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BONNEVILLE POWER ADMINISTRATION
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Submitted via BPA's Tech Forum (techforum@bpa.gov)

Comments concerning BPA June 15th Grid Access Transformation Workshop

Seattle City Light (City Light) appreciates the opportunity to provide comments on Bonneville Power Administration's (BPA) June 15 Grid Access Transformation Workshop

Additional General Comments:

BPA has rightly asked entities to provide revisions to their own system data. To maintain confidence in the process, BPA should clearly disclose any instances where it diverges from those provided assumptions and explain the specific criteria checks that guided those decisions. Transparent communication on these deviations is essential for building trust in the modeling results. Stakeholders need a meaningful opportunity to provide input on BPA's broader modeling assumptions, not only on the datasets they personally request. Expanding feedback opportunities beyond entity-specific data will strengthen the overall quality and credibility of the Grid Access Transformation effort.

Entities should have ample opportunity to review and refine the load, generation, and topology assumptions used across the LTCE and PCM—not just the PF cases historically used in WestTEC. For example, BPA has indicated it will rely on the 20-Year BPA Forecast as the starting point for LTCE, yet stakeholders have not been given an opportunity to review or comment on those assumptions, unless requested. In addition, BPA should clarify how LTCE load assumptions will be aligned with those used in PCM and PF modeling.

It remains unclear whether BPA plans to supplement WestTEC power flow cases to reflect hours that are specifically challenging for the Northwest, rather than relying solely on stressful-hour assumptions applied to the broader WECC system. Without transparency on this point, stakeholders cannot be confident that the modeling highlights the conditions most critical to our region. Greater clarity here is vital for the credibility of GAT results.

BPA should provide stakeholders with opportunities to review and comment on high-impact modeling assumptions that could significantly shape outcomes. These include: the set of supply- and demand-side resources available for LTCE by zone; assumed build rates and potential development barriers;

methods for siting new resources at the nodal level for PCM and PF; cost assumptions; treatment of interannual variability for weather-dependent generation; construction of sample days and representation of extreme or stressed periods in LTCE and PCM; and key policy constraints such as emissions and reliability requirements. Engaging stakeholders on these foundational assumptions will lead to more robust, trusted modeling outcomes.

City Light thanks BPA for accepting and considering these comments.

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cc: Melanie Jackson, Bonneville Power Administration