and interconnection planning. We request a timeline for these activities and a discussion with customers to develop a plan that balances the need for transformative change with the need to put something in place quickly so the BPA can resume commercial studies and identify HOT projects.

PPC looks forward to engaging with BPA, and its new Administrator, to help establish a path forward for the agency to continue to build on its current planned improvements and more effectively meet the region's transmission needs.

BPA's Expansion Planning Process Proposal

PPC appreciates that there has been time built into the process for customers to review data, helping to ensure that the agency is using informed data in its modeling.

Similarly, the planned engagement with customers to determine what scenarios will be run in Phase 2 of the process is critical for regional buy-in on future "HOT" projects. PPC requests additional information on how customer input into this process will be considered and weighed.

PPC requests that BPA formally commit to scoping the expansion planning process to include facilities down to 100 kV. Verbal commitments to this effect are helpful, but a written commitment on this point is preferred.

While PPC supports identification of "HOT" projects in concept, more discussion is needed on the process for identifying these projects, as well as clarity on what becoming a "HOT" project means for specific builds and for BPA's customers. As part of a HOT project policy, the agency should:

- Establish clear criteria for identifying HOT projects
- Create a process that allows for customer input on HOT project designation

- Estimate expected rate impacts, share that analysis with customers, and use that information to inform whether a project receives a HOT project designation
- Consider strategic value provided by identified projects at a quantitative or qualitative level

PPC looks forward to working with BPA to build out this process.

Looking Ahead to Future Workshops

As we look to August and beyond, when BPA will host additional GAT workshops, PPC offers the following thoughts.

So far, product planning has been discussed as a nebulous topic without much detail, and we look forward to learning more about what the agency envisions through this effort. As BPA develops potential new transmission products the agency should prioritize creating flexible products that will work with regional programs like the Western Resource Adequacy Program (WRAP) and Markets+.

The commercial planning element of the future state will be an important aspect of ensuring equity and achieving BPA's expansion goals. The agency must build-in a robust customer engagement opportunity to develop the commercial planning process. It is vital that load serving entities have timely access to capacity needed to serve load. That should be BPA's number one goal in planning its transmission system. As the agency looks at potential options for funding future studies and builds, the method that the agency will use for distributing new capacity must attempt to maintain equity. Those that are taking on the risk of new project construction and study costs should have initial access to newly created capacity. We look forward to discussions with BPA on how to approach this problem.

Lastly, PPC members continue to be supportive of BPA offering a customer build option as soon as possible – ideally by the end of 2026. As the agency has offered customer build opportunities in the past, it seems reasonable that BPA could explore potential pilot projects of its planned customer build policy by the end of the year. There are projects in the pipeline that PPC members are prepared to take on as self-build pilot projects and our members anxiously await that opportunity.

In Closing

As a general matter, PPC supports changes to BPA's planning process that would ensure those entities ready to take transmission service are able to receive such service. We appreciate the current efforts that are underway to advance that objective and look forward to opportunities to further enhance changes to the agency's processes.

PPC stands ready to partner with BPA as it tackles ongoing transmission challenges.

Thank you for considering these comments,

Lauren Tenney Denison
Chief of Staff and Strategic Initiatives
Public Power Council

Cc:

Mike Miller, Senior Vice President Transmission Services, BPA

Jeff Cook, Vice President of Transmission System Planning, BPA