

July 1st, 2026

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. We value BPA's engagement with customers and offer the following recommendations to support a more reliable, transparent, and forward-looking transmission planning process.

General Comments:

Include 100 kV Facilities in Planning Studies

Current BPA planning processes do not fully incorporate 100 kV sub-grid constraints, despite longstanding industry practice and NERC requirements to study facilities at 100 kV and above. Excluding these elements leads to incomplete assessments of regional transfer capability and customer load growth impacts. The November 2025 Wyoming Disturbance and March 2026 North of Pearl curtailment events illustrates the risks of omitting Portland-area 100 kV constraints. City Light requests BPA commit to including all applicable Bulk Electric System-level equipment in proactive planning studies.

Strengthening Proactive Planning Design

BPA has acknowledged that its current planning approach is too reactive. City Light agrees and encourages BPA to integrate customer and market signals—such as Transmission Service Requests—into scenario and sensitivity design. True transformation requires more than transparency into current practice; it requires consolidating siloed planning processes and shifting from deterministic to probabilistic methodologies.

Improve Expansion Planning Collaboration

City Light supports BPA's efforts to provide customer access to modeling data. Additional value can be realized by establishing a transparent, collaborative framework for jointly developing scenarios in both Phase 1 and Phase 2 studies.

Establish Clear Fair Criteria for HOT Projects

City Light requests BPA work jointly with customers to define objective, equitable criteria for High-Opportunity Transmission (HOT) project identification. BPA should also be transparent about cost and schedule impacts on GERP projects, including the use of contractors in place of BPA staff.

Product Planning

City Light recommends BPA explore a dedicated product designed to reliably deliver Federal power to Tier 1 and Tier 2 customers.

City Light thanks BPA for accepting and considering these comments.

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cc: Melanie Jackson, Bonneville Power Administration