

BPA Staff Responses to Future State Related Comments Received from the July 9-10, 2025 Grid Access Transformation Workshop

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

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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	At this stage, it is difficult to fully understand what BPA is proposing under the Future State framework. The materials presented raise more questions than answers, and we are concerned that the scope and implications of the proposed changes have not been clearly articulated. Furthermore, we fail to understand what the process will look like moving from the transition phase to the future state phase.	BPA’s current means of processing its rapidly growing transmission service request queue no longer leads to solutions that support the region's needs. BPA’s is exploring a Future State paradigm and proposals for a Proactive Planning process in order to better anticipate transmission needs and enable solutions. We will speak to this concern in the upcoming October 28 and 29 TC-27 pre-proceeding workshops, but the Future State paradigm and Proactive Planning proposals will contemplate integrated processes that are structurally aligned over an extended planning horizon.
NewSun Energy	1. What is the Future State intended to solve? • BPA has not clearly defined the problem statement or how the Future State addresses it. Is this about queue management, system reliability, or commercial reform? • How will BPA manage studying future requests they receive? 1. How will this look during and after the transition phase is completed? 2. When does BPA anticipate the conclusion of the transition state? 2. What is the structure of the Future State? • Is BPA proposing a new service model, a new planning framework, or a new tariff structure? The terminology used is inconsistent and lacks operational detail. • What will the model inputs and assumptions be within the future state? 3. How does the Future State interact with existing rights and processes? • Will current TSRs, rollover rights, redirect rights, and pathways to Long-Term Firm be preserved? How will transitional products be treated? Will the process to request transmission change? • What impacts will it have on how BPA currently studies and awards the system? 1. ATC changes, flow gate encumbrance changes, redirect changes, etc.? 4. What is the role of customer forecasts and scenario modeling? • BPA references future load and resource forecasts, but it is unclear how these will be used to inform transmission planning or service offerings. • What assumptions and inputs will BPA maintain in their models to study what future and current requests look like?	We intend to address these questions primarily in a future engagement series outside the TC-27 process to be focused on the Future State and the proposals for a Proactive Planning process. Additionally, as necessary, we will also discuss how staff proposals for the Future State and Proactive Planning process align with or may change existing processes in the TC-27 pre-proceeding workshops. Finally, we will provide timelines and to the extent possible implementation details in either the TC-27 pre-proceeding workshops or the Proactive Planning engagement series. As part of those future engagement processes we will provide opportunities for participants to provide comments and submit questions. 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
	5. What is the timeline and process for implementation? • The proposed changes appear sweeping, yet there is no clear roadmap, stakeholder engagement plan, or regulatory pathway outlined. • How do we get from the transition phase to the future state phase? What is this based on, and how long of a transition period do we expect?	
NewSun Energy	6. How will equity and open access be maintained? • BPA must ensure that all customer types—IPPs, COUs, LSEs, and Marketers—retain fair access to the system. The Future State must not become a gatekeeping mechanism. • Customers must retain the right to request transmission to meet their individual business case, risk assessment, and needs. BPA cannot be the arbiter of what is or is not a justified use of the transmission system beyond meeting its statutory obligations.	We appreciate NewSun’s concerns regarding open access and treatment of customers. BPA remains committed to the principles of open access. In exploring a Future State paradigm and proposals for a Proactive Planning process, our objective is to move to an approach that will better anticipate transmission needs and enable solutions. This effort seeks to develop greater efficiency in planning. It will not be designed to undermine the needs of customers or to place BPA in the role of arbiter of individual customer business cases. We will consider NewSun’s concerns as we develop proposals for the Future State or Proactive Planning as part of a future engagement process.
NIPPC and RNW	NIPPC and RNW agree with BPA on the following broad principles (this same agreement is reflected in our comments on the Transition state): • “Disruptive” reforms to BPA’s transmission planning process are necessary; • Scope of reforms should include Generator Interconnection, Transmission Service, and Line and Load Interconnections; • Separate timelines for Transition and Future states; • Accelerated timeline for Transition; • Need to engage Commissions on reforms to state requirements for Requests for Proposal; • Need for reasonable readiness criteria as a condition to request transmission service; • Need to accelerate plan, design, and build phases of transmission expansion; and • Reforms should not diminish the service of existing customers.	We appreciate your support for BPA’s reform effort and will consider your feedback as we develop the scope and content for our future public engagement process on Proactive Planning and Accelerate Expansion. In addition, we expect to discuss NIPPC and RNW’s concerns regarding timelines for Transition and Future States and impacts to existing service in the upcoming TC-27 pre-proceeding workshops and, as necessary, the future engagement series for Proactive Planning. Please see the Statement on the Future of GAT Engagement and Future State Solutions at the start of this document.
NIPPC and RNW	NIPPC and RNW appreciate BPA’s decision to reconsider its approach to planning, approving, and constructing transmission facilities needed to meet the Future needs of the region. NIPPC and RNW recognize that BPA’s vision for the Future state largely aligns with the vision that NIPPC and RNW expressed in our May 2023 White Paper entitled ‘Appropriate and Required’: BPA and Building the Grid the Northwest Needs. Accordingly, NIPPC and RNW strongly support the end state that BPA has described in these workshops, including:	We appreciate NIPPC and RNW’s support for the proposals we have shared for Proactive Planning and Accelerate Expansion. As discussed above in the Statement on the Future of GAT Engagement and Future State Solutions, we intend to discuss these topics in an engagement series that we are working to initiate in the near future.

Commenter	Summary of Comment/Question	BPA Staff Response
	• Shifting BPA from a reactive expansion model based on customer requests; • Moving to a proactive planning model that includes: - o A longer planning horizon; - o 20 year forecasts of load growth and generation resource development; - o Use of scenario-based modeling; - o Two to three year planning cycle; - o Identifying “least regrets” transmission projects that meet needs over multiple potential Futures; • Undertaking elements of planning, design, study, procurement, and construction in advance of need; • Implementing this Future state within 5 years.	
PNGC	PNGC Power stands firm on its assertion that 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. We look forward to continuing to work with the agency and its staff to resolve the current set of challenges together. It’s imperative that BPA implement a sustainable solution that addresses the regional needs of its customers. The gravity of the matter warrants strong public process that codifies BPA decisions, obligations, and perhaps most importantly, agency accountability.	BPA appreciates PNGC’s comments and concerns. We expect to address PNGC’s comments in our future engagement series for Proactive Planning and the TC-27 pre-proceeding workshops. Please see the Statement on the Future of GAT Engagement and Future State Solutions at the start of this document.
PPC	At a conceptual level, PPC supports the vision for the future state of BPA transmission as shared at the July 9 and 10 workshops. Pursuing a proactive planning process and enhanced project execution would provide significant benefits to BPA customers and the region. Currently these concepts have only been discussed at a very high level and the specific details will be critical for ensuring these initiatives achieve their intended outcomes. As BPA further develops the “accelerate expansion” aspect of its proposal, we would recommend that the scope be expanded to make all BPA transmission project execution more efficient, whether a specific project is related to “expansion,” interconnection, or reliability. PPC also strongly supports the concept of partnering with transmission customers to provide them opportunities to construct facilities on behalf of BPA where appropriate. This type of partnership would benefit all BPA customers by allowing the agency to focus on large regional projects and allowing its customers, who may be able to complete smaller scope projects at lower cost on a faster timeframe, take on those smaller scope projects.	The Accelerate Expansion future state will be clarified in future engagement series BPA will initiate outside the TC-27 proceeding.

Commenter	Summary of Comment/Question	BPA Staff Response
PPC	Project Decisions Must Be Transparent, Consistent with Agency Strategy and Incorporate Customer Input Any risk “taken on” by BPA related to these builds will be passed through to its existing transmission customers through their transmission rates and therefore BPA’s existing transmission customers must have a significant role in BPA’s decision-making process. Decisions on project construction and allocation of transmission capacity must be done transparently with the input of existing customers. To do this, BPA should develop a public process for sharing information about proposed projects and provide a formal opportunity for customer feedback. Information and decision sharing related to TSEP and Evolving Grid projects over the last several years has felt ad hoc and has not involved customers until after decisions have been made. As part of the justification for any proposed project, the agency should clearly explain how the investment advances BPA’s strategy, as well as discuss the business case associated with the specific project. It will be important to describe how the project will address regional and/or customer specific needs, the strategic and/or long-term benefits of the build, and anticipated revenues associated with service provided by the build. Pulling together this full picture transparently for customers will be important for gaining customer support both for BPA’s planning process and also for future spending levels and associated rate impacts that may be needed to support new investments.	The Future State paradigm, Proactive Planning, and the process to make decisions on project construction and allocation of transmission capacity, will be clarified in future engagement series outside the TC-27 proceeding.
PPC	PPC Supports Adopting Future State Features Sooner than the 5-Year Estimated Timeline It is PPC’s understanding that BPA is looking to fully implement proactive planning practices and “enhanced expansion” approaches in about five years. We would like to explore with the agency implementing some, if not all, of the improvements scoped under these workstreams more quickly. These approaches to project planning and capital execution will benefit all customers if they are thoughtfully designed and well executed. While we understand there may be some limitations on how quickly the agency can implement some aspects of its proposal, we encourage BPA to explore whether some improvements can be adopted in a nearer timeframe. For example, if BPA identifies opportunities to improve its project execution that it could implement today, the agency should pursue those as quickly as possible even if not all aspects of the “enhanced expansion” effort are ready to be deployed.	The timelines associated with Proactive Planning and Accelerate Expansion will be clarified in a future engagement series initiated outside the TC-27 proceeding.

Commenter	Summary of Comment/Question	BPA Staff Response
	This is not to say that BPA should rush through development or implementation of its “transition” process. The agency’s transition policies are critical for maintaining equity among all its customers and will require planful design and implementation.	
PPC	Establishing Ongoing Reporting and Metrics Critical for Ongoing Improvement PPC supports BPA thinking creatively about how to solve transmission challenges. The types of changes envisioned in the GAT process are significant deviations from how business is done today, and the envisioned future state could create meaningful benefits for BPA’s customers and the region. It is important that the agency commits to providing regular reporting on the progress of this initiative. This regular reporting should be paired with established success metrics to determine whether the adopted changes are having their intended effect and to inform whether additional changes to policies or processes may be needed. This information will be critical for allowing ongoing improvement to BPA’s processes; particularly in a time of significant change that is impacting both demand patterns and the composition of available supply across our region.	We appreciate the concerns raised regarding reporting and metrics and will continue to seek means to engage customers and provide transparency. We will consider this feedback and discuss reporting or ongoing engagement on the Future State in future engagement series for Accelerate Expansion and Proactive Planning.
PPC	GAT Proposals Must Be Consistent with Other Agency Priorities As the details of the GAT proposal are developed, BPA and customers must work together to ensure that the outcomes of this process are consistent with other agency priorities. Such priorities include the implementation of the Provider of Choice contract, involvement in the Western Resource Adequacy Program, and participation in Markets+. Ensuring consistency across these initiatives should be a foundational principle guiding the development of GAT proposals – both transition and future state.	We agree. We will continue to coordinate the GAT efforts with agency initiatives including Provider of Choice, Day Ahead Market, and other potentially impacted initiatives as necessary, in both the future engagement series for Proactive Planning and in the TC-27 pre-proceeding workshops.
PRITCA	While there is little available information on what the Future State proposal may contain, any Future State must meet the following minimum criteria: • <i>Clearly define the problems being addressed and how they will be solved.</i> To date, BPA has not clearly set forth its goals, how or whether its proposed solutions would accomplish those goals, or what metrics it might use to measure success. • <i>Support robust competitive markets</i> with barriers to entry minimized to the greatest extent possible. • <i>Be non-discriminatory:</i> BPA should not favor one group of customers over another, even indirectly through rules that may appear facially non-discriminatory but in practice favor one group of competitors over another. Similarly, BPA must not impose rules that foreclose some business models, such as merchant generation, but allow others.	We appreciate the suggestions from PRITCA and are considering them. BPA’s is exploring a Future State paradigm and proposals for a Proactive Planning process in order to better anticipate transmission needs and enable solutions. The goals and scope associated with Proactive Planning and Accelerate Expansion will be clarified in a future engagement series outside the TC-27 proceeding (please see the Statement on the Future of GAT Engagement and Future State Solutions at the start of this document). We appreciate concerns regarding treatment of customers and remain committed to the principles of open access.

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	• <i>Support regional investment:</i> Rules for interconnecting and transporting power in the Pacific Northwest must provide a stable platform that provides the predictability needed to ensure investment in the regional generation fleet and transmission system. BPA must not undermine investment by retroactively changing the rules on customers who submitted TSRs or otherwise made significant investments based on the expectation that the rules in place at the time the investments were made would remain in place. • <i>Permit flexible use of the grid:</i> Redirects, including long-term redirects, and other features of BPA’s OATT that permit flexible use of transmission rights must be maintained and enhanced. Flexibility is one of the keys to maximizing the value of the existing grid.	
Seattle City Light	City Light thanks BPA for rising to the challenge. The goal of reforming BPA transmission processes to allow for awarding firm transmission service to requestors in 5-6 years is worth the struggle and work. Thank you. City Light encourages BPA to continue to focus on being able to award firm service within five to six years from the initial transmission request as a north star for the Grid Access Transformation.	Thank you for the feedback and support.
Seattle City Light	Due to the disruptive nature of Grid Access Transformation, City Light suggest BPA open a conversion window for transmission products for the time it takes to reach the full future state. Customers have varied needs and positions that will need to be reevaluated in the new paradigm.	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.

III. Stakeholder Engagement

Commenter	Summary of Comment/Question	BPA Staff Response
NewSun Energy	NewSun Energy respectfully requests that BPA: • Provide a detailed explanation of the Future State proposal, including its objectives, structure, and implications. • Host dedicated workshops focused solely on unpacking the Future State framework and including how it aligns to the transitional period. • Clarify how stakeholder input will be incorporated before any formal adoption or implementation.	We expect to begin some discussions about Future State solutions for Proactive Planning and Accelerate Expansion in a future engagement series, which we will initiate outside the TC-27 process. In addition, as necessary, we will engage on topics related to the Future State in the upcoming TC-27 pre-proceeding workshops. Please also see the Statement on the Future of GAT Engagement and Future State Solutions at the start of this document.
PPC	PPC Requests that BPA Respond to Customer Comments Received to Date While we appreciate that BPA is adjusting its engagement schedule based on customer interest to present individual perspectives, we are concerned that the updated customer engagement schedule released earlier this week extends the timeline for customers to hear BPA’s response to their previous comments and stalls some aspects of the conversation. The comments we are submitting today are the third round of comments that PPC will have submitted since the July 8 and 9 workshop and it is not clear how BPA is incorporating those comments into the development of GAT. Customer presentations made during the customer-led workshops in May have also not received a sufficient response. For the upcoming customer-led workshop in September to be meaningful, agency staff must come prepared to ask questions and share initial reactions in real time.	We appreciate your patience as we reviewed the many comments and developed our responses. As we shift from the GAT process to the TC-27 process, we are still considering customers’ feedback in refining the GAT proposals presented this past July and developing new alternatives to share in upcoming TC-27 pre-proceeding workshops (please see the Statement on the Future of GAT Engagement and Future State Solutions at the start of this document). We want to clarify that for presentations made in customer-led workshops, BPA will not develop or create new content or provide specific written responses. The customer-led workshops are intended to provide an opportunity for participants in a workshop process to ask further questions or provide a presentation or information related to a workshop topic. We will consider any information provided, but we will not prepare responses to customer presentations.

IV. Readiness Criteria

Commenter	Summary of Comment/Question	BPA Staff Response
NIPPC and RNW	NIPPC and RNW have previously submitted comments related to BPA’s proposed readiness criteria in comments for the Transition phase. Those comments, including the concerns raised there regarding BPA’s proposed readiness criteria for the Transition phase, are equally relevant to the readiness criteria proposed for the Future state. NIPPC and RNW comments on this topic can be summarized as follows: • Evidence of a transaction between a generator and a load serving entity must not be the sole, primary, or preferred mechanism to establish commercial readiness; • Restructuring RFP processes in the region will require a significant investment in time and resources from public utility commissions, BPA, investor-owned utilities, generation developers, and other stakeholders; • Customers should be able to demonstrate commercial readiness through a financial commitment, including a commitment to take “Interim” service;	Thank you for sharing this perspective. We are considering NIPPC and RNW’s feedback as we develop alternatives to share for the Transition phase in the TC-27 pre-proceeding workshops and any proposals related to the Future State in a separate engagement series.
NIPPC and RNW	In comments on the Transition state, NIPPC and RNW suggested that reform of existing regulated utility Request for Proposal (“RFP”) requirements is not a tenable near-term approach. NIPPC and RNW, however, support exploring RFP reform as part of deeper regional transmission reforms, well beyond BPA, that are typically associated with the formation of a regional transmission organization or an entity offering analogous services (i.e., consolidation of transmission tariffs, transmission operations, regional planning, and cost allocation, and a general shift away from contract-path transmission rights to financial transmission rights). Indeed, NIPPC and RNW view the changes proposed by BPA in the GAT Initiative through the lens of financial transmission rights and flow-based transmission management as the obvious alternative, and potential eventual end-state, of BPA’s transmission services, perhaps as part of an evolution beyond the treatment of transmission rights and congestion revenue in the organized day-ahead markets that will launch soon. NIPPC and RNW would welcome BPA’s perspective on how that eventuality—a more fundamental shift away from the physical contract-path rights paradigm—intersects with the Future state. NIPPC and RNW believe that there is a possibility that the general approach that BPA has outlined in making commitments between generators and load-serving entities a main (not sole, primary, or preferred) mechanism to establish commercial readiness may work in limited circumstances. In that spirit, NIPPC and RNW encourage BPA to begin efforts to	We appreciate your feedback and considering the future “end state.” While moving away from contract path rights falls out of scope of this effort, this input is valuable and may be used to help shape the direction of future reforms. We remain interested in hearing from LSEs in the region regarding impacts and potential modifications to their RFP processes. We agree that we should consider other processes—both within BPA and other regional processes, and we appreciate NIPPC and RNW’s willingness to help facilitate appropriate coordination with other relevant entities as the region works through these challenges.

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	coordinate with state commissions on potential reforms to state RFP processes for the Future state. These changes, however, should be made only if the state regulatory commissions significantly modify their competitive procurement rules and policies. If BPA wishes to continue to pursue this option, then NIPPC and RNW will participate in the efforts to ensure that both utility procurement processes and BPA policies can work together. We note that a regional procurement model that places more emphasis on offtake agreements being signed prior to transmission being available would represent a significant new assumption of delivery risk by power suppliers and offtakers—this risk allocation would have to be carefully vetted by state regulators.	
NIPPC and RNW	In comments on the Transition phase, NIPPC and RNW also discouraged BPA from tying readiness criteria in the Transition process to the results of utility procurement processes unless and until the state regulatory commissions adopt policies that allow the utilities to contract with IPPs without having secured transmission. We noted that such a policy shift by the commissions must be accompanied by a demonstrated willingness of the actual counterparties for such power—the utilities themselves—to accommodate this new paradigm. NIPPC and RNW caution BPA that any effort to reform utility procurement practices and state commission policies related to procurement may not be successful; BPA and stakeholders should work to develop other alternatives in parallel. Nevertheless, NIPPC and RNW agree with BPA that in the Future state customers should meet readiness criteria as a condition to submitting a transmission service request. Elements of reasonable readiness criteria in the Future state could include the following: • Reverse Open Season • Commercial Readiness ○ Agreement between a load and generation resource; ○ Customer commitment to execute take-or-pay agreement for “Interim” service (with rate treatment for the service that reflects BPA’s actual cost of providing the service and customers’ increased risk of curtailment); • Certainty regarding details of the request (particularly Point of Receipt and Point of Delivery); • Reasonable at-risk deposits; • Minimum terms of service; • Reasonable security;	We remain interested in continuing to hear from LSEs in the region regarding impacts and potential modifications to their RFP processes. We appreciate NIPPC and RNW’s indication of support for readiness criteria as a condition to submitting a transmission service request and suggestions of possible elements for such criteria. We will consider your feedback as we develop proposals to share in future workshops. It is not clear to us how a Reverse Open Season would work in relation to readiness criteria and we would appreciate any additional information regarding this suggestion. We are also interested in NIPPC and RNW’s thoughts or possible specific requirements regarding: details of the request (PORs and PODs), at-risk deposits, minimum term of service, and limits on deferral rights as an element of the readiness criteria. Finally, we would appreciate additional detail on your suggestion of “appropriate progress in a generator interconnection process” to help increase our understanding of NIPPC and RNW’s thinking (along with any other detail you would like to provide on the suggestion for readiness criteria).

Commenter	Summary of Comment/Question	BPA Staff Response
	• Agreement to limit requests for Extension of Commencement of Service; and • Appropriate progress in a generator interconnection process. NIPPC and RNW do not here repeat all of our comments about readiness criteria from the workshops and comment period on the Transition state—including being open to alternative criteria beyond the ones BPA and we have outlined—but those same views, which have evolved over the brief course of the GAT Initiative, hold true here as well.	
NIPPC and RNW	Finally, NIPPC and RNW seek to underscore a concern raised in prior comments regarding the impact of these reforms on wholesale competition. Any reforms associated with customer access to transmission must not provide any advantage to vertically integrated load-serving entities seeking to contract with themselves for utility-owned assets thereby negatively affecting wholesale competition. While this is a particular concern for the Transition process, it will continue to be a concern for NIPPC and RNW as we work with BPA to develop the Future state. NIPPC and RNW would strongly discourage any transmission provider, including BPA, from creating a mechanism that would suppress supply-side competition, either intentionally or inadvertently.	More specificity on this concern in relation to criteria under consideration may be helpful, but we appreciate your concerns regarding treatment of customers and remain committed to the principles of open access.

V. Proactive Planning

Commenter	Summary of Comment/Question	BPA Staff Response
NIPPC and RNW	NIPPC and RNW commit to engaging with BPA and other stakeholders to develop the details necessary to implement these reforms. As the region moves to develop the details regarding how BPA will undertake “proactive” transmission planning, NIPPC and RNW encourage BPA to incorporate elements from existing proactive planning processes. Through its participation in WestTEC, BPA staff is gaining experience with scenario-based transmission planning. NIPPC and RNW anticipate that BPA will implement many elements of the WestTEC process as part of these reforms. Also, BPA is a member of NorthernGrid which is currently undertaking an effort to implement “proactive” planning in the region to comply with FERC Order 1920. While drafts of the NorthernGrid compliance plan are not yet public, NIPPC and RNW encourage BPA to consider and implement proactive planning consistent with Order 1920 as part of this reform process. NIPPC and RNW also encourage BPA to consider how its Attachment K planning and the NorthernGrid planning processes can mutually support each other with respect to timelines, planning assumptions, and scenario development. Ideally, the NorthernGrid and BPA planning processes will be consistent and coordinated. NIPPC and RNW anticipate that transmission expansions identified in the NorthernGrid planning process would be prime candidates to consider for early-stage development in advance of customer requests for transmission service. Accordingly, NIPPC encourages BPA to consider the results of NorthernGrid’s planning processes as one factor in determining which transmission expansions BPA will consider in selecting projects for early environmental and preliminary engineering studies.	We agree with NIPPC and RNW’s feedback to take into account existing regional forums and regional initiatives underway and will consider that feedback as we develop proposals to share in future Proactive Planning engagement series. We agree that long-term single entity and regional proactive planning opportunities are occurring in several locations. As we explore the development of Proactive Planning, we will take into account those other efforts, including opportunities through WestTEC and NorthernGrid, in order to align our efforts to those regional processes, as appropriate, and to address potential gaps. With respect to Order 1920, BPA is in the process of coordinating with NorthernGrid members to evaluate the Order with the expectation of adopting the reforms in BPA’s tariff 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 long term planning reforms includes consideration of the use of scenario planning over a 20-year horizon. We agree with NIPPC and RNW’s feedback to consider how our Proactive Planning proposals and the NorthernGrid regional planning processes can mutually support each other with respect to timelines, planning assumptions, and scenario development.

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NIPPC and RNW	NIPPC and RNW also encourage BPA to consider how other regional processes will likely impact transmission service requests. For example, stakeholders worked with BPA to develop and implement Generator Interconnection Queue reforms in TC-25, including phased cluster studies. NIPPC and RNW urge BPA to explore consider how to coordinate the timelines of the GAT reforms with the timelines of the Generator Interconnection cluster study process. Similarly, the Western Resource Adequacy Program (“WRAP”) has specific timelines and requirements; BPA should consider how the reforms under consideration here will facilitate (and not complicate) WRAP compliance. Ideally, the processes and timelines of these other regional processes will complement and support the processes and timelines of transmission service reforms under GAT.	We agree that we should consider other processes—both within BPA and other regional processes—as we develop Proactive Planning proposals. We will give consideration to the processes and timelines of both internal and regional processes and will contemplate how to integrate processes over an extended planning horizon. In particular, timing of the study process for Proactive Planning will be a key factor to assuring we are able to have the most recent and accurate data for the study work.
NRU	- At the outset, we underscore BPA’s tariff obligation to endeavor to plan its transmission system and provide sufficient transfer capability to meet its NITS customer load forecasts. To this end, we request that BPA articulate how it will continue to satisfy its planning obligation to NITS customers through the Proactive Planning process. BPA should at a minimum make explicit that it will rely on its NITS customer load and resource forecasts as a foundational input into its 20-year assumptions and ensure that projects resulting from the Proactive Planning studies will provide sufficient transfer capability to satisfy such forecasts. Along these lines, we recommend that BPA provide additional details on how it intends to allocate capacity that results from transmission upgrades identified through the Proactive Planning process among its customers and queues. - In recognition of the preceding bullet and the readiness criteria that BPA intends to apply, we would oppose circumstances where BPA expands its transmission system through the Proactive Planning process based in part on forecasted load growth of its NITS customers but exhausts the resulting project capacity before NITS customers are able to meet the readiness requirements. The transmission projects selected through the Proactive Planning process must provide sufficient transmission capacity to satisfy BPA’s planning obligation to NITS customers under its tariff, assuming all readiness criteria are met.	Thank you for your comments. We are considering NRU’s feedback as we develop proposals for Proactive Planning to share in a future engagement series, including how BPA will meet its planning obligations to NITS customers through any proposed processes. In addition, we acknowledge NRU’s concerns about how capacity created by project expansions through the future proactive planning process will be allocated. The process for providing and allocating capacity is an important consideration. The Future State paradigm and Proactive Planning is intended to anticipate transmission needs and enable solutions and, in doing so, must be able to consistently provide the needs of some customer classes without resulting in overly burdensome impacts on other customer classes. Addressing this issue is a high priority in the Proactive Planning process development effort.

Commenter	Summary of Comment/Question	BPA Staff Response
NRU	We support BPA’s pledge to conduct meaningful stakeholder engagement in identifying key expansion drivers and the development of long-term scenarios. We also support and look forward to additional engagement around BPA’s process to identify transmission expansion portfolios and decisions to build. Embedded in these aspects of Proactive Planning are critical elements related to how BPA will perform its “least-regrets” analysis, how project benefits will be calculated, and ultimately how the rate determinations will be made. It is imperative that robust customer and stakeholder engagement take place to provide stakeholder transparency into these elements, and we are encouraged by BPA’s statements during the Workshop on this aspect.	We appreciate your support for BPA’s reform effort and will continue to seek means to engage customers and provide transparency. We look forward to customer involvement, to engaging the region with our proposals, and to soliciting your feedback in our future Proactive Planning engagement series.
NRU	As much as possible, we encourage BPA to leverage existing work to-date in other forums related to establishment of long-term scenarios in the Pacific Northwest. This may include scenarios developed through WestTEC’s long-term planning study, the development of WECC’s 20-year Foundational Case, as well as Pacific-Northwest-specific long-term scenarios that may be developed through NorthernGrid’s compliance with FERC Order No. 1920. We recommend BPA avoid, insofar as practicable, developing long-term scenarios from scratch, given both the existing workstreams already engaged in developing long-term scenarios and BPA’s current resource constraints.	We agree with NRU’s feedback to take into account existing regional forums and regional initiatives underway and will consider that feedback as we develop proposals to share in future Proactive Planning workshops. We agree that long-term single entity and regional proactive planning opportunities are occurring in several locations. As we explore the development of Proactive Planning, we will take into account those other efforts, including opportunities through WestTEC and NorthernGrid, in order to align our efforts to those regional processes, as appropriate, and to address potential gaps. With respect to Order 1920, BPA is in the process of coordinating with NorthernGrid members to evaluate the Order with the expectation of adopting the reforms in BPA’s tariff 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 long term planning reforms includes consideration of the use of scenario planning over a 20-year horizon. We will consider how our Proactive Planning proposals and the NorthernGrid regional planning processes can mutually support each other with respect to timelines, planning assumptions, and scenario development.

Commenter	Summary of Comment/Question	BPA Staff Response
NRU	We also encourage BPA to consider broadening the scope of its Proactive Planning element, to include transmission facilities beyond the main BPA network. Specifically, we point to the Portland Area Reinforcement Study (PARS) as a meaningful example of how BPA could plan proactively at individual load areas based on long-term load projections. Because BPA’s Proactive Planning element will include these long-term NITS load forecasts, it appears logical to conduct both main grid as well as local load area studies that account for that load growth. Doing so likely would result in procedural and planning efficiencies and identify right-sized transmission reinforcements to accommodate transmission service all the way down to the local delivery area. This may potentially avoid time-consuming and separate load-area studies, and may also better capture sub-grid constraints and their transmission solutions.	We appreciate your feedback as to scope and encouraging opportunities to ensure procedural and planning efficiencies.
NRU	At the Workshop, BPA staff articulated its goal of five years to have a fully mature proactive planning study process. While we reiterate our support for BPA’s efforts, we encourage BPA to take any necessary steps to accelerate this workstream. The Proactive Planning element holds tremendous potential to address the load service needs of BPA’s NITS customers over the long term and would allow BPA to pivot away from solely responding to new transmission requests. We therefore would support BPA condensing this timeline as much as possible to initiate these types of studies sooner and transition away from studies that rely primarily or solely on customer transmission requests.	We are evaluating our public engagement process for developing and implementing Proactive Planning, which we anticipate will include a timeline for implementation. As discussed in the Statement on the Future of GAT Engagement and Future State Solutions at the start of this document, we intend to initiate a future engagement series related to proactive planning in parallel with the TC-27 process. As part of that public engagement, it is possible that draft processes will be available in less than 5 years, but we anticipate a need for assessments of these processes before they are finalized, including trial cycles.
PRITCA	While there is little available information on what the Future State proposal may contain, any Future State must meet the following minimum criteria: <i>Planning should be pro-active:</i> Planning should anticipate where loads will grow, where resources (especially renewables) will be constructed, and where transmission constraints are likely to develop, and should plan and construct transmission in advance of these transmission demands developing. The current system of transmission expansion is largely reactive to filing of TSRs and the network upgrades projected to be needed to accommodate these TSRs, and much of the current problem with queue congestion can be traced to this reactive approach. PRITCA believes Evolving Grid is a solid first step in the direction of proactive transmission planning and construction. <i>The value of existing transmission assets should be maximized:</i> This requires rules that	In exploring a Future State paradigm and proposals for a Proactive Planning process, our objective is to move to an approach that will better anticipate transmission needs and enable solutions. This effort seeks to develop greater efficiency in planning. The Future State paradigm and Proactive Planning proposals will contemplate integrated processes that are structurally aligned over an extended planning horizon. We agree that being proactive and maximizing the current system are high priority goals for our Proactive Planning efforts. We look forward to public engagement that will inform how we develop processes that will accommodate the needs of our customers.

Commenter	Summary of Comment/Question	BPA Staff Response
	allow flexible use of transmission capacity that would otherwise remain unavailable, study assumptions that reflect current realities and that are not overly-conservative, and rapid deployment of capacity-maximizing advanced transmission technologies.	
PSE	PSE is looking forward to opportunities to collaborate with the BPA planners in creating a new 20-year planning model. At minimum, we consider the following inputs from PSE and other regional load serving entities will be useful in building this model: 20-year peak load forecasts (winter/summer), planned resource additions in BPA’s service area/resource retirements, resource adequacy contributions of new/planned resources, and Western Resource Adequacy Program (WRAP) requirements. We recommend that BPA provide an opportunity for stakeholders to share feedback on the model.	We look forward to public engagement that will inform how we develop processes that will accommodate the needs of our customers. We are considering multiple ways for gathering/sharing modeling data and soliciting feedback to develop the Proactive Planning process. We expect to engage other utilities (for example, through NorthernGrid) to address data sharing and intend to initiate a future engagement series for Proactive Planning as described in the Statement on the Future of GAT Engagement and Future State Solutions at the start of this document.
PSE	In future meetings, PSE requests that BPA provide more details on the approaches to creating new study models and methodologies that will be used in the new study processes. For example, how will BPA move from using WECC 10-year cases to using 20-year cases? We encourage BPA to actively seek stakeholder feedback on the sensitivities to be evaluated during each planning cycle. In addition, we ask that BPA share methodology and study cases with transmission planners in the region to help in better understand how BPA is developing the new cases and evaluate risk assessment of curtailments.	We are actively discussing this topic and plan on sharing the initial idea and discussing potential improvements with interested participants in our future Proactive Planning engagement series.
Seattle City Light	Objectives – City Light supports BPA shifting to a model that anticipates transmission needs and uses scenario-based, probabilistic modeling and analysis. Principles – City Light supports BPA’s Proactive Planning principles and suggests BPA emphasize identifying projects of “Least Regret.” City Light recommends BPA be transparent and collaborative regarding scenario development and progress toward completing the first iteration of planning analysis within two years. City Light request BPA include 100kV and above transmission facilities in the Puget Sound Region in their planning models.	Thank you for the feedback. We look forward to public engagement that will inform how we develop processes that will accommodate the needs of our customers. We are considering multiple ways for gathering/sharing modeling data and soliciting feedback to develop the Proactive Planning process. BPA’s efforts to evaluate alignment to Order 1920’s long term planning reforms includes consideration of the use of scenario planning over a 20-year horizon. We agree with Seattle’s feedback to be transparent and collaborative regarding scenario development. We will consider how our Proactive Planning proposals and the NorthernGrid regional planning processes can mutually support each other with respect to timelines, planning assumptions, and scenario development. Voltage level of inclusion is something we will need to be careful about due to the nature of accuracy from projecting systems out 20 years. This may need to be a topic of discussion for our future engagement series on Proactive Planning.

VI. Interim Service

Commenter	Summary of Comment/Question	BPA Staff Response
NIPPC and RNW	NIPPC and RNW look forward to learning more from BPA regarding BPA’s proposal for Interim service. BPA indicates that instead of waiting for full energization of new plans of service to support requests for transmission service, upon receipt of a valid transmission service request, BPA will offer the customer “Interim” service which may be subject to significant curtailment until such time as transmission upgrades are complete – potentially as long as 5-6 years. In previous comments, NIPPC and RNW suggested that a willingness to execute an agreement for “as available” service would be a clear indication of a customer’s commercial readiness. NIPPC and RNW caution BPA, however, that customers should not pay the full rate for Firm Point-to-Point service for a transmission product that is subject to significant curtailments. NIPPC and RNW encourage BPA to engage its transmission rates staff to develop, with customer input, the rate treatment for this new transmission product which combines a long term of service with frequent curtailment and that reflects the actual cost to BPA to provide the service. NIPPC and RNW anticipate that BPA’s proposed Interim Service will also require changes to BPA’s ancillary services rates to reflect the increased uncertainty associated with this new product. BPA has also indicated that it intends to join the Markets+ day ahead market. In developing rates for this new product for the Future state, BPA should expect customers to offer their generation to the market when their transmission service is – or is likely to be – curtailed. NIPPC and RNW encourage BPA to engage its Power and Transmission rate stag early in this process to ensure that the reforms stakeholders consider in GAT will not have unintended or surprising consequences in future rate proceedings.	Thank you for raising your concerns regarding staff’s proposals on interim service. We will consider your feedback as we refine our proposals and/or develop new alternatives to share in TC-27 pre-proceeding workshops and any form of interim service we propose to offer in the future state in our proposed engagement series on Proactive Planning.
Seattle City Light	Objective – City Light supports BPA providing Interim service rather than waiting for full energization of supporting transmission projects. City Light additionally is in favor of a solution enabling the agency to offer structured, risk-managed service earlier, using existing tariff products like Conditional Firm (CF) or 6NN to bridge the gap between request for service and long-term firm service. Principles – City Light supports BPA’s principles for interim service including preserving the quality of service for existing firm transmission rights holders. City Light asks BPA implement interim service as soon as possible. Some version of a cluster study to enable designating projects for a particular service request is just	Thank you for your comments. We agree more discussion is warranted (please see our Statement on the Future of GAT Engagement and Future State Solutions at the start of this document). We will consider your feedback as we refine our proposals or develop new alternatives to share in the TC-27 pre-proceeding workshops.

Commenter	Summary of Comment/Question	BPA Staff Response
	repeating the current BPA TSEP process. BPA could include language supporting future study costs and requirements in the interim service contracts. The outcome of readiness requirements alone will likely not yield a queue that is small enough to study effectively. City Light believes requiring requestors to take interim service with a –multi-year service deposit will result in only mature, long-term transmission requests remaining to be studied. <u>Interim Service Options for offers of Transmission</u> City Light recommends BPA implement interim service at a NERC Priority 6 (CF,6NN). The benefits of providing interim service are greater than the risk of degrading existing priority 6 service. <u>Interim Service What to Expect</u> City Light supports BPA exploring limitations on Extensions for Commencement of Service Rights for interim service. Extensions requested due to delays in Generator Interconnection should be allowed. City Light appreciates BPA preventing new interim service from negatively affecting NWACI ownership and encourages BPA to have a NWACI customer meeting to discuss this issue.	

VII. Accelerate Expansion

Commenter	Summary of Comment/Question	BPA Staff Response
NIPPC and RNW	NIPPC and RNW support BPA’s objective to adopt reforms intended to reduce the time between the decision to build and energization of new facilities. Specifically, NIPPC and RNW support BPA’s proposal to reduce the time from BPA’s receipt of a request for transmission service to commencement of service to five or six years. BPA, however, has targeted implementation of these reforms by 2030. NIPPC and RNW, however, do not agree that BPA should wait until 2030 to implement changes that BPA can implement sooner. NIPPC and RNW urge BPA to move more aggressively and introduce incremental changes to its processes to speed project execution and reduce costs to customers. Some elements of BPA’s reforms may require tariff revisions to implement and may require a formal tariff revision process; other reforms, however, can be implemented under the existing tariff structure. BPA should implement incremental changes aggressively and as soon as it has the capability to do so. BPA should not develop and stack reforms for a single cutover date in the distant future.	Thank you for your comment. We intend to implement the Accelerate Expansion program incrementally as capabilities are in place, with all aspects of the program established by 2030. We are currently preparing to initiate an engagement series on Accelerate Expansion outside of the TC-27 tariff proceeding process.
NIPPC and RNW	BPA has identified three primary focus areas, Capacity, Speed and Customer Build. While a focus on cost may be implicit, NIPPC and RNW encourage BPA to promote Cost Containment as an area of focus on par with Capacity and Speed. NIPPC and RNW look forward to working with BPA to identify and facilitate the implementation of changes to BPA’s existing practices to enhance BPA’s capacity to expand the grid and speed project, design, procurement, and execution, all while containing costs. NIPPC and RNW anticipate that these reforms will include changes to BPA’s Secondary Capacity Model (“SCM”) designed to allow transmission customers greater flexibility in contracting to perform design, procurement, and construction of transmission facilities for BPA ownership and operation. NIPPC and RNW also encourage BPA to explore mechanisms to allow customers to engage contractors to conduct environmental studies for BPA to consider in weighing environmental impacts of transmission facilities. Competition in the wholesale electricity market is a core value of both NIPPC and RNW. Accordingly, we believe that enhancing the opportunities for competition among contractors qualified to perform environmental studies, project design, procurement, and construction to BPA’s standards will reduce the costs and timelines of transmission expansion. NIPPC and RNW agree that part of this approach should be an expanded and permissive mechanism to allow customers to build BPA network assets.	Thank you for your comment. We look forward to engaging as we explore options for customer builds. All aspects of BPA’s current project execution processes are in scope for evaluation under the Accelerate Expansion program.

Commenter	Summary of Comment/Question	BPA Staff Response
NRU	- We support BPA’s timeline of 2030 to fully implement this initiative but, like above, encourage BPA to evaluate opportunities to further shorten this timeline given the near-term and urgent need for BPA to expand its transmission system. - We support BPA expanding its use of the Secondary Capacity Model to allow additional experienced regional vendors to take on certain BPA transmission projects where BPA lacks sufficient primary resources. BPA must expand the resources on which it relies to complete transmission infrastructure critical to load service and system reliability.	Thank you for your comment. BPA intends to implement the Accelerate Expansion program incrementally as capabilities are in place.
NRU	- We would also greatly support BPA developing a mechanism to allow its customers to build BPA network assets. We note that, as it relates to generator interconnection procedures, the Western Area Power Administration, a fellow Power Marketing Administration, maintains a business practice that addresses the option for its customers to construct Stand Alone Network Upgrades pursuant to requirements under FERC Order No. 845. We urge BPA to provide for this same opportunity to all interconnection customers (both load and resources) as a means to accelerate transmission asset development. Allowing its customers to construct network upgrades could also free up BPA’s scarce engineering resources to accelerate the construction of higher priority, high-voltage transmission projects. - Along these lines, we recommend BPA evaluate the viability of relying on competitive solicitations and allowing third-party, independent transmission companies to construct assets that would later be turned over to BPA to own and operate. Competitive transmission development occurs throughout much of the country and could significantly expand the candidate pool to execute transmission projects on BPA’s transmission system. BPA could, for instance, run a competitive solicitation for third-party transmission companies to construct transmission projects for which BPA lacks sufficient resources and that score lower on BPA’s capital prioritization process. In such cases, BPA could provide the technical specifications and construction requirements to ensure that the project would be built to BPA’s standards, but otherwise turn over construction to an independent developer. Additionally, in many cases, independent transmission companies include binding cost caps intended to help mitigate cost overruns and prevent such costs from being allocated to transmission customers – a meaningful tool for maintaining reasonable rates for consumers.	Thank you for your comment. We look forward to engaging in as we explore options for customer builds. We are aware of WAPA’s business practices and are reviewing them in our evaluation.

Commenter	Summary of Comment/Question	BPA Staff Response
NRU	Although BPA staff stated that it would not be able to “shorten” the agency’s NEPA responsibilities, we nevertheless urge BPA to seek efficiency gains in how it conducts that process and not assume that it cannot be shortened in every case. There are numerous federal agencies across the Pacific Northwest that may require involvement in environmental reviews, so enhanced coordination and engagement between BPA and these other federal agencies may be appropriate and reduce timeline impediments. We note that the Department of Energy has established the Coordinated Interagency Transmission Authorizations and Permits (“CITAP”) Program, designed to coordinate, centralize, and accelerate federal environmental reviews and permitting processes for certain transmission facilities. While the CITAP Program may not be a perfectly comparable process for BPA to utilize, it may represent a useful framework for BPA to mimic for transmission expansion across its network throughout the Pacific Northwest and allow for a more efficient conducting of environmental review when such review requires involvement by other federal agencies.	Thank you for your comment. All aspects of BPA’s current project execution processes are in scope for evaluation under the Accelerate Expansion Program. We will review the CITAP program in our evaluation and solutioning.
NRU	A final observation is that the critical need for BPA to accelerate its expansion capabilities may eventually be assisted by its Proactive Planning process. To the extent that BPA’s Proactive Planning is successful in identifying transmission needs over a 20-year horizon, such needs would likely begin to be identified later in the long-term horizon, allowing more advanced notice and the ability for BPA to stage or sequence projects. This could reduce the pressure on BPA and allow it to avoid immediate-term urgency and allocate its engineering and construction resources more efficiently.	Thank you for your comment. We agree that Proactive Planning will yield significant benefits for our expansion program.
Seattle City Light	Objective – City Light supports BPA’s vision of energizing new facilities in 5-6 years from request to service. City Light request BPA update customers on the progress to enabling this capability in the Quarterly Business Review meetings. Focus Areas – City Light thanks BPA for focusing on mechanisms for customers to build BPA network assets.	Thank you for your comments and support. We will consider using the QBR for updates.

VIII. Cost Allocation

Commenter	Summary of Comment/Question	BPA Staff Response
PNGC	As a general matter, PNGC Power is supportive of the BPA implementing a proactive planning model where a transmission service request can be developed from initial request to in-service within 5-6 years. However, the significant changes that BPA has proposed in the GAT process to-date, make it very difficult to fully understand the nuances of how transmission service requests will be managed on a non-discriminatory basis. Absent additional information on the future state, there are too many outstanding questions for PNGC Power to formulate a comprehensive set of comments on how the transmission service queue should function. As an example, PNGC Power is very concerned about how future costs will be allocated for network load service. How does BPA propose to assign costs going to be allocated for network transmission upgrades in a future state paradigm? If proactive planning is the goal where system builds are completed in anticipation of the needs of the region, the process regarding how projects are chosen to be built and who pays for those projects needs to be explicitly explained and codified.	Thank you for the comment. We are considering your feedback as we develop proposals to share in our future engagement series on Proactive Planning.
PPC	Grid Access Transformation Discussions Must Address Cost Allocation and Risk Exposure BPA has yet to address cost allocation and risk exposure issues in any GAT discussions – whether they be related to the transition timeframe or the future state. These are critical issues which must be identified and addressed directly as part of a holistic transmission solution. In the context of the future state, this could mean a significant paradigm shift in who is exposed to the risk related to new capital projects pursued under BPA’s commercial planning process. Under TSEP, customers requesting service enabled by future build held much of the risk related to specific projects. PPC understands the interest in exploring alternative risk allocation approaches to facilitate more transmission projects moving forward; however, as policies are developed it will be critical that there are logical relationships between how new transmission capacity is allocated, how decisions on the construction of new builds are made, and who is exposed to the risk of stranded investments.	Thank you for your comments. We are considering your feedback as we develop proposals to share in either our TC-27 pre-proceeding workshops or future engagement series on Proactive Planning, as applicable.

Commenter	Summary of Comment/Question	BPA Staff Response
PRITCA	While there is little available information on what the Future State proposal may contain, any Future State must meet the following minimum criteria: • <i>Equitably distribute the burdens of transmission construction to reflect cost causation principles.</i> The current system places essentially the entire burden for financing network upgrades on interconnecting generation. This violates cost causation principles because it is well recognized that network upgrades benefit all customers. Thus, any Future State must impose the burden of financing network upgrades on all customer classes, not just interconnecting generators.	Thank you for sharing your concern. We will consider your feedback as we develop proposals to share in our TC-27 pre-proceeding workshops or future engagement series on Proactive Planning, as applicable. We do want to clarify your characterization of our current cost model for system expansion for transmission service. In our current processes, customers with requests for transmission service that drive the commercial expansion of the transmission system pay for the actual costs of scoping, design, and environmental work. BPA funds the construction of the projects and all customers pay for the cost of projects that are rolled in to the network embedded rate.

IX. Miscellaneous

Commenter	Summary of Comment/Question	BPA Staff Response
PRITCA	In developing the Future State, BPA should consider solutions that have been studied or implemented elsewhere. In particular, PRITCA commends two studies to BPA for careful review and consideration: • Elaine Hart, Toward a More Holistic and Adaptive Treatment of BPA Transmission Rights in Northwest Utility Planning and Procurement Processes, GridLab & Sylvan Energy Analytics at 9 (Table 3) (available at: Sylvan-and-GridLab Renewables-Transmission-Rights.pdf).This study identifies a number of reforms that could be adopted by BPA relatively easily and in the short term, such as revising overly-conservative modeling assumptions, that could permit BPA's considerable stock of unused transmission capacity to be used more efficiently while lowering barriers to entry. • Tyler H. Norris, Beyond FERC Order No. 2023: Considerations on Deep Interconnection Reform, Nicholas Institute for Energy, Environment & Sustainability, Duke University (August 2023) (available at: https://nicholasinstitute.duke.edu/publications/beyond-ferc-order-2023-considerations-deep-interconnection-reform). This study provides a detailed analysis of the “connect and manage” approach to transmission interconnection employed by ERCOT, which has resulted in a much faster interconnection process as well as interconnection of considerably more capacity than in BPA or other ISOs/RTOs. BPA must study connect-and-manage and other systems used in ISOs and RTOs across the world to identify the most effective strategies that have already been proven to be effective.	Thank you for your comment. We will take your suggestions into consideration.