

BPA Staff Responses to Comments Received from the July 29-30, 2025 Grid Access Transformation Workshop

The comments summarized in this document are available in their entirety on BPA’s Grid Access Transformation Project [webpage](#).

Table of Contents

- I. Statement on the Future of GAT Engagement and Future State Solutions 2
- II. General Comments 3
- III. Stakeholder Engagement..... 11
- IV. NITS Forecasts and NT Planning 20
- V. Readiness Criteria..... 29
- VI. Interim Service..... 49
- VII. Queue Management 67
- VIII. Future State 90
- IX. Process 91
- X. Miscellaneous 92

I. Statement on the Future of GAT Engagement and Future State Solutions

From your feedback during BPA's Grid Access Transformation (GAT) workshops and in your written comments, we heard a recognition of a need for change and some consensus around elements of staff's proposals. But we acknowledge a universal request for more engagement and information from the GAT team. Participants in the GAT workshops want additional data or analysis and have questions about impacts of our proposals. They are also raising concerns about how staff proposals align with BPA's Tariff, impacts to existing products, services, and contractual rights, and alignment with other BPA initiatives.

In consideration of these concerns, particularly the need for additional engagement and process, we are shifting GAT towards conducting a tariff proceeding process, starting with a series of pre-proceeding workshops. In addition, we intend to hold discussions in a future, separate engagement series for the topics of Proactive Planning and Accelerate Expansion, discussed in the GAT workshops. Our intention is to use the TC-27 pre-proceeding and the future Proactive Planning and Accelerate Expansion engagement series to build off the proposals we shared this summer and provide time for additional consideration of your thoughtful comments, feedback and questions. As the TC-27 pre-proceeding workshops progress, we will share proposed tariff language and other details on how GAT proposals may be implemented. And, although the engagement series for Proactive Planning and Accelerate Expansion will be separate from the TC-27 pre-proceeding workshops, we will discuss topics related to Accelerate Expansion or Proactive Planning in the TC-27 pre-proceeding workshops as necessary.

If there are comments you submitted during the GAT workshops that are not addressed in the upcoming workshops, we encourage you to submit that feedback as part of your comments following those meetings.

II. General Comments

Commenter	Summary of Comment/Question	BPA Staff Response
NewSun Energy	How does BPA justify its departure from open access principles? BPA’s proposals appear to undermine the neutrality of its transmission system by allowing BPAT to be the arbiter and make commercial judgments about transmission usage. This contradicts decades of precedent and BPA’s statutory obligations. We request: • A formal explanation of how BPAT’s role and this GAT process align with open access principles and statute. • Clarification of how BPA will ensure non-discriminatory access for all transmission customers. • What business models does BPA find a valid use of the system? • IPP, ESS, Marketer, LSE (with and without owned generation), IOUs, COUs, PUDs, large load customers. • How will BPAs' proposed changes affect these entities? We request further details on what these proposed changes will mean to the queue, the ability to build, and ultimately the entity types above.	Thank you for your comments. BPA remains committed to the principles of open access. We will take your comments under consideration as we proceed through the TC-27 process.
NewSun Energy	What analysis has BPA conducted on the potential harm to core customers and regional clean energy and capacity mandates? There is no evidence that BPA has evaluated the impact of its proposals on ICs, TCs, or regional clean energy and capacity mandates/programs. NewSun is concerned that the proposals will: • Undermine investment in transmission and generation. • Threaten the ability of certain LSEs to meet future load growth. • Jeopardize the region’s ability to meet statutory clean energy and capacity programs. • Remove viable projects from the GI queue. • Increase costs borne by the market and LSEs. • Increase policy uncertainty in the region. We request that BPA publish a comprehensive risk and impact assessment addressing these concerns.	Thank you for your comments we will take them under consideration as we proceed through the TC-27 process.

Commenter	Summary of Comment/Question	BPA Staff Response
NewSun Energy	How will BPA ensure that public preference customers are not disadvantaged? The proposals appear to restrict public preference customers’ ability to pursue transmission projects and secure non-BPA power. Given BPA-Power’s limited ability to meet future generation needs, is this an acceptable outcome? We request that BPA: • Clarify how public preference rights will be protected. • Explain how LSEs will be served if BPA-Power cannot meet their needs or how BPA will meet their needs? • Ensure stable, predictable access to PTP transmission service for all entity types. • Explain what the ramifications will be on liquidity in the market with these proposed changes.	Thank you for your comments. We do not understand based on NewSun’s comments how the proposals restrict preference customers’ ability to pursue transmission projects or secure non-federal resources. Please provide specific issues based on the refined proposals we share in upcoming TC-27 pre-proceeding workshops.
NewSun Energy	How will BPA protect investments made under the current TSR process? Customers have invested millions based on BPA’s existing rules. The proposed retroactive changes—such as requiring “evidence of transaction maturity”—threaten these investments. We request that BPA: • Guarantee that TSRs submitted under current rules will be honored. • Provide a transition plan that protects existing investments and expectations. • Reviews CRCs and how they impact or align with the GI and LLIR queues. • NS maintains that CRCs are not appropriate for processing the transmission queue. • Provide an analysis of how these actions will impact the liquidity of our region, especially the MIDC Hub.	Thank you for your feedback. We want to clarify that we are not proposing changes to the processing of requests that have been studied and received a plan of service, including requests which are currently funding Preliminary Engineering Agreements (PEA) or Environmental Study Agreements (ESAs). Our focus has been to propose changes to our transmission study processes for requests <i>which have not been studied</i> due to the rapidly growing transmission service request queue which is no longer leading to solutions which support the region’s needs. As we revise our GAT proposals or consider alternatives to share in the TC-27 pre-proceeding workshops, we will consider your feedback.
NewSun Energy	Core Principles and Recommendations 1. Preserve Open Access • BPA must maintain open access to its transmission system for all customer types, including IPPs, marketers, direct access providers, and load-serving entities (LSEs), regardless of generation ownership.	Thank you for the comment. BPA remains committed to the principle of open access.
NewSun Energy	Core Principles and Recommendations (continued) 2. Tariff Compliance • All proposed changes must align with the current BPA Tariff or initiate a formal Tariff proceeding to ensure legal and procedural integrity.	We agree with these comments. Please see the Statement on the Future of GAT Engagement and Future State Solutions at the start of this document for more information on our decision to initiate a TC-27 process.

Commenter	Summary of Comment/Question	BPA Staff Response
	Core Principles and Recommendations (continued) 3. Forward-Looking Reform • BPA should avoid retroactive changes. Reforms must be applied to the future state, where they can be appropriately managed and evaluated. 4. Certainty in Long-Term Firm Transmission • Any changes must provide a clear and reliable path to securing long-term firm transmission service. 5. Roll-Over Rights • Roll-over rights must be preserved in all transmission service offerings to ensure continuity and investment certainty.	Thank you for your comments. As we stated in prior GAT meetings, we are not proposing any changes to customers’ existing rollover rights. We will consider your feedback on application of any reforms to the existing queue as we develop alternatives to share in the upcoming TC-27 pre-proceeding workshops. We agree that reforms must provide a clear and reliable path to customers for securing long-term firm transmission.
NewSun Energy	Core Principles and Recommendations (continued) 6. Bridge Products for Transition • Transitional service offerings must be structured as bridge products and must not be subject to reassessment or reclassification.	Thank you for your suggestion. We have shared our intent that interim service offers will function as bridge product to long-term firm service. But, we acknowledge additional discussion is necessary and we will consider your comments as we revise our proposals to share in upcoming TC-27 pre-proceeding workshops.
NewSun Energy	Core Principles and Recommendations (continued) 7. Balanced Financial Commitments • Security deposits and financial commitments must be designed equitably across entity types. Large cost shifts will impact entities differently. BPA should explore ways to reduce costs and barriers to entry in helping to expand the transmission system. 8. Redirect Rights • BPA must not restrict the ability of firm transmission customers to exercise their redirect rights. 9. Batch Study of the Queue • BPA should resume queue processing and begin batch studies. NewSun recommends batch sizes of no less than 10 GW to ensure efficiency and scale.	Thank you for your comments. We have not proposed any restrictions for customers’ right to redirect their transmission service. In regard to your comments recommending BPA batch studies, please see the information on slide 21 of our Oct. 28-29, 2025 TC-27 Pre-Proceeding Workshop presentation explaining challenges with a batching approach. We will consider your feedback on financial commitments as we revise our proposals and develop alternatives to share in upcoming TC-27 pre-proceeding workshops.
NewSun Energy	Core Principles and Recommendations (continued) 10. Customer Transmission Rights • Customers must retain the right to request transmission anywhere on the system to support diverse business models and use cases. BPA should not determine the validity of business decisions related to transmission use.	Thank you for your comments. We will consider them as we refine our proposals for the TC-27 pre-proceeding workshops.

Commenter	Summary of Comment/Question	BPA Staff Response
NewSun Energy	Core Principles and Recommendations (continued) 11. Non-Firm Service Limitations • Long-term non-firm service offerings must not provide access to short-term firm Available Transfer Capability (ATC), to preserve system integrity and fairness. NewSun Energy urges BPA to adopt these principles as foundational elements of the GAT process. These recommendations are designed to support a robust, equitable, and future-ready transmission system that meets the needs of all stakeholders while maintaining regulatory compliance and operational excellence.	Thank you for your comments. We will consider them as we refine our proposals for the TC-27 pre-proceeding workshops.
NIPPC and RNW	NIPPC and RNW continue to agree with BPA that a fundamental shift in how BPA expands the transmission system is necessary to meet customer, constituent, and market needs while being responsive and aligned with BPA’s obligations. NIPPC and RNW strongly support many of the reforms BPA has proposed. NIPPC and RNW support the proposal to require customers to demonstrate commercial readiness as part of a completed application for transmission service under these transition business practices. NIPPC and RNW suggest BPA format the language presented during the Workshops as a single business practice. We also recommend that the title of this consolidated business practice reflect that the language represents a transition from TSEP to GAT. In addition, NIPPC and RNW make the following general recommendations: • Describe which transmission service requests will be subject to these transition business practices. Currently, applicability of the readiness criteria and eligibility for Interim Service use different language in different locations. If BPA intends to apply readiness criteria and offer Interim Service to the same requests, BPA should use the same language; • BPA should clearly state that these transition business practices will apply only an interim basis and that upon implementation of new tariff terms and conditions and revised rates, BPA intends to conform service offered under these provisions to the provisions developed for the GAT Future State.	Thank you for your comments. We are considering the approaches suggested as we shift to a tariff proceeding process.
NRU	Along these lines, NRU supports the current pace of the GAT Project and encourages BPA to continue to proceed quickly to implement the near-term reforms. NITS customers, including NRU members, must have certainty as to how BPA will plan its transmission system in response to current and forecasted loads and resources. We therefore disagree with calls for BPA to slow the GAT Project and would oppose BPA delaying implementation of its proposed near-term reforms, at least as they relate to NITS, absent additional justification from BPA.	Thank you for sharing these concerns. Please see the Statement on the Future of GAT Engagement and Future State Solutions at the start of this document explaining our decision to shift to the TC-27 tariff proceeding process. In addition, we are proposing to proceed with the staff leaning shared in a GAT meeting in July to establish an annual new large load threshold. We are still considering the timing of making an update to the business practice and we acknowledge there are aspects of the staff leaning which need additional discussion. We intend to have further discussion in the upcoming workshops.

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NRU	In addition, NRU respectfully requests that BPA establish and communicate the metrics it will use to determine success of the GAT Project. Given the regional significance and BPA resources committed to its execution, we submit that the region as a whole would benefit from transparency regarding how BPA intends to measure success. Additionally, metrics can help course correct along the way, to the extent necessary.	We appreciate the suggestions to develop and report metrics on the GAT Project. We will consider your feedback as we develop proposals and information to share in the TC-27 pre-proceeding workshops.
PacifiCorp	During the workshops BPA received considerable comments relating to the proposed business practices changes. PacifiCorp supports the comments customers made during the workshops. PacifiCorp also supports the comments being provided separately from other investor-owned utilities. To ensure customers understand the full impact of changes, PacifiCorp echo’s comments at the workshop that BPA provides a flow chart showing what the path to service is for each of the unique pools within the existing Transmission Service Requests queue.	Thank you for the suggestion. We will consider providing this information in upcoming TC-27 pre-proceeding workshops.
PPC	BPA Must Chart a Clear and Thoughtful Path Between the Transition and Future State PPC would like to better understand the specific objectives of the “transition” state and how these objectives connect to the future state that BPA envisions. There has been some high-level discussion about alternative approaches considered by BPA at previous workshops, and more explanation on how these alternatives were evaluated would provide helpful context. Some specific aspects that PPC asks BPA to address in charting out the path to the future state include: • What is the anticipated duration of the transition period. What happens if the duration is extended? How will BPA mitigate potential risks to achieving the “future state” vision in a timely manner? • How and when will decisions that are made for the transition period be reevaluated as part of the future state discussions?	Thank you for your feedback. We will consider how to provide this information as we share proposals in the TC-27 pre-proceeding workshops or future engagement series we will hold for Proactive Planning. Additionally, please see slides 58 to 64 of our July 10th GAT Presentation for the objectives we shared related to our GAT proposals from this summer.

Commenter	Summary of Comment/Question	BPA Staff Response
PPC	BPA Must Chart a Clear and Thoughtful Path Between the Transition and Future State (continued) What assurances will customers have about the quality and consistency of their “transition” state products? Is an offer of interim service a commitment from BPA to eventually provide firm service? What actions will the customer be expected to take to ensure that they can receive firm service given the uncertainty results of the future state planning process?	Thank you for raising these concerns. We will consider your feedback as we refine our proposals for the TC-27 pre-proceeding workshops.
PPC	BPA Must Chart a Clear and Thoughtful Path Between the Transition and Future State (continued) BPA should also include a conversion window as part of the transition to the future state. Aspects of the transmission service products that BPA currently offers may be substantially impacted by GAT and customers should be offered the opportunity to evaluate whether alternate products would better serve their needs.	We appreciate PPC’s suggestion and are open to discussing a conversion window between NITS and PTP products in the upcoming TC-27 pre-proceeding workshops.
PPC	Continued Monitoring, Reporting and Metrics Will Be Important to Measuring Success It is important that BPA clarify what “success” of this effort looks like – particularly regarding the transition state. The objectives shared in the July 9 and 10 presentations provide some context, but not measurable criteria or success metrics. PPC asks that BPA establish those metrics as part of this process and make a reporting commitment going forward.	We appreciate the suggestions to develop criteria or success metrics on the GAT reforms. We will consider your feedback as we develop proposals and information to share in the TC-27 pre-proceeding workshops.
PPC	BPA Must Chart a Clear and Thoughtful Path Between the Transition and Future State (continued) PPC would also appreciate an evaluation of other related reform efforts such as the recent Generation Interconnection (GI) Reform. At the most recent workshop BPA seemed to imply that the GI reform had not had the anticipated impact on the GI queue. Additional discussion on lessons learned from the GI reform process would be helpful to inform GAT development.	We appreciate PPC’s request for evaluation of other reform efforts, such as recent Generator Interconnection reforms, and will consider whether or not we can provide such information as part of the TC-27 process. In addition, as we develop proposals for the TC-27 pre-proceeding workshops, we will continue to coordinate with other BPA initiatives, including the implementation of TC-25 Generator Interconnection reforms.

Commenter	Summary of Comment/Question	BPA Staff Response
PRITCA	• The approach attacks the wrong problem: BPA’s engineering software has stopped working because the TSR queue has grown. To solve this problem, BPA proposes to take a chainsaw to the queue to chop it down to a size that fits its constrained software. BPA presumes inappropriately that BPA must treat customers discriminatorily to deal with backlog issue by retroactively changing the rules by which queued projects were to be processed. BPA’s approach will have a wide range of deleterious effects, including undermining competition, destabilizing investment expectations, and calling into question whether BPA’s OATT is a sound platform on which investments can be made in our region. • <i>The approach is unproven:</i> BPA has not offered any assurance that its proposal will actually solve the problem. Nor has BPA made clear how large a queue its engineering software could handle or whether there are fixes available (such as batch processing, discussed below) that could solve the problem without attacking validly-filed TSRs.	PRITCA mischaracterizes the problem BPA is trying to address as a software issue. BPA’s current means of processing its rapidly growing transmission service queue no longer leads to solutions that will support the region’s economic needs. In addition, we have clarified that the challenges with BPA’s current processes and GAT participant proposals (such as batch processing and capping the cluster study) are much broader than a software issue. Please see our October 28-29 TC-27 Workshop presentation (see slide 21). BPA has shifted its approach to conduct a TC-27 tariff proceeding process (please see the Statement on the Future of GAT Engagement and Future State Solutions at the start of this document). We will consider the possible impacts PRITCA raises in developing and sharing our proposals in upcoming TC-27 process.
PRITCA	• <i>The approach won’t stem the tide of TSRs:</i> BPA apparently bases its proposal on the old canard that the queue is filled with “speculative requests.” The claim is unfounded. All generation development is speculative in the sense that it faces multiple risks that can force abandonment of development and loss of investment. There is nothing to separate project developments with ordinary risk from developments that are unacceptably “speculative.” More importantly, the fundamental drivers for rapid expansion of the queue in recent years are aggressive state-level policies driving rapid decarbonization of the regional electric system, the explosive growth of data centers driven by a technological revolution in artificial intelligence, and strong interest from major Northwest industries in decarbonizing their production processes, also in response to state-level policies. BPA’s solution does not address any of these fundamental drivers of demand for transmission services and therefore will not stem the demand for these projects. But, by forcing the abandonment of projects that are already in development, BPA’s solution will force delays in how rapidly these demands can be met, while driving up the cost of meeting these demands by destabilizing BPA’s OATT as a platform for investment, thereby increasing the risks generation developers, and their financial backers, face in this region. • <i>The approach won’t address BPA’s staffing and resource problems:</i> PRITCA recognizes that BPA faces limits on staffing and resources that might be employed to help solve the	Thank you for your comments and support. Please see the Statement on the Future of GAT Engagement and Future State Solutions located at the beginning of this document. Additionally, customers and other GAT participants will have the opportunity to share concerns, insights, and proposals via customer-led workshop during the upcoming TC-27 pre-proceeding workshop series.

Commenter	Summary of Comment/Question	BPA Staff Response
	problems underlying the freeze on processing TSRs. In fact, PRITCA members advocated strongly on BPA’s behalf to limit the impact of the Trump Administration’s DOGE initiative which, in BPA’s case, sought to arbitrarily reduce the size of the agency without any consideration of the region’s needs, the critical nature of BPA’s functions in the Pacific Northwest, the fact that BPA-Transmission staff was already stretched thin, or the fact that BPA is not a taxpayer-funded agency. PRITCA members will continue to advocate for better salaries for BPA employees with specialized expertise, greater resources, and greater federal support.	
PRITCA	PRITCA strongly supports BPA’s Evolving Grid because it meets the fundamental need for new transmission infrastructure, which is planned proactively to anticipate regional needs, not reactively in response to requests for new transmission service under the traditional approach.	Thank you. For clarity, BPA does consider GERP Projects as meeting regional needs, but, these projects were identified in reaction to requests for new transmission service. The GERP Projects identified following the 2023 TSEP Cluster Study highlighted a growing shift in the queue and this shift was not beneficial to the region. That 17 GW study took 2 years to complete and resulted in 80% of the requests studied withdrawing. Proving the approach of identifying expansion projects as a reaction to TSRs, of which a large portion will not turn into LTF service, is not the best use of BPA’s limited resources for developing a robust transmission network with the right expansion projects in the right locations.
PRITCA	PRITCA also strongly agrees that BPA must restart the interconnection study process expeditiously. However, GAT is a fundamentally wrong-headed approach to restarting the study process. GAT carries with it many obvious deleterious consequences without any assurance that it will solve the underlying problems. BPA should abandon CRC and start processing TSRs with updated model input assumptions and should give due consideration to the many alternatives noted above, as well as other alternatives that may be put forward by interested parties in the region.	Thank you for your comment, but we disagree. The interconnection study process has not been paused, so it does not need to be restarted. Study model assumptions are updated before every study. We have considered approaches and have clarified that the challenges with BPA’s current processes and GAT participant proposals (such as batch processing and capping the cluster study) are much broader than a software or input issue. Please see our October 28-29 TC-27 Workshop presentation.

III. Stakeholder Engagement

Commenter	Summary of Comment/Question	BPA Staff Response
Avangrid	Bonneville Staff Should Be Commended for Effectively Meeting the Demands of an Evolving Landscape Avangrid recognizes that the development of the Draft BPs has occurred under significant constraints, including limited staff availability due to federal workforce policies and increasing demands placed on existing staff due to new regulatory requirements, evolving market dynamics, and stakeholder needs. These factors underscore the dedication and professionalism of Bonneville’s team in advancing complex policy initiatives despite resource limitations. Avangrid deeply appreciates the time and effort staff has committed to this process and remains eager to continue collaborating to refine the Draft BPs to leverage lessons learned in the TC-25 GI Queue Reform and develop more efficient processes that can mitigate increased workload demands. At the same time, the magnitude of the proposed policy changes warrants additional analytical work and stakeholder engagement to ensure the final framework—for both the transition and future end-states—is operationally sound and broadly supported.	Thank you for your comment. Please see the Statement on the Future of GAT Engagement and Future State Solutions located at the beginning of this document.
Avangrid	Bonneville’s Draft BPs Offer a Radical Departure from the Status Quo and Would Benefit From Additional Development to Avoid Unintended Consequences The July Workshops left critical questions unanswered that we hope will be addressed in future workshops, including: the operational feasibility of the proposed reforms; the interaction of the BPs with regional procurement processes; and the agency’s contingency plans if the reforms fail to produce the intended results. The gaps in understanding have prevented the agency from putting forth a holistic framework for the transition process, which create both legal and operational risk—particularly if Bonneville moves forward without an adequate evidentiary record. Given the scope and potential impact of these proposed changes, adoption without further clarification and stakeholder engagement could expose the agency to procedural challenges and extend uncertainty for market participants.	Thank you for your comment. Please see the Statement on the Future of GAT Engagement and Future State Solutions located at the beginning of this document.

Commenter	Summary of Comment/Question	BPA Staff Response
NewSun Energy	Why has BPA proposed such sweeping changes without a deliberate process allowing for the depth of discussion needed? BPA published its GAT proposals on July 25, 2025, days before stakeholder workshops. These proposals will have long-term impacts on transmission rights and access across all customer types and business investments. We assert that this process needs to reach a level of discussion depth within the process timeline to avoid future challenges. We request that BPA: • Extend the comment and review periods. • Commit to a more deliberative, inclusive process. • Provide a detailed impact analysis of the proposed changes. • Provide details on how BPA studies the queue and what model input assumptions are present. • Explain why BPA cannot model its existing system. • Explain why different software cannot solve their modeling issue?	Thank you for your comment. Please see the Statement on the Future of GAT Engagement and Future State Solutions located at the beginning of this document. We will take your concerns and suggestions into consideration in the TC-27 tariff proceeding process.
NewSun Energy	Request for Customer-Led Workshops To strengthen stakeholder alignment, operational readiness, and understanding of the potential impacts of these proposed changes, we are formally requesting that BPA incorporate customer-led presentations as a required component of the transition phase. These presentations should provide customers with a platform to: • Share concerns, insights, and impacts. • Offer implementation insights, consequences, and lessons learned. • Allow the region to hear all insights before any final decisions are made. This process and flexibility are essential to accommodate the complexity of this effort, ensure full stakeholder engagement, and address outstanding concerns.	Thank you for your comment. Please see the Statement on the Future of GAT Engagement and Future State Solutions located at the beginning of this document. Additionally, customers and other GAT participants will have the opportunity to share concerns, insights, and proposals via customer-led workshop during the upcoming TC-27 pre-proceeding workshop series.
NewSun Energy	Request for Topic-Specific Workshops Furthermore, NewSun respectfully requests that BPA schedule dedicated workshops focused on the following critical topic areas: • Commercial Readiness Criteria • Security Deposits and Financial Commitments • Bridge Products & Eligibility • Study Process, including Model Inputs and Assumptions These topics are foundational to the success of BPA's Grid Access Transformation and	Thank you for the comment. We will consider how to address these topic areas in the upcoming TC-27 pre-proceeding workshops.

Commenter	Summary of Comment/Question	BPA Staff Response
	deserve focused attention. Each topic area should be addressed in an individual workshop to allow for deep dives, stakeholder feedback, and collaborative problem-solving. We believe these additions will significantly enhance the quality, transparency, and accountability of the transition process and respectfully urge BPA to adopt them as standard practice.	
NIPPC and RNW	NIPPC and RNW continue to support a rapid timeline for development of a transition mechanism through business practices as a preliminary step towards a Future State that implements further reforms through tariff and rate modifications. Much of this urgency stems from members’ desires to resume processing of redirects with de minimus impacts as soon as practicable.	Thank you for the comment. Please see the Statement on the Future of GAT Engagement and Future State Solutions located at the beginning of this document. Additionally, although we are not currently processing <i>de minimis</i> requests, we will continue to evaluate whether that process can be resumed sooner as part of the TC-27 pre-proceeding workshops.
NIPPC and RNW	Some stakeholders have urged BPA to extend the timeline to implement the GAT transition business practices. NIPPC and RNW note that these comments are in response to “pre-draft” business practices that BPA has provided well in advance of kicking off the formal business practice review process. NIPPC and RNW are confident that the standard business practice review timeline (which has not yet begun) will provide sufficient remaining opportunity for customers to raise any additional concerns with the proposed business practices. If a stakeholder does raise specific issues that BPA agrees warrant additional stakeholder engagement (including any concerns or counterproposals raised in these comments), NIPPC and RNW encourage BPA to establish a revised timeline that is no longer than necessary to address the discrete issue(s) that BPA feels need to be addressed.	Thank you for your comment. Please see the Statement on the Future of GAT Engagement and Future State Solutions located at the beginning of this document.
NT Customer Group	At the Workshop, a number of parties expressed concern with the pace of BPA’s current timeline, requesting that BPA slow down and clarify the GAT Project to allow additional time for engagement given the scope of proposed policy changes. Absent new information, the NT Customer Group would oppose any proposed slowdown of the GAT Project timeline, while agreeing to facilitating a process that offers discussion and a formal feedback loop between BPA and participants. While we certainly encourage BPA to implement reforms that are both implementable and defensible, we consider BPA’s obligation to NT customers to ensure reliable load service as immediate and no longer deferrable. Therefore, we encourage BPA to continue its current implementation trajectory, at a minimum as it relates to NT-specific proposals.	Thank you for the comment. Please see the Statement on the Future of GAT Engagement and Future State Solutions located at the beginning of this document. In addition, we are proposing to proceed with the staff leaning shared in a GAT meeting in July to establish an annual new large load threshold. We are still considering the timing of making an update to the business practice and we acknowledge there are aspects of the staff leaning which need additional discussion. We intend to have further discussion in the upcoming workshops.

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PNGC	Thank you for the opportunity to provide the Bonneville Power Administration (BPA) with the following comments. Pacific Northwest Generating Cooperative (PNGC Power) is submitting comments which are intended to help further inform and shape BPA's Grid Access Transformation (GAT) process. BPA's transmission system faces many challenges ahead and we expect that changes may be disruptive, and difficult decisions will need to be made. It is for this reason that PNGC Power strongly urges BPA to consider this process to be the first draft of reform and establish a timeframe and a process to complete an assessment with stakeholders reviewing how changes implemented because of the GAT process have either improved or worsened the planning processes associated with transmission service.	Thank you for your comment. Please see the Statement on the Future of GAT Engagement and Future State Solutions located at the beginning of this document.
PNGC	Collaborative and Transparent Discussions PNGC Power believes it is imperative that BPA move expediently to develop solutions that will ensure reliable, cost-effective load service over the long term for all NITS customers. BPA has repeatedly stated that the desire is to work collaboratively to develop a process that moves the transmission service queue "off pause". So far, workshops have provided participants with the opportunity to comment on the materials presented. For stakeholder participants to believe this is a collaborative process; BPA needs to allow more time for discussion of issues during workshops and commit to a process where BPA responds in writing to feedback. Its concerning that BPA staff shrugs off request for written responses and say, "we will try our best". The gravity of the situation warrants more deliberate documentation of goals, metrics and accountability for results. The region cannot afford a mere attempt to do better and hope for improvement. PNGC applauds BPA for acknowledging they have been unable to fulfill their obligation to maintain and expand the transmission system to meet regional needs, so this process calls for more formality than what has been demonstrated to this point. BPA is proposing major shifts in how Transmission Service Requests will be processed, and staff often rush participants quickly through discussions. For the region to intelligently evaluate and respond with thoughtful comments this discussion is critical to fully understand the scope of the changes BPA is proposing to the process. We have witnessed multiple occurrences where BPA staff contradict one another or describe objectives differently. At times, PNGC staff finds themselves confused about proposal objectives and how BPA plans to measure success. Additionally, it would be helpful if	Thank you for your comment. Please see the Statement on the Future of GAT Engagement and Future State Solutions located at the beginning of this document.

Commenter	Summary of Comment/Question	BPA Staff Response
	BPA would identify where participant suggestions are being incorporated into the proposed processes. Without the time for discussion and providing detailed feedback, participants are often left wondering if this effort will be a collaborative process or will it be a desktop exercise that falls short of the intended results. PNGC Power appreciates Bonneville’s collaborative approach to meeting the transmission service needs of its customers on a long-term, sustainable basis. It is recognized that there are no easy solutions and that difficult decisions will need to be made. BPA’s obligation is to proactively plan, maintain and build a transmission system that will ensure reliable, long-term, firm service to its preference customers and the load growth customer’s forecast. PNGC Power looks forward to continuing to work with the agency and its staff to resolve the current set of challenges together.	
Powerex	Continued Stakeholder Engagement Will Enable Durable Solutions The GAT initiative is a significant undertaking for Bonneville and its customers that will only be successful through ongoing and iterative dialogue with transmission customers and other stakeholders. The stakeholder workshops held so far have been a good first step in that process. By participating in the workshops, Powerex was better able to understand the challenges facing Bonneville and to begin to consider potential solutions. Powerex commends Bonneville staff for their collaborative approach and encourages additional customer engagement. While Powerex supports moving quickly, several of the potential solutions would have significant implications for Bonneville and its customers and, therefore, warrant sufficient time for careful evaluation and refinement. Powerex believes an iterative process with multiple opportunities for stakeholder engagement as proposals evolve is essential to achieve Bonneville’s goals, while avoiding unintended consequences. Additional workshops, for example, will help stakeholders meaningfully evaluate and provide feedback on the proposed options, while advancing the shared goal of achieving workable and durable solutions.	Thank you for your comment. Please see the Statement on the Future of GAT Engagement and Future State Solutions statement located at the beginning of this document.

Commenter	Summary of Comment/Question	BPA Staff Response
PPC	PPC Continues to Support BPA’s Efforts to Improve Transmission Service in Partnership with its Customers As we have stated previously, PPC continues to support the objectives of the GAT effort. Access to reliable transmission in a timely manner is critical for PPC members to serve the needs of their communities. PPC supports BPA pursuing a more strategic planning process, exploring the identification of “no regrets” projects, and enhancing its project execution. These aspects of the described “future state” are very appealing and will benefit from additional refinement and customer input. Seeing the language provided as part of BPA’s “deep dive” on July 29 and 30 was helpful to better understand aspects of BPA’s “transition” proposal. However, at this time we find it difficult to provide specific, new, substantive comments on that proposal. BPA has received multiple rounds of comments from customers that it has yet to respond to which makes it difficult to continue to provide constructive input. For example, there are significant outstanding policy questions which customers have raised around aspects of BPA’s proposed policies. Instead of responding to those comments, the “deep dive” in July was focused on implementation of those policy directions, which in some cases do not have broad customer support. It is unclear whether BPA is open to making changes in these areas consistent with previous customer comments or whether decisions on aspects of the GAT proposal have been made. Understanding this would help customers determine whether further discussion and debate of specific policy questions is beneficial or whether time is better spent on refining business practices and processes. PPC acknowledges that transitioning from the current state to the future state will be challenging. This transition will be most successful if BPA brings its customers along in the discussion so that they can provide input and better understand the agency’s ultimate direction. We appreciate BPA leaning in to explore different approaches for customer engagement; additional adjustments to this engagement will help achieve a more successful conclusion of this process. More frequent and robust discussions are needed to gain broad customer support for BPA’s transition proposal. We offer some specific recommendations below.	Thank you for the comments.

Commenter	Summary of Comment/Question	BPA Staff Response
PPC	Recommendations for Customer Engagement on Proposed Business Practice Changes PPC appreciates the conversations that BPA has held to date; however, there are still significant outstanding questions and a lack of consistent understanding about some of the agency’s proposal. To address these issues BPA should hold at least two more workshops to discuss transition policies and business practice language prior to entering the formal business practice process. During these workshops, we recommend BPA structure the discussion to provide: 1) Clarity on policy development and decisions. • To do this BPA should clearly summarize any areas where policy decisions have been made and explain the reasoning for the proposed direction. • Agency staff should summarize the alternatives considered and the criteria used to evaluate those alternatives. • BPA should also clarify where these decisions will be formally codified (will it be included in a Record or Decision, policy direction document, or only in business practice updates). • Open policy questions where BPA is seeking feedback should be clearly identified to maximize constructive customer engagement. 2) Opportunity to review and discuss Business Practice language/implementation details in a “working session” format. • BPA should publish draft business practice language for customer review in advance of upcoming workshops. • The agency should solicit specific comments/edits/clarifications on the published language in advance of the workshop to inform the working session discussion. • BPA should take live notes/proposed edits during the meeting. • A similar format was used during the Provider of Choice contract development process and could serve as a helpful template. 3) Opportunity for customer perspectives. • Time should be allotted for customers to present their perspectives. To make this opportunity more effective, the expectation must be that the customer will bring specific proposals or concepts for consideration BPA and of other stakeholders. • BPA should be prepared to engage on customer proposals in real-time. The current timeframe for the agency responding to customers’ perspectives has not allowed for customer input to be adequately incorporated into BPA’s proposals. It also creates uncertainty around the status of policy decisions. 4) Clear expectations for the relationship between the transition state and the future	Thank you for your comment. Please see the Statement on the Future of GAT Engagement and Future State Solutions located at the beginning of this document. We will take your concerns and suggestions into consideration as part of the TC-27 tariff proceeding process.

Commenter	Summary of Comment/Question	BPA Staff Response
	state. - Any policy decisions or leanings should be clearly communicated to indicate if it is relevant to the transition state, the future state or both. - BPA should maintain a “parking lot” or “action item” list for issues related to the future state which should be discussed in subsequent meetings. - The agency should clearly identify a process for reviewing the decisions made during the transition process as part of the future state to see if adjustments are needed. - This will require clearly identified objectives and associated metrics to track success of those objectives. - It will be important to note areas where the objective in the transition state may differ from objectives in the future state.	
Shell Energy	Shell Energy believes it is vital that fair access to the transmission system be a core consideration in the reform effort and that consideration is given to all use cases of the transmission system during the policy development process. While Shell Energy is aware of the desire to adhere to an ambitious implementation timeline, we urge BPA to consider scheduling a stakeholder-led workshop as a means of fostering robust discussion around impactful subjects including business readiness criteria and securitization. Shell Energy is concerned that the capital requirements and holding costs associated with the securitization framework in its current form may be prohibitive for many entities in the region. Therefore, careful consideration should be given to this aspect of the design as a means of avoiding inadvertent impacts on competition and any subsequent downstream effects on the ability to develop the resources necessary to meet the region’s clean energy targets and reliability needs.	Thank you for your comment. Please see the Statement on the Future of GAT Engagement and Future State Solutions located at the beginning of this document. Customers and other participants will have the opportunity to discuss their concerns, insights, and proposals via customer-led workshop during the TC-27 pre-proceeding workshop schedule.
Tacoma Power	To that end, Tacoma Power is concerned that BPA is trying to move at a pace that is untenable and is not properly taking customer comments and concerns into consideration. For example, BPA started drafting and sought management approval for the draft business practices it presented at the July 29-30 meeting before the comment due date from the July 9-10 GAT meeting. Because the July 9-10 meeting was the first time stakeholders had the opportunity to see the ‘six part wheel’ BPA designed, this meant that BPA started drafting critical Business Practices that affect every BPA transmission customer, before looking at any customer comments from the workshop that set out the fundamentals of BPAs proposal. While BPA did take notes at July 29-30 workshop, it is unknown how BPA will incorporate either the comments submitted in	Thank you for your comment. Please see the Statement on the Future of GAT Engagement and Future State Solutions located at the beginning of this document. We will take your concerns into consideration as we shift into the tariff proceeding process.

Commenter	Summary of Comment/Question	BPA Staff Response
	response to the earlier meeting or the comments made at the workshop. Further, there was a request at the July 29-30 meeting for BPA to set up a customer-led workshop in August, but no meeting has been scheduled to date. Additionally, BPA originally intended for comments to the July 29-30 workshop to be submitted in under a week. This is not a reasonable timeline. There are many issues that would benefit discussion, including the treatment of NWACI facilities, the realistic effects of BPA's proposals in the longer term, the process by which BPA will notify the customers it intends to remove from the queue and the related cure period, and other specific issues related to the draft Business Practices. Tacoma Power requests that BPA set up at least one customer-led meeting as well as deep-dive meetings to work on specific topics. BPA has stated that it anticipates that the processes and procedures it adopts for its transition 'clear the queue' initiatives will take at least two years to resolve for the parties in the queue from August 2022-August 2024. Review of the queued projects from August 2024 to current will presumably start two years after the initial round. BPA owes it to its stakeholders to ensure the processes that will take at least four years to execute and clear the queue are well vetted by its stakeholders.	
Seattle City Light	City Light suggests BPA schedule an additional deep dive collaborative workshop with customers regarding business practice changes supporting the Grid Access Transformation transition. This could be a customer-led workshop where BPA responds to customers' suggestions and questions. This should happen with enough time for BPA to incorporate these ideas into the redlines of the affected business practices.	Thank you for the comment. Please see the Statement on the Future of GAT Engagement and Future State Solutions at the start of this document.

IV. NITS Forecasts and NT Planning

Commenter	Summary of Comment/Question	BPA Staff Response
AWEC	In effect, BPA is proposing to tier transmission service for NITS customers, which as other stakeholders have observed, may result in discriminatory treatment due to disparate outcomes among customers. AWEC is skeptical that a “bright line rule” delineating trended load growth from non-trended load growth is either necessary for NT loads or consistent with BPA’s Open Access Transmission Tariff (“OATT”) for NITS. If BPA nevertheless determines that it is necessary to delineate between trended load growth and New Network Load, then load designated as Contracted For, Committed To (“CF/CT”) pursuant to the Northwest Power Act¹ should be explicitly excluded from loads considered in a New Network Load determination. As explained by BPA in its Provider of Choice Record of Decision, “[a] CF/CT load...is a load that existed prior to September 1, 1979, that was either ‘contracted for’ to be served by a Bonneville customer, or ‘committed to’ by a Bonneville customer to be served.”² Thus by definition, these are not “new” loads, even in circumstances where the CF/CT load has been operating under its CF/CT designated amounts but subsequently increases its load to its CF/CT designation. Importantly, consumers with CF/CT loads have already paid for – and BPA has already planned for – firm transmission to serve those CF/CT designated amounts. It is therefore unreasonable to subject CF/CT loads to more onerous New Network Load requirements, which would likely result in delayed access to long-term firm transmission service, added costs including potential directly assigned costs, interim service that is less than firm, and onerous deposit and security requirements that are ultimately borne by the CF/CT end-use consumers.	Thank you for the comments. We identified the need for additional planning processes to plan for NITS transmission needs that are growing in a manner never seen before. Our proposal seeks to maintain processes that were developed to plan for the type of NITS transmission growth that has occurred historically while defining measures to appropriately plan for increases in transmission needs for which current processes were not designed. We think that clearer business rules, such as the proposed Network Load delineation, will simplify processes for customers and BPA planners. We have worked to integrate several large loads, such as data centers, under existing processes and think that continuing to do so on a case-by-case basis without clarifying procedures poses greater policy concerns than adopting a threshold. Ultimately, we think that the BPA transmission network will be better served by the procedural steps and transparency of the commercial study process for integration of these types of loads. We also understand the dependency between the NITS forecasting proposal and the outcomes of the Grid Access Transformation project and appreciate stakeholders’ patience and participation. BPA is actively examining the relationship between the proposal and CF/CT load service obligations and looks forward to further conversation on this topic.
AWEC	While AWEC appreciates that paragraph 6 of the Network Integration Transmission Service New Network Load Section of the GAT Draft Language includes a carve-out for BPA to exercise discretion to exclude “a portion of the load at a Point of Delivery...from being identified as New Network Load” and the factors that BPA will consider – which should weigh in favor of excluding CF/CT loads – this language alone does not provide sufficient assurance that CF/CT loads that are increasing within statutorily designated CF/CT amounts will not be subject to Business Practice requirements applicable to New Network Load requirements. CF/CT loads that remain within their CF/CT designation should be treated as trended NT load growth given the unique nature of	As noted above, we are further examining the relationship of CF/CT loads to the proposal.

Commenter	Summary of Comment/Question	BPA Staff Response
	these loads and the fact that they are not, in fact, new loads to BPA. This treatment should be explicit in BPA’s Business Practice so as to ensure that CF/CT loads are explicitly excluded from being considered New Network Load, and not subject to a discretionary determination process.	
AWEC	In addition to a CF/CT carve-out, AWEC recommends that BPA make additional changes and/or clarifications for New Network Loads. First, BPA should only apply New Network Load requirements during the “transition” state, as opposed to continuing the practice into the “future state.” Second, BPA should not rely on a Point of Delivery as the threshold for whether such load growth should be considered New Network Load. While this may provide for a streamlined approach for BPA, AWEC shares the concerns raised by other stakeholders that there are important differences in contract PODs among customers, and reliance on Exhibit A PODs may be discriminatory among customers. Additional time and dedicated discussion on the implications of using Point of Delivery is needed so that the nuances and implications of this proposal can be fully understood by BPA.	We recognize that the current POD proposal has received substantial feedback from customers and plans to continue conversation on this topic. As we consider potential solutions, they need to be administratively feasible, cost effective, and transparent. We acknowledge the need to be flexible and consider dynamic solutions in a rapidly changing environment, but notes that the challenges of planning for never-before-seen NITS transmission needs may not disappear and that well defined planning processes for forecasted large loads may remain necessary to ensure reliable service. At this time the NITS proposal is not linked to the transition state of the Grid Access Transformation project, but we are open to discussing ways to review impacts and make adjustments in a collaborative manner.
NRU	NRU does not oppose BPA’s proposal to modify its current definition of “New Network Load” to include increases of 13 MW or greater than the previously submitted LaRC forecast for that same year. We acknowledge that BPA has indicated that establishing this New Network Load definition would enable it to more quickly process and encumber firm transmission capacity for load growth that does not meet the definition of New Network Load. Doing so would meet a significant portion of NRU members’ needs on a long-term basis and would also free BPA resources to prioritize more urgent transmission planning issues. However, we have concerns with BPA’s proposal to apply this New Network Load definition at the Point of Delivery (POD) level. We agree with comments submitted by the NT Customer Group regarding the varied circumstances that NITS customers face with their respective PODs, and support the concerns raised over the application of a broad-brush policy of identifying such discrete loads. Specifically, BPA’s proposed reform (section 6.b.i of the NITS New Network Load section) indicates that BPA may use its discretion to exclude “a portion of the load at a Point of Delivery” based on a variety of factors such as “the types of load served by the Point of Delivery, available	Thank you – We appreciate NRU’s comment that the proposed 13 MW threshold would meet the needs of a significant portion of NRU members. We recognize that the current POD proposal has received substantial feedback from customers and plans to continue conversation on this topic. As we consider potential solutions, they need to be administratively feasible, cost effective, and transparent. We are certainly considering efficiencies that might be afforded by utilizing NLSL determinations.

Commenter	Summary of Comment/Question	BPA Staff Response
	metering, and any material change to the load or types of loads served.” Though we appreciate and support BPA’s interest in allowing for nuanced evaluations, we suggest that applying the definition on a more granular basis—such as at the meter or facility level—at the outset will enable BPA to avoid case-by-case evaluations of various POD situations and potential challenges over BPA’s use of discretion. It is also our understanding that any loads that meet the New Large Single Load definition under the Northwest Power Act, which we would generally expect to also qualify as New Network Load under BPA’s proposal, are already metered at the individual facility level. To the extent BPA can leverage this existing dynamic to narrow the New Network Load definition, we would be in complete support.	
NRU	We also request additional clarification on the applicability of the New Network Load policy to forecasted resources. For instance, section 1 of BPA’s proposed NITS New Network Load section states that a forecast for a new resource would subject to a Needs Assessment review. Beyond the lack of a definition of “Needs Assessment”, we seek clarity as to the scope of this provision. In previous stakeholder meetings, BPA staff indicated that all forecasted load increases that did not qualify as New Network Load would be encumbered for and provided longterm firm transmission capacity (through BPA’s System Assessment process or otherwise), <i>irrespective of the resource</i>. Accordingly, we request that BPA confirm whether these previous indications remain valid, or, instead, whether BPA will subject the firm encumbrance of a non-New Network Load to an evaluation of the particular forecasted resources of the NITS customer.	We are considering the applicability of the proposal to forecasted resources and look forward to further discussion in the TC-27 pre-proceeding workshops. The current proposal contemplates that loads below the threshold of New Network Load, regardless of resource type, will require a reliability assessment and potentially a line load interconnection request. If either the reliability assessment or LLI study indicates that a study or corrective action plan is needed the load will not be energized until those necessary reliability steps are taken. Similarly a reliability assessment would likely be required for a resource forecast, above or below the threshold, of a resource that has not been previously designated by the forecasting party. We intend to host a customer workshop to work through different forecasting scenarios to identify and resolve complexities.
NRU	Lastly, we request that BPA clarify whether, and if so how, the modification to the definition of New Network Load would apply to load served outside of BPA’s balancing authority area (“BAA”) (i.e., Transfer Service customers). We note that the proposed language appears to apply to all NITS customers, including Transfer Service customers. If this is BPA’s intent, we note that a Transfer Service customer serving load in another BAA may have a single POD at the interface with BPA’s transmission system and host utility but serve load at various PODs distributed across the host BAA’s transmission system. Application of the New Network Load definition at a POD that serves as an interface with an adjacent transmission provider for Transfer Customer load service may present unanticipated impacts, both to Transfer Service customers and BPA.	We appreciate NRU’s focus on the additional layer of complexity in providing transmission service for transfer customers, particularly at the POD level. We recognize that the current POD proposal has received substantial feedback from customers and plans to continue conversation on this topic. We intend to host a customer workshop to work through different forecasting scenarios to identify and resolve complexities, and transfer service scenarios could be included.

Commenter	Summary of Comment/Question	BPA Staff Response
NT Customer Group	We do not oppose BPA’s proposal to establish a New Network Load definition. We understand that this would temporarily enable BPA to more quickly process and encumber firm transmission capacity for load growth that does not fall under the New Network Load definition, which would meet a significant proportion of NT customers’ needs.	We appreciate the NT Customer Group’s feedback regarding the proposed New Network Load definition.
NT Customer Group	Although we do not oppose BPA’s proposed 13 MW-or-larger New Network Load definition, it is imperative that BPA develop an alternative approach to applying the threshold than at the Point of Delivery (POD) level. The NT Customer Group is comprised of utilities with varying electric delivery situations. Some PODs contain a number of individual substations underneath them, while others do not. Some PODs serve a variety of end use types (residential, commercial, industrial), while others do not. In keeping with BPA’s intent to apply the New Network Load definition to only those load increases that represent challenges to sufficiently plan for in advance, applying this New Network Load definition on a more granular basis, such as at a facility or meter level, would ultimately prove less burdensome than BPA and NT customers having to “carve out” residential or other more organic load growth from specific PODs after the fact to arrive at what load ultimately represents New Network Load. Additionally, establishing a more granular evaluation at the outset will avoid BPA having to consider the components of a given POD-level forecast on a case-by-case basis; a process that would add unnecessary staff time and both legal and financial risk to an already burdensome process.	Thank you for this comment. The current POD proposal has received substantial feedback from customers, and we plan to continue conversation on this topic. We agree there is significant value in avoiding the need to make case-by-case determinations. This is a driver behind this proposal in general. As BPA considers potential solutions to the POD aspect of the proposal, they need to be administratively feasible, cost effective, and transparent.
NT Customer Group	BPA should also commit to sunseting the New Large Load designation in the future state once achieving the proactive planning state. As indicated, the New Large Load designation is intended to move projects into the commercial planning queue even if they are considered network loads. If the transmission planning reform process is successful there should be no reason to maintain the NLL designation in the future.	The need to distinguish planning processes to plan appropriately for large increases in NITS customers’ transmission needs may not be completely alleviated by proactive planning. However, we do anticipate that proactive planning will allow it to identify at least some of the necessary transmission projects that will support transmission service for NITS customers’ large increases when the forecasted transmission need is subsequently identified. We see the need to be flexible and consider dynamic solutions in the current environment, but think that a threshold to define planning processes for forecasted large loads may remain necessary into the future to ensure reliable service. At this time the NITS proposal does not include a sunset provision or link to the different phases of the Grid Access Transformation Project, but we are open to discussing ways to review impacts and make

Commenter	Summary of Comment/Question	BPA Staff Response
		adjustments in a collaborative manner. We also understand the dependency between the NITS forecasting proposal and the outcomes of the Grid Access Transformation project and appreciate stakeholders’ patience and participation.
NT Customer Group	BPA needs to identify the 10-year load and resource forecasts that will serve as the baseline for applying the New Network Load definition. The NT Customer Group proposes using the most recent ten-year load and resource forecasts possible, prior to the New Network Load definition going into effect.	Thank you for your input on the baseline forecasts.
NWCPUD	Another ongoing point of concern for Northern Wasco is how existing encumbrances based on previously accepted load forecasts will be treated. We believe we have heard verbally in workshop discussions that existing encumbrances and FTSRs will be honored, but would like more details on how this will be memorialized in a formal policy decision.	We appreciate NWCPUD’s concern regarding existing encumbrances. Customers who have encumbrances for existing system capability documented in LARC close-out letters can continue to rely on those encumbrances.
PacifiCorp	Network Integration Service (“NITS”) Forecasts To assist in the usefulness of forecasts BPA receives, BPA intends to use a 13 MW threshold per point of delivery (“POD”) to determine the portion of forecasted NITS load growth that BPA will accommodate without additional studies as part of normal business. PacifiCorp previously provided comments to the May 20, 2025, NITS Access to Transmission Capacity workshop that the BPA should consider a threshold based on tiered levels, based on customer size. A tiered approach recognizes the differences in customer size. A single threshold could disproportionately impact large customers in higher growth areas.	While we did consider a threshold based on a percentage of customer load, the BPA staff recommendation of a 13 MW threshold weighed concerns regarding industry standards, impact to currently smaller customers without a correlating benefit in identifying actual new large loads, and administrative complexity heavily in the current staff recommendation. These concerns were key reasons that a percentage of load was not recommended by staff.
PNGC	PNGC Power understands BPA’s intent to “get off pause” and manage system impacts that can be attributed to New Large Loads (NLL), PNGC Power is concerned by the proposed adoption of a NLL policy within the transmission business line—particularly one modeled after BPA’s Power business line’s New Large Single Loads policy, which is statutorily required under the Northwest Power Act. Unlike BPA Power’s business line, BPA’s Transmission business line is not subject to the same statutory obligations, and applying a similar framework, risks introducing inequitable treatment and unnecessary barriers for load-serving entities. PNGC insists that BPA clearly define and strictly	We appreciate PNGC’s desire for additional clarification regarding how the proposed NLL policy will be applied in planning, and note that the proposal does not contemplate using the proposed threshold in operations. The proposal is intended to more clearly define processes for customers and enable BPA to consistently apply policies in transmission planning. We agree that clear definitions and enforcement are important, and this proposal seeks to clarify policy in order to assist customers in their own planning. Currently we do not anticipate that NLL policy will be sunset when proactive planning is in place, rather, BPA expects that increased NITS NLL transmission service needs will continue to need additional planning

Commenter	Summary of Comment/Question	BPA Staff Response
	enforce how the NLL policy will be used in planning and operations. The NLL policy should be established with a sunset provision once the GAT reforms have been implemented, and proactive planning is achieved. The NLL policy should not be allowed to become pervasive and distorted like BPA's implementation of the New Large Single Load policies.	processes in the long term. Proactive planning will, though, likely increase the capability of the planning processes to define necessary infrastructure prior to forecasting of NLL transmission needs. Also, we are open to discussing ways to review impacts and make adjustments in a collaborative manner. We understand the dependency between the NITS forecasting proposal and the outcomes of the Grid Access Transformation project and appreciate stakeholders' patience and participation.
PNGC	13 MW Threshold Impact PNGC Power remains extremely concerned about the proposed increase of 13 MW per Point of Delivery (POD) threshold that prioritizes service based on BPA's categorization of the retail members/customers its preference customers serve. It has been stated through workshops that the 13 MW threshold will be advantageous by helping reduce the number of existing queue requests that will need to be studied. PNGC struggles to see how this will truly resolve customer's request for long-term transmission service, offering a short-term conditional product simply punts the long-term need down the road with an undefined process and lacks commitment or accountability to ensure long-term firm service. It appears that BPA is anticipating that customers will remain satisfied with the interim conditional firm service of which too many questions are still outstanding: How will firm service be obtained? How will queue positions be managed for those interim requests when the 13 MW requests are studied? How will costs be allocated amongst the parties? Another point of concern is the point of measurement proposed by BPA staff. Setting the point of measurement at the POD level raises more questions than it appears to solve, while BPA has not sufficiently demonstrated how this will help improve the transmission planning process. PNGC does not agree with a one size fits all approach and individual requests may dictate a more common-sense approach. If a threshold is needed for a NLL, PNGC Power believes that it would be better to manage NLL(s) at the facility level than the POD level. A key question is how will native load growth be treated at a POD where the NLL is also being established? As the facilities are developed for a NLL, specific metering will be designed to meter the load. If the addition of a facility is what causes the impact, the limits should be applied at the facility level rather than the entirety of the POD, mitigating risks to native load growth within a POD. This also raises questions on how BPA plans to treat load increases due	Thank you. Reducing the number of queue requests was not a driver for the 13 MW threshold proposal. Please see BPA's Staff Response to Comments from the May 20, 2025 NITS Access to Capacity Workshop for a discussion on the convergence of the NITS proposal with the other elements of GAT. Our proposal seeks to address the challenges posed by applying existing planning processes that were created to plan for historical NITS growth transmission needs to large load increases some NITS customers are experiencing. The proposed New Large Load policy does not result in an immediate ability to receive transmission service for large increases in transmission needs but, importantly, provides BPA with the ability to plan reliably for long-term firm service for those needs. While that does not result in service upon demand, BPA's GAT proposal includes the addition of an interim service product to address NITS customers' near-term needs. We recognize that a number of questions are outstanding and that there is a need for further discussion and development. An important driver for this proposal is to reduce, not increase, the number of case-by-case determinations required by BPA staff. The current POD proposal has received substantial feedback from customers, and we plan to continue conversation on this topic. We intend to host a customer workshop to work through different forecasting scenarios to identify and resolve complexities. We have not proposed a change from the current approach of identifying queue position for LARC forecasts that are planned for through commercial planning based upon forecasted date and time. We recognize that the current POD proposal has received substantial feedback from customers and plans to continue conversation on this topic. As we consider potential solutions, they need to be administratively feasible, cost effective, and transparent. We

Commenter	Summary of Comment/Question	BPA Staff Response
	to electrification which falls more into a native load bucket than a specific facility load. Furthermore, calculations for transmission credits will also be much more complex if the POD threshold level is maintained. If simplification of the process is desired, and a threshold is applied, then it should be done at the facility level.	appreciate this feedback regarding additional complexities that may be raised if assessed at the POD level.
Tacoma Power	Furthermore, it is readily apparent that BPA’s intention is to favor NITS projects in the queue, regardless of queue order or customer status. BPA has suggested that any NITS customer be allowed up to 13MW a year at any applicable POD for “forecasted growth.” BPA intends to apply this 13MW/year retroactively back to 2022, so a NITS customer could have 39MW of “forecasted growth” at the applicable PODs outside of BPA’s commercial planning process. This growth also does not fall under BPA’s new definition of “New Network Load.” Further, BPA stated in the July 29-30 workshops that in its efforts to clear the queue, it will award NITS customers this “forecast growth” NITS service irrespective of queue order. This 13MW/year/POD does not consider the size of the NITS customer, so even if this amount is far beyond ‘normal’ growth of a few percent, it will be retroactively awarded. All NITS “forecast growth” service will be awarded at the detriment of earlier queued Point to Point requests. While BPA has produced language giving it the ability to pause and study these proposed projects, it remains clear that the intended goal is to award NITS service without reasonable study. Tacoma Power suggests that that NITS forecast load growth be tied to a real number related to the size of NITS customer load, like 3% annually, and be calculated based on the NITS overall forecast, not the forecast of a specific POD. Tacoma Power also suggests that, at a minimum, this same standard be applied to BPA’s Point to Point Preference Customers who are using BPA transmission to meet BPA’s power preference requirements	We do not concur that the GAT proposal favors NITS projects in the queue. We have identified the need to adjust how BPA meets its obligation to plan for NITS customers. NITS customers’ trended increases in transmission needs are not planned for via entry into the queue for transmission service but instead are planned for through the system assessment planning process. Provision of transmission service for NITS trended increases in transmission needs is not a new proposal. Rather, it is a continuation of the regional practice that BPA has used for decades and has been very transparent about, starting with the inception of BPA’s ATC methodology. Rather, BPA’s proposal would add a threshold to that practice to limit the annual amount of NITS transmission needs that are planned for in that manner at each POD. Reducing the number of queue requests was not a driver for the 13 MW threshold proposal, nor was awarding service to NITS customers in an unreasonable or manner that could negatively impact reliability or earlier queued requests. Further, BPA does not support inaccurate NITS forecasting to utilize the NITS 13 MW threshold to build flexibility for large loads above 13 MW and appreciates Tacoma Power’s concern regarding the possibility of such a dynamic. We look forward to more detailed discussion around implementation, including working through forecasting scenarios with stakeholders. While we did consider a threshold based on a percentage of customer load, the BPA staff proposal that resulted in a recommendation of a 13 MW threshold weighed concerns regarding industry standards, impacts to currently smaller customers without a correlating benefit in identifying actual new large loads, and administrative complexity heavily in the current staff recommendation. These concerns were key reasons that a percentage of load was not recommended by the staff. We are not contemplating applying this proposal to Point to Point (PTP) transmission customers. BPA has an obligation to plan, construct, and operate its transmission system to transmit NITS customers’ designated resources to the customers’ load and forecasted load growth. Experience has informed BPA’s proposal to continue to meet this obligation for trended load growth through its system assessment planning studies, and to provide a more

Commenter	Summary of Comment/Question	BPA Staff Response
		direct path to needed infrastructure for the new type of rapid load growth some customers are experiencing. NITS and PTP are distinct offerings, with different attributes, and customers must choose between point-to-point and network services, each of which has its own advantages and risks. NITS customers are required to forecast loads and resources annually, and these forecasts are foundational to BPA's ability to plan the transmission system and BPA's proposal to manage trended load growth that has been consistently forecasted by NITS customers over time. PTP customers retain a more significant role in planning for their own load growth. PTP customers may submit transmission service requests well in advance of anticipated load growth. Further, because they provide WECC with models reflecting their forecasted load growth, they have the ability to reflect load growing in their system models that BPA uses for planning.
Umatilla Electric Cooperative	BPA must clearly articulate in writing how it intends to honor its existing contractual and Open Access Transmission Tariff (“OATT”) obligations. To this end, BPA needs to specifically identify which vintage of 10-year load and resource forecasts will be used to apply the yet to be implemented New Network Load definition. Currently, UEC’s Network Integration Transmission Service Agreement defines Network Load as any loads submitted to the Transmission Provider by September 30th of each year. Thus, BPA should use the 10-year load and resource forecasts that NT customers will submit in September 2025, and then compare this LARC submittal to the NT customer’s next submission to determine if any loads meet BPA’s New Network Load definition. UEC strongly believes this approach is the only way that BPA can meet its current OATT and contractual obligations, which requires BPA to plan and construct its transmission system based on the Network Load submitted by customers prior to any business practice changes going into effect.	Thank you for this comment, we will continue to address specific concerns and clarify processes. We recognize that BPA must clearly define the initial implementation and intends to host a customer workshop to work through different forecasting scenarios to identify and resolve complexities.
Umatilla Electric Cooperative	BPA’s proposed business practice changes make no mention of Behind The Meter Resources and only acknowledge FTSRs and TSRs as having transmission encumbrances when applying its proposed New Network Load definition. From a contractual perspective, Behind The Meter Resources must meet the attestation requirement outlined in section 29.2 of BPA’s OATT and are similarly situated to any Network Resources that are interconnected to BPA’s system except that a customer must only notify BPA via email to include a Behind The Meter Resource in the	Thank you for your comment. As we consider implementation details further, we will consider these comments. We are not entirely clear on the concern regarding behind the meter resources expressed here and look forward to further engagement.

Commenter	Summary of Comment/Question	BPA Staff Response
	customer’s NT service agreement. This means that Behind The Meter Resources have no associated FTSR or TSR on BPA’s Open Access Same Time Information System. Thus, UEC proposes that BPA include language to provide similar treatment for Behind The Meter Resources that is similar to a forecasted or designated Network Resource that has been previously been granted a transmission encumbrance.	
Seattle City Light	City Light suggests that BPA considers that a bright line between trended and commercial load growth should be a percentage closer to 2.0% or less. The proposed single value of 13MW is far too large for most BPA NITS customers under the proposed scheme and additionally unfairly penalizes large NITS customers. City Light recommends that a bright line architecture that allows many BPA NITS customers to double their load in 5 years is neither sustainable nor equitable to customers under cost causation.	Thank you. While we did consider a threshold based on a percentage of customer load, the BPA staff proposal that resulted in a recommendation of a 13 MW threshold weighed concerns regarding industry standards, impacts to currently smaller customers without a correlating benefit in identifying actual new large loads, and administrative complexity heavily in the current staff recommendation. These concerns were key reasons that a percentage of load was not recommended by the involved staff. We do not support inaccurate NITS forecasting to utilize the NITS 13 MW threshold to build flexibility for large loads above 13 MW and appreciate Seattle City Light’s concern regarding the possibility of such a dynamic.
Seattle City Light	City Light additionally suggests BPA clearly state that accepted NITS forecasts will be the values used in BPA agency forecasts and BPA WECC base case updates. If BPA has doubts about planning for NITS LaRC forecasts, they need to institute policy mechanisms to ensure the accuracy of accepted forecasts. Additionally, only accepted forecasts should be used for encumbering transmission.	Thank you. We are actively looking at what additional measures could be taken to monitor the accuracy of forecasts. In order to plan for NITS needs BPA relies on customers to submit accurate forecasts, but forecasts are inherently uncertain. BPA will continue to work with forecasting customers to achieve the highest level of accuracy possible.

V. Readiness Criteria

Commenter	Summary of Comment/Question	BPA Staff Response
Avangrid	Avangrid is Concerned about the Impact of Bonneville’s Proposal requiring TSRs to Provide Evidence of Generation Maturity As briefly noted above, the Draft BPs would eliminate TSRs that have not completed Phase 2 of an interconnection study, which would eliminate every project in Bonneville’s Transition Cluster. Assuming this is Bonneville’s intent in conjunction with transaction maturity (requiring a PPA award or financial security), Avangrid would respectfully urge Bonneville to consider eliminate this requirement for at least the transition. The projects included in Bonneville’s GI transition cluster have already experienced delays as a result of establishing a new cluster study approach, and the cluster continues to be behind schedule despite the unique scalable block concept BPA thought would allow the planners to move forward more efficiently. The merits of linking TSR validity to generation maturity could be reevaluated once the transition is over and there is more clarity about what the future state will offer.	Thank you for your feedback, we are considering these concerns as we refine our proposals to share for upcoming TC-27 pre-proceeding workshops. However, we note that TSRs that do not have a GI plan of service may not be ready to take interim service. Further, there are challenges to appropriately plan the local area and main grid (i.e., the defined network paths) for TSRs that do not have clarity regarding the plan of service to interconnect the source generation to the transmission grid.
Avangrid	Avangrid is Concerned about the Impact of Bonneville’s Proposal requiring TSRs to Provide Evidence of Transaction Maturity Avangrid has concerns about the durability and long-term impacts of a policy change requiring a transmission requestor to provide evidence of transaction maturity -- a power purchase agreement, letter of intent with a third-party, or notice of award from a request for proposal. Avangrid recommends further discussion and coordination with regional stakeholders prior to adopting the approach on a permanent basis. Moreover, this type of readiness criteria has proven problematic as it is hard to define what level of commitment must be contained in these types of agreements that would prove true transaction maturity. For example, if a regional utility were to provide a letter of intent associated with bids selected in a shortlist, and the shortlist were to be whittled down further once bids were selected, it is unclear what would happen with the projects that were able to provide a letter of intent but were not ultimately selected. The mechanics and details associated with this approach could create new complexities and Avangrid would recommend avoiding this approach altogether, or thoroughly discussing prior to implementation.	Thank you for sharing your concerns regarding evidence of transaction maturity and alignment with utility regional procurement processes (raised by other commenters). We will consider these concerns as we develop proposals to share in the TC-27 pre-proceeding workshops. We did propose to include a financial mechanism for customers to submit requests as an alternative to proof of a transaction maturity. We envision that such mechanism may involve a letter of credit that would provide assurance that the party will sign and securitize the offer of firm or interim service when offered by BPA. If the party did not sign and securitize the offer of service, then BPA would draw on the letter of credit. If we share this option, we would appreciate feedback on how this approach could be adjusted to incorporate financial risk mechanisms acceptable to Avangrid.

Commenter	Summary of Comment/Question	BPA Staff Response
	The merits of utilizing this approach on a long-term basis will be contingent on revisions to regional utility commission and regional utility procurement processes. Avangrid requests coordination and aligned implementation of such a change with regional utilities, utility commissions and other power purchasers, to ensure state procurement practices and Bonneville’s business practices support each other and do not create a chicken-or-egg situation that stifles nonfederal development across the region. If the problem that Bonneville is intending to solve in the near-term is the existing queue of requests, Avangrid would prefer a reform process that favors a long-term workable regional solution that upholds a fair approach to transmission planning and service and that incorporates financial risk mechanisms. If this preference requires further delay in the processing of those requests or a resubmittal, it is still preferred to the current readiness criteria or deposit approach.	
Brookfield Renewable	Readiness Criteria and Fallback Plan – As stated in Brookfield Renewable’s previously submitted comments, Brookfield Renewable generally supports BPA’s adoption of readiness criteria for firm transmission requests. Among other details, and as detailed in the draft language, BPA's proposed readiness criteria include a requirement that any new generation have an established plan of service and that, for bilateral transactions, the customer must provide evidence of transaction maturity. Acceptable evidence of a mature transaction includes any one of the following: • Power Purchase Agreement; • Letter of intent signed by both parties; • Notice of award from a request for proposal; or • Security.	We appreciate Brookfield’s support for our proposed requirements.
Brookfield Renewable	In response to customer comments, BPA added the option to post security to meet the requirements. The security requirements are based on the transmission service requirements (not the costs of needed upgrades, like today). While Brookfield Renewable supports the adoption of fairly stringent readiness criteria, Brookfield Renewable does not oppose the inclusion of the security option. As noted in its previous comments, Brookfield Renewable remains concerned that reliance on security requirements may alone not eliminate more speculative, less mature, firm transmission requests.	Thank you for your comments. We do note that our proposal for use of financial security for TSR validation is that it is only to be used in place of evidence of transaction maturity. Other requirements of our proposals would continue to apply.

Commenter	Summary of Comment/Question	BPA Staff Response
Brookfield Renewable	Notwithstanding Brookfield Renewable’s qualified support for the proposed readiness criteria outlined in the draft language, Brookfield Renewable recommends that BPA add additional language to address the circumstance where, after application of the above readiness criteria, the transmission queue is not substantially reduced, at least for the transition period. As discussed at the July 9-10, 2025 workshops, if the existing 65GW transmission queue is not substantially reduced after application of the readiness criteria, BPA could still be faced with a queue that is too large to study/solve and/or one where it is not viable to provide conditional firm service (CFS) to all applicants. At the workshops, BPA stated that, at that point, it may have to study the remaining queue in “batches.” Brookfield Renewable is concerned that, depending on the criteria used to “batch” requests, that approach may still result in study clusters too large to solve or that result in an unnecessary comingling of mature and less mature transmission requests. As an alternative or fallback plan, Brookfield Renewable recommends that BPA instead rely on reapplication of more stringent readiness criteria. For example, BPA could reapply the above criteria, absent the security requirement option. Other options could include processing requests that have: an executed engineering and procurement agreement; the filing of a notice of intent for permitting; submittal of a “final” state permitting application (e.g., application with Oregon’s Energy Facility Siting Council or EFSC); or evidence of long-lead equipment procurement. While these options are associated with mature generation development requests, these milestones nonetheless indicate a project is ready to request firm transmission service. In the end, BPA cannot adopt a process that results in a do loop where it is faced with a transmission queue that is too large to study, i.e., is unsolvable and that would take a decade to process.	Thank you for your comments. We will consider your feedback for our final proposals.
Grant PUD	FTSR/TSR Readiness Criteria (§1.a. , pp. 5-8) and LTF Queue Management (pp. 9-11) Both Readiness Criteria and Queue Management address commitments by applicants during the process of obtaining new transmission service. Grant generally supports BPA’s efforts to increase the financial commitments of entities and the documentation of progress toward offers of service in the TSR queue, to help ensure that BPA’s analytical resources can focus on requests that are most likely to result in accepted offers. Applicants should be prepared to provide reasonable demonstrations that their requests for transmission service are increasingly likely to be successful throughout	Thank you for your supportive comments. In regard to FERC Order 1920, BPA is in the process of coordinating with NorthernGrid members to evaluate Order 1920 with the expectation of adopting the reforms in a manner that is consistent with the existing structure and governance in place at NorthernGrid. Similar to its approach to Order 1000, Bonneville expects to adopt the Order 1920 planning reforms with its regional planning partners at NorthernGrid, but it does not intend to adopt Order 1920’s reforms relating to cost allocation. BPA’s efforts to evaluate alignment to Order 1920’s reform includes consideration of the use of 20-year scenario planning analysis.

Commenter	Summary of Comment/Question	BPA Staff Response
	the queue management process based on documented progress on several fronts (e.g., site conditions, financing, and off-taker agreements). Grant encourages BPA to implement all FERC standards in this area (e.g., Order 1920). BPA should remain open to accepting forms of security that provide equivalent assurances to BPA and its customers but are less expensive for applicants.	
NIPPC and RNW	NIPPC and RNW offer the following recommendations related to Readiness Criteria: • Add a separate section that describes the transmission service requests that will be subject to Readiness Criteria for the transition phase with as much specificity as possible. • NIPPC and RNW support the proposal to apply readiness criteria to Forecast Transmission Service Requests (“FTSRs”) and Transmission Service Requests (“TSRs”) that have not been studied or have not yet signed agreements to support transmission projects. NIPPC and RNW understand that previously studied requests that have executed a Preliminary Engineering Agreement or an Environmental Study Agreement will not be required to demonstrate commercial readiness. NIPPC and RNW note, however, that some requests from earlier study cycles have not been granted service due only to sub-grid constraints. NIPPC and RNW recommend that only transmission service requests queued for the 2023 TSEP (or later) should be subject to the new readiness requirements.	Thank you for this feedback and for sharing recommendations for the readiness criteria. We will consider your feedback as we refine our proposals to share in the TC-27 pre-proceeding workshops, including adding clarification about which requests would be impacted. We would like to clarify that we are proposing that all unstudied requests (which would not have follow-on agreements such as a preliminary engineering agreement) would be subject to the proposed readiness criteria. We are not proposing that requests that have already been studied would be subject to the readiness criteria. However, we have discussed the idea that if previously studied requests would like to be eligible for interim service, they could seek to demonstrate that they meet the validation requirements to be eligible for such an offer. But, we would not propose that failure to meet any proposed criteria for previously studied requests to be offered interim service would result in removal from the queue.
NIPPC and RNW	• NIPPC and RNW agree that transmission requests associated with new generation resources under development are likely not ready to take immediate service and that a customer should be able to demonstrate appropriate progress through the generator interconnection queue (assuming such generator is interconnecting on BPA’s system) as a condition to requesting transmission service during the transition. We note, however, that BPA has proposed to require a customer to have completed Phase 2 of the generator interconnection transition cluster study in order to qualify to submit a valid request for transmission service. First, we recommend adding parallel language for customers in the serial transition process. We also note that by requiring a customer to have completed Phase 2 of the generator interconnection transition cluster in order submit a request, customers will lose one option under the recent interconnection reforms to avoid posting security for their interconnection Network Upgrades (reasonable evidence of transmission service reservation for the Generating Facility). BPA should consider	Thank you for your comments. We will consider this feedback as we refine our proposals to share in the TC-27 pre-proceeding workshops.

Commenter	Summary of Comment/Question	BPA Staff Response
	whether customers who participate in Phase 2 of BPA’s interconnection Transition Cluster should qualify to submit transmission service requests under these proposed transition business practices.	
NIPPC and RNW	• NIPPC and RNW support the proposal to require customers to provide evidence of “transaction maturity”. - o We appreciate that BPA has proposed allowing customers the option to provide security in lieu of evidence of demonstrating a bilateral agreement. This addition, while imposing new costs on prospective customers, was essential for the support of independent power producers and marketers for the overall direction of this initiative. BPA repeatedly noted during the Workshops that the security requirements in this section to establish readiness are independent of the security requirements required to provide financial security for the expansion as described in the LTF Queue Management section at Page 9 of the materials. The security requirements in the LTF Queue Management section apply regardless of how a customer demonstrates commercial readiness and are intended to provide BPA with a guaranteed revenue stream to support construction of plans of service. In that context of LTF Queue Management, NIPPC and RNW do not oppose security in an amount representing five years of service, which may be reasonable depending on the Plan of Service the customer needs. BPA, however, should consider establishing a lower security amount for purposes of establishing commercial readiness. For purposes of demonstrating commercial readiness through the posting of security, NIPPC and RNW suggest BPA require security representing the revenue from one year of service under the request. If BPA determines that a customer needs construction pursuant to a Plan of Service to enable the request under the LTF Queue Management section, BPA would provide the customer with notice that additional security was necessary. - o BPA should also consider establishing different tiers of security requirements based on BPA’s actual exposure to risk. As BPA’s risk increases, BPA could require more robust securitization commitments from customers. See the proposal below in the section related to Long Term Firm Queue Management. - o Given the challenges associated with executing a binding power sales agreement in advance of securing transmission service, NIPPC and RNW recognize that as buyers and sellers adapt to this transition, most customers will likely rely on security to establish commercial readiness. - o Accordingly, NIPPC and RNW are concerned that some of the proposed readiness	We appreciate NIPPC and RNW’s suggestions and proposals for providing security in lieu of evidence of transaction maturity, lower amounts for security, and tying security requirements to BPA’s actual risk exposure. We also acknowledge their concern about the potential for gaming and possible limitations which could mitigate those concerns. We will consider their feedback as we refine our proposals and/or develop alternatives to share in the TC-27 pre-proceeding workshops.

Commenter	Summary of Comment/Question	BPA Staff Response
	criteria may be subject to manipulation and “gaming”. - A letter of intent is generally not a binding agreement between the parties. A letter of intent is merely a framework for parties to work towards a binding agreement. To avoid submitting security for their transmission service request, customers will have an incentive to use a letter of intent to show commercial readiness even if they do not have a binding agreement. Accordingly, if BPA intends to allow customers to rely on a letter of intent, NIPPC and RNW recommend BPA impose reasonable limits on the duration of the letter of intent [90 days though possibly as long as one year]. Upon expiration of the term of the letter of intent, BPA should require the customer to provide either evidence of the binding agreement, post security, or meet separate criteria that BPA may adopt in this initiative (including those proposed below); - Similarly, a customer who participates in an RFP and makes the buyer’s short list should be required to notify BPA of its progress towards execution of an agreement. In the event a customer on an RFP short list does not execute an agreement within a reasonable time, the customer should withdraw its request, or post security. NIPPC and RNW note that the execution of an agreement is dependent on an offtaker’s final decisions that are also influenced , in the case of a regulated utility, by the state regulatory commission.	
NIPPC and RNW	o Customers should have the ability to redact sensitive commercial terms from the evidence they offer to establish commercial readiness. BPA should also consider providing customers with a form non-disclosure agreement or confidentiality agreement that BPA will execute to assure customers that their confidential information will not be disclosed;	Thank you for your comments. We will consider your feedback in developing our final proposals.
NIPPC and RNW	- o BPA should expand the types of security BPA will accept in support of commercial readiness to include surety bonds; - o Additional Commercial Readiness criteria: - BPA should accept evidence that a customer has executed an LGIA as evidence of commercial readiness; - BPA should accept a Network Customer’s attestation that it intends to identify a generator as a Designated Network Resource as evidence of commercial readiness; - BPA should accept evidence of an executed Long Term Firm Service Agreement	Thank you for these suggestions, we will consider them as we refine our proposals to share in the TC-27 pre-proceeding workshops.

Commenter	Summary of Comment/Question	BPA Staff Response
	(Point-to-Point or Network) with a non-BPA transmission provider that connects to the Point of Receipt or Point of Delivery of the Transmission Service Request on BPA’s system; - NIPPC and RNW would consider supporting additional mechanisms for customers to demonstrate commercial readiness. - BPA should also consider adopting measures to eliminate “queue flooding” by customers. For example, BPA could implement a concurrent feasibility standard to eliminate duplicative requests submitted by a customer associated with a generation resource on BPA’s system. The total long-term transmission service requests associated with a generator could be limited to the MW of the generator’s interconnection service.	
NIPPC and RNW	- o Because they do not require the same level of commitment by the customer to take service, NIPPC and RNW would not support the following to be considered adequate demonstration of commercial readiness: - A longer term of service beyond 5 years without security; - Participation in a generator interconnection study process (short of execution of an LGIA); - Submission to a request for proposal; - Active negotiations towards a bilateral agreement; - Early stage minimal construction activity (e.g., site control, equipment procurement, ground clearing).	Thank you for sharing these thoughts. We appreciate these cautionary notes and look forward to additional conversation. Our GAT proposals did not consider activities like site control, equipment procurement, and ground clearing as relevant to considerations for transmission service request readiness. And securitization is a significant consideration that we expect to further discuss in TC-27 pre-proceeding workshops.
NIPPC and RNW	• NIPPC and RNW support the proposal to require a customer who submits a request for point-to-point transmission service to a point of delivery that serves only Network Transmission Service customers to provide an attestation from the Network Transmission Service customer that it intends to use point to point service to serve a portion of its load. (Sec. 2.c).	Thank you for expressing support for this potential validation criteria.
NIPPC and RNW	• NIPPC and RNW generally support the proposals related to treatment of NWHUB and MIDCREMOTE (Sec. 2.d and Sec. 2.e), but do have concerns: - o Customers should have the ability to request service with a start date more than 180 days in the future from the date of the transmission service request. - o For requests that are longer than 180 days but less than 360 days in the future, BPA could request an increase in the amount of security (assuming BPA revises its proposal	We will consider suggestions for start date capability related to NWHUB requests and associated security requirements. We acknowledge further discussion is necessary on proposed limitations on service to and from NWHUB in the Future State.

Commenter	Summary of Comment/Question	BPA Staff Response
	and scales the security requirement from customers as discussed below). o NIPPC and RNW may be able to support the limitations on service to and from NWHUB on a temporary basis for the duration of the transition period; NIPPC and RNW will probably not be able to support similar limitations if BPA proposes them as part of the Future State with particular concern regarding the limits on the start date and BPA's refusal to develop a plan of service to enable long term firm service from the market hub to support imports or exports.	
NIPPC and RNW	• NIPPC and RNW support the proposal in Sec. f. to require customers requesting transmission service to enable imports, exports, or wheeling transactions to demonstrate upstream and downstream transmission rights on neighboring transmission systems. As noted above, NIPPC and RNW believe that evidence of upstream and downstream transmission service agreements should be acceptable evidence of commercial readiness.	Thank you for your comments.
NIPPC and RNW	Do the limitations and requirements for FTSRs/TSRs with a POR or POD of NWHUB (Sec. 2.d.) apply to FTSRs/TSRs associated with transmission service requests for generation facilities or load outside of BPA's balancing authority area (Sec. 2.f.)? Specifically, would a TSR from NWHUB to a load outside of BPA's balancing authority area be subject to the timing and other limitations of Sec.2.d? If so, why?	Under the proposals we shared this summer, these limitations would apply, including for POR or POD of NWHUB when the generation facilities or load are outside of BPA's balancing authority area. Our proposal did seek to focus on readiness to take transmission service regardless of where the load or resource that is associated with the NWHUB TSR is located. We will continue to consider feedback as we revise our proposals for the TC-27 process.
NIPPC and RNW	Would BPA consider reducing the amount of security required to demonstrate commercial readiness to the estimated revenue associated with one year of service?	Yes. We are considering your feedback as we refine our proposals related to security for the TC-27 pre-proceeding workshops.
NIPPC and RNW	Will BPA consider releasing customer security when the customer's request requires only plans of service that BPA has already decided to construct?	We will consider feedback as we refine our proposals, or develop alternatives, including those related to security. We also want to consider the purpose of security requirements, including how security is meant to ensure that customers driving the need for a project provide their share of the revenue that makes up the economic justification of a project.
NRU	In general, NRU supports BPA's proposals regarding readiness criteria. Ensuring that BPA prioritizes planning for and serving those customers with service requests that are "mature" is a prudent use of BPA's scarce transmission resources and will ensure that those most ready to take service will be able to receive service in a timely fashion. This approach will ensure a more efficient integration of new resources and loads and	Thank you for your comments. We will work to further clarify milestones of the line/load interconnection process that would be required for BPA to evaluate and encumber capacity for a NITS forecast.

Commenter	Summary of Comment/Question	BPA Staff Response
	minimize delays caused by waiting on parties that are not ready to move forward. Moreover, requiring requesting customers to demonstrate that they have secured a purchaser for their energy or are in active negotiations through a letter of intent will allow load serving entities to help influence the transmission needs for which BPA would construct new facilities. However, we request BPA clarify the specific milestone of the line/load interconnection process that would be required for BPA to evaluate and encumber capacity on behalf of a NITS customer's forecast. Section 7.b of the NITS New Network Load proposal states that "BPA cannot evaluate long-term firm service needs without a valid line/load interconnection plan of service – result of a Line & Load Interconnection Facilities Study (LLIFS)", which would require that the customer has simply completed the Facilities Study. In section 2.ii of the Readiness Criteria proposal, however, BPA states "For line/load interconnections in BPA's balancing authority area, if the required facilities are new or involve expansion of existing facilities, and assuming customer contract execution is required, contract has been fully executed." NRU requests that BPA clarify which specific contract is required to have been executed in order to meet BPA's readiness requirements, as well as how that readiness criteria relates to the requirement above that only the LLIR Facilities Study must have been completed in order for BPA to evaluate the NITS New Network Loads for transmission capacity.	
NRU	In addition, as noted above, we request that BPA clarify the applicability of the proposed readiness criteria to Transfer Service customers serving load outside of BPA's BAA. We note that section 2.a.ii of the Readiness Criteria proposal (regarding evidence of line/load interconnection agreements) appears to apply only to "line/load interconnections in BPA's balancing authority area." Additionally, section 2.f.i of the same section states that for load outside of the BPA BAA, "the load location must be electrically connected to BPA's POR/POD)." Additional details on these readiness criteria and their applicability to Transfer Service customers would be appreciated.	Thank you for your comment. We will work to clarify the applicability of any proposed readiness criteria to Transfer Services customers serving load outside of BPA's BAA.
NRU	One additional observation, as it relates to the proposed readiness criteria, is that BPA appears to be placing the ability of transmission customers to secure transmission service directly on the effectiveness of its interconnection queue processes. Relevant to NITS, customers with New Network Loads will be unable to be evaluated for transmission service until such time as they have proceeded through the line/load	Thank you for raising these concerns. We will consider them as we revise our proposals for the TC-27 process and welcome further discussion on these issues.

Commenter	Summary of Comment/Question	BPA Staff Response
	interconnection study process and a plan of service has been identified (according to proposed section 7.b of the NITS New Network Load section). To the extent that BPA’s line/load interconnection queue becomes inundated with load interconnection requests that create delays in being studied, which we view as a legitimate risk, this could severely impede those NITS customers from being evaluated for transmission service or meeting the proposed readiness criteria, through no fault of their own. This is especially true as, to our understanding, BPA currently processes its line/load interconnection queue on a serial, first-come-first-served basis. We want to call attention to this risk as BPA allocates its resources across the various queues that it manages. We note on the generator interconnection process, BPA recently announced a delay in completing its Phase 1 cluster study by approximately 5 months. Subjecting access to BPA’s transmission capacity to the outcomes of these other queues presents considerable risk if the processing of these other queues experiences delays or is not efficient. We urge BPA to consider this relationship as it establishes its readiness criteria and consider situations where a customer cannot meet the readiness requirements through no fault of its own.	
NT Customer Group	• We generally support BPA’s proposals as they relate to readiness criteria. Specifically, we support BPA’s proposed requirement that requesting customers provide evidence of transactional maturity. Such provisions would enable committed load serving and resource pairs to help direct the transmission needs for which BPA ultimately constructs new facilities.	Thank you for your comments.
NWCPUD	Northern Wasco appreciates BPA’s responsiveness to feedback regarding the use of virtual points. Virtual points are an essential feature of efficient wholesale power markets functioning in the Northwest. We believe BPA’s approach in the draft language is moving in a positive direction that is workable for Northern Wasco. We look forward to working on more detailed implementation concepts with BPA. In Northern Wasco’s specific circumstances, we are interested in exploring use of Big Eddy as a POR/POD for NWHUB which could more accurately reflect how power is delivered to our load, and as a means to potentially reduce pancaked rates paid on the Network for load service by applying the Short Distance Discount to the NT leg of service to get wholesale power purchases to our load (in addition to the PTP leg from the generator to NWHUB).	Thank you for your comments. We note that addition of new hubs is outside the scope of the GAT project.

Commenter	Summary of Comment/Question	BPA Staff Response
NWCPUD	Regarding “FTSR/TSR Data Validation Readiness Criteria” Northern Wasco supports BPA’s goal of encouraging inclusion of “mature” LLIR requests in the queue. However, we are concerned that the criteria in the draft language are too vague and may not account for delays in the LLIR process that are caused by BPA and not the customer. Northern Wasco supports Umatilla Electric Cooperative’s proposed language of “Line/load interconnections in BPA’s balancing authority area shall be deemed to be mature if the customer has fulfilled its most current LLIR contractual and procedural obligations.”	Thank you for your comments and sharing your concerns regarding delays in the LLIR process. We will consider them as we revise our proposals for the TC-27 process and welcome further discussion on these issues.
PacifiCorp	Data Validation Readiness Criteria BPA provided detail supporting the criteria to be used in evaluating readiness. BPA is seeking to validate evidence of transaction maturity. BPA acknowledged that in designing updates to support readiness criteria it attempted to eliminate pain points experienced in the past. During discussions it was noted that those pain points were infrequent. PacifiCorp believes that inclusion of infrequent items only complicates the overall change required. PacifiCorp recommends only implementing those readiness criteria required to achieve immediate results within the transmission service request queue. Other changes can be proposed in future updates. It also appears that BPA has elected to modify the security deposit requirement, and other details regarding letters of credit and reductions thereof as part of this update. PacifiCorp supports changes to deposits that streamline the ability to request and receive transmission service; however, it is unclear if these are needed for this reform effort or other desired improvements that could be considered as part of a separate overall credit practice review.	Thank you for this comment. We will consider your comments as we prepare our final proposal for this process.
PGE	PGE supports BPA’s objective to improve the quality and readiness of transmission service requests; however, the proposed FTSR/TSR Data Validation Readiness Criteria introduce procedural and commercial requirements that could limit flexibility in meeting resource and load service needs. • Requiring executed interconnection agreements, completed Phase 2 studies, signed power purchase agreements or letters of intent, or posted security prior to accepting a request in the queue moves the process toward a “ready-to-build” standard. While this may reduce speculative requests, it creates challenges for utilities managing multi-year	Thank you for sharing your concerns about the proposed readiness requirements. We acknowledge there may be misalignments with customer’s business decisions, regional procurement processes, and BPA timelines that need to be discussed. We welcome any suggestions to resolve these issues, and we are considering your feedback as we refine our proposals for the TC-27 pre-proceeding workshops.

Commenter	Summary of Comment/Question	BPA Staff Response
	planning horizons, where procurement, customer negotiations, and BPA timelines do not always align. • The elimination of extensions for service commencement, location-specific restrictions such as reducing the ability for flexibility scheduling points like NWH to obtain 7F for long-term requests, and simultaneous upstream/downstream transmission rights requirements for external generation further compress timelines and increase coordination complexity. • The proposed GAT language is unclear with respect to requests from a load serving entity that is acquiring service with the intent to serve load through market access. - o PGE requests that BPA clarify within its proposed business practice what documentation or requirements are needed when transmission requests are not directly tied to a specific resource for stakeholder feedback. For example, please clarify how the readiness criteria apply to the following: 1) existing load for a PPA, 2) A purchase to offset a carbon resource, 3) Requests to deliver firm service from an existing resource with NF rights.	
PGE	<u>I. Power Purchase Agreement (PPA).</u> While PGE does not object to the inclusion of this as a readiness criterion, it is only reasonable to include as an option so long as it does not end up being the sole method to prove readiness. There are many situations in which PGE would need certainty to the quality, amount and timing of when transmission service will be granted for a project prior to the execution of a PPA, however, it is understandable that this could be a good solution for other parties.	We appreciate PGE's indication that inclusion of a PPA as readiness criteria, as long as it is not the only means of validation, is reasonable.
PGE	<u>II. Letter of Intent.</u> PGE encourages BPA to adopt the Readiness Criteria that calls for a customer in BPA's transmission queue to share a "letter of intent signed by both parties" as acceptable evidence to remain in the queue. • PGE requests that BPA provide a form letter with all required components as a means of standardizing and accelerating the process. • PGE does not support the disclaimer provided by BPA in the proposal which states 'Offer of transmission service may be contingent on final execution with X period of time'. Consistent with PGE's comment under the readiness criteria for PPAs, it will be common that PGE require certainty of transmission service prior to the execution of definitive agreements. PGE understands that BPA does not want to continue to hold a queue position for a resource that ultimately fails to enter a contract. PGE encourages BPA to accept the request, with a requirement that Parties submit to BPA over a	We appreciate the information you have shared as well as your suggestions, questions and related feedback. We are considering your suggestions as we refine our proposals for the TC-27 and will address your questions at that time.

Commenter	Summary of Comment/Question	BPA Staff Response
	specified period – such as one hundred and eighty (180) days - either (1) an additional letter to confirm parties are still in discussion or (2) an attestation to the execution of a definitive agreement. • PGE also suggests that readiness demonstrated via a letter of intent between PGE and a third party not be considered sufficient should that third party ultimately seek to enter a contract with an entity other than PGE. In such case, the third party would need to provide a new letter of intent with the new offtake counterparty. • The schedule for PGE’s 2025 RFP anticipates publication of an initial shortlist by November 13, 2025. This timing appears to offer reasonable alignment with BPA’s GAT timelines, which supports a process in which PGE can offer Letters of Intent for shortlisted bidders. Noting that PGE’s RFPs do not operate on a standard annual cycle, PGE requests further information from BPA regarding timing alignment between the GAT process and utility procurement cycles, if it is an ongoing process, no longer a cluster study, and requests must meet this new readiness criteria to get in BPA’s queue. <u>III. Notice of Award from a Request for Proposal (RFP).</u> PGE is supportive of the inclusion of this readiness criteria, however, would like to seek clarity as to (1) the intent of the word ‘Award’ within its proposal; and (2) the use of the phrase ‘Request for Proposal’. • With respect to (1), PGE would like to clarify if ‘award’ counts as being included on an initial shortlist, a final shortlist, selected to enter a negotiation, or some other point in a formal RFP process. • With respect to (2) PGE’s clarifications with respect to ‘award’ assumes that BPA is referring to a formal competitive solicitation, for example in Oregon would be under Oregon Administrative Rules (OAR) 860-089 and not any bilateral solicitation a Utility may perform. PGE would only be likely to offer an award, through an RFP process or otherwise, if there was a very high degree of certainty that the project would be awarded a rollover-eligible CF product of reasonably forecastable curtailment risk that would not face exposure to estimated upgrade costs. <u>IV. Additional suggestions and clarifications needed:</u> • Regarding accepting a PPA as a form of evidence, PGE suggests that this should be expanded to other transaction types – such as Build-Transfer Agreements or Asset Purchase Agreements – as acceptable types of definitive agreements between counterparties, especially considering any requirement to provide evidence of an	

Commenter	Summary of Comment/Question	BPA Staff Response
	executed arrangement in any options provided to demonstrate readiness. • PGE suggests BPA allow for a grace period for the readiness requirement, which would allow bidders to submit a request, but not have to demonstrate readiness, until a shortlist is published. At the point in which the shortlist is published requests could be removed or the condition is satisfied. • PGE seeks additional clarification on several of the proposed requirements listed under Generators/Load Outside of BPA Balancing Authority Area (BAA) (Page 7 of BPA’s draft GAT document). • Section 2(f)(ii) – please clarify what might qualify as ‘The information must reflect electrical feasibility’. If possible, provide examples. • Section 2(f)(iii) – please clarify what might qualify as ‘path must be electronically valid’. If possible, provide examples. In addition, PGE has concerns with the phrase that ‘the timeframe must match’. It is feasible that a project located outside of BPA’s BAA may get service on another transmission providers (TP) transmission system that starts before or after the requested service to BPA. That may be due to when the third-party TP can start to provide service or possibly by design (e.g. there could be plans to sell into other markets, other parties, use other transmission rights in the near-term, etc. prior to getting additional service from BPA). PGE encourages BPA to consider that the party just must demonstrate service or requested service which will ultimately align and deliver to the matching BPA POR/POD being requested.	
PGE	• Section 2(f)(v) – similar concerns around matching and timeframe as noted in Section 2(f)(iii). In addition, PGE would like to clarify that if it intends to use existing NITS service when the generator exists BPA’s POD (i.e. BPAT.PGE), that is sufficient to meet this criterion. • Section 2f(vi) – Please clarify how and if this requirement would apply if resources were coming from the Eastern Interconnection.	If we correctly understand PGE’s request for clarification, if NITS service is being used to serve load in PGE’s balancing authority area, we expect that would be sufficient. In order to award capacity across the across West of Garrison or BPA.NWMT, a resource needs to be identified that can be put on a RAS generation dropping scheme. This is necessary to enable an increase in TTC based on plan of service requirements.
PGE	PGE appreciates that BPA does not intend to change any granted service with the changes associated with NWHUB and MIDCRemote scheduling points. Regarding BPA’s question on what “...functionality [would] be lost by requiring MIDCRemote to be conformed to NWHUB and utilizing short-term redirects to Columbia Market?”, PGE did not identify any significant issues with this change in requestable points.	Thank you for noting that it is helpful to PGE to understand that we do not intend to modify existing contracts with NWHUB or MIDCRemote. We further appreciate hearing PGE’s input that removal of MIDCRemote from the long-term firm market with NWHUB remaining does not create any identified functional issues for PGE.

Commenter	Summary of Comment/Question	BPA Staff Response
	However, PGE understands from BPA’s proposal under Section 2(d)(i) and (vi) that new service from NWH will only be granted as Reassessment CFS (or parallel NITS), with no ability for this service to be firmed up to long-term firm 7-F. If future transmission from NWH were only available as Reassessment CFS, PGE would lose deliverability certainty for long-term PPAs and owned resources at or through this scheduling point and reducing geographic diversity in the supply portfolio. PGE requests that BPA also allow a path to firm for virtual hubs such as NWHUB. Allowing a path for NT customers through 6NN service to get to firm, while not allowing PTP customers a path to firm is not equitable service. Specifically, how future requests for 7F at MID-C could sacrifice the scheduling flexibility afforded to customers in their (continued) ability to redirect firm transmission from NWH to COLUMBIAMKT. BPA should evaluate its decision to carve out NWH from bridge CFS eligibility, or alternatively, provide a pathway to firmness for a strategic regional point like NWH.	We would like more information regarding PGE’s concerns with our proposals related to new service from NWH. Additionally, if PGE has thoughts on appropriate assumptions for planning transmission expansion from a virtual point, we would be interested to hear those thoughts.
PNGC	Readiness Requirements The implementation of a readiness standard is supported by PNGC Power, provided it does not introduce significant procedural hurdles and barriers for customers seeking long-term firm service, particularly for projects that are otherwise viable. BPA’s readiness criteria must balance needs to support reliability, fair access to long-term firm transmission, and economic development opportunities. PNGC would like to further underscore its position that resources contributing to regional resource adequacy (i.e. WRAP) must take precedence to support regional reliability.	Thank you for your comments. We will consider your feedback as we refine our proposals.
PRITCA	Section 1 (application requirements): BPA proposes to require “valid” TSRs and Data Exhibits. PRITCA is concerned that the “valid” qualifier creates unjustifiable discretion for BPA to impose new and unanticipated data and other requirements on valid TSRs. BPA must clarify that it will not impose new data and other requirements on TSRs that did not exist at the time the TSR was filed. In addition, the “specified due date” language in Section 1(d) is ambiguous. BPA must clarify where the due dates are specified or otherwise provide clear guidelines so that Interconnection Customers know precisely the deadlines they face.	Thank you for raising these concerns. We will consider them as we prepare our final proposals for the TC-27 pre-proceeding workshops.

Commenter	Summary of Comment/Question	BPA Staff Response
PRITCA	• Section 2(a) (plan of service requirements): The awkward phrasing of this provision creates ambiguity. The “not yet studied and have not yet signed agreements” combined with the “must be defined and moving forward” language makes it difficult to determine exactly how the data validation criteria would be applied. PRITCA re-emphasizes that BPA must make clear it will not apply new data validation criteria retroactively if they did not exist at the time a TSR was submitted.	Thank you for your comments, including questions regarding the ambiguous language. We are considering your feedback as we prepare our proposals for the TC-27 pre-proceeding workshops. We want to clarify that we are not proposing new requirements to be applied to requests that have been studied and received a plan of service, including requests which are currently funding Preliminary Engineering Agreements (PEA) or Environmental Study Agreements (ESAs).
PRITCA	• Section 2(b) (“transaction maturity” criteria): The “transaction maturity” criteria are commercial readiness criteria by another name and must be rejected. These requirements are unacceptable for a number of reasons: - o To start with, commercial readiness criteria are unacceptable in principle, regardless of the moniker. - o They eliminate merchant generation and other business models that do not rely on long-term bilateral sales. - o They enhance generator self-build bias because it is much easier for an integrated utility to create a PPA or Letter of Intent with itself than it is for IPPs to obtain a PPA or binding Letter of Intent. - o BPA’s transmission function, which is not a commercial entity, should not be in the business of picking and choosing which generation business models are commercially viable. - o The requirements create a Catch-22: under these criteria, a project cannot obtain transmission rights until it has a PPA or has won an RFP but projects generally cannot compete in RFPs unless they have transmission rights in place. The most recent solicitation from Portland General Electric is a good example. It requires bidders to have transmission rights as a prerequisite to submitting a bid.⁵ If BPA’s criteria are adopted, the universe of projects eligible to bid into such RFPs will be seriously constrained, and new projects interconnecting with the BPA system will likely be eliminated entirely. - o They focus myopically on the Investor-Owned Utility’s procurement processes while failing to account for other common methods of acquiring generation, such as purchases from market hubs, from merchant generators, and through short-term transactions. - o Especially when combined with the huge security deposits that would be required by BPA’s proposal (discussed below), these criteria are discriminatory because they favor large developers and large customers (like technology companies operating data	Thank you for your feedback, including the alignment between our proposed requirements and regional RFP requirements (which other GAT participants have also raised). We are considering your concerns as we are revising our proposals for the TC-27 process. We would appreciate any specific information you can provide regarding your concerns. Additionally, we would like to clarify that the requirements on customers to submit and proceed with requests through our interconnection processes are distinct and do not confer rights to proceed with a transmission request. For example, the readiness criteria BPA adopted in the TC-25 Record of Decision (which BPA is implementing as part of its Transition Process for Large Generator Interconnection Service) is utilized in the large generation interconnection process and does not take the place of the need to implement requirements to submit and proceed with a request for transmission service.

Commenter	Summary of Comment/Question	BPA Staff Response
	centers) who can afford to tie up large amounts of cash for long periods. Smaller IPPs and LSEs, especially publicly-owned LSEs, simply don't have cash available that can be tied up for years with no interest. o They are duplicative of site control requirements. If a developer has invested enough in the development process to obtain land rights, transmission rights-of-way, permits, etc., it has demonstrated a firm commitment to completing the development and has put substantial capital at risk. It is unreasonable for BPA to require more, especially where the new requirements are discriminatory and not reasonably attainable for the reasons noted above.	
PRITCA	• Section 2(b)(vi)(4) (release of security): The language is ambiguous. BPA must clarify that nothing in its proposal would override the security requirements, including release of security, in existing contracts or would change the rules for security for TSRs that have already been submitted.	Thank you for your feedback.
PRITCA	• Section 2(b)(vii) (evidence of transaction requiring "requested transmission path"): - o This test eliminates merchant generation because merchant generation in most cases does not rely on any one transmission path. BPA must not impose rules that arbitrarily eliminate otherwise acceptable business models. - o The "particular transmission path" formulation doesn't work for Network service.	Thank you for your comments. We are uncertain what your concern is regarding these proposals and would appreciate additional information as we share our refined proposals in the TC-27 pre-proceeding workshops.
PRITCA	• Asterisked statement ("Offer of transmission may be contingent on final execution within x period of time"): The undefined "x" creates potential dangers to otherwise viable projects. If the time period for final execution of the offer of transmission is too short to allow the developer to ensure financing and other commercial arrangements are in place, otherwise viable projects will be forced out of the queue and forced to forfeit their deposits simply because they run out of time, not because project is non-viable.	Thank you for your feedback. We are interested in hearing from customers and LSEs as to a reasonable timeframe to inform our proposals for the TC-27 process.
PRITCA	• Section 2(e)(ii) (MIDCRremote POR/POD): - o BPA's approach, by restricting requests to certain locations on the system, causes systematically inefficient use of the system, compounding its current problems by disfavoring, removing, or prohibiting certain broader request options, which then effectively compounds and worsens problems at already challenged PODs and PORs and across constrained paths. Indeed, the last TSEP report demonstrates this problem	Thank you for raising these concerns. We are reviewing your feedback and will consider it as we refine our proposals.

Commenter	Summary of Comment/Question	BPA Staff Response
	clearly, by showing that essentially all the requests from PORs at Big Eddy or John Day to network PODs in numerous directions (PSE, PGE, NWH, UEC) triggered massive upgrades -- a half or full dozen of major, multi-year transmission projects in many cases -- such that service from those places would be unlikely to be confirmed for 10-15 years. BPA here proposes to amplify this problem, piling restrictions that limit to only (or predominantly) GI and market hub points, while also attacking the foundations and viability of GI associated requests, increasing their abilities to remove requests (especially if considered in combination with GI policies and BPA ill-fated and legally dubious TSR data exhibit policies). o The proposal makes clear that “[c]urrent reservations with MIDCRemote points will not be impacted.” BPA here recognizes that there are substantial reliance interests that make retroactive application of new rules to existing transactions unacceptable. BPA must extend that consideration to all existing transactions, especially to TSRs that were submitted with the expectation that the rules in place at the time of submission would remain in place.	
PRITCA	• Section 2(g) (“Other information”): The proposed language would give BPA “sole discretion” to determine validity of “additional information required in the OATT.” This is unacceptable because: (i) it opens up the possibility of BPA arbitrarily adding information requirements to existing TSRs that did not exist at the time the TSR was submitted, with no recourse for the Interconnection Customer; (ii) it invites arbitrary BPA action to knock projects out of the queue, which seems to be BPA’s intention; and, (ii) it is contrary to the OATT, which provides dispute resolution process if customer disagrees with BPA conclusions or actions.	Thank you for your comment. We are shifting to propose our proposals as part of the TC-27 tariff proceeding process (please see the Statement on the Future of GAT Engagement and Future State Solutions at the start of this document). We want to reiterate that we do not intend to arbitrarily add or revise requirements for requesting transmission service. We will follow the appropriate processes necessary to modify either our OATT or business practices, as applicable. Finally, we are not proposing any change to a customer’s right to initiate a dispute under section 12 of BPA’s OATT.
PSE	BPA proposes that it will require customers complete Phase 2 of a generation interconnection study to meet the new Readiness Criteria (GAT Preliminary Draft Language document, p. 5). Please provide examples and/or flow charts of the BPA Interconnection Processes and how the different study timelines correspond to “Phase 2.”	Thank you for your request for this information. We will consider providing this, or other related information, as we share our revised proposals in the TC-27 pre-proceeding process.
Shell Energy	<u>Northwest Market Hub (NWH)</u> Shell Energy suggests that BPA introduce a Tier-2 NWH offering for start dates between 181 and 365+ days after submittal. This Tier-2 path would retain all of BPA’s existing posture for NWH (reassessment-only conditional firm, no extensions for commencement, and no study toward firm service) while adding a narrowly tailored, incremental securitization requirement to compensate for the additional planning exposure that accompanies the longer lead.	Thank you for sharing this proposal. We would like more information to better understand this proposal.

Commenter	Summary of Comment/Question	BPA Staff Response
Shell Energy	<u>Data Validation and Duplicative Requests</u> BPA may consider developing a methodology to identify and manage duplicative requests—submissions from the same customer that overlap in POR/POD combinations, volumes, or timeframes and/or appear to serve essentially the same commercial position. A potential solution is to define “duplicative TSRs” and create tools to consolidate them, require the customer to elect among them, or apply escalating, non-refundable processing fees to discourage excessive parallel submissions on the same constrained flow-based paths.	Thank you for this suggestion. We will consider this as we revise our proposals for the TC-27 pre-proceeding workshops. We do want to share that BPA currently has a "Cumulative Demand" component to its data exhibit validation process. That process assesses whether the customer is asking for transmission in excess of the nameplate of the specified generating resource. If that is the case, and the customer indicates that they are not actually seeking transmission amounts in excess of the generator nameplate, the customer must select which requests that want to proceed with limited by the generation nameplate amount at the end of the study. We are interested in knowing if Shell is proposing something different than that approach.
Tacoma Power	Tacoma Power is also concerned that the transition initiatives that BPA is introducing are discriminatory and could lead to disputes that will ultimately slow down BPA’s ability to move through its queue. Concerning readiness criteria, any customer who requests transmission service and is willing to pay for that service should have equal and open access to that transmission service, regardless of BPA’s determination about maturity of the project or service type (Point to Point or NITS). FERC, and BPA’s OATT, have supported limitations on the interconnection process to ensure that developer projects that enter the interconnection queue are projects likely to be built. These restrictions have not been applied by FERC to transmission requests and BPA should not attempt to apply interconnection standards to transmission projects. Further, BPA’s desire to retroactively apply these readiness criteria to projects who entered the queue in good faith as far back as August 2022 may be effective in removing some projects from the queue, but it certainly raises questions about equitability. Again, Tacoma Power understands BPA’s desire to move forward and get itself out of the ‘queue jam’ it is currently in, but the manner in which it does so still should follow the Good Utility Practices of good faith.	We appreciate Tacoma raising these concerns about the readiness criteria. We have made the decision to conduct a TC-27 proceeding as necessary to address any potential changes to BPA’s OATT (please see the Statement on the Future of GAT Engagement and Future State Solutions at the start of this document). We are considering Tacoma’s feedback as we revise our proposals to share in the TC-27 pre-proceeding workshops.
Umatilla Electric Cooperative	Under the “FTSR/TSR Data Validation Readiness Criteria”, BPA proposes to eliminate FTSR/TSRs associated with a specific Line and Load Interconnection Request (“LLIR”) unless the LLIR ‘contract has been fully executed’. This is too vague, as there are several contract actions associated with the LLIR process. Additionally, BPA consistently misses its own LLIR study deadlines, which are no fault of the customer. Said differently, BPA is often the barrier to an LLIR request moving from an initial LLIR submittal to the potential construction of a new transmission facility. Thus, UEC proposes that BPA deem any line/load interconnections in BPA’s balancing authority	Thank you for your comments. We will consider your feedback as we clarify our proposed requirements related to LLIRs. We understand that BPA’s ability to process LLIR requests is relevant to the maturity of a customer's request. We also note that our ability to model increased load requires a new interconnection plan of service is directly tied to completion of the LLIR plan of service.

Commenter	Summary of Comment/Question	BPA Staff Response
	area to be mature if the customer has fulfilled its most current LLIR contractual and procedural obligations. UEC believes similar treatment should be applied to generation interconnection requests.	
Umatilla Electric Cooperative	UEC generally supports BPA’s proposed “Transition to Future State” approach for the treatment of virtual points and the ability of NT customers to obtain FTSRs for long-term NITS enhanced priority 6 service for a POR of NWHUB. We look forward to working with BPA to refine details as the process progresses.	Thank you for your comments.
Seattle City Light	City Light supports BPA applying updated TSR Data Validation Readiness Criteria to TSRs in the Queue that have not accepted a service agreement or executed a Preliminary Study Agreement. City Light supports BPA including a path for PTP requests other than designated resources to load to achieve Data Validation Readiness Criteria. A security deposit in lieu of meeting criteria is an acceptable alternative. City Light supports BPA accepting a security deposit in lieu of meeting commercial readiness for TSRs.	Thank you for your comments supporting our proposals.

VI. Interim Service

Commenter	Summary of Comment/Question	BPA Staff Response
Avangrid	Avangrid Requests More Opportunities to Discuss Issues Associated with the Proposed Readiness Criteria, Interim Service, and Security Requirements Additional clarity and refinement are needed before the Draft BPs are ready to implement. The Draft BPs raise foundational questions, like how Bonneville will ensure it is able to fund transmission construction with security linked to a flat per-MW fee, which have no apparent venue for additional consideration. Bonneville should prioritize consultation with stakeholders to help find workable solutions before the Draft BPs are implemented. To that end, Avangrid highlights additional areas of concern below. First, security is referenced throughout the Draft BPs with only one calculation provided (in the Long Term Firm Queue Management section) suggesting that perhaps the same amount is used throughout, but an up-front “security” payment for interim service also suggests that the interim service should not be subject to an annual transmission rate paid for the service (regardless of whether it is utilized, and with rates subject to change through a rate proceeding). Bonneville should clarify whether interim service is a one-time security payment paid payable at the time the service is offered (at then-current rates), an annual rate payment made each year the service is required (at rates that may increase after a rate proceeding), or both.	We agree that additional discussion is necessary for the GAT proposals shared this summer, which is one reason why we shifted to the TC-27 process (please see the Statement on the Future of GAT Engagement and Future State Solutions at the start of this document). We will consider the feedback and specific issues Avangrid is raising as we refine our proposals to share in the TC-27 pre-proceeding workshops. BPA’s current model for funding transmission service expansion projects is for BPA to fund the construction of expansion projects; with security provided by the customers whose requests are driving the need for the transmission expansion project. The security is not to fund the expansion, per se, but rather to ensure the customer takes and pays for the long-term firm transmission service enabled by the expansion. Our proposals shared this summer were intended to simplify the calculation of the amount of security to be provided by a customer proceeding with a transmission expansion project and provide a financial option to demonstrate meeting a readiness criteria. Rather than establishing the security amount on the pro rata share of the direct project costs, we proposed using the estimated 5 years of revenue that would be the result of the customer taking and paying for the long-term firm transmission service enabled by the expansion. Because of the time uncertainty of interim service, we also proposed to relieve the security obligation over a fixed, 5-year period of interim service that is taken and paid for by the customer rather than over the term of the long-term firm service granted.
Avangrid	Avangrid Requests More Opportunities to Discuss Issues Associated with the Proposed Readiness Criteria, Interim Service, and Security Requirements Second, regarding interim service offers, Bonneville should first consult with stakeholders on when and how much service might be offered to avoid degradation of the system, support a viable conditional firm product, and ensure existing transmission rights are upheld. This dialogue should address whether the volume of new service contemplated could adversely affect the rights of existing transmission service holders, as well as defining the level of curtailment that would be associated with the new conditional firm product offerings.	Thank you for your comments. BPA looks forward to collaborating with customers on the analytics BPA can provide to increase understanding and transparency around any impacts to existing rights holders and/or the level of curtailment for interim service. BPA is clarifying that bridge interim service is a product to firm service and would include rollover rights.

Commenter	Summary of Comment/Question	BPA Staff Response
	Additionally, interim service offers should come with rollover rights, otherwise the risk for projects is too great as it is unclear after a period of operation whether it would be able to utilize transmission service. Generators (carbon-free or thermal) make long-term commitments to their customers and require long periods to earn the required return on investment. Without a long-term deliverability commitment from BPA, these investments will have a difficult time getting financing and cannot support the continued load growth the region is expecting.	
Avangrid	Avangrid Requests More Opportunities to Discuss Issues Associated with the Proposed Readiness Criteria, Interim Service, and Security Requirements Finally, the Draft BPs appear to require “take-and-pay” transmission service – service that may not be needed without offering a deferral, which is a departure of current practice. Bonneville should provide the ability to start the service in the future, for at least the transition, or defer the transmission service up to a certain number of times to recognizes the construction window for new resources. Making a resource pay for transmission on day one will unnecessarily increase prices of new resources for the ultimate retail consumer as generators will have to price that service into their offerings. It also is in advance of the upgrades that would be required for long-term service and doesn’t appear to be necessary for their support.	Thank you for your feedback. We will take your comments into consideration as we further develop proposals for interim service, readiness criteria, and security requirements.
Avangrid	The Proposed Interim Service Proposal Has Merit, But Should be Offered to Customers Consistent with Open-Access Principles Avangrid agrees 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. However, any such offering must be designed and administered in a manner consistent with open-access principles to ensure non-discriminatory treatment among customers. Several aspects of the current proposal raise concerns. As a threshold, the Draft BPs contemplate circumstances in which certain customer groups may be offered interim service while other similarly situated customers may not. The connection between Bonneville’s proposed readiness criteria, security provisions, and availability of interim service offers appears somewhat arbitrary. The lack of specificity in this approach as to how interim service will be offered risks undermining stakeholders’ confidence in the fairness of the process and could raise questions about compliance with Bonneville’s open access obligations. Conversely, the	Thank you for your feedback. We will take your comments into consideration as we refine our proposals for interim service.

Commenter	Summary of Comment/Question	BPA Staff Response
	current framework also allows some customers the option to decline interim service without adverse consequences while others would not enjoy the same flexibility. This inconsistency creates inequities that could lead to disputes over disparate treatment. Avangrid strongly urges Bonneville to offer unstudied TSRs the opportunity to decline interim service consistent with the expectation for studied TSRs. Finally, Bonneville’s stated intent to allocate capacity from the Evolving Grid Projects before evaluating all pending TSRs for interim service could result in an uneven playing field. This sequencing may inadvertently disadvantage certain projects or customer groups, particularly if the allocation process is not aligned with a comprehensive evaluation of all eligible TSRs. Avangrid recommends that Bonneville revisit the proposed sequencing to ensure that interim service opportunities are distributed and in full alignment with open access requirements.	
Brookfield Renewable	Conditional Firm Service (CFS) - BPA, as part of both its long-term future state and on a transitional basis, plans to immediately offer CFS to customers before they can provide long-term firm service. As stated in its previously submitted comments, Brookfield Renewable supports BPA’s proposal. The proposed draft language makes clear that the 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 earlier workshops, BPA indicated that, notwithstanding the fact that the proposed CFS may be curtailable in more hours in a year, BPA does not experience or expect a high degree of curtailments on its system. Brookfield Renewable urges BPA to continue to provide curtailment data that can be analyzed and risk-assessed by customers. Brookfield Renewable also urges to provide granular curtailment data, so that it can distinguish between, for example, forced outages and curtailments that may arise due to congestion, so that it can better assess curtailment probabilities under the proposed CFS. As noted by the Northwest and Intermountain Power Producers Coalition at the last series of workshops, BPA is truly proposing a transformation of its transmission planning and request process; a transformation that will require socialization and education across both the customer, client (load-serving entity), policymaker, and financial institution communities. To that end, Brookfield Renewable believes that it is imperative that BPA continue to offer and provide “firm” transmission service, albeit on a conditional basis, so that customers can secure necessary financing of their generation projects and satisfy counterparty delivery requirements.	Thank you for your comments. We will take them into consideration as we revise our proposals. Below are links to curtailment information requested. BPA currently posts curtailment reports externally: Hourly Firm Data Monitoring Evaluation - Bonneville Power Administration BPA currently posts actuals information externally: BPA - OPI Interties and Flowgates

Commenter	Summary of Comment/Question	BPA Staff Response
Grant PUD	Non-firm Transmission Service and Roll-Over Rights (§3.b., p. 1 of Preliminary Draft) Grant asks BPA to clarify the role of existing rights to renew transmission service in its planning studies, to ensure that ROFRs, roll-over rights and rights to extend are all undisturbed due to the offer of new nonfirm transmission services. BPA has stated that forecasted NITS load growth (other than New Network Load above 13 MW) and forecasted new non-federal NITS resources lead to future encumbrances of transmission capacity under current tariff provisions and business practices. Grant understands that existing TSAs, both PTP and NITS, are assumed to be renewed in studies of future conditions, irrespective of the reason for the study (e.g., economic dispatch, available transmission capacity, or reliability). However, Grant is concerned that the full extent of existing TSA rights may not be part of the standard assumptions in BPA’s studies, and requests that BPA ensure that future FTSR encumbrances not interfere with PTP roll-over or ROFR rights that were established prior to the subsequent requests that create such encumbrances. BPA should regularly update its assumptions and forecasts regarding roll-over rights and FTSRs by asking relevant customers to update their expectations. Grant requests that BPA identify the circumstances, if any, in which forecasted encumbrances could have priority over then-current long-term PTP roll-over or ROFR rights; Grant expects that no such circumstances exist. Accordingly, Grant asks how PTP Interim service and enhanced NITS will be incorporated into planning studies. Grant also asks BPA to provide FERC standards that support BPA’s current and proposed practices in this area."	Thank you for your comments. We will consider your feedback as we refine our proposals for both the TC-27 pre-proceeding workshops. As we shared in GAT meetings this past summer, we are not proposing to restrict or change customers’ existing rollover rights. BPA encumbers transmission capacity for long-term firm transmission, including right to roll-over transmission service. These encumbrances are included in models for BPA’s studies. In addition, BPA updates the information for the existing long-term transmission rights, including rollover rights, prior to a study to ensure recently confirmed service, including customers’ rollover rights, are modeled. BPA follows the requirements in its OATT for encumbering for both existing commitments (including right to rollover) under Section 2.2 as well as any NITS forecasted needs under Section 28.2.
Grant PUD	Combinations of NITS and PTP Service (§5.e., p. 2) Grant asks BPA to clarify that it follows existing FERC standards that generally prohibit some combinations of PTP service and NITS at a given customer POD. More specifically, which combinations of PTP and NITS service are currently permitted by BPA? How will BPA’s discretion on including/excluding “portions of the load at a POD” ensure compliance with FERC standards on combined service?	A NITS customer is not precluded from using PTP service to serve some portion of its load. Rather, the OATT, rate schedules and existing business practices provide that unless the load is electrically separate, both the NITS and PTP billing determinants must continue to be paid.
Grant PUD	Service Quality and Service Priorities Grant requests that BPA clarify how the proposed Interim PTP Service and Enhanced NITS 6NN Service will fit into the existing ranks of service priorities (e.g., ranking of curtailment priorities). More specifically, how will the overall ranking of transmission service qualities change due to the offer of PTP Interim Service and enhanced NITS	Thank you for your feedback. We will consider your comments and questions (regarding service priority, planning, and operational impacts) as we revise our proposals to share in the TC-27 pre-proceeding workshops.

Commenter	Summary of Comment/Question	BPA Staff Response
	6NN service with respect to (a) planning, including queue management prior to commencement of service, and (b) operations, including curtailments and redispatch (choice of locations, amounts of curtailed and redispatched service, durations of such events, and the implications for balancing accounts and/or liquidated damages)? How might the current ranking of service qualities change after the adoption of PTP Interim Service and enhanced NITS 6NN service? How will the planning and operational priorities for Interim PTP Service interact with the corresponding priorities for Conditional Firm PTP Service? How do the priorities for access to short-term firm (STF) during curtailments and redispatch differ across all service types, both currently and after the proposed changes involving PTP Interim Service and enhanced NITS 6NN service? What is the operational priority of Interim PTP Service relative to enhanced NITS service during curtailments and redispatch and for access to available STF? Is that proposed relationship consistent with FERC standards and existing reliability standards, and if so, which specific standards? How will the new enhanced NITS 6NN rights to STF ATC compare with other rights to short-term firm ATC? What is the ranking of new/existing types of transmission service (both PTP and NITS) in all time frames: planning (during queue management) and operations (during curtailments and redispatch)? What rights and obligations do the various types of transmission service, including newly proposed variations, have with respect to the opportunity to fund expansion (e.g., Bridge PTP vs. Assessment PTP vs. existing NITS vs. enhanced NITS), and how do those rights and obligations change under a new paradigm? How will BPA ensure that system conditions that trigger curtailments and redispatch are comparable and not unduly discriminatory across all affected service types?	
Grant PUD	Transition to Firm Service Grant requests that both Interim PTP and Enhanced NITS 6NN service be firmed up as possible over time based on future investments on the grid and other effects on flows, including both durations and conditions. Assuming that both PTP Interim Service and enhanced NITS service are nonfirm during all hours, Grant expects that both services' exposure to curtailment and redispatch could shrink over time as grid capacity grows, and that some hours or conditions would not trigger curtailments and redispatch even if all hours are not available on a firm basis. Grant requests that BPA update expectations regarding curtailments and redispatch of PTP Interim Service and enhanced NITS on a regular basis, with as much notice of change as possible, if such events could affect the operation of non-federal resources owned by or contracted to	Thank you for your comments. We will consider your feedback regarding the need to firm up interim service and change any conditions associated with interim service as capacity on the grid increases as we revise our proposals for interim service.

Commenter	Summary of Comment/Question	BPA Staff Response
	Interim PTP and enhanced NITS service. Grant asks that BPA clarify how PTP Interim Service and Enhanced NITS can mature into firm service in general as changes on the grid occur. As a general rule, the conditions under which Interim PTP service and enhanced NITS service can convert to firm service should be the same (e.g., both should retain placeholder positions in the queue for later studies that would enable a transition to firm service).	
Grant PUD	Pricing of Nonfirm Transmission Service Grant asks that BPA reconsider the pricing of Interim PTP Service and Enhanced NITS 6NN Service. Charging rates for nonfirm service that are equal to the rates for firm service would interfere with efficient dispatch, because the marginal cost of transmission service is limited to line losses and is unrelated to the embedded cost of service. BPA should take this opportunity to reset rates for nonfirm transmission at levels that will minimize redispatch. Further, greater reliance on nonfirm transmission service (both interim PTP and enhanced NITS 6NN) means that customers will need back-up plans (e.g., local storage and/or demand response, the ability to rely on alternative power supplies during transmission curtailments and redispatch, and instruments to manage the financial risk of transmission curtailments/redispatch and reliance on secondary power supplies). BPA can support these management decisions by its customers to help minimize the cost to end-users, e.g., by improving information in advance (extent, timing, and duration of expected curtailments/redispatch).	We appreciate Grant’s feedback and concerns about the costs of offering an interim service product. We are currently evaluating and revising our proposals for interim service and will consider Grant’s feedback.
Grant PUD	Relationship to Redispatch in Day-Ahead Markets BPA should adopt a system to minimize and recover any additional cost of generation redispatch driven by the curtailment of nonfirm transmission service. The addition and growth of Interim PTP and Enhanced NITS should be explicitly tied to redispatch in day-ahead markets, rather than relying on new and/or temporary tracking of redispatch costs. Day-ahead markets (DAMs) should help effectively manage the financial consequences of curtailments and redispatch of Interim PTP and Enhanced NITS, given that market operators will be dispatching and redispatching generation anyway. Least-cost redispatch triggered by curtailment of nonfirm service may or may not cause incremental generation costs, and the recovery of any additional generation costs should reflect conditions in real-time on the grid, including congestion, not historical or contractual patterns of cost responsibility, and not traditional transmission rights. Given the prospective implementation of DAMs, BPA should avoid	We understand Grant is proposing that we develop a mechanism to address financial impacts of curtailments or redispatch that are associated with any possible interim service offering. We disagree with this approach and proposal. We understand that there may be financial impacts in any interim or conditional firm service offering. But, it is important to also recognize that BPA is proposing to identify a way for customers to obtain some form of firm transmission service, particularly considering the likely delays in any approach to addressing the volume of requests in the queue. Grant’s proposals may be too complex or difficult to implement. In developing our proposals, we are happy to discuss the potential impacts Grant or other participants in the process identify.

Commenter	Summary of Comment/Question	BPA Staff Response
	setting up a parallel or competing redispatch structure for Interim PTP and Enhanced NITS. In short, BPA should use the proposed offer of additional nonfirm service as a significant, meaningful and substantive step toward DAMs, which can and should provide price signals for customers and suppliers to manage curtailed and redispatched take-or-pay obligations on a non-discriminatory basis with growing reliance on congestion pricing and congestion rents that will eventually replace traditional transmission contracts and embedded cost, contract-based transmission pricing.	
NIPPC and RNW	• BPA’s proposed interim service represents a significant deviation from expectations in the current market related to the characteristics of Conditional Firm Service (“CFS”). Not all load serving entities in the region are willing to accept CFS even in its current form; yet BPA is proposing a new flavor of CFS that is even more likely to be curtailed than “traditional” CFS. • The proposed Interim Service is CFS but with no limitations to the number of hours or system conditions that may trigger curtailment. Many members of NIPPC and RNW share a concern that load serving entities in the region will not accept transactions based on Interim Service. At the same time, many members also recognize that offers of Interim Service prior to completion of a study may be the only mechanism that allows BPA to resume processing transmission service requests. • The Interim Service product will be valuable to members of NIPPC and RNW only if load serving entities are willing to enter into wholesale energy transactions (either long term power purchase agreements or shorter-term merchant transactions) that rely on the Interim Service transmission product. At this point in time, there are no clear signals from load serving entities or commercial and industrial load customers whether they will find Interim Service acceptable. We anticipate that customers who are seeking dispatchable capacity resources are less likely to accept Interim Service than customers who are seeking a portfolio of geographically diverse lower capacity factor renewable generation. • NIPPC and RNW understand that the current proposal for Interim Service represents the extent to which BPA can reform its product offerings under the current tariff and rate provisions; we anticipate that the stakeholder process for the Future State of GAT will include tariff amendments and rate provisions that may lead to further evolution of the Interim Service product. • NIPPC and RNW urge BPA to confirm that BPA will conform the Interim Service	Thank you for your comments. We look forward to collaborating with customers in upcoming TC-27 pre-proceeding workshops. We will consider NIPPC and RNW’s feedback as we re-evaluate proposals shared in July.

Commenter	Summary of Comment/Question	BPA Staff Response
	product offered through the transition business practices to the Interim Service product(s) that are eventually developed for the GAT Future State.	
NIPPC and RNW	• NIPPC and RNW also share concerns regarding the impact of an Interim Service offering to customers with existing conditional firm service agreements. BPA’s existing conditional firm service agreements contain specific terms under which BPA can curtail the customer’s service which can consist of either a specific number of hours of curtailment per year or congestion across specific flow gates on BPA’s system. Many members of NIPPC and RNW are concerned that sales of significant quantities of Interim Service will degrade their current conditional firm service. NIPPC and RNW understand that the magnitude of impacts to existing conditional firm service agreements will depend on how many customers submit transmission service requests into this transition process and how many customers are willing to accept the Interim Service product. Previously, BPA has shared high level graphics demonstrating that CFS is rarely curtailed across many of BPA’s flow gates. NIPPC and RNW encourage BPA to provide an analysis of how curtailments across those flow gates would change based on different levels of sales of Interim Service. • NIPPC and RNW understand that Interim Service would retain all the characteristics of other forms of transmission service (assuming other requirements are met), including rollover rights, and the ability to transfer or reassign the rights to other customers.	Thank you for sharing your comments and concerns regarding our proposals for interim service offerings and customers’ existing conditional firm service. We are considering your comments as we revise our proposals for interim service. Additionally, much of the existing conditional firm service is for bridge conditional firm service and on a pathway to be firmed up between 2028-2030 due to plan of service energization. The requested start dates for transmission service for the majority of the unstudied TSRs ramp up after 2030, so we do not anticipate a significant overlap between existing conditional firm service offerings and interim service. Finally, we shared that interim service offers would require the ability to effectively manage constraints.
NIPPC and RNW	NIPPC and RNW also ask BPA to clarify specific elements of the proposed Interim Service: • Sec. 2.c. states that all offers are for Bridge CFS (unless involving NWHUB); but Sec.2.d describes offers of CFS Reassessment. What transmission service requests would qualify for CFS Reassessment. Would this be limited to requests to or from NWHUB? Or are there other requests that would qualify for CFS Reassessment?	In the proposals we shared this summer, we shared that requests to or from the NWHUB Hub and request that are not eligible for rollover would only be eligible for Reassessment Conditional Firm service. For other requests that are not from the NWHUB and with rollover, the Bridge Conditional firm service would remain until project energization. If BPA modifies these aspects of its proposals, we will share this in TC-27 pre-proceeding workshops and consider any additional customer feedback. Under our current business practices, this bridge conditional service would remain unless a customer chose to stop supporting a plan of service, in which case the customer’s service would convert to Reassessment Conditional Firm Service. Additionally, if BPA made the determination to not proceed with a project, then the customer would have the option to request consideration for Reassessment Conditional firm Service.

Commenter	Summary of Comment/Question	BPA Staff Response
NIPPC and RNW	NIPPC and RNW also ask BPA to clarify specific elements of the proposed Interim Service: • Please clarify the consequences to customers in the event they fail to meet a requirement to continue to 7-F service. Are those customers removed from the queue pursuant to Section 2.e., or are those customers converted to Conditional Firm Reassessment? Similarly, please describe customers’ options in the event BPA decides not to build. In that case, NIPPC and RNW encourage BPA to allow customers the option to terminate their service without penalty or convert their Interim Service from Bridge to Reassessment.	See above response.
NIPPC and RNW	NIPPC and RNW also ask BPA to clarify specific elements of the proposed Interim Service: • In Section 3.b., BPA proposes that previously studied TSRs that can meet the “current validation criteria” will be eligible for Interim Service offers. Does “current validation criteria” refer to the proposed FTSR/TSR Data Validation Readiness Criteria set forth in these draft business practices or does it refer to some other validation criteria? Please clarify. • In section 3.b., does BPA intend to allow (but not require) customers who have TSRs that have been studied to request consideration for Interim Service if they meet the “current validation criteria”? If so, what is the mechanism that customers would use to communicate this interest to BPA?	Under our proposals shared in July, customers with previously studied requests must meet the readiness criteria set forth in these draft business practices to be reviewed for a potential offer of Bridge Conditional firm Service. We are revising our proposals based on feedback we’ve received and are continuing to work through the mechanisms for how customers would request any interim service that BPA offers. We will clarify any such requirements in upcoming pre-proceeding workshop and anticipate Transmission Account Executives will help with implementation.
NIPPC and RNW	NIPPC and RNW also ask BPA to clarify specific elements of the proposed Interim Service: • In Section 3.c.2., BPA proposes to require customers to provide financial security for the expansion of the transmission system. NIPPC and RNW agree that in instances where a customer needs a new expansion of the grid to enable its requested service, then it is appropriate for BPA to request security. In cases where, however, BPA has already approved a business case to pursue an expansion of the grid based on its Evolving Grid criteria, BPA will have already committed to the upgrades without relying on revenue from additional customers. If a customer’s identified plan of service consists exclusively of projects that BPA has already decided to develop, NIPPC and RNW suggest that BPA should not require that customer to post financial security to secure revenue that BPA has not relied upon.	Thank you for the feedback. For all projects, the decision to require a project to be securitized by customers is a case-by-case determination that is made as a business case matures. Those determinations can change over time. As BPA considers its proposals for the upcoming pre-proceeding workshops, staff will share any changes in the financial security requirements.

Commenter	Summary of Comment/Question	BPA Staff Response
NIPPC and RNW	If one of BPA’s preference customers elects to serve a portion of its load through Interim Service, will curtailment of the interim transmission service expose the preference customer to Unauthorized Increase Charges (UAI) under the Regional Dialogue contract? BPA should consider explaining in the business practices the circumstances under which a BPA power customer will (or will not) be subject to UAI for curtailment of Interim Service.	Thank you for your questions regarding UAI and the use of interim service. We are still evaluating and considering refinements to our proposals for interim service. We will revisit the implications of a UAI charge as we share our proposals in the pre-proceeding workshops. We will also consider the feedback of possible changes or updates necessary to our business practices.
NIPPC and RNW	What, if any, deferral rights will a customer have to delay commencement of service of the Interim Service product? Or does BPA intend that requests for extension of the commencement of service are not available for the transition phase of GAT? Would BPA consider allowing customers to defer service in response to delays in construction of Network Upgrades or third-party upgrades identified in the customer’s generator interconnection study?	We are currently evaluating the current provisions for deferral of service in BPA’s OATT and will clarify in the upcoming pre-proceeding workshops if we intend to propose any changes.
NIPPC and RNW	How does BPA intend to manage sub-grid issues as part of the transition phase of GAT? Will BPA offer a customer Interim Service even if BPA identifies sub-grid issues? Or does BPA intend to include sub-grid issues among the system conditions that would trigger curtailment of Interim Service?	An internal team has been formed to discuss the currently recognized subgrid areas, which should result in early identification known subgrid constraints on FTSRs and TSRs. The team would work together to see if there is a current or new path that could be used to manage the constraint in order to facilitate offers. This also requires sufficient resources to perform the operational and real-time studies.
NRU	We agree with the comments of the NT Customer Group regarding Interim Service. Most importantly we appreciate BPA’s efforts to provide NITS customers with equal access to shortterm firm transmission capacity as PTP customers. BPA’s earlier proposal did not afford this parity, and so we again express our thanks to BPA for finding ways to improve access for NITS customers. Although NRU remains concerned about BPA’s continued reliance on secondary network service for serving load in a day-ahead market given the related potential for increased financial risk exposure and lack of congestion rent allocation, we believe this service can satisfy the near-term needs of New Network Loads. However, despite the meaningful improvement to the original proposal, we respectfully request that BPA continue to explore an additional enhancement to NITS customers’ access to shortterm firm transmission capacity, in the context of its tariff obligation to plan for the load growth reasonably forecasted by its NITS customers. Specifically, in Order No. 888 FERC stated:	Thank you for your comments. We are considering this feedback as we continue to refine our proposals for interim service to share in the TC-27 pre-proceeding workshops.

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	“We conclude that public utilities may reserve existing transmission capacity needed for native load growth <u>and network transmission customer load growth reasonably forecasted within the utility’s current planning horizon.</u>” (emphasis ours) In consideration of this principle, it is NRU’s understanding that BPA can reserve existing transmission capacity, including short-term firm transmission capacity, to meet NITS customers’ reasonably forecasted load growth. And under the GAT Project, BPA proposes to implement readiness requirements to ensure that NITS customer load forecasts are sufficiently mature such that BPA would plan its transmission system—i.e., reasonable. We therefore encourage BPA to take whatever steps necessary to reserve existing transmission capacity (in this case short-term firm capacity) for NITS New Network Loads before releasing such capacity to others. Not only would this adhere closer to the abilities of a transmission provider to plan for its network transmission customers under the construct FERC set forth in Order No. 888, but increasing the opportunity of NITS customers to access short-term firm capacity would, in such instances, qualify for congestion rent in the proposed day-ahead market.	
NT Customer Group	• We support BPA’s proposal to develop and offer an enhanced version of priority 6NN transmission service as an interim bridge to NT customers that require transmission upgrades to enable firm service. We specifically acknowledge BPA’s efforts to increase the parity between the Point-to-Point Conditional Firm service and this new priority 6NN service to NT customers, by allowing equal access to short-term firm transmission capacity. This is a significant improvement over what BPA originally proposed earlier in the GAT efforts, which would have resulted in NT customers having vastly inferior access to short-term firm transmission capacity.	Thank you for your comments.
NT Customer Group	• We generally support BPA’s proposed “Transition to Future State” approach for the treatment of virtual points and the ability of NT customers to obtain FTSRs for long-term NITS enhanced priority 6 service for a POR of NWHUB. We look forward to working with BPA to refine details as the process progresses.	Thank you for your comments.

Commenter	Summary of Comment/Question	BPA Staff Response
PacifiCorp	Interim Service: Conditional Firm Service & Enhanced NITS Priority 6 In addition to providing a flow chart showing what the path to service is for each of the unique pools within the Transmission Service Requests queue PacifiCorp would like to understand the offers of service being provided to the existing pools within the transmission service request queue.	Thank you for the suggestion. We are considering your request as part of refining our proposals and information to share in the TC-27 pre-proceeding process.
PGE	A. Product Questions: PGE requests more detail to fully understand the attributes and risks of this product. Following are example questions intended to achieve clarity: • Will interim CF have rollover rights? • Will customers have the option to defer interim CF-bridge service up to 5 times? • Can customers take interim CF bridge and later change to CF-reassessment? • What are the termination rights of the Interim CF-Bridge? • Is the security deposit refunding if the election is made to stop taking/paying for CF and removed from the queue? • What happens if a signed letter of intent with a customer is provided, security deposit is made, and the customer chooses not to move forward with the project? • Can a customer take their BPA TX to another utility? Or will they automatically be removed from the queue?	Thank you for your questions. Under our proposal for interim service this past summer, interim service would be offered with rollover rights if the request qualifies rollover. We are still evaluating if we would propose any changes to deferral rights under BPA’s OATT. Under our current policies, if a customer taking Bridge Conditional Firm service decides to no longer support their plan of service (such as not signing a PEA or ESA), that service will be converted to Reassessment Conditional Firm service. If BPA decides to not to build a project in a customer's plan of service, then the customer may request to be considered for Reassessment Conditional Firm service upon termination of the Bridge Conditional Firm service, rather than automatically being converted. Additionally, in our proposal from this summer, a customer that does not take and pay for the transmission service that is being enabled by an expansion project for a minimum 5-year term will forfeit the remaining portion of their security. Finally, assuming PGE means security provided to meet readiness criteria the customer is expected to take a pay for a minimum of 5 years of interim service otherwise the security would be forfeited. However, BPA was not contemplating that a customer with a signed letter of intent would need security to meet the readiness criteria. Rather the customer would meet the readiness criteria by having one or the other, but not both. We are continuing to consider your comments and questions as we refine our proposals and will address them further as necessary in the TC-27 pre-proceeding workshop process.
PGE	B. Financial Cost Obligations Bridge CFS: The proposed requirement to post financial security for bridge CFS at the time of offer further shifts risk to customers by committing capital or credit early in the process, before a plan of service is finalized or construction decisions are confirmed. This creates an upfront capital obligation without commitment from BPA on certainty and timeline for upgrades. These limitations introduce both operational and financial risk that must be carefully	Thank you for your comments and questions. Under our proposal, the customer is choosing to use security to meet their readiness criteria before the customer knows their study results. A customer that does not want this financial obligation or risk can reenter the queue when they have a TSR that meets the non-financial readiness criteria. Additionally, the security discussed in this comment is not tied directly to transmission expansion projects.

Commenter	Summary of Comment/Question	BPA Staff Response
	managed to avoid stranded investment. • PGE requests that BPA explore criteria more aligned with utility procurement practices.	We are considering PGE’s comments as we consider refinements to our proposals to share in the TC-27 pre-proceeding workshops.
PGE	C. <u>Impacts to existing LTF rights holders</u>. While PGE appreciates BPA's efforts to offer interim service, PGE remains unclear how the implementation of BPA's proposal will impact existing (or Traditional) CFS service holders. The traditional CF holder, those who already have a CF contract from BPA based upon outlined curtailable hours in their contract, will differ from new Interim CF contract holders with unlimited curtailable hours in their contract. PGE offers the following to drive clarity, consistency, and fairness: • Please provide a summary of regional system studies and curtailment risk assessment BPA has conducted. • What are BPA’s metrics for measuring progress and ultimately success of this new product? • How will BPA maintain the existing quality of service for existing contract holders, while making unlimited offers of interim CF-Bridge? • When discussing the principles of interim service in the last GAT workshop, it’s unclear what BPA meant by “acceptable and manageable congestion”? Please define. • Are you including suspension of non-firm hourly sales and redirects as an indicator of congestion? • How will customers be kept apprised of increased congestion? • Will there be regular curtailment reports available? • How will the curtailment order be handled between traditional CF and interim CFS-Bridge? (the new interim CF-bridge has 8,760 number of hours of potential curtailment, yet traditional CF was based upon your contract NOH). • Willing existing LTF contracts be impacted by the new product? What assurances will be provided to do so? • How many MW/GW of Interim CF-Bridge service will BPA add to the system? • Has BPA defined success objectives as it pertains to reducing the existing queue? • What will BPA do if you don’t get smaller size batch queues as desired?	Thank you for your comments and concerns. We are considering your feedback, and feedback from other participants in the GAT process, as we refine our proposals or develop new alternatives to share in the TC-27 pre-proceeding workshops. We will address PGE’s questions and requests for additional information as part of sharing our refined proposals in the upcoming workshops.

Commenter	Summary of Comment/Question	BPA Staff Response
PGE	D. <u>Clarity needed regarding Deferrals</u> . PGE’s RFP process, after evaluation, selection of a project, and ultimately execution of agreements can take several years, and does not account for the period of time for construction and integration which could take several more years. Hence, the importance of BPA continuing to offer a deferral option for CF-bridge service to protect customers from unnecessary financial obligations.	Thank you for sharing your concern. We will take this into consideration as we refine staff proposals we share in the upcoming TC-27 pre-proceeding workshops.
PGE	E. <u>Impacts to major paths of congestion</u>. PGE currently experiences significant congestion issues on the North of Pearl S>N and Cross Cascades South E>W paths. BPA recently acknowledged these constraints in the Short-Term Available Transfer Capability (ST ATC) Proposed Improvement meeting held on July 9, noting that current heavy load stress scenarios are not reflective of recent changes in system usage. BPA’s proposed interim solution is to implement short term adjustments for 2026 summer months that will result in reduced ATC across five paths (including NOPE S>N and Cross Cascades South E>W). PGE maintains that the California import scenario driving BPA’s proposal is not a short-term trend. The evolution of the regions procurement efforts, specifically California’s excess solar capacity and the addition of GWs of battery storage, has resulted in negative energy prices influencing PNW power flows on BPA paths and GWs of requests for new load service. Any reductions of ATC in the ST or LT market undercut the PNWs ability to serve its customers. While service bottlenecks may be remediated by accelerating awards of transmission, it remains unclear to PGE how offering more CFS wouldn’t contribute to increased transmission congestion. • PGE requests that BPA produce baseline reports and establish metrics to measure the impact CF is having on the system before implementing unlimited CF offers. • PGE appreciates BPA staff’s recognition that analyzing historical data on transmission curtailments has limitations in its usefulness, particularly as the system rapidly transforms. Therefore, PGE requests that BPA establish models, forecasting methods, and reporting to be available to customers that assesses system impacts including congestion. • Full transmission optimization will be more challenging with multiple day-ahead markets, especially given the ability to withdraw transmission capacity from the market optimization. o PGE requests that BPA provide analysis and studies pertaining to how BPA’s proposal	Thank you for sharing your concerns and requests for additional information. We will take this into consideration as we refine staff proposals and prepare additional information to share in the upcoming TC-27 pre-proceeding workshops. In addition, there is information that BPA posts that is available to PGE. BPA currently posts curtailment reports externally: Hourly Firm Data Monitoring Evaluation - Bonneville Power Administration BPA also posts actuals and information externally: BPA - OPI Interties and Flowgates

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	to offer unlimited CF offers will impact market-to-market coordination between market operators and the ability to manage the physical transmission congestion on elements that are impacted by flows from Markets+ and EDAM?	
Powerex	Meeting the Growing Demand for Transmission Service Powerex understands that Bonneville is considering developing new variations of yearly transmission service that may be granted without the same studies and evaluation of ATC that occur when evaluating requests for its existing long-term firm and conditional firm transmission products. Powerex recognizes that Bonneville is facing growing demand for transmission service and supports Bonneville’s goal of providing service to its customers to the extent possible. That said, Powerex believes that a workable solution must preserve the value of Bonneville’s existing transmission products, including firm and conditional firm service. Powerex believes this can only be achieved by carefully considering the appropriate physical priorities to assign to each of its current and potential product offerings, and by ensuring appropriate financial outcomes (including outcomes associated with Markets+ congestion rent) for each product type. Powerex looks forward to further discussion of these details.	Thank you for sharing your concerns. We will take this into consideration as we refine staff proposals we share in the upcoming TC-27 pre-proceeding workshops.
PRITCA	• PRITCA notes that these services are critical because grid congestion (which is largely an artifact of BPA’s extremely conservative study assumptions rather than genuine constraints) means Conditional Firm service is generally the only option available to get generation online without a years-long wait.	Thank you for your comment.
PRITCA	• Section 3(d) (Reassessment CFS): As we understand it, BPA proposes to offer reassessment service only, including for rollover requests (which are subject to ROFR treatment and therefore covered by Section 3(d)(ii)). If this interpretation is correct, the proposal unacceptably compromises rollover rights because reassessment service is only for two years, whereas rollover rights are necessary to ensure the long-term availability of transmission so that LSEs are assured that their load can be met into the future. The same problem appears in the Conditional Firm and Generation Interconnection Business Practices, which allow BPA to terminate any confirmed or unconfirmed reassessment offer if: (a) BPA cancels the any project related to the plan of service; or (b) there isa failure to comply with any BPA requirement, including new ones that did not exist when TSR was submitted. These provisions must be rejected and BPA must clarify that it does not intend any element of its Conditional Firm or NITS Priority 6 service to undermine the ability of Customers to exercise transmission rollover rights in accordance with the terms of BPA’s OATT.	Thank you for sharing your concerns. We will take this into consideration as we refine staff proposals we share in the upcoming TC-27 pre-proceeding workshops. BPA is clarifying a reference made to the Conditional Firm Business Practice. Under that business practice, if BPA determines it will not move forward with a project (or alternative to the project) that was identified in a customer's plan of service and the customer is taking Bridge Conditional Firm service, the service will not automatically convert to Reassessment Conditional Firm Service. Rather, the customer would have the choice to be assessed for a Reassessment Conditional Firm Service offer. Additionally, Reassessment Conditional Firm service is not for only two years, it is for the term of the service award. The conditions can be studied <i>every two years</i> to see if the conditions should remain the same or if there is a need to update them. Finally, in regard to the Generation Interconnection Business Practice, there is no reference in that business practice to Conditional Firm practices for transmission service.

Commenter	Summary of Comment/Question	BPA Staff Response
PRITCA	• Section 2(e) (Interim service offers): BPA would require a Customer to accept the offer of interim service “within the specified timeframe.” BPA must clarify what is meant by this language and must allow sufficient time for the Customer to make a reasoned commercial decision and arrange necessary financing before it is required to bind itself to the offer of service.	Thank you for sharing your concerns. We will take this into consideration as we refine staff proposals we share in the upcoming TC-27 pre-proceeding workshops.
PRITCA	• Section 3(c)(2) (financial security): BPA proposes to incorporate by reference the financial security requirements discussed above. These are unacceptable for the reasons discussed above.	Thank you for sharing your concerns. We will take this into consideration as we refine staff proposals we share in the upcoming TC-27 pre-proceeding workshops.
PSE	With respect to BPA’s proposed Interim Service Principles, on slide 29 of its workshop materials, BPA proposes to have acceptable and manageable congestion, to preserve existing transmission rights, and preserve the quality of service for existing transmission rights holders. PSE is seeking clarification on what is meant by “acceptable and manageable congestion.” In prior GAT meetings, BPA reported a 0.5% curtailment rate over a five year period. Will BPA have a targeted percentage of annual curtailment after new awards of interim service, and if so, what would will the target be? In addition, what are the tools that BPA would use to manage a more congested system and how would the new Interim Service transmission be managed differently than current long-term bridge Conditional Firm service? PSE requests that BPA, at a future GAT workshop, provide further information and details on the approaches and risks to managing a more congested transmission system.	Thank you for your feedback. BPA looks forward to collaborating with customers and sharing additional information to increase understanding and transparency during the upcoming TC-27 pre-proceeding workshops.
PSE	PSE submitted prior comments regarding the treatment of subgrid conditions. In addition to those previously submitted comments, we are seeking clarification of a contingent agreement that BPA proposes in e(ii) on page 13 of the GAT Preliminary Draft Language document. Item e(ii) notes that a contingent agreement may be offered in a case where a subgrid project may be required to offer PTP interim service. What is a contingent agreement and the conditions of such an agreement? In addition, what is the proposed process to offer a contingent agreement to a customer that specifically requires the proposed Schultz-Olympia subgrid project for service?	Thank you for your comments. In offering interim service, BPA first ensures that there are adequate paths to manage congestion through the existing paths or by potentially creating a new path. If there was a case where a subgrid could not be managed, it is possible that a contingent offer could be provided based on its energization date. The project would have to be in a later state such as construction or nearing construction.

Commenter	Summary of Comment/Question	BPA Staff Response
PSE	BPA previously proposed that deferrals would not be allowed with Interim Service. Per our previous comments, PSE recommends allowing for deferrals for start of service. This would be particularly helpful for projects that have not yet started construction and would not be using the Interim Service until the project is placed into service. We recommend a standard five deferrals for the start of Interim Service, especially given that BPA has already secured financial security from the customer.	Thank you for the comment. We will take this suggestion into consideration as we refine staff proposals we share in the upcoming TC-27 pre-proceeding workshops.
Tacoma Power	Finally, Tacoma remains concerned that BPA’s new interim service provisions for Long-Term NITS Enhanced Priority 6 further favors the awarding of NITS contracts over Point to Point contracts. BPA states on page 13 of its draft language that this product would “have priority rights to Short-Term Firm (STF) ATC along with CFS before it is released to the market for sale.” Tacoma Power notes that ATC is a construct to allow Point to Point customers to know how much available capacity may be available between two specific points. ATC that could be awarded for NITS would need to be available on the grid as a whole, which is why ATC is not used for calculating available NITS. Taking ATC away from PTP customers and awarding it to NITS customers, who are already receiving awards before Point to Point customers, for a new product designed to benefit NITS customers, will degrade Firm and Conditional Firm Point to Point rightsholders. This new product also has the potential to harm any redirects done currently by BPA customers.	BPA would like to thank Tacoma for sharing its concerns. We will take this into consideration as we refine staff proposals we share in the upcoming TC-27 pre-proceeding workshops. BPA is clarifying that our ATC calculations include both NITS and PTP in the ETC assumptions. The ATC is used to award both short-term products on flow-based paths and both short-term and long-term on 1-1 paths. Request evaluation for all requests on flow-based paths use a PTDF calculation to estimate flow over several flow-based sales paths simultaneously, it is not simply a linear calculation between two points. The Transmission Service Request (TSR) Evaluation business practice has more information on TSR assessment in the short-term horizon.
Seattle City Light	City Light recommends that BPA consider that Interim Service offerings need to be investment grade commitments. Financial institutions and investors need firm commitments that interim service will be available when requested and that the interim service will have a transparent path to permanent long-term firm service with rollover rights.	Thank you for the comment. We will take this suggestion into consideration as we refine staff proposals we share in the upcoming TC-27 pre-proceeding workshops.
Seattle City Light	City Light recommends that the rules for Interim Conditional Firm PTP service and Enhanced 6nn NT service for short-term firming up be equitable between the product types. It may be better for interim service to never be firmed up in the short term regardless of product type. This would be equitable treatment of customers. It is in both customers’ and BPA’s interest to choose a policy solution that would not require a lengthy and expensive software change to e-tag management or curtailment software.	Thank you for the comment. We will take this suggestion into consideration as we refine staff proposals we share in the upcoming TC-27 pre-proceeding workshops.

Commenter	Summary of Comment/Question	BPA Staff Response
Seattle City Light	City Light recommends that BPA’s securitization requirements for interim service apply equally to both PTP and NT customers.	Thank you for the comment. We will take this suggestion into consideration as we refine our proposals we share in the upcoming TC-27 pre-proceeding workshops.
Seattle City Light	City Light requests BPA to consider that customers that execute a five-year or longer interim service agreement with a start date within 30 days should only be required to supply three years of service security.	Thank you for the comment. We will take this suggestion into consideration as we refine staff proposals we share in the upcoming TC-27 pre-proceeding workshops.

VII. Queue Management

Commenter	Summary of Comment/Question	BPA Staff Response
Avangrid	Avangrid Supports the Processing of Redirect Requests that Have de minimus Impacts Bonneville paused the processing of redirect requests that had even a de minimus impact until after the transmission reform is complete. Continuing to process these requests during the period of reform benefits the agency’s workload by reducing the number of new requests that are made as transmission customers are able to receive certainty on transmission paths. This also helps focus transmission customers to paths that do not trigger large system upgrades, helping keep transmission rates more affordable for the region. Avangrid appreciates the resource constraints BPA faces and believes the continued processing of redirect requests would increase efficiencies on a system-wide basis.	Thank you for sharing your concerns regarding the pause. BPA will share an update on this request at the October 28-29 workshop.
Avangrid	Avangrid Supports Establishing Permanent Risk Mechanisms for TSRs, such as Financial Security in a Modified Form, as they are Proven Ways to Limit Requests and Ultimately Benefit Grid Stability and Efficiency The issues plaguing Bonneville’s transmission queue are similar to the issues that spurred the agency to reform GI queue processing. In its approach to GI withdrawal penalties, however, Bonneville’s policy includes transparent off-ramps and future deadlines (not upon submission of a request as proposed in the recent draft BPs), which we recommend consideration in the context of transmission security deposits. Utilizing this kind of approach would be keeping with regional transmission providers, which generally follow the FERC pro forma policy. Similar to Bonneville’s implementation of GI withdrawal penalties (and the FERC pro forma OATT) security posted to support the TSR could grow as the process continues, increasing risk for customers, providing known withdrawal procedures, incorporating policies with opportunity for Bonneville to waive penalties upon certain conditions – all of which could address existing customer stranded cost risk and weed out requests on the speculative side. Applying a similar approach to the current reform efforts also allows customers to make more informed decisions about the risks it is willing to accept with more information about things like upgrade costs and timing. Avangrid suggests expanding its proposed security approval by incorporating these policy elements.	Thank you for your feedback and suggestions. We will consider this as we revisit our proposals and consider alternatives in the TC-27 pre-proceeding workshops.

Commenter	Summary of Comment/Question	BPA Staff Response
Avangrid	Avangrid Supports Establishing Permanent Risk Mechanisms for TSRs, such as Financial Security in a Modified Form, as they are Proven Ways to Limit Requests and Ultimately Benefit Grid Stability and Efficiency One reason to consider the approach utilized by regional transmission providers and FERC is that Bonneville has a history and commitment of following FERC pro forma OATT, unless otherwise directed because of statute or specific reason to do otherwise. To date, other transmission providers have managed their queue sizes by establishing financial risk mechanisms. Bonneville should confirm whether it seems any reason to diverge from FERC and other transmission providers until testing whether the pro forma approach addresses Bonneville’s objectives.	Thank you for the comment. We will consider this concern as part of refining our proposals for the TC-27 tariff proceeding process.
Avangrid	Avangrid Supports Establishing Permanent Risk Mechanisms for TSRs, such as Financial Security in a Modified Form, as they are Proven Ways to Limit Requests and Ultimately Benefit Grid Stability and Efficiency In addition to considering more expansive policy elements associated with security risk mechanisms, Avangrid suggests Bonneville should consider other risk mechanisms such as longer contract terms, provisions to limit queue flooding whereby customers are prevented from submitting multiple requests for essentially the same TSR, and other risk elements that have been utilized by other transmission providers to establish a holistic and durable policy.	Thank you for the comment and suggestions. We are considering them as we revisit our proposals.
Avangrid	Avangrid Requests More Opportunities to Discuss Issues Associated with the Proposed Readiness Criteria, Interim Service, and Security Requirements Additional clarity and refinement are needed before the Draft BPs are ready to implement. The Draft BPs raise foundational questions, like how Bonneville will ensure it is able to fund transmission construction with security linked to a flat per-MW fee, which have no apparent venue for additional consideration. Bonneville should prioritize consultation with stakeholders to help find workable solutions before the Draft BPs are implemented. To that end, Avangrid highlights additional areas of concern below... Third, the Draft BPs also propose that customers post security on day one, at a time when it is unclear what level of upgrades might be required or how costly they might ultimately be. Avangrid understands that Bonneville would like to switch to requiring security based on the size (MWs) requested as opposed to the current pro rata	Thank you for raising these concerns. The key change in the proposals we shared this summer is with security was for how the amount of security to be held was established. In the status quo, the amount of security a customer is to provide is their pro rata share of the direct project costs for each project a customer needs to enable the LTF service request. Under our proposals shared this summer, as Avangrid noted, a customer may not have a complete plan of service at the time an interim service offer is tendered. BPA’s proposal to get around this problem was to establish the security amount as the estimate of 5 years of revenue. This lowers a customer’s security obligation from the status quo because security is collected one time for one amount rather than for each project. We are considering the concerns and feedback from Avangrid as we refine the proposals for security and will share them in the TC-27 pre-proceeding workshops.

Commenter	Summary of Comment/Question	BPA Staff Response
	approach but has not explained how the agency will ensure that it collects enough security to fund the transmission expansion. This pre-funding approach (where the entire amount of security is also immediately at risk) will prevent development in the region as the risks associated with Bonneville transmission service will be too large. Therefore, Avangrid requests discussing the security provisions, how the proposed provisions would work with other security measures, and generally reworking the approach as proposed above.	
AWEC	AWEC understands that BPA is interested incentivizing transmission service requests that are highly likely to materialize in provided service, however, aspects of BPA's proposed FTSR/TSR Data Validation Readiness Criteria related to security in particular raise concerns for AWEC.	Thank you for the comment.
AWEC	In addition to the significant level of security that would be required, AWEC is concerned about potential implications that variations in NT load could have on customer recovery of security. It is possible – and in some cases likely – that a utility could require that the consumer(s) driving a FTSR provide funds to cover the customer's security obligations. In order to avoid security draws, the consumer's Network Load on the hour of the Monthly Transmission System Peak Load must increase above a 50% threshold. As was discussed on the afternoon of July 30th, an NT customer with several PODs could have the large load appear as anticipated, but have significant load loss elsewhere on its system resulting in a net load amount that is less than the base year. Even though the upgrades would be used as intended, the customer – and perhaps consumer(s) would not be able to recover their security. AWEC understands BPA's perspective that the 50% threshold is intended to account for fluctuations in NT load, but this does not mitigate the situation where individual consumer fronted security may not be recovered due to circumstances outside of the consumers' control and despite the fact that upgrades are being used as intended. This is a circumstance that should be avoided.	Thank you for the comment. We are considering the concerns AWEC is raising as we refine our proposals to share in the TC-27 pre-proceeding workshops.
NewSun Energy	How will BPA address the discriminatory impacts of its proposals? Requiring large deposits and making speculative judgments about project viability favors large developers and mega-loads, disadvantaging smaller LSEs and IPPs. We request that BPA: • Reevaluate deposit requirements and validation criteria.	We appreciate NewSun's concerns and comments. We will consider these comments as we review and revise our proposals for the TC-27 process.

Commenter	Summary of Comment/Question	BPA Staff Response
	• Ensure equitable treatment of all transmission customers, regardless of size or financial backing. • Provide analysis and discussion of what impacts deposits, CRC, and bridge offers will have on the existing queue, different entities' business cases, and the future state.	
NewSun Energy	Batch Study Feasibility and Capacity Question: Can BPA confirm its ability to conduct batch studies of the transmission queue in queue order? What are the maximum MW volumes BPA can reasonably study in each batch while maintaining accuracy and timeliness? Recommendation: NewSun believes that batch studies conducted in queue order are both feasible and beneficial. We recommend that BPA define clear batch size thresholds and publish criteria for how projects will be grouped and prioritized.	We have discussed our concerns with batching the study in previous GAT meetings as well as in the October 28-29 TC-27 Pre-Proceeding Workshop presentation. Additionally, the 2023 TSEP Cluster Study demonstrated that it takes approximately 2 years to study roughly 17GW. Based on our experience, we estimate it may take BPA 7 years to study the approximately 64 GW of requests submitted as of August 15, 2024. This also does not account for all of the requests that would continue to be submitted over this 7-year period. If at the end of all this 80% of the requests withdraw the results of the study and the identified projects would in large part be meaningless. Batch processing under today's model is not tenable.
NewSun Energy	Queue Pause During Study Process Question: Is BPA willing to lift the pause on existing queue requests, redirects, and provide bridge offers during the batch study process to ensure viable non-discriminatory outcomes for the region? Recommendation: NewSun recommends not applying retroactive rulemaking while BPA works to study the queue and provide offers of service. There are better solutions that solve BPAs' proposed constraints.	No, as we have explained BPA's current means of processing its rapidly growing transmission service request queue no longer leads to solutions that support the region's economic needs. We look forward to discussing our refined proposals in the TC-27 process.
NewSun Energy	Treatment of LLIR Projects Question: Will BPA include all existing and submitted LLIRs (Large Load Interconnection Requests) in the study model with 100% confidence? Recommendation: NewSun recommends that BPA treat LLIRs as firm commitments in the study model to accurately assess system capacity and constraints.	We will be standing up a future engagement series on Proactive Planning and will provide more information in that public process. We do anticipate that our 20-year, forward-looking analysis will be informed by submitted Large Load Interconnection requests.

Commenter	Summary of Comment/Question	BPA Staff Response
NewSun Energy	Impact Analysis on Queue and BPA Capabilities Question: Can BPA provide a comprehensive analysis of how the inclusion of Grid 1.0/2.0 projects and LLIRs will impact the transmission queue and BPA's ability to process requests? Recommendation: This analysis is critical to understanding the implications of proposed changes and should be shared with stakeholders to inform future decisions and justify proposed changes.	We have not made any decisions on an analysis of this type and scope. We thank New Sun for its recommendation and will take it into consideration.
NewSun Energy	Offers Through Batch Analysis Question: Will BPA commit to making transmission service offers based on the outcomes of batch analyses? Recommendation: NewSun supports the use of batch study results to inform actionable transmission service offers, which will enhance transparency and predictability for developers, marketers, financiers, and LSEs. NS believes BPA can conduct batch studies, no less than 10 GWs at a time, to work through the queue and provide offers.	No, please see our responses above.
NIPPC and RNW	• NIPPC and RNW support the proposal in Sec.1. in which BPA will evaluate transmission service requests to determine whether BPA can offer service on the existing system. NIPPC and RNW also agree that if BPA determines a request for service needs a project identified in a previous study, then the customer should execute the appropriate agreement.	Thank you for your comments.
NIPPC and RNW	• However, if a customer needs only transmission upgrades identified in a previous study to enable its transmission service request and those upgrades have successfully advanced through the Evolving Grid process, BPA should consider whether it can release that customer's security. If BPA has already established a business case for a plan of service through the Evolving Grid process, then BPA should not need customers to securitize an incremental revenue stream to BPA. In the case where BPA has determined that the business case does exist to build facilities without full subscription, BPA should consider releasing the security posted by customers who need only service on Evolving Grid projects. If BPA determines that a customer needs a plan of service that has not been approved in the Evolving Grid process, NIPPC and RNW agree that BPA should retain security to support those non-Evolving Grid upgrades.	Thank you for your comments. This determination is a part of the decisions made as the project and its business case mature. Evidence of this is with the GERP 1.0, GERP 2.0. and non-GERPs. For GERP 1.0 BPA has already stated that it will not collect security for the construction of the project. For GERP 2.0 this decision will not be made until scoping is completed and the business case is more mature. Where there are projects that are not regionally needed BPA will likely require full security from customers. For all projects, it is a case-by-case determination, and those determinations can change over time.

Commenter	Summary of Comment/Question	BPA Staff Response
NIPPC and RNW	NIPPC and RNW generally agree that BPA should draw on security posted by customers who submit requests, but do not fully execute agreements offered by BPA. In some instances, however, delays outside of the customer’s control or that may be wholly within BPA’s control may cause a customer to terminate its request. In those cases, customers should not face loss of their full security. Accordingly, NIPPC and RNW urge BPA to consider scaling the customer’s risk of losing its security to the investment BPA has made in new facilities. For example, if the customer terminates its request, BPA would draw on the security only to the extent it has begun construction of upgrades identified in the customer’s plan of service. Alternatively, the customer’s security at risk could escalate at different benchmarks based on BPA’s investment in the system. BPA should consider whether there are other circumstances in which it would be reasonable to refund security to customers who withdraw their requests.	We are interested in hearing what might be examples supporting the refunding of security. The economics of a project are a large factor in the decision to construct a commercially driven transmission expansion project. Key customer components of the economics are the number of customers, the total MW of the requests, and the terms of the requests. If a customer has said they will provide 100 MWs of revenue for 5 years then those are used to help justify the expansion. Failure to provide that changes the economics of the project as a whole and pushes costs onto other parties. Security for the construction of a project is to protect the economics of the project and to minimize the cost risks to other parties.
NIPPC and RNW	- NIPPC and RNW encourage BPA to carefully evaluate the quantity of security a customer must post under Section 4. - o BPA proposes to require customers to post security in the amount of five years of revenue from the customer’s request. NIPPC and RNW urge BPA to consider whether it can accept a lower amount of security. Under BPA’s proposal, customers would be required to post \$122,580/MW under BPA’s current rates. Members have advised that this level of security is significantly higher than the amount of security that customers must post in other regions to provide security for interconnection upgrades. We understand that the highest security commitment in the country is currently \$24,000/MW for MISO’s M2 process. If BPA adopted a requirement for customers to post security in the amount of one year of revenue, the security amount would equal \$24,516/MW. Accordingly, we encourage BPA to consider requiring customers to post security in the amount of one year of service as demonstration of commercial readiness.	Thank you for your comments. We will consider NIPPC and RNW’s suggestions as we refine our proposals for the upcoming workshops.
NIPPC and RNW	- o BPA should also consider refining the quantity of security to be commensurate with the risk to BPA based on the preliminary plan of service; - If the plan of service is limited to service on existing facilities, on Evolving Grid projects, or requires only minor upgrades, then the security could be based on the revenue associated with one year of service; - If the plan of service requires major additional upgrades, the security could escalate based on the actual risk to BPA up to an amount equivalent to five years of revenue.	Thank you for the comment. BPA will note that the GERP projects are major additional upgrades for service on existing facilities. It is these detailed nuances that make tiering a risk profile challenging to implement and to manage over time,

Commenter	Summary of Comment/Question	BPA Staff Response
NIPPC and RNW	o BPA should also consider whether a customer should be required to post a minimum amount of security for purposes of meeting the commercial readiness requirement.	Thank you for your comment, we will consider this as we refine our proposals.
NIPPC and RNW	• BPA proposes to require customers to provide a deposit or letter of credit as security. NIPPC and RNW encourage BPA to accept other forms of security including surety bonds.	Thank you for your comment, a cash deposit in a non-interest bearing account and a letter of credit are our current acceptable means for securitizing a commercially driven transmission expansion project. We will consider your suggestions but are uncertain if we will propose any other forms of security.
NIPPC and RNW	• NIPPC and RNW agree that a customer that has provided security in support of more than one contract or transmission service request must maintain all agreements in “good standing”; o BPA however, should consider providing more detail regarding its definition of “good standing” to eliminate any ambiguity; o BPA should also clarify that when a customer has provided security for more than one agreement, but falls out of “good standing” on one of those agreements, BPA will not draw on the security for all of the customers’ agreements but only on the security associated with the agreement that is no longer in “good standing”	Thank you for the feedback. “Good standing” in this context means in compliance with the provisions of all agreements applicable to enabling the long-term firm transmission service of the request. As we revise our proposals, we will consider whether additional details or clarifications are necessary.
NRU	NRU generally supports BPA’s Long-term Firm Queue Management proposals, in that BPA should quickly move to contract those unstudied requests and LaRCs to interim service and/or required transmission upgrades, whether existing Evolving Grid projects or projects identified through prior cluster studies. Such an approach, following the implementation of the proposed readiness criteria, will allow BPA to efficiently provide the requested transmission capacity and reduce the size of its unstudied long-term transmission queue.	Thank you for the comment.
NRU	However, we request that BPA modify its proposed financial security requirement as it pertains to NITS customers in three ways. First, we discourage the use of the NITS customer’s Network Load on the hour of the Monthly Transmission System Peak Load as the determinant for returning a NITS customer’s financial security, as BPA proposes in section 8.b of the LTF Queue Management document. Requiring that the NITS customer’s total load increases by at least 50% of the requested capacity of the FTSR(s) that drove the transmission upgrade may obfuscate the actual activity of the specific New Network Load that drove the transmission upgrade, such that the customer will not receive its financial security when the New Network Load itself increases as forecasted. This could occur when load elsewhere on the NT customer’s transmission	Thank you for your comments and concerns. We are concerned about mitigating the risk of proceeding with an upgrade for a forecasted load that does not come online. But, we understand that there are unique aspects for NITS customers. We are considering your feedback as we refine our proposals for the TC-27 pre-proceeding workshops.

Commenter	Summary of Comment/Question	BPA Staff Response
	system decreases at the same time that the New Network Load increases but would not be captured by BPA’s proposed methodology. We request that BPA revise its proposal to rely on a more granular determinant to return financial security, such as at the facility or meter level of the New Network Load. This approach would mirror our request described above for BPA to apply its New Network Load threshold at a level more granular than at the POD.	
NRU	Second, we request BPA revise its proposal and exempt NITS customers from the financial security requirement in circumstances where the NITS customer may require transmission upgrades driven not by New Network Load, but instead due to the forecasting of a new resource. We understand that such a situation would not necessarily result in new BPA revenues as would New Network Load, and so we are uncertain what BPA would be securing against. These situations could arise from an NT customer seeking to switch its designated resources, or in instances of resource retirements and replacements, and so we question the logic of applying a financial security requirement based on increased revenues.	Thank you for the example and the comment. BPA will review further.
NRU	Lastly, we urge BPA to consider circumstances where retaining the current financial security requirement, which corresponds to the customer’s pro rata share of the project costs, would be prudent. Specifically, we would oppose the use of BPA’s proposed financial security requirement in situations where the transmission upgrade(s) have a poor benefit-to-cost ratio and where security in an amount equal to 5 years of revenue would fail to equal the total cost of the network upgrade(s). For these situations we would encourage BPA to continue requiring the customer to provide financial security that is commensurate with the costs of the project, to avoid the risk of cost shifts to other transmission customers if the customer ends up not taking service.	Thank you for the comment.
NT Customer Group	• We generally support, despite the exception noted below, BPA’s proposals as they relate to management of its Long-Term Firm Queue. BPA should move quickly to contract those parties remaining in its transmission queue to existing transmission projects or to interim service, and require relevant financial security provisions to ensure the customer’s ability to pay for the service requested.	Thank you for the comment.

Commenter	Summary of Comment/Question	BPA Staff Response
NT Customer Group	BPA needs to revisit its proposal for how financial security is calculated and returned for NT customers. Specifically, we recommend that BPA not adopt its proposal to use the NT customer’s Network Load on the hour of the Monthly Transmission System Peak Load as the basis to return its financial security. Relying on the NT customer’s Network Load as a whole would mask the specific actual New Network Load that drove the need for transmission upgrades, and more likely result in the NT customer not being returned its financial security due to fluctuations and changes in the peaks of the customer’s other loads, for instance such as those driven by weather or load loss due to economic factors, demand response programs, or other conditions. We suggest BPA rely on a more targeted measure for financial security purposes that focuses on determining whether the specific load(s) that caused transmission upgrades truly manifests.	Thank you for your comments and concerns. We are concerned about mitigating the risk of proceeding with an upgrade for a forecasted load that does not come online. But, we understand that there are unique aspects for NITS customers. We are considering your feedback as we refine our proposals for the TC-27 pre-proceeding workshops.
NT Customer Group	We also think that BPA should consider a risk informed approach to determining the appropriate level of security per individual project basis. The point is that BPA needs to balance risk while finding ways to minimize barriers for customers to serve growing demand in their service territories.	Thank you for the comment. We are interested in hearing more about your suggestions.
PacifiCorp	Long-Term Firm (“LTF”) Queue Management In addition to providing a flow chart showing what the path to service is for each of the unique pools within the Transmission Service Requests queue PacifiCorp would like improved clarity of will be BPAs proposal should the decrease to the existing queue not materialize to a level to support continued real time studies.	We are exploring ways to provide a visual on how the “buckets” of TSRs in the long-term firm pending queue will be addressed in the transition to the future state. As stated in the GAT meetings, we would like to see what changes in the queue may occur before determining the next steps. We also acknowledged there may be a need for a more traditional looking TSEP Cluster Study to get over the hump and into the future state.
PGE	The proposed Long-Term Firm Queue Management rules introduce concepts that could lead to significant financial and operational impacts that warrant refinement. A. PGE offers the following proposals to address such financial and operating concerns: <u>Phased in approach with Enforceable Timelines and Commitments</u>: Utilize a phased or milestone-based approach to financial security that aligns clear, enforceable service commencement, timelines and transparency with each phase of advancing the TSR request through to line upgrade energization. For example, posting partial security at the cluster study stage and then increasing security as projects advance through environmental, permitting, and construction readiness milestones. - The proposed timelines for executing post-study agreements and funding associated security creates pressure to commit prior to internal procurement, planning, and	Thank you for your suggestions. We are considering them as we refine our proposals to share in the TC-27 pre-proceeding workshops. We do note that security is for the construction of a transmission expansion project. It is not used for the other phases (e.g., NEPA) of developing a project. In general, customers pay for scoping and NEPA costs and therefore security is not required. It is when BPA starts to use its capital for the construction of the expansion project that security is required. Our understanding is that customers are aware at the time they request long-term firm transmission service that there may be costs throughout the process to enable that firm service requires.

Commenter	Summary of Comment/Question	BPA Staff Response
	customer arrangements are finalized forcing entities like PGE to make multi-million-dollar commitments without full clarity on project readiness, customer demand, timeline certainty, or alignment with integrated resource planning cycles. o The risk is heightened for projects requiring multiple concurrent agreements (e.g., Conditional Firm and Environmental Study Agreements), as default under one could jeopardize all associated queue positions and result in BPA drawing on posted security.	
PGE	• <u>Reverse Open-Seasons</u>: Given BPA’s objective of ensuring removing projects lacking maturity or capability from the queue, PGE recommends that BPA incorporate reverse open season and customer-funded upgrades as mechanisms to fast-track service while managing their risk. - o Reverse Open Season can act as an aggregation tool where BPA solicits binding commitments from multiple customers before committing to build an expansion. - o Allows BPA to spread cost obligations across multiple committed customers and more efficiently process its queue.	Thank you for the comment. We would like to understand more about this suggestion.
PGE	• <u>Customer Funded Upgrades</u>: BPA should allow customer-funded upgrades as many customers may be willing to directly fund targeted upgrades to accelerate project service date, assuming a well-defined process and financial structure exists and reduces or even waives the post-service financial security requirement. - o BPA could create linkage between its interconnection queue and LFT queue management process. - o Combining the current financial security framework with reverse open seasons and customer-funded upgrades, BPA has a better chance of achieving its goal of managing a committed and ready-to-build transmission queue while enabling faster access service for projects willing to direct invest in needed upgrades.	Thank you for the comment. We will consider your feedback as we develop proposals to consider for the future public engagement series on Accelerate Expansion.
PGE	• <u>Process Map</u>: PGE requests a process map that identifies the various stage gates in this proposed GAT queue management.	Please see the July 9 – 10 workshop material slide 62 . If a study is needed to complete the transition of the queue then the chart in the TSEP BP section A may be applicable.

Commenter	Summary of Comment/Question	BPA Staff Response
PGE	B. <u>Clarification to Financial Security Requirements</u> : PGE understands the need to securitize the Plan of Service through appropriate collateral as the system is expanded to serve additional load and resources. PGE raises concerns and offers suggestions related to the posting of this security. Additionally, the proposed 5-year revenue financial security deposit could be cost prohibitive and ultimately increase the cost of energy supply in the region. To ensure equitable treatment of NT and PTP customers, PGE recommends that BPA's securitization requirements for interim service apply equally to both PGP and NT service.	Thank you for your comments. We will consider your feedback as we refine our proposals for the TC-27 pre-proceeding workshops.
PGE	• <u>Timing of Providing Security</u>: Per Section 4, it states 'A Customer with a TSR that will be enabled by the construction of an identified Plan of Service must provide BPA with financial security.' - o PGE asks that BPA clarify at what point this will required? For example, is it after a Cluster Study is complete (assuming one is needed)? - o Is it upon being tendered a transmission service agreement, including an interim CF Bridge agreement?	Thank you for your questions. In today's status quo security is required with the tendering of the LTF service offer, which is after the cluster study, scoping, design, and NEPA. In our proposal from this summer, it would be required at the tendering of an interim service offer. In the proposal, tendering of interim service can occur before or after a cluster study.
PGE	• <u>Type of Credit</u>. PGE strongly encourages BPA to consider alternative forms of security, such as parent guarantees or surety bonds. Given the potential magnitude and significant amount of time associated with posting such collateral, the carrying costs are likely to add up to a material amount of financial exposure.	BPA's acceptable forms of security for the construction of a transmission system expansion project is a cash deposit or an Irrevocable Standby Letter of Credit.
PGE	• <u>Interest-bearing account</u>. PGE recommends BPA place security deposits in an interest-bearing escrow account, particularly given such deposits are retained for the required five-year period. While PGE acknowledges that this reflects BPA's current practice, it is inequitable to require customers to provide such substantial cash deposits without any return on those funds.	BPA will hold a deposit provided by a Customer in a non-interest bearing account. The customer can use an Irrevocable Standby Letter of Credit in lieu of the cash deposit.
PGE	• <u>Updated BPA's Tariff</u>. Regarding the amount of deposit, BPA's Tariff suggests it's the Pro-Rata Share of the costs of the upgrade. PGE seeks clarity as to whether BPA plans to change the tariff to match the new deposit calculation.	Thank you for your comment. Please see the Statement on the Future of GAT Engagement and Future State Solutions at the start of this document.

Commenter	Summary of Comment/Question	BPA Staff Response
PGE	• <u>Customer Refunds</u>. Given the potential magnitude of financial security required, PGE recommends that BPA credit back excess security in a timely fashion. PGE requests that BPA clarify the process and requirements for such refunds.	Thank you for your suggestions. In the status quo a customer's security obligation is reduced annually over the terms of the LTF service request. In our proposal security obligation was reduced annually over a 5-year period. We will consider your feedback as we refine our proposal.
PGE	• <u>Notice to Provide Security</u>. PGE requests that BPA provide thirty (30) calendar days' notice to the Customer of the deadline for providing security or initial deposit, consistent with the existing TSR Study and Expansion Process (TSEP). Depending on the type of collateral allowed, fifteen (15) days could introduce challenges to arrange for such security.	Thank you for the comment.
PGE	C. PGE has identified the following questions requiring BPA clarification: • What criteria are BPA applying to determine whether a TSR request can utilize an existing plan of service and be assigned a PEA or ESA, or when an additional study is requested, as outlined in in the Long-Term Firm Queue Management section 1 of BPA's proposal on page 9.	When a TSR is submitted on OASIS that request goes through a variety of system checks to determine if the request can be fulfilled on the existing system, without study. In the determination that the existing system cannot provide the requested service and that further study is needed BPA is often able to determine at that time that an existing project would be required. If an existing project is required, BPA would like to tender a PEA or ESA, whichever is applicable for the identified project(s) before the TSR participates in a study.
PGE	• Does the security deposit cover new study costs such as a PEA or ESA, or do those studies and agreements require additional costs/security?	Security is for the construction of a transmission expansion project. Security ensures BPA receives the incremental increase in revenue from the increased power flows that drove the need for the expansion project. Security is not for PEA or ESA costs. Customers are to fund those work activities for commercially driven transmission expansion projects. Our proposal did not change what security is used for and what costs customers are responsible for from the status quo.
PGE	• Does section 7.a.i. intend to suggest that a PTP customer who submitted a TSR and necessary deposit, with a requested start date two years in the future, that the 5-year clock, "commencement of transmission service," starts when the PTP customer starts taking Interim – CF-Bridge service? BPA should add a sentence that clarifies the definition of "commencement of transmission service." Does it refer to Interim CF or to Firm service only?	Thank you for your question. It refers to both.

Commenter	Summary of Comment/Question	BPA Staff Response
PNGC	Security Requirements As stated in Section 32, BPA’s own Open Access Transmission Tariff (OATT), requests for transmission service come with an obligation to pay; thereby negating the oft-cited and rarely experienced “stranded cost” of transmission and thoroughly undermining the need for the additional security requirements.	Thank you for this comment. We will consider this as we review our proposals.
PNGC	Introducing additional security requirements for Network Customers is very concerning and directly contradicts the provisions within BPA’s OATT.	Thank you for sharing your concerns. We are not introducing additional security requirements on Network Customers. Security provisions for the commercial expansion of the transmission system have been in place since before Network Open Season. We also acknowledge BPA’s GAT proposal further envisions use of security as a means to enter the queue if bilateral readiness cannot be demonstrated. However, use of security for that purpose is completely optional. We are considering your concern as we revise our proposals.
PNGC	PNGC Power’s members serve small, rural communities owned by the members they serve and were established to provide at-cost electric service. The additional security requirements proposed would penalize these rural communities and limit opportunities for the crucial economic development needed in these communities.	Thank you for your comment. We see a need for security in because there is large growth occurring in the rural community, greater than the 13 MW at a POD. The local utilities may be able to establish their own mechanisms for protecting their customers by placing financial requirements on the companies causing the large load growth. We are considering your concerns as we refine our proposals.
Powerex	Accelerating Queue Processing Powerex generally supports Bonneville’s objective of more quickly evaluating requests for transmission service. As Bonneville considers how to accelerate timelines for processing the queue, including establishing readiness criteria, it should ensure that those approaches enable all legitimate transmission service requests to be evaluated in a non-discriminatory manner. Potential solutions should reflect the wide and varied use of the Bonneville transmission system, including: (i) NT and PTP transmission service used to deliver generation to load both within BPA’s territory and outside of it; (ii) wheel-through transmission service used to deliver energy to and from other regions (often as one segment of a longer path); and, (iii) transmission used to support delivery of energy to support regional programs and organized markets. This will ensure that future processes will continue to be consistent with Bonneville’s long-standing commitment to open access and to providing non-discriminatory transmission service.	Thank you for the comment.

Commenter	Summary of Comment/Question	BPA Staff Response
PRITCA	• <u>Alternative solutions must be explored:</u> Before taking steps that will destroy investments in renewable energy projects across the region, BPA should explore alternatives that would solve its software problem, including: - o Running batched cluster studies on a subset of queued projects starting with senior queue positions. This would include an option for projects that are no longer viable to withdraw from the queue without cost and for projects that face regulatory or other delays to defer being studied until they are ready to move forward.	We have clarified that the challenges with BPA’s current processes and GAT participant proposals (such as batch processing and capping the cluster study) are much broader than a software issue. Please see our October 28-29 TC-27 Workshop presentation (see slide 21).
PRITCA	- o Correcting assumptions underlying the study models. The available evidence demonstrates that: ▪ transmission constraints on the BPA system are largely chimerical, based on the invalid assumption that renewable projects operating under PTP contracts will generate at maximum capacity at all times, including periods of extreme system stress. As a result, even supposedly constrained paths on the BPA system operate with much of their available transfer capability unused in all but a few hours per year. ¹ ▪ BPA’s model must incorporate planned Evolving Grid transmission projects. ▪ BPA’s model must include all planned load additions such as data centers, all loads reflected in LaRC submissions, and all LLIRs at 100% probability. ▪ The model greatly overstates threats to transmission reliability. In fact, even on paths where BPA considers transmission to be constrained, actual curtailments are rare. Between 2008 and October 2024, during high demand conditions, curtailments occurred only in 0.17% of hours and resulted in an average curtailment of 414 MWh. In short, “transmission curtailments are both rare and small under typical operating conditions and are no more likely or severe during regional peak load conditions.”² Overly conservative planning assumptions make it appear that the transmission system is in crisis but actual operations show that it is not.	We thank PRITCA for their suggestions and will consider them in developing its future state process. We will be initiating a future engagement series on Proactive Planning.
PRITCA	- o Acquire and use advanced software to maximize the capacity of the existing system. For example, AI-powered non-hardware dynamic line rating software has been used to successfully squeeze up to 40% more capacity out of existing lines than was available using traditional approaches to line ratings.³ - o Solutions used by other transmission providers, ISOs, and RTOs to address transmission congestion should be explored. In particular, BPA should look to the “connect and manage” approach employed by ERCOT, which has resulted in a much faster interconnection process as well as interconnection of considerably more capacity	Thank you for the comment. BPA is exploring use of AI at the agency. The suggestion of “no requirement that Network Upgrades be completed before transmission service is offered” sounds like a similar approach to BPA’s Interim Service proposal. We will consider your suggestions as we finalize our proposals.

Commenter	Summary of Comment/Question	BPA Staff Response
	than in BPA or other ISOs/RTOs.⁴ Under connect-and-manage, there is no requirement that Network Upgrades be completed before transmission service is offered. As a result, interconnection occurs in a much shorter period than in comparable systems. Generators and their customers are required to address the risks and costs of transmission constraints contractually but there is no reason to believe that this will constitute an impediment to interconnecting new generation to the BPA transmission system. o PRITCA supports the idea of a customer-led workshop to explore these alternatives to GAT, as well as other alternatives that may be proposed by other customers and interested parties.	
PRITCA	• <u>BPA’s approach undermines regional energy investment</u>: Fundamentally, BPA proposes to take a chainsaw to queued TSRs by imposing arbitrary new requirements on projects that entered in queue in good faith and according to the then-existing rules. By undermining investment expectations, BPA’s proposal threatens future investment in the regional electric grid. Repercussions will include lower power supply, higher prices, and reduced market liquidity, resulting in the region being unable to meet its clean energy, reliability, and capacity needs and policy mandates.	Thank you for the comment. We will consider your comments as we refine our proposals. We do want to reinforce that the current means of processing our rapidly growing transmission service request queue no longer leads to solutions that support the region’s needs. We have heard support from many other GAT participants of a need for change.
PRITCA	• <u>BPA’s approach is unfair to customers who have long been in the queue</u>. Many TSR customers have been waiting in the queue for years, and have invested substantial sums to support transmission studies, PEAs, environmental studies, etc. On the other hand, recent TSR filers knew when they submitted their TSRs that BPA had a substantial backlog. It is fundamentally unfair to penalize those customers who have long followed the rules and stayed in the queue by making all required deposits and paying for required studies. And it undermines investment by indicating that BPA is willing to jettison customers who have followed the rules and made substantial investments in advancing through the queue in favor of new customers who have not.	As we have explained, we are not proposing requirements for previously studied TSRs that are under post study agreements, such as confirmed service agreements, PEA, or ESAs. We would appreciate more information about the investments that would be impacted by customers with unstudied requests.
PRITCA	• <u>BPA’s proposal is counterproductive</u>. If implemented, GAT will force some of the most viable transmission requests to exit the queue in favor of transmission requests that are less viable and contingent upon a suite of transmission builds that will take many years, perhaps a decade or longer, to complete (as the last TSEP report demonstrates). Projects that may be forced from the queue include many TSRs that were submitted years ago that have been waiting for service offers and BPA transmission builds, often	Thank you for your comments and concerns. We will consider them as we refine our proposals in the TC-27 process.

Commenter	Summary of Comment/Question	BPA Staff Response
	for five to ten years, all the while following the rules in place at the time the TSRs were submitted. This result is contrary to BPA's stated goal, ill considered, not properly analyzed, and therefore arbitrary and capricious.	
PRITCA	• <u>BPA's approach will only compound restudy problems.</u> By compounding the risks that a TSR will be arbitrarily rejected from the queue, BPA will also increase re-study problems, which are caused by projects dropping from the queue.	Thank you for sharing this concern. We will consider this as we refine our proposals in the TC-27 process.
PRITCA	This is particularly true for GAT because it attacks NEWPOINT designations, increasing the risks that GI-associated requests will be forced from the queue. Longstanding practices focused on system locations, which made transmission service neutral (as it should be) to a specific generator association.	Thank you for sharing your concerns. We will consider this as we refine our proposals in the TC-27 process.
PRITCA	If a party had a generator development delay or failure, it could still accept transmission service, commit to paying for it, and either use it for something other generation or resell, long-term or short-term, that transmission for use by other entities. BPA proposes to make such uses of the system impossible, or at least tenuous or unreliable, such that someone might rightfully believe that waiting years for service could just result in BPA either forcing TSRs from the queue based on new, retroactively-applied policies that could not be predicted or known at the time earlier investments were made. This makes it less likely, not more, that BPA will be able to fund transmission expansion.	Thank you for this feedback. We will consider this as we refine our proposals.
PRITCA	• Section 1: (Evaluation of service offers on existing system): The section ends with the sentence "BPA will determine if a request needs further study." BPA must clarify what criteria will be used to determine if further study is needed. This language must be rejected if it is intended to allow BPA to add studies at will to those studies that are already required to obtain interconnection.	Thank you for the question. A TSR needs further study when BPA determines the existing system cannot provide the requested service. Under our OATT, BPA maintains two separate queues. One for interconnection and another for transmission service. Participating in each queue requires their own separate studies. Studies for transmission service are not the same studies for interconnection service.

Commenter	Summary of Comment/Question	BPA Staff Response
PRITCA	Sections 3(a)(i) & (ii) (Pre-cluster studies): The proposed language requires that, if BPA determines further study is needed, the customer must execute the relevant agreement and provide funding “by the due date(s)” to be eligible for next study phase or to accept offer of firm service. BPA must make clear what these due dates are so that there is no ambiguity about the deadline for the Interconnection Customer to act. Further, due dates must allow a sufficient period for the Interconnection Customer to make a reasoned commercial decision about whether to proceed and to obtain necessary financing.	The due dates are in the agreement that is tendered.
PRITCA	- Sections 4-8 (financial security): BPA’s proposals for financial security are unacceptable for a number of reasons: - They are excessive. The formula proposed by BPA (Section 5) would require a Customer to deposit cash or an equivalent equal to five years of revenue based on the current rate. BPA itself estimates that a \$10 million deposit would be required for a 100 MW request, and we estimate that a \$1 million deposit would be required for a modest 10 MW request. Hence, the proposal would require Customers to tie up tens of millions of dollars in cash (or equivalents), potentially for a period of ten years or more based on the time requirements set forth in Section 7. There is no reasonable basis for requiring deposits of this magnitude to ensure that queued projects are viable. Deposits a fraction of the required size would be sufficient to meet that purpose.	Thank you for your feedback. We will consider your concerns as we refine our proposals.
PRITCA	They are counterproductive. The huge deposit requirements create an unnecessary barrier to market entry. Worse, by imposing new requirements that will force TSRs that have long preserved their queue position by making BPA required deposits, paying the costs of studies, maintaining land rights, etc., out of the queue. This will diminish the value of these TSR positions and therefore discourage future TSR customers from moving forward by creating the possibility that their substantial investments in maintaining queue positions will also be diminished or destroyed by future BPA actions like GAT. Instead of solving the problem BPA itself created through under-performance on the prior TSR requests, its proposal, if adopted, will undermine market liquidity, reduce investment, and hobble competition	We appreciate your feedback and will consider it as we refine our proposals.

Commenter	Summary of Comment/Question	BPA Staff Response
PRITCA	o They are discriminatory. These excessive deposits arbitrarily favor developers and customers with large balance sheets who can afford to tie up cash for long periods of time. It also favors integrated utilities because they can easily make a PPA or Letter of Intent with themselves to satisfy the “transaction maturity” requirements, thus avoiding deposit requirements in a manner that is unavailable to their competitors in the generation market. Smaller IPPs and LSEs lack the wherewithal to meet these excessive deposit requirements, and the end result of imposing them will be to undercut the competitive forces in the generation market that drive lower prices for consumers, while reducing the number of transmission customers available to pay for BPA’s Network Upgrades.	We acknowledge PRITCA’s concerns and will consider them as we refine our proposals in the TC-27 process.
PRITCA	o No interest on deposits makes the proposal unfair. As noted, the proposal would require Customers to tie up cash, or have cash equivalents in place, for long periods, likely ten years or more. At an inflation rate of 2.5%, a deposit held for ten years would lose approximately 22% of its value because BPA proposes that no interest would be paid (Section 4(a)). It is unfair and unacceptable, and a notable deviation from generally-accepted business practices, to impose such deadweight losses on Transmission Customers.	BPA will hold a deposit provided by a Customer in a non-interest bearing account. A customer may use an Irrevocable Standby Letter of Credit in lieu of the cash deposit.
PRITCA	o The 15-day deadline is far too short. BPA proposes (Section 6) that Customers be given only 15 calendar days written notice of the deposit requirement. This is far too short a time. If notice arrived during the summer vacation season or the Christmas holidays, it is doubtful that the necessary bank personnel could be assembled within 15 calendar days, let alone that they could consider and approve financing of millions or tens of millions of dollars to meet the deposit requirement. Even at other times of the year, it would be rare for a bank to act on financial requests of this size in 15 calendar days or less. The period must be extended to at least 45 business days.	Thank you for the comment. We will consider this feedback as we refine our proposals.
PRITCA	o The proposal violates cost-causation principles. The deposit requirement effectively requires generators by themselves to finance generation expansion on the BPA system. This violates cost causation principles because it is well recognized that transmission expansion and Network Upgrades benefit all transmission customers, not just generation. As FERC has long recognized:	Thank you for raising this concern. We will consider your comments as we refine our proposals.

Commenter	Summary of Comment/Question	BPA Staff Response
PRITCA	[T]he Transmission System is a cohesive, integrated network that operates as a single piece of equipment, and that network facilities are not ‘sole use’ facilities but facilities that benefit all Transmission Customers. The Commission has reasoned that, even if a customer can be said to have caused the addition of a grid facility, the addition represents a system expansion used by and benefiting all users due to the integrated nature of the grid. For this reason, the Commission has consistently priced the transmission service of a non-independent Transmission Provider based on the cost of the grid as a whole, and has rejected proposals to directly assign the cost of Network Upgrades.⁶ These generalized benefits have also long been recognized by the federal courts⁷ and have been confirmed by studies of the transmission system. For example, a study of Network Upgrades in MISO concluded that its 17 “Multi-Value Projects” approved in 2011 will produce net benefits of \$7.3 to \$39 billion over 20 to 40 years, producing a benefit-to-cost ratio of 3.5.⁸ Another study of transmission upgrades in the SPP and MISO regions demonstrates the Network Upgrades generate significant benefits for the transmission system and transmission users generally, and those benefits generally exceed the costs allocated to the shared transmission system.⁹ While generation should bear a fair share of the costs of financing transmission upgrades, other transmission customers should also bear a fair share of those costs. By effectively placing the entire burden for financing Network Upgrades on new generation, the GAT proposal falls far short of meeting basic cost-causation principles.	Thank you for your comments.
PRITCA	• Section 9 (security for data validation requirements): BPA proposes to allow a customer to make a security deposit to satisfy data validation requirements, but states that the customer must “take transmission service when tendered” or lose its deposit. This is an even more extreme version of the 15-day deadline since the “when tendered” language suggests that the transmission service must be accepted immediately. This is unacceptable for the same reasons that the 15-day deadline is unacceptable. • Section 10 (cross-defaults): While the proposed language is not completely clear, BPA appears to propose that BPA can draw on any security deposited by a customer under any contract if the customer fails to “maintain all agreements in good standing.” Hence, a failure by a customer under Agreement A would allow BPA to draw security deposited to support a completely unrelated Agreement B. If that is BPA’s intent, it is	We acknowledge your concerns and will consider them as we refine our proposals.

Commenter	Summary of Comment/Question	BPA Staff Response
	unreasonable and must be rejected. BPA should draw on security deposits only if there is a failure of the specific obligation secured by the deposit. BPA’s proposal, if accepted, would likely eliminate the possibility of obtaining letters of credit or other cash equivalents because the banks issuing those instruments would be unable to adequately assess the risk created by Section 10.	
PSE	As it relates to the LTFQ Management timeline on Slide 25 of the workshop presentation, PSE is seeking clarification on Steps 1 to 3 and how those relate to the application of capacity from Evolving Grid Projects (EGPs) 1.0 and 2.0. It appears that BPA will wait until Step 3 to apply EGPs’ future capacity to transmission service requests (TSRs) that have committed to Interim Service by executing service agreements and posting of financial security in Step 2. PSE requests that BPA confirm this understanding is accurate. If so, BPA should discuss its planned tools and metrics for managing its transmission system. BPA should also describe how it will ensure current service would not be degraded with the addition of Interim Service capacity that has not yet been studied.	The purpose of Step 1 is to position the unstudied TSRs for a feasible size study and subsequent interim service offers by removing requests for transmission capacity that are not ready to use the available capacity. Step 2 is specifically for previously studied TSRs. The purpose of Step 2 is to tender service offers to secure or free up capacity on existing projects which include the GERP 1.0 and 2.0 projects. Step 3 is specifically for unstudied TSRs. The purpose of Step 3 is to apply any available GERP capacity (either already existing or freed up from the studied TSRs) to the unstudied TSRs that remained after Step 1.
PSE	With respect to BPA’s MIDC changes for service to MIDC, PSE is supportive of BPA’s planned treatment of previously studied TSRs with a point of receipt (POR) of MIDCREMOTE or NWHUB. PSE supports BPA’s proposal to have previously studied TSRs with a POR of NWHUB or MIDREMOTE receive an award of long-term firm transmission after the completion of identified plans of service, and that these previously studied TSRs would not be limited to a reassessment Conditional Firm (CF) award. In addition, PSE would support allowing customers with TSRs having a point of delivery (POD) of MIDREMOTE to conform their TSRs to NWHUB. Lastly, PSE would support allowing the same customers to receive an offer of Interim Service if they meet the Readiness Criteria. In addition to the above changes to MIDC policy, PSE recommends that BPA consider allowing existing BPA transmission customers to use their long-term firm point-to-point (PTP) transmission with a MIDREMOTE or NWHUB POR to schedule projects interconnected at BPA substations at MIDC. For example, a customer with an existing transmission contract that has a Vantage 230kV Source should be allowed to schedule a generation project that is interconnecting at the BPA Vantage 230kV substation.	Thank you for your comments, we will consider them as we refine our proposals.

Commenter	Summary of Comment/Question	BPA Staff Response
PSE	BPA has also acknowledged that coordination of timelines with regional load-serving entities’ Request for Proposals (RFPs) is needed to provide an effective and timely processing of the long-term firm (LTF) queue. It will be important that our organizations coordinate directly on these timelines to preserve access to BPA transmission service for bidders into our next RFP.	Thank you for the comment. We appreciate PSE willingness to engage on coordinating regional RFP processes with BPA’s proposed processes. We are considering revisions to our proposals based on feedback from many customers and stakeholders regarding the alignment of regional RFP proposals and our GAT reforms. We look forward to continuing to discuss this issue in the TC-27 pre-proceeding workshops.
PSE	PSE is also seeking confirmation on future financial security commitments of customers who take Interim Service. It is our understanding that customers are obligated to provide financial security for five years of transmission service when an Interim Service agreement is returned. We further understand that customers would not have a subsequent obligation to provide additional financial security for future plans of service to firm up the Interim Service into long-term firm transmission.	Your understanding is correct. Security, as was proposed this summer, is a one-time activity per TSR.
PSE	Lastly, PSE agrees with other customers that a fifteen-day window to provide financial security is insufficient and we recommend a minimum of thirty days.	Thank you for the feedback, we will consider this as we refine our final proposal.
Shell Energy	Shell Energy supports BPA’s goal of discouraging speculative queue positions and aligning financial commitments with commercial readiness. However, a flat, high securitization may have the unintended effect of entrenching well-capitalized developers, disproportionately burdening smaller entities and subsequently suppressing competition. A uniform requirement of ~\$120,000/MW risks driving this outcome. Shell Energy recommends that BPA contemplate a stepped, calibrated, risk-proportionate approach to securitization as outlined below: No new build or previously approved plan of service: 1–3 years of revenue - o For “service on the existing system” and/or TSRs with de minimis flow-based impact Minor new build with limited reinforcements, no long-lead permitting: 2–3 years of revenue - o Where PEA, ESA or further study may be necessary Major build - Significant plan-of-service with large cost exposure: 3–5 years of revenue - o Aligned with the Draft Language’s current five-year structure, and should be reserved for projects that trigger major upgrades	Thank you for the comment. We will consider Shell’s suggestions for structuring security requirements as we consider refining our proposals.

Commenter	Summary of Comment/Question	BPA Staff Response
Shell Energy	<u>Draws on Security</u> Shell Energy recommends that draws on security be codified and proportionate to BPA’s actual, non-recoverable costs so that there is a full understanding of what can trigger a draw, how the draw will be sized, and what opportunities exist to cure before any funds are taken. Shell Energy suggests that BPA enumerate various cost categories (completed preliminary engineering, third-party consulting and environmental work, procurement hold fees, externally imposed coordination expenses, documented internal processing etc.) and cap draws to the lesser of the sum of those incurred, non-recoverable costs or a defined portion of the calibrated revenue-year security that corresponds to the missed milestone period. Further, Shell Energy suggests that draws occur on a time-phased basis (for example monthly or semiannual) and only for costs already incurred as a means of discouraging punitive, one-time liquidations. BPA should consider providing customers with a cure period before any draw (for example, ten business days for contract execution-related issues) thereby creating a reasonable opportunity for customers to remedy administrative or timing errors without impairing BPA’s interests.	We appreciate Shell’s feedback and suggestions regarding our proposals for security, cure periods, and concerns regarding draws on security. We are considering Shell’s comments and suggestions as we revise our proposals for the TC-27 pre-proceeding workshops. To clarify, security for BPA’s construction of a commercially driven transmission expansion project is to ensure the customer takes and pays for the transmission service that created the need for the project. The obligation is relieved annually as service is taken and paid for.
Shell Energy	To preserve value and minimize the likelihood of unnecessary liquidations, customers should also have a standard right to assign or novate their TSR to a qualified buyer who meets BPA’s credit and readiness standards.	Thank you for the suggestion, we will consider it as we consider revisions to our proposals.
Shell Energy	The term “good standing” should be defined explicitly to avoid ambiguity. At a minimum, it should include the absence of payment defaults beyond an agreed grace period, timely achievement of milestones or approval of milestone extensions, an active LOC meeting credit criteria, the absence of termination notices, and delivery of required project updates.	Thank you for the comment. Our use of the term “good standing” is meant for compliance with the provisions of all agreements applicable to enabling the long-term firm transmission service of the request. We will consider Shell’s comments as we revise our proposals for the TC-27 pre-proceeding workshops.
Umatilla Electric Cooperative	BPA needs to revisit its proposal for how financial security is calculated and returned for NT customers. Specifically, we recommend that BPA not adopt its proposal to use the NT customer’s Network Load on the hour of the Monthly Transmission System Peak Load as the basis to return its financial security. Relying on the NT customer’s Network Load as a whole would mask the specific actual New Network Load that drove the need	We appreciate Umatilla’s comments regarding our proposals for financial security. We will consider the comments as we revise our proposals for the TC-27 tariff proceeding process.

Commenter	Summary of Comment/Question	BPA Staff Response
	for transmission upgrades, and more likely result in the NT customer not being returned its financial security due to fluctuations and changes in the peaks of the customer’s other loads, for instance such as those driven by weather or load loss due to economic factors, demand response programs, or other conditions. We suggest BPA rely on a more targeted measure for financial security purposes that focuses on determining whether the specific load(s) that caused transmission upgrades truly manifests.	
Seattle City Light	City Light encourages BPA to provide an interim service option to the BPA queue after filtering for Data Validation Readiness Criteria and NWACI impacts. These interim service agreements could include language allowing BPA to require future participation in study and projects. City Light believes that the alternative is an eventual queue still too large for BPA to effectively study.	Thank you for your comments, we will consider them as we evaluate changes to our proposals for interim service.
Seattle City Light	City Light suggests BPA convenes a meeting of NWACI owners to candidly discuss the risks and benefits of BPA offering interim service that affects NWACI facilities.	Thank you for your comments. We are considering this suggestion for additional engagement.
Seattle City Light	City Light recommends BPA institute a policy change of not allowing deferral of service or extension of commencement of service longer than 12 months. City Light additionally suggests that the current deposit requirements for deferral or extension of commencement should be increased to the five years of service amount.	Thank you for your comments. We will consider your suggestions as we revise our proposals for the TC-27 pre-proceeding workshops.

VIII. Future State

Commenter	Summary of Comment/Question	BPA Staff Response
NewSun Energy	What is BPA’s defined future state, and how do these proposals support it? BPA has not articulated what the future transmission study and expansion process will look like. Without this clarity, stakeholders cannot assess whether the transitional reforms are appropriate. We request: • A detailed roadmap of BPA’s envisioned future state. • Justification for how current proposals align with that future. • The future state, once BPA studies the queue, is the appropriate place for some of the drastic changes initially proposed by BPA.	Thank you for the comment. We will be initiating a future engagement series on Proactive Planning and Accelerate Expansion outside the TC-27 pre-proceeding workshops and can address your comments in those processes.
NewSun Energy	Inclusion of Grid 1.0 and 2.0 Projects Question: Will BPA include all evolving Grid 1.0 and Grid 2.0 projects in the study model to reflect the most accurate system conditions and future state? Recommendation: We urge BPA to incorporate all known and planned grid modernization efforts into the study model to ensure realistic and forward-looking outcomes.	Thank you for your comments. We will consider your feedback as applicable for our pre-proceeding workshops or for future engagement series on the Future State.
PRITCA	• BPA’s future state is undefined: BPA asserts that GAT would implement near-term changes to get the region “off pause” and to transition to a future state under a different, yet-to-be-defined transmission study and expansion process. But it is unclear what this future state might entail and therefore impossible to determine if GAT will help or hinder the transition to the future state.	Thank you for the comment. We will be initiating a future engagement series on Proactive Planning and Accelerate Expansion outside the TC-27 pre-proceeding workshops and can address your comments in those processes.

IX. Process

Commenter	Summary of Comment/Question	BPA Staff Response
Grant PUD	FERC Standards Grant asks that BPA clarify how the proposed reforms are consistent with FERC standards. For example, which FERC standards apply to the creation by BPA of “placeholders” for enhanced NITS in the queue for later study? What industry standards already adopted in other regions and approved by FERC does BPA consider relevant to the topics addressed in the new language as of 7.29.25 (as may be enabled through business practices or tariff revisions)?	Thank you for your comments. We will consider them as we refine our proposals for the TC-27 process.
NIPPC and RNW	NIPPC and RNW understand that the draft business practices discussed during the workshops are intended as a temporary solution and will be replaced as new tariff terms and conditions and rates become effective. Once those new provisions become effective, NIPPC and RNW anticipate that BPA will terminate these transition business practices and conform service granted under them to the new tariff terms and conditions and rates developed for the Future State. NIPPC and RNW also agree that the changes embodied in the GAT transition business practices, including offers of Interim Service, must be nondiscriminatory and consistent with FERC’s open access requirements. As BPA and customers gain experience operating under these transition business practices, NIPPC and RNW anticipate that BPA will revisit these business practices – especially the readiness criteria – to ensure that they are meeting the needs and expectations of BPA and customers and align with the reality of resource procurement processes in our region.	Thank you for your comment. Please see the Statement on the Future of GAT Engagement and Future State Solutions located at the beginning of this document.

X. Miscellaneous

Commenter	Summary of Comment/Question	BPA Staff Response
Seattle City Light	City Light recommends BPA consider opening a transmission product conversion window due to the disruptive nature of the Grid Access Transformation. Customers should be allowed to change transmission products for a period from the initiation of the GAT business practice changes until BPA completes and publishes the results of the first future state transmission planning study.	We appreciate Seattle’s suggestion and are open to discussing a conversion window between NITS and PTP products in the upcoming TC-27 pre-proceeding workshops.
Franklin PUD	From discussion at last month's workshops, we understand that Bonneville is considering whether to offer a conversion window as part of the GAT initiative. Given that this initiative has the high potential to alter the service terms for BPA’s transmission products, and potentially introduce new products, we request that BPA make a firm commitment to offer a conversion window for customers to switch products for a period leading up to the implementation of the Provider of Choice power contracts. Establishing a defined conversion window would provide customers with a clear and equitable opportunity to reassess their transmission products in light of evolving system conditions, including congestion, different planning standards between PTP and NITS, and changes to BPA's transmission service framework. Such flexibility is critical to ensuring that existing transmission customers are not disadvantaged by upcoming policy changes and have a sufficient period to make an informed decision about the product that best meets their operational and planning needs.	We appreciate Franklin PUD’s suggestion and are open to discussing a conversion window between NITS and PTP products in the upcoming TC-27 pre-proceeding workshops.