BPA Staff Responses to Transition 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.

Table of Contents

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
Brookfield Renewables	Brookfield Renewable supports BPA's efforts to reform its existing transmission service request (TSR) study and expansion process (TSEP). Brookfield Renewable has submitted a number of TSRs in BPA's 2025 TSEP study process, each of which is critically important in progressing the company's above-noted development pipeline. Brookfield Renewable strongly supports BPA's long-term vision of establishing a proactive load and resource forecast- and scenario-driven transmission planning process and establishing a viable transition process whereby existing queued transmission requests can be quickly processed and authorized.	Thank you for the comment.
EWEB	Applying the continuous improvement concept of Plan, Do, Check, Act (or similar tool) for the GAT project may help alleviate some of our concerns. This iterative process involves systematically testing possible solutions, assessing the results, and implementing the ones that are shown to work. It's a repeatable construct that leads to higher quality outcomes over time. Using a flexible framework such as this may provide customers with reassurance that we will not be locked into an undesirable future state, while at the same time providing BPA with the ability to continue forward progress on the GAT project.	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.
NIPPC and RNW	In the view of NIPPC and RNW, until recently, the TSEP requirements and customers' contractual flexibility under the OATT were fairly adequate in balancing the needs of customers and BPA. While NIPPC and RNW also recognize the historical background that led to the existing TSEP requirements, BPA's circumstances and the regional demand for new generation and transmission have changed significantly enough that new processes and requirements are necessary to ensure that transmission service is available to those who need it. As BPA's transmission system has become more constrained, it has become increasingly clear that the low barriers to entering TSEP, the options that customers have to delay service, and customers' limited exposure in the event they renege on their contracts have all contributed to customers entering and lingering in the queue even when they have no immediate need for transmission service (but continue to encumber capacity that could be awarded to other customers who do have an immediate need for service). While customers' current strategies were a rational commercial response to utility procurement practices in the region in the past, as the region has evolved new solutions are required. NIPPC and RNW agree with BPA that drastic change in the transmission service queue process is necessary.	Thank you for the comment.

Commenter	Summary of Comment/Question	BPA Staff Response
	NIPPC and RNW also recognize the challenge that the sheer volume of requests in the 2025 TSEP cluster poses to BPA planners. Large numbers of immature or incomplete transmission service requests exacerbate the challenges to BPA. Accordingly, NIPPC and RNW support reform of BPA's transmission service request process towards a first-ready, first-served model like the reforms to BPA's Generator Interconnection queue adopted in TC-25. Accordingly, NIPPC and RNW support the adoption of reasonable readiness criteria as a condition to requesting transmission service.	
NIPPC and RNW	NIPPC and RNW agree with BPA on the following broad principles: • "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.	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.
NRU	As a preliminary matter, NRU would like to express our appreciation for BPA's responsiveness to our previous comments, and those of the NT Customer Group, requesting a more robust and engaging stakeholder process. The GAT project is extensive in both scope and potential impact, and BPA's level of engagement both in the public workshops and related NT Focus Group meetings is sincerely appreciated. Additionally, we are also grateful for the detailed responses that BPA has already provided to customers, and your commitment to provide responses to future comments. We remain optimistic about the potential benefits of the GAT project and look forward to working collaboratively with BPA to help the agency achieve its 5-to-6 year energization timeline. At the same time, we feel the need to reiterate our serious concerns with respect to the agency's ability to implement any day-ahead market solution in the future unless and until BPA is able to either guarantee that 6NN transmission would qualify for congestion rent, or, preferably, provide long-term firm transmission for all NT customers.	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, as we develop alternatives for the TC-27 pre-proceeding workshops, we will continue coordinating with other BPA initiatives, including Day Ahead Markets.

Commenter	Summary of Comment/Question	BPA Staff Response
PGP	2. Concepts from the future state should be incorporated in the transitional changes, and the plan should include a full review of the BPs after design of the future state concepts. While sequencing this effort appropriately will be critical for making changes as quickly as possible, it could result in unintended consequences or missed opportunities for streamlining, automation, and de-siloing of BPA processes. Given there are important implications for the future state as BPA addresses NT load service, queue management, and transitional interim service, we recommend building placeholders into the transition processes that consider the future state. This will enable the identification of opportunities to collect critical information that could inform and enhance proactive planning and future state design and execution. PGP also recommends a comprehensive review of BPs to complete these linkages at the end of the future state concepts discussions. Some examples of potential future-state concepts that may make sense to incorporate now include: • Scenario analysis may be introduced in the system planning analysis, so immediate changes to the load forecast submittal guidance should incorporate this concept now. This could provide BPA with critical proactive planning information earlier in the process and enable customer input into the range of scenarios considered for planning. • The introduction of resource zones could align with BPA's vision of focusing on backbone enhancements, while enabling readiness criteria to be slightly broader and better linked to the proactive-planning elements of GAT. • Customer build options provide an opportunity for acceleration of buildout and risk reduction. Placeholders in the BPs/new data collection processes and readiness cure process for queue management could, at minimum, flag parties and requests that may provide opportunities for customer builds. This will not only inform BPA on interest for customer builds, but provide the ability for targeted sequencing and immediate action on the accelerate expansion concept when the time comes. • If the interim service concept for the transition period is intended to be different from the future version, or transitioned to the future version of that product, this should be clarified and new naming conventions introduced if needed. • PGP encourages ongoing coordination with power services to ensure any new concepts maintain compatibility with BPA's future participation in a day-ahead market.	Thank you for your comment. We will take your suggestions into consideration as we proceed into the TC-27 tariff proceeding process and develop future GAT engagement series for Proactive Planning and Accelerate Expansion.

Commenter	Summary of Comment/Question	BPA Staff Response
PPC	As a general matter, PPC supports BPA's concept of exploring creative ideas to enhance the quality and responsiveness of the agency's transmission services consistent with the goals of the Grid Access Transformation project. Communities in the Northwest are relying on BPA to continue to provide reliable transmission service throughout the region, delivering on its historic mission to electrify the Northwest. The six-point framework shared by BPA at the July workshops is a promising starting point for developing a responsive future state. In particular, PPC is supportive of BPA's pursuit of proactive planning and enhancing its transmission construction capacity to achieve a future state that better meets the needs of customers in the Northwest. There are many outstanding details on the implementation of these concepts and those details will be critical to the success of this effort. Along with considering out of the box solutions, BPA has also indicated openness to working more collaboratively with customers through "deep dive" working sessions. We appreciate the agency utilizing a different approach to customer engagement and hope that BPA continues to evolve its stakeholder engagement throughout the GAT process to best incorporate customer perspectives. The type of transformation that BPA is seeking will not be achievable without customer input and support.	Thank you for your comment. We will take your suggestions into consideration as we shift into the tariff proceeding process and develop future GAT engagement series.
Seattle City Light (Preliminary)	City Light, like all entities, advocates for the best outcome for our ratepayers. City Light suggests that when BPA agrees to language supporting exceptions and special rules accommodating one subset of customers to gain consensus only has some limited value. City Light proposes BPA should not memorialize exceptions and special rules in either the NITS Load Forecasting or the Readiness Criteria. Much of the existing challenges with transmission expansion processes have roots in BPA accommodating specific customer concerns to the detriment of a better, least cost, process for all. City Light understands that this may affect existing City Light TSRs.	Thank you for your comment. We will take your suggestions into consideration as we shift into the tariff proceeding process.
Shell Energy	Shell Energy North America US, L.P. (SENA) commends the work that BPA is doing to reform the transmission service request work and appreciates the opportunity to submit informal feedback ahead of the July 29/30 workshops. As a non-utility merchant transmission customer, SENA's business model is fundamentally different from a large portion of BPA's customer base as it relies on buying and selling energy across the Northwest. SENA 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.	Thank you for your comment. We will take your concerns into consideration as we shift into the tariff proceeding process.

Commenter	Summary of Comment/Question	BPA Staff Response
NewSun Energy	BPA must provide clear, detailed guidance on how Network Integration Transmission (NIT) forecasts and readiness criteria will be applied. This is especially important for Network Transmission (NT) customers experiencing trended load growth above 13 MW at a single Point of Delivery (POD), across multiple PODs, or at new Point of Receipt (POR) locations. The proactive planning process must be transparent and inclusive of NT and PTP service. Readiness criteria must be objective, clearly defined, and inclusive of projects that are actively progressing through interconnection, funding, or market development stages. Both BPA products support load service, resource development, and market liquidity. The market needs options and liquidity, the ability to take power to load centers and market hubs, and entities willing to invest in the transmission system. BPA must consider the investments made to date and create a pathway to continue regional investment in our resources and grid.	Thank you for your comment. We will take your concerns into consideration as we shift into the tariff proceeding process.
PRITCA	Comments on specific reform proposals. 2. BPA's Proposed Approaches Likely Ensure Structurally Inefficient Use of the Transmission System. Numerous elements of BPA's approach limit and/or discriminate on many common and inherently more efficient uses of the system, including the ability of parties to request service where they want to go to and from on the BPA system. By arbitrarily limiting from where and to where a party may request service – including binding services requests to limited points and/or generators under development (which may fail or be delayed) – BPA actually discourages the most broadly beneficial types of transmission service: TSRs with a high degree of redirectability. BPA policies would prohibit, limit, or otherwise discriminate against PTP requests at major system points where a requestor does not have a generator under development, even if that point might benefit multiple generators, existing and prospective, on the system in that vicinity, including as a result of redirected transmission service. Securing "useful paths" on the BPA (or any) transmission system is something many sophisticated users do routinely, but which core practice BPA's proposals functionally not only fail to recognize, but impede. For example, there are thousands of MW of wind, solar, and storage being developed at or the Buckley substation, a key Evolving Grid project. Multiple independent customers are developing near there, of various sizes and schedules. BPA proposes policies which force LGIRs and TSRs to bind to specific LGIR GIs and POIs, all of which could likely be easily	Thank you for your comments. As discussed in the Statement on the Future of GAT Engagement and Future State Solutions at the start of this document, we recognize a need for additional engagement with customers around GAT proposals shared this summer and we have shifted to a tariff proceeding process. Notably, a customer's request for transmission service from BPA, including a request to redirect existing transmission service to alternative receipt or delivery points, does not give the customer an automatic right to the requested service. If there is insufficient capacity, the request is subject to evaluation and a study may be conducted to identify a plan of service necessary to provide the requested firm service, including for requests to redirect to alternative receipt or delivery points.

Commenter	Summary of Comment/Question	BPA Staff Response
	served from a Buckley POR, with redirects, perhaps even allowing a nearby wind and solar projects to use the same confirmed PTP service. BPA would force different and redundant TSRs, create risk for each LGIRs (including POI modification), and put confirmed (or surviving) TSRs at risk of revocation if one developer's project got LTF but no GI outcome (or 10-15 year delay), thus compounding risks service to any party at the Buckley POR. Many variations on these problems exist.	
PRITCA	Comments on specific reform proposals. 3. BPA's Proposals Lack Evidence of Remedying the Purported Issues While Misassigning Fault to TCs and ICs, In Contrast to the Actual Primary/Only Non-Performing Party: BPA. There is no record to support BPA's proposals, or its apparent determination that "speculative" projects are impeding transmission access. The record of the past TSEP processes is one in which TCs have performed based on the rules, tariff, and business practices in effect at the time. The entirety of the long-term firm pending queue, including prior TSEP participants, and TSRs submitted after the BPA 8/2022 cut-off date, is one of transmission CUSTOMERS performing their obligations: They submitted deposits, signed study agreements, funded engineering PEAs and ESAs, etc. They have waited for service. The party failing is BPA Transmission. BPA's proposed changes assert harm on those complying with BPA's policies without taking responsibility or making changes directed at the non-performing party. BPA inability to perform should not result in undermining the rights of TCs and ICs that are faithfully performing their obligations to obtain transmission service. This is the opposite of both the record shows and what fairness requires. Further, this approach will undermine future investment from non-BPA and non-public power sources to support regional transmission expansion. BPA ignores, at the peril of the region, the harms its proposal may inflict on these customers, who are BPA's most faithful counterparties, who have entered the BPA queue assuming stable rules, who funded tens of millions of dollars to study and seek needed expansion, and waited, often for years, for the established rules to reward their investments with the promised, and duly-requested, transmission service.	Thank you for your comments. We acknowledge the current TSEP process has allowed BPA to successfully process requests over the years; however, in light of BPA's rapidly growing transmission service request queue, this approach no longer leads to solutions that support the region's needs. BPA has heard broad affirmation from participants in the GAT process of a need for reforms to BPA's existing processes, including TSEP. As discussed in the Statement on the Future of GAT Engagement and Future State Solutions at the start of this document, our shift to a tariff proceeding process will allow for additional engagement with customers. We are developing alternative proposals to share in the upcoming TC-27 pre-proceeding workshops and will take PRITCA's concerns into consideration.

Commenter	Summary of Comment/Question	BPA Staff Response
PRITCA	Comments on specific reform proposals. 4. BPA's Proposals Discriminate Against Current Performing Parties in Favor of Junior Requests and Those That Opted Out of Prior TSEP Processes, and Against Those Who Correctly Anticipated Future Transmission System Needs BPA's proposals favor interest who did not seek transmission service or invest in the region in the past, and those that started the interconnection process but dropped out. It disfavors those parties in prior TSEPs who funded ESAs and PEAs in good faith and are still in the queue. BPA now proposes policies harming those parties that performed—by re-writing the entire construct of legitimate uses of the transmission system. For example, BPA's proposed commercial readiness requirements would favor those who • did not request transmission service in the past, despite abundant opportunities; • did request service in prior TSEPs, but declined to provide BPA PEA deposits required by the applicable policies at the time of prior TSEP studies or otherwise failed to fund required studies; • did not anticipate the needs of the region; • did not timely act to pursue needs based on policies at the time, whether due to lack of expertise, awareness, market knowledge, supporting development assets, or lack of commercial plans; • failed to plan or foresee other needs. None of those reasons justify BPA now proposing to favor those that did not participate (or failed to fund) in prior opportunities against those who did – much less create harm against those who did follow its policies. BPA and the region must consider the incredible harm it would create to existing investing customers -- and bad signals it will irrevocably send to all future investment. Should BPA's message be: (1) Any investment that relies on BPA's transmission expansion policy is at risk because rules could change and BPA could revoke the TSR, and all associate rights, despite compliance with tariff and rules that were in place at the time a TSR was submitted? (2) That LTF PTP requests are never safe, even if you have to wait 10 years for proposed service?	We would like to clarify a possible misunderstanding with our GAT proposals shared this past summer. We did not propose 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 *which have not been studied* due to the rapidly growing transmission service request queue which is no longer leading to solutions which support the region's needs. In the TC-27 pre-proceeding workshops, we encourage participants to share their feedback on the alternatives and information we share, including specific questions or concerns regarding impacts to studied requests, to help address any concerns.

Commenter	Summary of Comment/Question	BPA Staff Response
	(3) That it best to wait and not fund into BPA, and instead lobby BPA for rule changes that undermine competition, in hope of more favorable rules that work against senior competitors? (4) If BPA proposes to change the rules, the changes may be adopted with minimal process even if the rule changes threaten customers who have had TSRs in the queue for years transmission?	
PRITCA	Comments on specific reform proposals. 5. BPA's Proposals to Benefit NITS Service are Speculative and Suffer The Same Risk to COUs (and other LSEs) of Future Retroactive Changes Undermining Business Plans and Load Service Obligations. The risks created by BPA's changes to rules aimed at arbitrarily ejecting customers from the transmission queue threaten not just IPPs, but also LSEs, especially the COUs who depend heavily on IPPs for future power supplies. Once BPA establishes here in this process that any TCs can have their rights and seniority yanked – and that BPA is the sole arbiter of worthiness of a load – and that seniority in request lines can be forcibly yielded to junior positions, the Pandora's Box is opened. COUs (and other LSEs) should consider carefully which of the other COUs should be able to occasionally jump the queue—or remove some or all senior requests—and under what conditions—and what happens if loads (specifically or generally) change—and how and when customers will know if and how BPA might reassess and eliminate long-standing requests for transmission service. Or what happens if BPA doesn't provide a path with enough power for you as a public power LSE. Should each COU have a (safe? Investable?) PTP path as an alternative to BPA NITS and BPA-Power failures to provide sufficient resources for your needs. Notably, the best important counter-remedies to insufficiencies of future BPA-Power and BPA Transmission service being provided to COUs reliant on BPA are: *(1) requesting your own PTP LTF services; (2) relying on market IPP and traders' access to, and investment in PTP LTF and generation development (which requires LTF PTP).*	Thank you for your comment. We will take your concerns into consideration as we shift into the tariff proceeding process. Additionally, our shift to the tariff proceeding process will address some of your concerns. Please also 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
PRITCA	Comments on specific reform proposals. 6. BPA's Proposals Appear Charted at a Pre-Ordained but Unrevealed Conclusion – On Specific Policies and Overall Approaches The combination of pace, volume, BPA work product, and timing (including slides, workshops, draft business practices) create good cause to believe BPA has already decided that it will and will not do certain things, without process, evidence, and proper analysis.	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.
PRITCA	Comments on specific reform proposals. 7. Biases Towards Large Balance Sheet Loads and Developers Likely to Result in Harm to Region, Costs, and Small LSEs & IPPs An obvious risk of BPA's proposal to require huge deposits to advance in the transmission queue is that smaller players, including many COUs, will be ejected from the queue in favor of a few large-balance-sheet mega-loads, like data centers, served by a few large-balance-sheet IPPs. Hence, BPA's proposal could easily crowd out COUs' requests for their own transmission service, whether for NITS or PTP service. This is the result of BPA's apparent assumption that only TCs or ICs who can make multi-million dollar deposits are the only "real" and meritworthy transmission requests. FOR EXAMPLE: If Mega-Tech's thousands of MW of data center loads have a contract with Mega-IPP that are able to satisfy BPA's enormous deposit requirements, then many thousands of MW of LTF PTP requests will survive, even if those LGIRs are tied to POIs that may not be buildable for 5, 10, 15 years (a realistic assumption given BPA interconnection timelines and/or known results from the 2022/23/24 TSEP report showing a mix of 10- and 20-year transmission builds). In that case, all the NITS and PTP requests behind those Mega-IPP requests are still junior. And BPA's model may still not solve, as there will still be many GWs in TSR queue, even after gutting competitors with smaller balance sheets. How will BPA (and COUs) protect themselves against that? At a minimum, BPA has not provided any evidence of having carefully considered these potential consequences. And it has seemingly presupposed certain types of solutions, like queue clearing and commercial readiness, among other specifics, are the ultimate "solution," even though there is little hope these proposals can be implemented in a non-	Thank you for your comment. We will take your concerns into consideration as we shift into the tariff proceeding process. Please also 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
	discriminatory, fair, transparent, and statutorily compliant manner. In short, basic questions remain: How do you know BPA's path proposal here will (a) fix anything; (b) not make things worse; (c) not spend months and years to end up in a substantially identical or worse place, but with lost time and options; (d) not slow progress on existing investments and projects and TSRs needed by the market; (e) not harm overall supply investment to the region; (f) not undermine IPP/TC cost share for transmission expansion; and/or (g) not ultimately end up discriminating against you (and/or perhaps against the generator and power supplier solutions you'd prefer where maximally available)?	

III. Stakeholder Engagement

Commenter	Summary of Comment/Question	BPA Staff Response
EWEB	We appreciate BPA moving the Transmission Planning for NT Loads workstream into the GAT project, specifically because of BPA staff's indication that they intend to move a portion of NITS load growth into the commercial planning process. It is appropriate to discuss these proposals holistically. We recommend that BPA staff should also include all NT Planning workshop materials on the GAT project page. EWEB feels that BPA staff have heard customer and stakeholder requests for more and better engagement and appreciate seeing that the Engagement Roadmap includes more meetings that include working sessions and Deep Dive formats. We encourage BPA to consider adding brainstorming sessions as a way to create alignment and buy in when addressing difficult issues. Bringing options to the table can be limiting and isn't always the best method for solving problems. Open dialogue, collaboration, and transparency are critical for making the right decisions at the right times and we recommend maintaining the ability to be flexible to add or modify engagement as may be necessary.	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.
EWEB	EWEB appreciates that BPA has structured the GAT project into a transition phase to address near-term needs and a future state phase focused on developing effective transmission policy that accommodates the variety of customer and stakeholder interests. We recognize there are many future unknowns, particularly around Markets + and WRAP, and that BPA may not have significant ability to influence market design. Due to these factors, it is critical that BPA establish appropriate time and engagement to assess, anticipate, and maintain flexibility as it reforms its transmission planning process. It is essential that the future state of policy align with statutory obligation as well as maintain product integrity and equity across customers. With a lot of uncertainty on the horizon, that will require a high level of due diligence, customer interaction and engagement as well as willingness to adjust and adapt policy decisions as markets become established.	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
Northern Wasco County PUD	While Northern Wasco appreciates BPA's desire to move quickly to get transmission processes off a "pause" state, the changes being contemplated are substantial and carry significant potential for unintended consequences. We strongly urge BPA to be flexible in its implementation going forward. One outcome of the Grid Access Transformation Project must be a clear policy decision and record with clear measures for what "success" of the transition process looks like. BPA has characterized many potential actions as transitional in nature, and these should be clearly documented as such with explicit timelines for reevaluation.	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. As part of the TC-27 tariff proceeding process, decisions will be documented in a record of decision at the conclusion of the proceeding. In addition, any suggestions on how to measure success of our proposals will be taken into consideration.
Seattle City Light (Final)	City Light believes BPA has struck the right balance between the need to rapidly reform and "get off pause" for transmission planning processes and allow for collaboration with customers. The schedule is aggressive, forces real time collaboration, and will require large commitments by both BPA and customers. City Light suggests that moving this fast will require an iterative review after a likely upcoming tariff process.	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.
Tacoma Power	Before commenting on the contents of the workshop presentation, Tacoma Power would like to note that it is concerned about the speed in which BPA is developing Business Practices on this critical topic. In many ways it feels that BPA still does not have a direction or firm methodology for its potential solutions, yet it is already in the process of Business Practice development for changes that will affect all Bonneville stakeholders.	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.
Dynasty Power	First, we strongly encourage BPA to preserve continuity and avoid significant changes to business practices as they relate to existing Transmission Service Requests (TSRs). These TSRs represent long-standing customer commitments, financial investments, and planning assumptions. Any retroactive changes could undermine trust in the process and introduce unintended risk to the region's development pipeline. Ensuring the integrity of existing TSRs is paramount to maintaining market confidence and supporting near-term resource and transmission development.	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
Dynasty Power	We also encourage BPA to consider how GAT integrates with parallel tariff and queue management reforms, and to ensure CRC eligibility remains accessible to projects demonstrating real development activity. A holistic, transparent approach will support the region's need for resource integration, liquidity, and grid reliability. In short, we support BPA's efforts and recommend a more deliberate pace, greater transparency, and close coordination with stakeholders to ensure GAT achieves its intended goals without unintended disruption.	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.
NewSun Energy	NewSun Energy respectfully submits these comments to express significant concern regarding the pathway, initial positions, pace, scope, structure, and lack of analysis provided with BPAs' proposed GAT process. The current timeline is insufficient to fully evaluate the complex and far-reaching implications of the proposed reforms. Customers have not had enough time to review and discuss these proposals adequately. These changes affect not only the mechanics of transmission access but also the broader ability of the Pacific Northwest to develop critical energy infrastructure and meet its load service and decarbonization requirements.	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.
NewSun Energy	We request that BPA adjust the agenda for the 7/29/25 meeting. The Agenda Review, Workshop format, and objective section are the most important conversations we need to have as a region. We request that this agenda item take up the first half of the day. We further request more customer-led presentations within the GAT process.	Thank you for your comment.
NewSun Energy	If the proposed changes being discussed so far are the path BPA is on, it will destroy existing precedent. It will inhibit investability in transmission and resource development in the region (this damages the existence of IPP and Marketing business cases). It will damage liquidity and create inequity in the market. It risks going as far as undermining open access and moving towards discriminatory practices, whereas BPA selects the winners and losers through business practice changes. Changes that need to be understood, analyzed holistically, and aligned with all the changes being discussed in multiple forums. Moreover, the current design of the process risks introducing uncertainty into the regional transmission framework at a time when investment certainty is paramount. BPA must not alter foundational principles—such as rollover rights (which are crucial for long-term investments, resource development, and load service), deferral flexibility (which is crucial	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
	for contracting and cost management), pathway to LT Firm, especially from conditional products (which is needed for investing, compliance programs, system expansion, and reliability), and the integrity of previously processed Transmission Service Requests (TSRs). Without a thorough and inclusive stakeholder process, we fear a dangerous precedent is being created and implemented.	
NewSun Energy	We understand the pressure and issues BPA has in processing their queues, but this process and subsequent impactful changes need time to be understood. There are a multitude of other tariff and business practice changes underway. We must ensure that the priority is getting this right and not sacrificing that goal for the goal of speed. We cannot implement policies and procedures that create a loss of confidence, investability, or development in the region. We cannot discriminate against existing entities that invest in the region under the existing set of rules. It's a dangerous precedent to set and doesn't solve the issues at hand. The scale and ramifications of these proposed changes are of serious concern. The region and BPA, appropriately, took more time dealing with LGIA and the Data Exhibit process update reform. Yet, we are just now getting business practice updates for GI reform. This GAT process is multiple magnitudes larger and more impactful than those issues. We must consider them together in alignment because that is what creates a reliable, investable, and efficient region. The region is currently dealing with many important and impactful decisions: BP-26 ROD, finalizing PoC, GI reform, CFS reform, WRAP/DAMKT implementation, normal operational needs, and it is summer vacation season. We urge BPA to slow down the process, hold detailed discussions on subsets of these issues, consider alternative means to study the queue, and not just look to clear the queue if that means sacrificing the long-term future of resource and transmission development in the 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.
NewSun Energy	The proposed four-month timeline is inadequate to fully vet the implications of these sweeping reforms. BPA must engage in a more deliberate and inclusive stakeholder process to avoid unintended consequences that could destabilize the market or delay critical infrastructure development. Aspects such as customer presentations need a place in this process moving forward.	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
PRITCA	A more deliberative process is needed: BPA published its GAT proposals on July 25, 2025, giving interested stakeholders only two business days to review the proposals before the July 29 and 30 workshops. Yet BPA's proposal will have decade-or-longer consequences on both forward- and backward-looking basis, through an abbreviated (and likely inappropriate) process fundamentally inconsistent with the nature and complexity of the changes. BPA proposes to restructure the core rights and principles of current, past, and future transmission customers—across myriad user types—LSEs and IPPs; public and non-public; large and small; power traders and power developers; big munis and small coops; all requirements and partial requirements; mega loads and incremental loads There appears to be no real analysis or consideration of how and whether (or, likely, how much) unintentional harms may arise from the proposals, and little rigorous analysis of whether the proposals will be effective in achieving their intended outcomes. The highly compressed process proposed by BPA is far too attenuated to adequately address all the concerns its proposal may raise.	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.
PRITCA	BPA's proposals undermine open access to the regional transmission system: BPA's proposals are inconsistent with the basic principles of open access transmission because they are predicated on Bonneville's Transmission Function asserting commercial judgements on what comprises legitimate use of the transmission system, in a way that flies in the face of decades of established practices, proven outcomes, and a diversity of parties who have relied on their ability to trust BPA as a safe venue for neutral transmission service for the conducting of current and future power supply transactions for the region. Given BPA Transmission's ("BPA-T") firewalling from BPA-Power (and own repeated recognition in the TC-25 process of how little it does understand various commercial uses of its system, such as RFPs and project finance requirements for new generators), it is at best questionable for BPA's non-merchant function to assert so much judgment and, implicitly, expertise about what is and is not a legitimate commercial venture on the transmission system.	Thank you for sharing your concerns. 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 refine proposals we shared this past summer and develop new alternatives to share in the upcoming TC-27 pre-proceeding workshops.
PRITCA	*BPA's proposal may undermine service to its core customers and endanger regional decarbonization goals:* PRITCA is not aware of any BPA process to discuss or analyze the potential consequences for its proposals for the dozens of ICs and TCs that will feel the impacts of BPA's proposals. Nor has there been any analysis of whether BPA's proposals might fundamentally undermine the investment in BPA transmission expansion and in new	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 refine proposals we shared this past summer and develop new alternatives to share in upcoming TC-27 pre-proceeding workshops.

Commenter	Summary of Comment/Question	BPA Staff Response
	power regional power supply. For such investment to occur, the BPA access to the BPA transmission system must be non-discriminatory, predictable, and stable. PRITCA fears that the BPA proposals will be the opposite of these requirements, and therefore will undermine the financability and investability of new IPP power supply. PRITCA is therefore concerned that BPA's proposals may impede the ability of the Pacific Northwest states to meet their statutory clean energy requirements and load growth needs, thereby undermining the public interest as defined by the elected representatives of those states.	
PRITCA	BPA has proposed changes to its processing of transmission requests within its GAT process that in many respects fundamentally change the expectations for Transmission Customers that long ago submitted Transmission Service Requests ("TSRs") to BPA, and that have since been moving through the process in good faith, paying substantial amounts to BPA for study agreements and other requirements arising in the BPA Transmission Study and Expansion Process ("TSEP"), while investing millions of dollars in obtaining the necessary requirements under the current process to piece together a viable project. BPA's proposals fundamentally change the requirements for transmission service after those TSRs had already been submitted in compliance with the rules. For example, BPA is now proposing that Customers provide "evidence of transaction maturity" for bi-lateral transactions as part of that data validation process in order to even submit a TSR. Hence, BPA's proposed changes fundamentally alter the assumptions upon which Customers relied when filing their TSRs. The changes therefore threaten to destroy many millions of dollars that have already been invested in reliance on a predictable and stable platform for obtaining transmission service on the BPA system, threatening future investment in the region's electric system. These investments are critical. The Edison Electric Institute recently issued a report estimating that $1.1 trillion must be invested by IOUs by 2029 to meet rising electricity demand. Given the importance of these issues, we respectfully request that EPA: (1) allow time for meaningful review of the working business practice draft, time for discussion amongst stakeholders, and a future workshop opportunity after that review and discussion period; (2) at least an additional three months to analyze and comment on BPA's proposed changes; (3) include the proposed changes to the Conditional Firm Service Business Practice in the GAT process; and, (4) follow the rule of reason requirements in limiting Business Practices to measures that complement BPA's OATT by, for example, detailing the specific kinds of documents that would satisfy Site Control requirements, but exclude measures that should	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 in the tariff proceeding process.

Commenter	Summary of Comment/Question	BPA Staff Response
	be included in the OATT itself... BPA should not be ramming through such consequential changes while much of the region is on vacation, buried in other BPA processes and comment deadlines, and otherwise functionally incapable providing the careful analysis required for a proposal of this magnitude, which requires discussion among stakeholders, with legal counsel and other technical experts, and with transactional transaction counterparties (like PPA bidders and trading desks), and with regulators.	
PRITCA	We also note that BPA's current approach places it on thin ice legally. Changing the rules on customers who have been proceeding through the transmission study process in good faith violates the rule against retroactive ratemaking. Further, as noted in our previous comments, many of the changes proposed by BPA violate the rule of reason governing what should be included in tariffs rather than business practices. Major changes should be considered in full Section 7(i) process that is subject to BPA's Rules of Procedure, which allow for formal legal notice (not just notice to those who happen to view BPA's Business Practices website), the opportunity for interested parties to submit written and oral views, data, questions, and arguments, and a formal Record of Decision by the Administrator. The proposed Business Practices raised issues of sufficient importance that they should be fully vetted in the 7(i) process.	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.
PRITCA	PRITCA urges BPA to suspend the current schedule for adoption of its proposed business practices, extend the period for comment on those proposed practices, and remove elements from the business practices proposals that properly should be included in BPA's OATT. In the meantime, we recommend that BPA: • begin working through studying the existing TSRs submitted after the August 2022 cut-off date, which should consider Evolving Grid projects already announced, and should result in offers of transmission service; • consider which issues should be subject to a 7(i) process and initiate that process promptly; • propose and implement a robust set of workshops and customer-led presentations; • restructure the proposed agenda and process, beginning with the July 29, 2025 workshop, to ensure adequate time is provided to fully vet BPA's proposals; • define and examine key scenarios, like whether BPA changes actually reliably result in claimed or perceived benefits. For the reasons discussed above, we have serious doubts that the proposals will achieve their intended results and avoid unnecessary harm to the 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.

IV. NITS Forecasts and NT Planning

Commenter	Summary of Comment/Question	BPA Staff Response
Clatskanie PUD	As an initial item, within these comments we refer to the term "Embedded Forecast". For the purposes of these comments, "Embedded Forecast" refers to a historically accepted baseline forecast that includes: (1) historical load; (2) projected growth or decline; (3) returning load; and (4) large loads that are contingent upon readiness criteria such as permitting or notice provisions. While additional context is warranted; we offer the following distilled comments: **Clatskanie currently supports;** 1. Additional planning tools which allow BPA to accommodate traditional embedded load forecast and unknown asymmetrical requests. 2. Implementation of a "Readiness Criteria". a. We request additional clarification about how BPA plans to treat "Regional Transfers", "Hybrid Resources", and "System Resources". b. We believe "state and/or federal permits are a type of acceptable evidence to assert readiness. c. We believe listing of a resource within any table of Exhibit A of the utilities BPA power contract is acceptable evidence to assert readiness. 3. Use of "Queue Management" tools under review to transition to the "Future State" 4. Development of a 6NN product comparable to 6CF. 5. Acceleration expansion with a 5 year target. 6. Use of all forecasted load submissions regardless of probability. We further support reasonable planning discretion when considering how portions of the load will be incorporated. 7. Inclusion of a formal "Dispute Mechanism" for an array of the processes including application of the readiness criteria, adoption of NITS load forecast, application of New Large Load status.	BPA thanks you for your comment and appreciates hearing what Clatskanie supports. BPA will need clarification on what on what is described as "Regional Transfers," "Hybrid Resources," and "System Resources" in order to adequately address these comments. But BPA intends to host a customer workshop to work through different forecasting scenarios to identify and resolve complexities related to BPA's NITS load growth proposal. BPA will consider your comments as we propose alternatives in the TC-27 pre-proceeding workshops. BPA anticipates there will be further discussion regarding forecast probability for inclusion in the system assessment. In regard to the request for a dispute mechanism, BPA has a formal dispute mechanism process in its OATT, see BPA OATT Section 12, Dispute Resolution Procedures. BPA is also willing to revisit determinations made relating to NITS load forecasting BPA and to future adjustments should unforeseen impacts be identified.
Clatskanie PUD	**Clatskanie does not currently support;** 2. An annual New Large Load threshold of 13 MW per POD. a. We have concerns with a simple use of "POD" as the singular reference when applying a planning threshold. As an alternative we recommend BPA apply a combination of	BPA is considering aspects of the staff proposal of a 13MW load threshold based on customer feedback, including whether this threshold would be assessed at a Point of Delivery (POD), facility or other alternative approach. As BPA considers potential solutions, they need to be administratively feasible, cost effective, and transparent.

Commenter	Summary of Comment/Question	BPA Staff Response
	measurement points including the POD to establish when an alternative planning process is warranted. Specifically, a combination of the cumulative utility forecast, POD forecasts and individual end use forecasts. b. Given the desire to identify growth beyond what is included in the embedded forecast, we believe a series of checks will better target and track load growth outside the purview of the standard process. The checks are outlined below. i. Does the parties total forecast exceed the embedded forecast? ii. Do any of the individual POD forecasts exceed the greater of the embedded forecast or the previous forecast plus 13MW? iii. Where the POD forecast exceeds the greater of the embedded forecast or the previous forecast plus 13MW, can the growth be attributed to an individual end-use consumer? iv. When a New Large Load is being considered, is service requested within BPA's short term planning horizon? c. A spreadsheet with high level examples is attached illustrating some of the forecasted load growth scenarios and how they would be considered with a multifactor methodology.	BPA intends to work through different forecasting scenarios with customers to identify and resolve complexities. Please continue to share your thoughts in the upcoming TC-27 pre-proceeding workshops.
EWEB	EWEB supports the proposed treatment of awarding Long Term Firm service upon Designation of a Network Resource for "trended" growth. We recognize BPA believes the agency must create a bright line distinction to adequately plan for "trended" growth through proven and effective methods. In the July 10, 2024, Planning for NITS Loads & Resources Workshop BPA asked, "Should BPA differentiate between load growth scenarios in order to plan for local capacity and transmission capability?" and offered considerations of size, timing, risk profile and/or impacted transmission paths. We remain puzzled why BPA has not talked about considerations other than size or how creating a bright line distinction purely based on size specifically solves a problem associated with planning for NITS forecasts. In the recent GAT workshops BPA presented that, "Applying additional planning scrutiny to transmission forecasts associated with new large loads ensures appropriate transmission access, planning treatment and cost allocation"2. This raises questions including: • BPA has suggested that 13 MW may be a reasonable and appropriate size to define a bright line distinction based on drawing a parallel, with assumptions, to New Large Single Load policy. In addressing confusion raised by customers because NLSL policy is associated with BPA Power, not BPA Transmission, BPA has responded that the specific size is not important but that a bright line distinction is necessary. EWEB questions if relegating all 'non-trended'	While BPA 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, and administrative complexity heavily in the current staff recommendation. BPA recognizes that further consideration and discussions around the details of the new large load threshold need to occur and intends to have those discussions as part of the TC-27 pre-proceeding workshops. Cost allocation is likely to be dependent on other outcomes of the GAT program and subject to continuing discussions. BPA appreciates customers' patience and collaboration as we work through these transitional issues.

Commenter	Summary of Comment/Question	BPA Staff Response
	NITS load to commercial planning is appropriate based simply on this arbitrary size determination. • Are there considerations where a larger NITS forecasted load may not need additional planning scrutiny, i.e. low risk profile, long planning time horizon, in a less congested part of the system, etc…? Is there a more specific problem associated with larger NITS loads that might be identified through more refined bright line criteria? • Why aren't we talking about cost allocation? It is an important component of making this policy decision.	
EWEB	BPA's proposal regarding establishing a "new large load" MW threshold per Point of Delivery appears to conflict with BPA staff's summary that the intent is to maintain treatment of residential and commercial as "trended" load. This is because some 'trended' commercial and residential load may be lumped in with large loads at a POD and be treated differently than other trended loads. BPA proposed working with customers that have mixed-use loads at a POD, but this seems ripe for producing a range of inconsistent and potentially inequitable outcomes. Policy should be designed to provide clarity and consistency for trended load that might develop at a POD with "new large load" growth or otherwise become unintentionally pushed into the "new large load" category. The proposal of designating a POD as a "new large load" for life once the threshold is met could perpetually exacerbate this issue and we recommend moving away from this concept. EWEB believes BPA should reconsider revisiting defining "new large loads" by the end-use site. The potential to "game" the facility measurement could be mitigated in a number of ways and identifying specific loads rather than aggregate loads at a POD appears to more closely align with how BPA is defining the problem.	Thank you for this comment. BPA recognizes that linking the new large load threshold proposal to a POD raises complexities. We intend to have further conversation regarding differentiating trended and large load growth at a POD or an alternative approach in the TC-27 pre-proceeding workshops. Clarity and consistency are drivers for the NITS forecasting proposal, and the concern over gaming of any adopted threshold is prompting further discussion around the proposed requirement to require commercial study for subsequent increases to New Network Load ("for life"). BPA also appreciates EWEB''s concern regarding POD designation for the life of the POD and looks forward to further conversation on this point.
EWEB	At a high level, BPA's proposal to modify the transmission queue and distinguish between 'trended' and 'non-trended' growth so that the agency can prioritize appropriate builds and award transmission contracts makes sense. However, as a NITS customer, EWEB is not yet fully comfortable assigning "new large loads" into the commercial planning queue when we do not yet understand how planning for that queue will work, or how cost allocation will be implemented. We hope to see BPA leave flexibility in this policy determination, or alternately in future processes, to allow for adjustments as needed.	Thank you for your feedback. BPA appreciates EWEB's desire for deeper understanding regarding how planning for the queue will work and how cost allocation will be implemented. BPA staff will consider your comments as we revise and share our GAT proposals in the TC-27 pre-proceeding workshops (please see the Statement on the Future of GAT Engagement and Future State Solutions located at the beginning of this document). Regarding the NITS forecasting proposal, BPA intends to work through different forecasting scenarios with customers to identify and resolve

Commenter	Summary of Comment/Question	BPA Staff Response
		complexities. 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.
Grant PUD	Grant continues to oppose the proposal to plan for encumbering transmission capacity for trended load growth for NITS customers, especially beyond the term of existing Transmission Service Agreements and if PTP roll-over rights are endangered. Trended load growth service as proposed by BPA will likely cause undue discrimination among NITS customers and between NITS and PTP customers, as discussed in comments previously submitted by Grant. The result of the current plan will be BPA building additional transmission capacity to stay ahead of NITS Trended Load Growth, resulting in increased pressure on transmission rates. However, no additional PTP access will be created unless the new capacity built out for NITS happens to ease a flowgate constraint or if expected power flows change and open up Available Transmission Capacity.	Thank you for the comments, BPA staff will consider these comments and concerns as we revise and share GAT proposals in the TC-27 pre-proceeding workshops (please see the Statement on the Future of GAT Engagement and Future State Solutions located at the beginning of this document). BPA would also like to make a few clarifications in response to Grant PUD's comments. In regard to roll-over rights, as BPA stated in prior GAT meetings, BPA is not proposing any changes to its existing policies regarding roll-over rights. Additionally, the proposed New Network Load threshold of 13 MW would modify BPA's existing processes for meeting BPA's tariff obligations to plan for NITS forecasted loads and resources. The new network load threshold of 13 MW sets a threshold limit on the amount of NITS customers' forecasted loads that are planned for primarily through the system assessment study process. BPA further notes that the "system assessment" is used as the foundation for the WECC power flow base cases, which reflect load projections, or forecasts, for both NITS and PTP customers in the region. BPA acknowledges there are aspects of the proposal for setting the 13 MW new large load threshold which need to be discussed in the upcoming TC-27 pre-proceeding workshops. Finally, BPA does not agree that no new capacity for PTP service will be constructed unless new capacity is constructed to support NITS service. This is inconsistent with the overall GAT vision. For example, proactive planning is expected to receive a variety of inputs, including using WECC base cases that have PTP customer loads and inputs from potential new generation that will serve those loads.
Mason 3 PUD	Placing forecasts at the center of BPA's planning and shifting from reactive to proactive planning is the right approach. BPA staff made it clear in the July workshops that new large loads are a major concern when considering planning treatment and cost allocation. It was articulated that the application of a demarcation (or threshold) between trended and non-trended load growth is not intended to apply to residential or commercial load but rather those large, chunky loads associated with significantly sized industrial customers. If that is	Thank you for your comment. BPA recognizes that tying the new large load threshold proposal to a POD raises complexities. BPA staff intend to have further conversation regarding differentiating trended and large load growth at a POD or an alternative approach, such as a facility, in the TC-27 pre-proceeding workshops. BPA also appreciates Mason 3's expression of concern regarding POD designation for the life of the POD and looks forward to further conversation on this point. BPA will consider

Commenter	Summary of Comment/Question	BPA Staff Response
	indeed the intent, then the threshold should directly be associated with that facility and not its Point of Delivery (POD). It should not be assumed that new large load from a single industrial facility will have its own POD. There could be a case where a single facility with upwards of 150 MW would still be served from an existing Mason 3 POD. Mason 3's request is to change the proposed annual new large load threshold from 'per POD' to 'at a single facility' so residential and commercial load growth is not inadvertently impacted. Alternatively, BPA could retain the proposed 'per POD' perspective for the threshold and add language to the business practice so that: 1) the readiness criteria is only applied to that portion of the load growth associated with the single industrial facility; 2) the forecast not associated with the single industrial facility is awarded firm service and not at risk for denial of transmission service if the single industrial facility does not meet the readiness criteria; and 3) remove the language requiring the POD be perpetually designated as a new large load for life essentially requiring commercial planning for each year's incremental load growth.	Mason 3's comments as we propose solutions related to the new large load threshold proposal. Finally, as BPA considers potential solutions related to the new large load threshold, BPA will consider whether the solutions are administratively feasible, cost effective, and transparent.
Northern Wasco County PUD	As a general matter, differentiating NITS customer loads on the basis of size is problematic and in conflict with the open access transmission principles governing the service. If BPA continues on this path, it is essential that this practice be strictly limited to the "transition" period moving towards the "future state." Northern Wasco is relatively agnostic among the "threshold" options presented by BPA staff, but notes that any "one-size-fits-all" approach will be unlikely to work for all customers under all circumstances. We encourage BPA to build some flexibility and discretion into its approach and believe an explicit sunset of any transitional "bright line" distinction between NITS loads based on size is necessary.	BPA disagrees that differentiating forecasted load based on size is in conflict with open access transmission principles and BPA remains committed to following FERC and pro forma standards where possible. BPA appreciates any thoughts Northern Wasco may bring to the upcoming discussions regarding this concern and the need for flexibility in its approach. BPA also acknowledges 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 be temporary and that a threshold to define planning processes for forecasted large loads may remain necessary 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.
NRU	As a preliminary matter, there have been several discussions regarding decisions to be made at the POD level. Specifically, it was stated that the PODs in question are not "scheduling" PODs, but those listed in Exhibit A of the Contract. While this did clear up some confusion, it did not set the conversation on a level field. For some utilities, all PODs are substation delivery points. For other utilities, some or all PODs are transmission delivery points with several substations "underneath". With BPA's intent to define a line – which is understood in conceptual terms and generally supported – the tie to a contract POD with such varied definitions is potentially, and presumably intentionally, discriminatory between customers.	BPA acknowledges the feedback from GAT participants and recognizes that tying the new large load threshold proposal to a POD raises complexities. BPA staff intend to have further conversation regarding differentiating trended and large load growth at a POD in the TC-27 pre-proceeding workshops. As BPA considers potential solutions related to the new large load threshold, BPA will consider whether the solutions are administratively feasible, cost effective, and transparent. BPA is open to further conversation on this topic, as well as NRU's expression of concern regarding POD designation for the life of the POD. The basis for this latter aspect of the proposal is not

Commenter	Summary of Comment/Question	BPA Staff Response
	For instance, a utility with all PODs at the substation level, is likely to have no "trended" growth above the 13MW line. However, a utility with only a transmission POD, may easily have "trended" growth above the 13MW line. Additionally, and to reiterate a point made several times already, NRU simply cannot support any approach that includes designating a POD as a "New Large Load" for the life of the POD, subjecting all subsequent customer load increases at that POD to Commercial Planning. Though we can appreciate the symmetry doing so would create with BPA Power's statutory New Large Single Load (NLSL) policy, the proposed approach to NITS forecasts would represent an unnecessary and unjustified burden on any customer. Moreover, there is no basis from a transmission system planning standpoint to forever designate a specific POD as "New Large Load" and subject all subsequent load growth to BPA's Commercial Planning process, when such subsequent forecasts may fall well below the 13 MW threshold. We recognize – and appreciate – the fact that BPA has recently indicated a willingness to move away from this recommendation, but felt compelled to state our position, nonetheless.	simply create symmetry with the NLSL policy, but in anticipation of staged growth occurring at new large load facilities that will trigger the same planning challenges as the initial large load forecast even if the subsequent forecasts are below an adopted threshold. BPA looks forward to further conversation on these challenges.
NRU	BPA's proposal to guarantee long-term firm transmission for all NITS growth of less than 13 MW in any single year, at any single POD, is likely sufficient for the great majority of NRU members, and NT customer group overall. We would like to acknowledge and express our appreciation for the benefit that this would provide for the majority of our members. However, we submit that there are several nuances that need to be further explained and/or addressed before the alternative can be considered further. For example, we would like to better understand how BPA intends to apply the "70% likelihood" threshold for both "trended" and "above-the-line" forecasts. While we understand that the agency is reconsidering applying the criteria at all, and appreciate the explainer that BPA posted alongside the Workshop materials titled "Application of the 70% Probability to Possible New and Growing Loads", until customers have a complete picture of how BPA will be considering NT customer load forecast data, NRU is unable to support any proposed solution. BPA staff also noted in the workshop that the "70% likelihood" threshold would continue to be utilized for (at least) the 2-year case in its System Assessment. At the same time, BPA also noted in the materials that it would defer additional conversations on the "70% likelihood" threshold to a future date. As a result, it remains challenging to provide meaningful feedback on BPA's 13 MW proposal until more detail is known about the use of this threshold.	BPA appreciates the feedback that the proposed 13 MW threshold appears to meet the needs of the majority of NRU's members and looks forward to continued dialogue to support finalizing the threshold approach. BPA's system assessment utilizes the Agency Forecast which continues to require a 70% likelihood for any load to be included. BPA notes that large loads above the 13 MW threshold that are determined to be above 70% probability will have been included in the system assessment, and this is not an area of proposed change. The distinction is that large loads above the new large load threshold of 13 MW will not result in increased long-term firm transmission rights until further planning is completed to assure reliability to provide that long-term firm service. Discussions about treatment of forecasted load of lower probability are ongoing. BPA anticipates there will be further discussion regarding forecast probability . BPA would like to engage further on this topic in the continuing TC-27 pre-proceeding workshops. Some level of judgment is inherently required in forecasting and planning, but we are open to discussing the 70% criteria and to ideas on how to better balance the needs of customers.

Commenter	Summary of Comment/Question	BPA Staff Response
NRU	…BPA also proposes to implement readiness criteria in order for NITS customers to obtain a forecast TSR ("FTSR") and encumber transmission capacity, while at the same time maintaining some use of its "70% likelihood" threshold. It is our perspective that the interplay between the "70% certainty" threshold and the readiness criteria that BPA intends to implement remains opaque and would benefit from additional clarification. This is underscored by the presentation materials stating that BPA would also include all NT customer load forecasts, irrespective of readiness or likelihood, in its future proactive planning model.	BPA appreciates the need for additional clarity and the dependency between the NITS forecasting proposal and the proposals of the Grid Access Transformation project and appreciates stakeholders' patience and participation. We would note that under the proposals shared this past summer, various elements of NITS forecasts will be planned for through a variety of study processes, as follows: 1) The proposed new large load 13 MW threshold allows BPA to continue to plan for transmission service for NITS customer's needs under the threshold in that process. Further consideration is ongoing regarding the probability level of load forecasts that will be included in system assessment. At minimum, NITS load forecasts with more than 70% probability will be included in system assessment (LLIR results may be needed to support appropriate modeling). 2) Forecasts above the new large load 13 MW threshold, when paired with a resource forecast, will have the opportunity to be included in commercial planning processes to enable additional offer of transmission service. 3) LLIRs continue to be needed in a number of circumstances and BPA is working to clarify the LLIR business practice to provide additional transparency as to when a NITS customer needs to provide an LLIR. 4) All NITS forecasts will be included in the proactive planning process.
NRU	Further, BPA's proposal to apply additional planning scrutiny to "chunky", "new large loads" seems reasonable, especially when considering the goals of ensuring appropriate planning treatment and cost allocation. However, subjecting all "above-the-line" requests to the Commercial Planning process is, as one customer put it, to convert all NT requests above 13 MW to point-to-point (PTP) requests. While, once again, we understand that additional planning and cost allocation considerations may be necessary, we would like to better understand why all such requests would receive a Queue Time based on receipt of the customers' LaRC. BPA has an obligation to endeavor to plan for reasonably forecasted network load growth; there is no equivalent requirement for PTP transmission requests.	BPA does not share the perspective that planning for NITS above-threshold requests converts those requests to PTP service. Studying forecasted needs or requested service that cannot be accommodated on the existing transmission system is a foundational part of the open access framework for PTP and NITS. BPA has historically met the trended needs of NITS customers without requiring commercial study, but when forecasted needs are of a type that could not have been predicted BPA has determined that additional steps are required, and believes that the proposed threshold will provide customers with greater clarity of the likely outcome of forecasts and will improve responsiveness and transparency. BPA can only begin planning with its NITS customer for an above-threshold NITS forecasts when the forecast is received, thus BPA has indicated that the receipt of that forecast sets the queue time. This is also consistent with FERC policy. BPA recognizes that further consideration and discussions around its NITS business model and financial considerations need to occur.

Commenter	Summary of Comment/Question	BPA Staff Response
NRU	Additionally, applying a “bright line” at the POD level all but guarantees the blending of "trended" and "specific" load increases and risks subjecting the "trended" load growth of a large utility to the Commercial Planning process. For example, consider a utility with a POD comprised of many different types of end use customers that is forecast to grow by 12 MW between year 5 and 6, 11 MW between year 6 and 7, and then by 13 MW between year 7 and 8 – the overall load growth is clearly “trended”, but the utility will be required to participate in Commercial Planning in year 7. This treatment is in direct contrast with BPA's statement on slide 38: "The transmission needs of NITS Customers experiencing trended load growth are differentiated from and balanced with NITS Customers experiencing large load growth". These are just a few of the potential unintended consequences that could arise from applying a “bright line” rule to something as nuanced as load forecasting, which is why we hope that BPA will be open to reviewing the specifics of each such request on a case-by-case basis as necessary.	BPA recognizes that the current POD proposal has received substantial feedback from customers and plans to continue conversation on this topic. As BPA considers potential solutions, they need to be administratively feasible, cost effective, and transparent. We would like to work toward fewer case-by-case determinations and are open to future adjustments should unforeseen impacts be identified.
NRU	Finally, we remain committed to ensuring that the NITS load forecasting policies and other GAT project reforms will not unintentionally impact Transfer Service customers of BPA Power. While we cannot at this time identify any specific adverse impacts, the forecasting process of one transmission provider may result in impacts to a BPA NITS customer that is ultimately served by another transmission provider, and therefore BPA should remain willing to consider adjustments as necessary to accommodate impacts to these customers, should they be identified.	BPA appreciates NRU’s concern for the additional layer of complexity in planning for its NITS customers served via transfer and appreciates any insights the NITS community may provide. BPA notes that BPA’s planning processes do not address transmission expansion needs on other transmission providers’ transmission systems. BPA has offered transfer service in order to enable deliveries of federal power without undertaking redundant infrastructure projects, but this does not mean that transfer service will always be provided on an identical basis to service for directly connected customers. That said, BPA intends to host a customer workshop to work through different forecasting scenarios to identify and resolve complexities, and transfer service scenarios could be included. BPA is also open to future adjustments should unforeseen impacts be identified.
NRU	With respect to BPA transmission reform and the GAT project, at the highest level it is NRU’s perspective that BPA’s historic approach to NITS service was similar to the “proactive planning” that the agency described in the most recent Workshop. Specifically, BPA incorporated NT customers’ forecasted needs into its base case planning and ensured that the transmission system was capable of providing reliable access to firm transmission service on a forward-looking basis. This is one of the primary reasons we remain optimistic about this project and BPA’s proposals to date. We submit that this approach to transmission planning is a primary reason the region has been able to rely on BPA for reliable, affordable delivered power for as long as it has. However, the lens through which transmission planning seems to view the “growth” problem has clearly shifted over time.	Thank you for this comment. We believe that the perspectives offered are consistent with the goals of the GAT project. BPA’s commitment to work with its NITS customers to plan for their transmission needs has been and can be met in a variety of ways. BPA is committed to continuing to work with its NITS customers to transparently define how it will do so in the changing world. While not frequently utilized for NITS customers’ needs in the past, BPA expects that its commercial processes remain one of the ways in which BPA will plan for historically unprecedented NITS transmission needs. BPA takes the load service obligations of its customers seriously, and the proposal to include some NITS forecasts in commercial planning processes is intended to provide more clarity and

Commenter	Summary of Comment/Question	BPA Staff Response
	Whereas, historically, the grid was built with the future load service needs in mind, we now seem to focus entirely on reactionary, path-based solutions that appear designed specifically to address the requests of point-to-point customers. While we maintain that the "proactive planning" end state is likely ideal, in the near term we would encourage BPA to reconsider the lens through which it is considering today's problems, and the statutory framework that led to the buildout of the grid we know today. More specifically, while we are cognizant of the volume of requests in the queue and the amount of generation that we all hope to see integrated, that generation is necessary because of the load it is needed to serve. It is that load service, and BPA's continued commitment to reliable, affordable delivered power, that we hope will help inform the GAT project and related processes, going forward. We are taking the time to point this out because it seems necessary. For example, a BPA staff member recently noted that the 13 MW "bright line" for NITS forecasts is BPA's "attempt to avoid forcing all NT forecasts into the Commercial Planning process." While we acknowledge that BPA's proposal includes the potential to process some portion of NITS customer forecasts through its Commercial Planning process, we underscore the ongoing tariff obligation that BPA has to include NT customers' network load in its transmission system planning and endeavor to construct sufficient transfer capability to deliver the NT customers' network resources to serve its network load. To this end, we support BPA policies that would minimize the proportion of forecasted load and resources that would be processed through the Commercial Planning process and instead rely on BPA's System Assessment or other processes for ensuring reliable, firm service for growing loads.	predictability for customers experiencing large load growth while maintaining the positive attributes of BPA's historical planning processes.
PPC	PPC supports BPA's goal of providing certainty for NT customers about whether their load will be served through developing a more formalized policy on how it handles planning for its NITS forecasts. At this time, it is unclear whether BPA's proposed approach adequately achieves that objective. A more robust discussion is needed on how this alternative will impact customers. Some areas for additional discussion and clarification during the next discussion: - If BPA continues to propose that this evaluation be imposed at a POD level, BPA must provide additional details on how it intends to retain parity among customers in the application of this policy. Customers often have unique load service circumstances which can complicate the application of this policy at a POD level including but not limited to the number of PODs serving a customer's load, behind the meter resources, and whether the	Thank you for the comments. We recognize that further consideration and discussions around its NITS business model and financial considerations need to occur. The current POD proposal has received substantial feedback from customers, and we plan to continue conversation on this topic. As BPA considers potential solutions, they need to be administratively feasible, cost effective, and transparent. BPA intends to utilize all customer forecast submittals regardless of probability for use in one or more studies. At minimum, NITS load forecasts with more than 70% probability will be included in system assessment (LLIR results may be needed to support appropriate modeling). The proposed 13 MW threshold allows BPA to continue to plan for transmission service for the majority of NITS customers' needs under this process. Further consideration is ongoing regarding the probability level of

Commenter	Summary of Comment/Question	BPA Staff Response
	customer is directly served or served by transfer. - The discussion around NITS forecasts has been focused on the planning process, but there are timing and cost allocation implications of this alternative as well that should be considered. These should be specifically identified and evaluated before BPA moves forward with a preferred option. - BPA should clarify whether the current 70% confidence policy will continue to be applied to customer forecasts. If so, what actions is BPA taking to ensure consistency in the application of that policy? How does the application of this policy align with the "disruptive" thinking that is being used to develop other aspects of the Grid Access Transformation? - Does the LaRC continue to be the tool for entities to submit their long-term forecast? Is that the same in the transition and future state? Will the LaRC be undergoing a review during the process to ensure it is facilitating data sharing as intended?	load forecasts that will be included in system assessment and BPA anticipates there will be further discussion regarding forecast probability. We expect the LARC to continue to be utilized as a key tool in planning for NITS customers' long-term forecasted needs. GAT does not propose to change that, but BPA will continue to solicit feedback on the LaRC process in order to make improvements.
Seattle City Light (Final)	<u>BPA Objectives and Principles</u> – City Light supports the stated objectives and principles for treating NITS customer load growth in a transparent, equitable, and consistent manner. Annual New Large Load Threshold per POD – City Light suggests BPA reconsider having a single value threshold per POD for delineating commercial load growth from trended load growth. Using a single value instead of a Larger of percentage or MW threshold penalizes larger NITS customers. A POD designated as a New Large Load will generally remain so for the life of the POD - City Light recommends BPA considering that a POD designated as a New Large Load should only be so designated until the transmission projects needed to firm up the interim service to that POD are completed.	BPA appreciates Seattle City Light's expression of support for the objectives and principles that BPA has articulated in the GAT process to treat NITS customer load growth in a transparent, equitable, and consistent manner. While BPA 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, 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 the involved staff. BPA recognizes that the current POD proposal has received substantial feedback from customers and plans to continue conversation on this topic. As BPA considers potential solutions, they need to be administratively feasible, cost effective, and transparent. BPA also appreciates Seattle's expression of concern regarding POD designation for the life of the POD and looks forward to further conversation on this point.

Commenter	Summary of Comment/Question	BPA Staff Response
Seattle City Light (Final)	NITS Planning Model (slide 40) – City Light recommends the NITS Forecasts Evaluation for Trended-or->13WM NITS portion of the graphic could apply to all transmission service requests in the future. City Light requests BPA develop a policy mechanism to discourage entities from over-forecasting their LaRC load to build up a bank of unused, encumbered transmission capacity that would never be considered commercial for transmission planning purposes. Encumbered transmission capacity has a cost, and BPA should have a mechanism to recover that cost regardless of product type. NITS customer organizations are rational actors and would maximize value and future savings for their customers if they overschedule to build up encumbered capacity for future economic development.	BPA appreciates these comments. The proposed treatment of trended load growth is tied directly to the forecasting and planning obligations associated with NITS and we do not foresee extending this to Point to Point (PTP) service requests. 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 the concern expressed here. Discussion around forecasts will continue and BPA is considering ways to limit over- or under-forecasting load growth.
Seattle City Light (Preliminary)	City light supports BPA designating the New Large Load Threshold per POD. We suggest that the permanent designation of that POD should be moderated to the time it takes to grant Long-Term Firm Service for the above threshold load forecast. City Light additionally suggests that the 13MW threshold is too high without consequences for over forecasting. If most NITS customers over forecast, this could have unintended rate impacts on all customers.	BPA acknowledges that further discussion of the proposal for permanent designation of the POD as New Large Load is needed. 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 the concern expressed here. Discussion around forecasts will continue and BPA is considering ways to limit over- or under-forecasting load growth.
Tacoma Power	BPA has stated quite clearly that it intends to continue to defer to NITS customers at the potential expense of other preference customers, including those Point-to-Point (PtP) customers who are using BPA transmission service to meet the needs of their retail customers. Tacoma Power questions the annual new normalized growth thresholds for NITS customers of 13MW per POD as being egregiously large**.** If every POD on BPA's system with a NITS customer grew 13MW every year and BPA encumbered that growth in its planning, Tacoma Power questions BPA's ability to maintain that level of growth and the expense that all customers would have to pay to support that growth. It is far more equitable for NITS customers' trended growth to be based on a percentage, as BPA has suggested and outlined on Slide 39. Tacoma Power also requests that BPA monitor to ensure that NITS customers do not simply forecast load growth that is unlikely to be realized simply as an effort to build available capacity at the POD, in order to entice a large load onto the system. It is also certainly possible for BPA to calculate trended, normalized load growth for its	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 the concern expressed here. As has been the case since BPA began the annual NITS forecasting processes, there is reliance on NITS customers submitting good faith forecasts that accurately reflect the customers' anticipated needs. Customer behavior will influence the extent to which monitoring and enforcement are necessary, but discussion around forecasts will continue and BPA is considering ways to limit over or under-forecasting load growth. While BPA 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

Commenter	Summary of Comment/Question	BPA Staff Response
	preference PtP customers who use BPA transmission to meet retail load. BPA could hold that capacity in reserve, use it for short-term sales, and then issue firm transmission when those PtP customers request it. Preference customers who use BPA transmission service to meet retail customer loads should not have to wait in the queue process to receive a conditional award for that service, when NITS' retail load customers are guaranteed continued transmission service.	complexity heavily in the current staff recommendation. These concerns were key reasons that a percentage of load was not recommended by the involved staff. BPA believes that its proposal to maintain differentiated planning processes for NITS below-threshold transmission needs and PTP needs is consistent with appropriate distinction between the NITS and PTP OATT products. The ability of the transmission provider to reserve transmission capacity for forecasted needs is an attribute of NITS service, but this attribute is bounded by the requirement to make the capacity available until needed and the requirement that the reservation (encumbrance) be sufficiently supported by customer forecasts. BPA has an obligation to plan for the forecasted needs of NITS customers, and thinks that its proposal will help BPA meet this planning obligation in the context of a changing industry landscape.
Umatilla Electric Cooperative	Prior to addressing the proposals in BPA's July 10 presentation, it's important to recognize BPA's legal obligation for NT Load service. BPA's Open Access Transmission Tariff ("OATT") states that the "Transmission Provider shall include the Network Customer's Network Load in its Transmission System planning and shall, consistent with Good Utility Practice and Attachment K, endeavor to construct and place into service sufficient transfer capability to deliver the Network Customer's Network Resources to serve its Network Load on a basis comparable to the Transmission Provider's delivery of its own generating and purchased resources to its Native Load Customers" (emphasis added). BPA's OATT makes no distinction by size, type, or any other factor when determining what is deemed to be Network Load. In fact, it is the Network Customer, not BPA, that determines Network Load. The BPA OATT defines "Network Load" as "[t]he load that the Network Customer designates for Network Integration Transmission Service under Part III of the Tariff" (emphasis added). OATT, Part I, Section 1.60. This is further supported by Section 5 of UEC's Network Integration Transmission Service Agreement, which vests UEC with the right to submit initial Network Load information and to update it on an annual basis: "The Application provides the Transmission Customer's initial annual load and resource information. Annual load and resource information updates shall be submitted to the Transmission Provider at the address specified in Exhibit D (Notices), by	BPA has repeatedly acknowledged its obligation to plan for NITS customers and is striving to put policies in place that will improve upon its ability to do so, including directing forecasts to commercial processes in some instances. BPA is not proposing to reject forecasts as not qualifying as Network Load, although today's large loads are different from traditional Network Load and bring new risks and uncertainties. NITS service was developed to smoothly transition pre-OATT load service to the OATT framework, and new large loads pose many challenges, such as the speed at which these loads may increase or decrease based on technological developments. BPA's proposal maintains and adds to the ability to utilize a variety of planning processes to address its NITS customers' above-threshold needs. Exclusion of network load that is not yet mature from the system assessment does not result in failure to plan for these needs. Other planning processes, such as line/load interconnection, proactive planning, and commercial planning are all mechanisms to enable the BPA and the NITS customers experiencing above-threshold transmission needs to plan together to address those needs. BPA does not believe that blind acceptance of all load forecasts is consistent with FERC's intent or with industry standards and is seeking to strike a balance that will ultimately improve BPA's ability to expand the transmission system for customers' needs.

Commenter	Summary of Comment/Question	BPA Staff Response
	September 30th of each year, unless otherwise agreed to by the Transmission Provider and the Transmission Customer" (emphasis added). In follow up discussions between BPA and customers after the July 10 workshop, BPA staff stated that BPA's transmission planning department made a subjective "judgment call" to not include large loads submitted in NT Customer's 10-year load and resource forecasts in its long-term planning and study processes. There are at least two glaring defects in this proposed BPA "judgment call." First, BPA is attempting to unilaterally determine a Network Customer's Network Load. Under the BPA OATT, determination of Network Load is the sole purview of the Network Customer, not BPA. Second and in direct contravention of its OATT, BPA is endeavoring to not plan for or develop a plan of service to ensure sufficient transfer capability is in place for a significant portion of its current NT Load service obligation. Instead of addressing these blatant conflicts between its OATT and planning practices, BPA is proposing to apply load limits and readiness criteria in order to remove a significant portion of Network Load from its NT planning obligation.	BPA notes that under existing processes large loads determined to be above 70% probable have been and will continue to be included in the system assessment. The distinction is that such inclusion will not result in increased long-term firm transmission rights without further planning to assure reliability to provide that long-term firm service. While BPA currently includes all loads of 70% probability or above in the agency load forecast as the basis for system assessment, discussions about whether additional forecasted load of lower probability will be included are ongoing. UEC is correct that the size of the proposed NITS threshold does reflect some degree of judgment call. However, BPA emphasizes that this threshold does not mean that its proposal results in a lack of planning processes for above threshold loads submitted in NT customer's 10-year load and resource forecasts. As has been discussed at length, NITS customers continue to have the ability (and in some cases obligation) to submit line/load interconnection requests to initiate BPA's ability to plan for new large load. Further, the GAT proposal provides a new proactive planning process for NITS customers to provide potential load in the 20-year horizon. Finally, utilizing the commercial planning process to study how to reliably provide NITS customers with the ability to designate resources to serve above-threshold growth is the proposed means for NITS customers with above-threshold transmission needs to have those needs planned for. This does not remove those needs from BPA's planning processes. Rather, it defines how those planning processes will be implemented.
Umatilla Electric Cooperative	*BPA's Current NT Transmission Planning* BPA is proposing to implement a threshold where any 13 MW or more load forecast increase during any year at any Point of Delivery must participate in Commercial Planning. UEC submitted comments on June 17 stating its position that the proposed 13 MW threshold is purely arbitrary and in addition to the OATT conflicts would result in negative and discriminatory outcomes. Implementation of the proposal will result in BPA decoupling a portion of NT Loads from its current NT Load service obligation and apply the TSEP study and cost allocation principles to larger NT Loads. This further result in BPA allocating the costs for network reinforcements directly to some NT Customers, but not others, based on an arbitrary 13 MW limit. Second, the proposal will relieve BPA of its NT planning obligation within its system assessment process for a significant portion of NT Loads, but not others. This will result in different treatment of similarly situated Network Customers based on an	BPA rejects the premise that customer participation in a system expansion study removes the applicable load from BPA's load service or NITS planning obligation. BPA has worked with customers to integrate large loads under its existing processes and has determined that the disproportionate amount of time and resources it must dedicate to do so is not sustainable as the frequency of these types of forecasts continues to increase. While it was possible to work with the first customers experiencing large load growth to install necessary facilities, continuing to do so on a regular basis raises questions of cost allocation and efficiency that must be addressed. The size of the proposed NITS threshold does reflect some degree of judgment and substantial thought and analysis was utilized to arrive at this proposal. The statutory definition of New Large Single Load served as a starting point for analysis. Subsequent

Commenter	Summary of Comment/Question	BPA Staff Response
	arbitrary standard. It would also effectively erase any planning distinction between BPA's Network Integration Transmission Service and its Point-to-Point Transmission Service. In other words, BPA is proposing to treat certain NT Customers the same as BPA treats its Point-to-Point customers in the assessment and planning for transmission service requests. To date, BPA has provided no response or feedback to UEC's comments.	analysis of historical data found that a similar capacity line of 13 MW (rather than 10aMW) would essentially allow BPA to continue its historical practice of planning for transmission needs that the system assessment process was designed to plan for while supporting additional planning processes needed to ensure robust planning for new large load needs. The proposal to adopt a 13 MW threshold to differentiate planning processes based on the size of the load does not, as Umatilla asserts, "relieve BPA of its NT planning obligation within its system assessment." BPA has not proposed any distinction regarding inclusion of forecasted load in the system assessment based on the size of the load. BPA has historically included all NITS load above 70% probability in its system assessment and the proposal does not suggest removing large load above 70% from the system assessment. Rather, the proposal is based on finding that above-threshold load – regardless of probability – requires additional planning to ensure that it can be reliably awarded long-term firm service. BPA anticipates, and is open to, further discussion regarding forecast probability.
Umatilla Electric Cooperative	At the July 10 meeting, BPA staff stated that "95% of NT forecasts will fit under this threshold" and warned customers that if they push too hard that NT Customers face the risk that BPA will "make everything go through more extensive review, more study, more analysis, more delay". These statements by BPA staff are extremely alarming. Putting aside the threatening and coercive nature of the statement, it implies that BPA will knowingly discriminate against a small subset of its NT Customers to benefit other NT Customers. Additionally, BPA's alternate proposal, or "risk" as described by BPA, is the antithesis of BPA's NT Load service obligation. Pushing all NT Load growth to BPA's commercial planning is in direct conflict with BPA's OATT, which obligates it to plan and construct its system to serve all NT Load growth as designated by the NT Customer.	We feel that it is important to underscore that the staff proposal to use a threshold in the NITS planning process was arrived at due to strong desire on staff's part to maintain the benefits of the historical system assessment process to plan for growth in NITS customers' transmission needs. We are adapting its planning process to reflect the fact that growth in transmission needs for some NITS customers looks very different from historical conditions and must be planned for in a manner that appropriately reflects the scope of these transmission needs. This comment was not intended to be "threatening and coercive" – it was simply a reflection of the staff discussion process as we endeavored to define how to respond to these changing needs. 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.

Commenter	Summary of Comment/Question	BPA Staff Response
Umatilla Electric Cooperative	What's of equal concern is BPA's proposal to apply its arbitrary 13 MW threshold to NT Load growth at Points of Delivery ("PODs") rather than specific, single loads. The use of PODs will have the effect of removing diversified NT Loads (e.g., commercial, residential, irrigation) that are served at the same POD as large loads from BPA's NT planning obligation. This will have the effect of treating diversified load growth differently across BPA's NT Customers. This is not only arbitrary and discriminatory – it is once again inconsistent with BPA's OATT. Under the OATT, a Network Customer may elect to designate less than its total load as Network Load. But, the OATT clearly states that a Network Customer "may not designate only part of the load at a discrete Point of Delivery" as Network Load. OATT, Part I, Section 1.60.	We recognize that the current POD proposal has received substantial feedback from customers and plans to continue conversation on this topic. As BPA considers potential solutions, they need to be administratively feasible, cost effective, and transparent.

V. Readiness Criteria

Commenter	Summary of Comment/Question	BPA Staff Response
Brookfield Renewables	Brookfield Renewable supports BPA's proposal to establish and quickly implement some form of commercial readiness criteria; criteria that will help cull BPA's 68 GW transmission request queue into something more manageable and that prioritizes commercially viable and ready projects and transmission requests. BPA proposes the following readiness criteria (see slide 49 of presentation): • Mature line and load interconnection/generator interconnection plans of service with any necessary agreements to initiate the project signed/funded • Acceptable evidence of readiness for bilateral requests: o Power Purchase Agreement; o Notice of award from Request for Proposal (possibly conditional on final execution); o Letter of intent signed by both parties (possibly conditional on final execution); o Other formal indications that the transaction will be used to serve load that exists or will exist during the period of the contract Brookfield Renewable understands that the intent of the above criteria is to validate the point of receipt (POR) and point of delivery (POD) associated with transmission service requests. The first bullet point above is to confirm that there is an electrical plan of service that is defined (no longer subject to change) and that that plan of service is moving forward, i.e., that there is an established POR and POD and that the POR/POD is either online or in construction. The second bullet confirms there is a known off-taker who is purchasing the resource associated with the POR or that is party to a power transaction. Brookfield Renewable supports these requirements, as it will necessarily exclude from service qualification more speculative generation projects (projects that are not yet commercially viable) or where no off-taker and/or load service contract exists or is likely. Brookfield Renewable presumes that long-term firm bilateral system and/or resource-specific sales would qualify under their proposal. Brookfield Renewable requests that BPA confirm and clarify the treatment of such bilateral sales/purchases, i.e., those not associated with a specific generation project under development, both with respect to their treatment under both BPA's transitional and future state proposals. Similarly, Brookfield Renewable requests that BPA clarify the treatment and impact of Western Resource Adequacy Program (WRAP) and day-ahead market (CAISO extended day-ahead	Thank you for your comments. We will consider your feedback regarding the criteria BPA proposed this past summer as we develop alternatives for the 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). In addition, we are confused by Brookfield's questions regarding the impacts on long-term firm bilateral system or resource-specific sales as well as transactions related to day-ahead markets and WRAP. We would appreciate more clarity around your specific concerns as we share alternatives in the TC-27 pre-proceeding workshops

Commenter	Summary of Comment/Question	BPA Staff Response
	market or EDAM and Southwest Power Pool (SPP) Markets+) related transactions. While Brookfield Renewable acknowledges that both WRAP and the aforementioned day-ahead market transactions are more likely short-term in nature, to the extent they are, or have to be accommodated, BPA should clarify whether and how such sales could impact the validation/award/provision of long-term service.	
Brookfield Renewables	Finally, Brookfield Renewable supports aspects of the comments and proposals included in the comments jointly submitted by the Northwest and Intermountain Power Producers Coalition (NIPPC) and Renewable Northwest (RNW). Specifically, Brookfield Renewable agrees that a PPA should not be the "sole, primary, or preferred" means to establish the commercial readiness of a transmission request. While, as stated by NIPPC/RNW, a PPA can be a means to establish readiness, Brookfield Renewable agrees that it should not be the only means to establish readiness. As stated above, Brookfield Renewable generally supports BPA's proposed criteria because we interpret it as more flexible than just requiring an executed PPA.	Thank you for your comments. We will consider your feedback as we develop alternative proposals to share in the upcoming TC-27 pre-proceeding workshops.
Brookfield Renewables	NIPPC/RNW also raise concerns with respect to the interaction between BPA's readiness criteria and the existing and established utility request for proposal (RFP) resource procurement processes in the PNW. While, to date, the utility procurement processes in the PNW have not been a focus of Brookfield Renewable itself, we agree with NIPPC/RNW that BPA should work with utility commissions in the PNW to ensure that the utility procurement processes work in conjunction with BPA's rules and processes for securing transmission service. Brookfield Renewable acknowledges that utilities, as load-serving entities, are subject to state clean energy standards and thus are an important and critical piece to renewable resource development in the PNW; development that will not otherwise occur if BPA does not align its transmission request processes to work in concert with utility RFP requirements.	Thank you for affirming the concerns raised by NIPPC and RNW regarding regional RFP processes. We are considering those concerns in developing alternatives to share in the upcoming TC-27 pre-proceeding workshops.
Brookfield Renewables	Brookfield Renewable also supports further discussion of the alternative proposals included in NIPPC/RNW's comments, including consideration of open or reverse open season processes that may include enhanced term-of-service, or other requirements. Such mechanisms could be a means to release transmission capacity to those customers who need it first and whose requests are commercially ready and viable. Brookfield Renewable cautions, however, that requirements such as higher deposits or security requirements may not be sufficient to deter speculative transmission requests that many	BPA appreciates Brookfield's comments proposing alternatives for staff to consider. Additionally, we will consider Brookfield's concerns regarding deposits, security requirements, and the need to delineate the near-term, Transition State from the long-term, Future State as we develop alternatives to share in the TC-27 pre-proceeding workshops.

Commenter	Summary of Comment/Question	BPA Staff Response
	clog the queue. In addition, while Brookfield Renewable supports further discussion and further refinement of the concepts outlined by NIPPC/RNW, we recommend and caution BPA to delineate between those mechanisms that can be implemented in the near term (Transition State) and those that may have to be implemented on a long-term basis (Future State). As noted above, Brookfield Renewable supports application of some form of BPA's proposed readiness criteria now, in the transition, so as to measurably reduce BPA's existing and overloaded 68GW transmission queue.	
Brookfield Renewables	Brookfield Renewable does not oppose BPA's proposed treatment of the virtual planning points. That is, Brookfield Renewable does not oppose BPA eliminating MIDCREMOTE as an available point for long-term firm transmission reservation requests so long as, as proposed, it remains available in the short-term market. In addition, Brookfield Renewable does not oppose retaining NWHUB as a point available for long-term transmission reservations, with existing queued requests at MIDCREMOTE transferred to NWHUB. As long as these rules are generally applicable to all customers, Brookfield Renewable does not oppose BPA's proposal.	Thank you for sharing your perspective on our proposals for the NWHUB and MIDCRemote. We will consider your feedback as we develop or refine alternatives to discuss in the upcoming TC-27 pre-proceeding workshops.
Clatskanie PUD	Clatskanie does not currently support; 1. Elimination of MIDCRemote and/or NWHub. a. We believe this topic needs additional discussion and understanding before changes can be supported.	Thank you for sharing your concerns. BPA will consider this feedback as we develop or refine alternatives related to MIDCRemote and NWHUB for the TC-27 pre-proceeding workshops. As we discuss refined proposals or alternatives, we encourage you to share specific issues we should be aware of regarding the impact of retaining the NWHUB and/or removing the MIDCRemote from the long-term market.
EDP Renewables	EDPR implores BPA and its regional partners to work together to align the transmission, interconnection and resource procurement processes so load serving entities conduct their competitive solicitations when each interconnection cluster of projects is ready to be evaluated and there is sufficient near-term transmission capacity for the project to connect without unnecessary delay. Doing so allows new projects to submit the most accurate and complete package into the resource solicitation process to the ultimate benefit of Pacific Northwest ratepayers. The IPP community has gotten extremely efficient at building projects but the key determinants for whether and how fast a project gets built are the cost and timeline for interconnecting and delivering the power, not building the generating facility. Two reasons IPPs may request transmission service early in the project development process	Thank you for your comments and suggestions regarding the alignment between BPA's transmission and interconnection processes and regional resource procurement processes. We will consider your feedback as we develop or refine our proposals to share in the TC-27 pre-proceeding workshops.

Commenter	Summary of Comment/Question	BPA Staff Response
	is to ensure sufficient transmission service to support the commercial transaction and to ensure that timelines for power delivery align with project development. BPA must build out the capacity and then allocate it to the projects that are ready to use it and pay for it on an ongoing basis at the right time in the development process. Getting this right is paramount if IPPs are going to help address the ~ 2 GW of energy capacity deficit the region faces before the transition to the future state is complete. Under this type of structure, regional jurisdictional boundaries can be respected, statutory mandates can be met, and together we can ensure that the lights stay on at the lowest price.	
Grant PUD	Grant supports the development of additional and clarified readiness criteria in order for TSRs to remain in the queue. Unknown and New-Point PORs/PODs should be deemed speculative and removed from the queue until and unless new procedures are developed to accommodate such PORs/PODs in a realistic and timely manner.	We appreciate and will consider Grant's perspective and feedback on readiness criteria as we develop alternatives or refinements to GAT proposals for upcoming TC-27 pre-proceeding workshops.
Mason 3 PUD	Mason 3 generally supports the addition of readiness criteria, so encumbrances are not provided for requests that will likely not convert to service. This will create an actionable queue the only includes mature long-term transmission service requests. Given the amount of time given for consideration it is unknown if the criteria proposed is sufficient. Mason 3 will likely provide comments to this end later this year. Mason 3 looks forward to discussing the 70% or greater probability standard as it should be reconsidered given the addition of readiness criteria. Given the severity of the outcome, it is Mason 3's suggestion that any Forecasted Transmission Service Request be evaluated by a BPA committee prior to being declined. That way it can ensure the criteria are applied fairly and consistently. As noted in the NITS Forecast section above, any load growth on a POD not associated with a new large load at a single industrial facility should not be subject to the readiness criteria or put on a path in which it can be denied transmission service. This is not the intent of BPA's proposal so the business practice should explicitly address it.	We thank Mason 3 for its feedback regarding the 70% or greater standard and the proposal for readiness criteria. We will consider Mason 3's feedback as we develop alternatives for the TC-27 pre-proceeding workshop, including solutions related to the new large load threshold proposal. We want to clarify that under the new large load threshold of 13 MW, we did not propose applying a "readiness criteria" if the forecasted load was below 13 MW.

Commenter	Summary of Comment/Question	BPA Staff Response
NIPPC and RNW	NIPPC and RNW, however, do not agree that evidence of a commitment to a transaction between a generator and a load serving entity should be the sole, primary, or preferred mechanism to establish commercial readiness for transmission service. While evidence of an agreement could serve as one mechanism to establish readiness, it should not be the only, primary, or preferred way a customer can demonstrate that it is ready to take service. Currently, regulated utility procurement processes in Oregon, Washington, and Idaho typically require customers to have transmission service in place to be eligible to bid into a regulated utility's Request for Proposal ("RFP"). Portland General Electric Company ("PGE") is currently structuring an RFP process that will require bidders to have long-term firm or conditional firm service in place by September of 2025 (when bids are due). PGE would prepare its shortlist by February of 2026.2 In its recent RFP, Puget Sound Energy ("PSE") also required customers to have long-term firm or conditional firm service as a requirement for an eligible bid. PacifiCorp's Draft 2025 RFP for Oregon and Washington requires customers to have long-term firm service in place to be eligible to bid. Furthermore, PacifiCorp does not propose to accept any bids based on conditional firm service. The existing standard regional practices for the principal (but not sole) source of new resource procurements—investor-owned utilities—require customers to have long-term firm service in place as a requirement to bid into an RFP. This standard RFP requirement is one of the primary drivers of the size of BPA's transmission service queue. To be eligible to bid into one of these RFPs, bidders (BPA transmission customers) must be able to show that they have transmission service. Thus, customers must submit transmission service requests into the BPA queue with no certainty that they will eventually be successful in a future RFP. The standard RFP requirement that customers have at least conditional firm service in place to be eligible to bid also suggests that utilities may not accept bids based on "as available" interim service that has a lower priority than conditional firm, but NIPPC and RNW look forward to input from the utilities themselves on this point. While NIPPC and RNW can conceive of a future state in which BPA expands transmission capacity rapidly enough for utilities and generators to start banking on such expansions in advance of their completion, the negative potential outcome of an entire RFP hinging on transmission	We appreciate the concerns and issues raised by NIPPC and RNW regarding our GAT proposals and requirements in regulated RFP processes for evidence of transmission service. They encourage us to be cautious in setting requirements on customers to provide evidence of transactions between generators and load-serving entities without better alignment between regional RFP processes and BPA's planning processes. NIPPC and RNW recommend deferring such requirements to the Future State to allow time to work on alignment between our processes and regional procurement requirements. In addition, NIPPC and RNW raise concerns about the acceptability of our proposals regarding interim service for utilities' RFP processes. We are 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 facilitate appropriate coordination between relevant entities. We will consider NIPPC and RNW's feedback as we develop alternatives to discuss in the TC-27 pre-proceeding workshops and anticipate further discussion on these issues.

Commenter	Summary of Comment/Question	BPA Staff Response
	capacity that does not yet exist creates myriad new risks for both generation developers and potential od-takers. Our initial view is that this is not a tenable near-term approach. Instead, it is a more plausible approach in the context 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).	
NIPPC and RNW	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 has the potential to work in many circumstances. Therefore, NIPPC and RNW encourage BPA to begin efforts to coordinate with state commissions on potential reforms of RFP processes for the Future State, but these changes should only be made if the state regulatory commissions significantly modify their competitive procurement rules and polices. The time frame laid out for the GAT Transition process is likely too short to allow immediate reform of state RFP processes. NIPPC and RNW anticipate that efforts to reform state RFP processes will likely take 12-18 months once those efforts begin; and the reform processes will require the active participation of staff from BPA, utilities, state commissions, and independent power interests. If BPA wishes to continue to pursue this option, then NIPPC and RNW will engage in the efforts to ensure that both state procurement and BPA policies can work together.	We appreciate hearing NIPPC and RNW's perspective that a general approach to making commitments between generators and load serving entities a readiness requirement may work in certain circumstances. We also acknowledge their concerns about the misalignment between such requirements and regional RFP requirements, as discussed in our response above. We will consider this feedback, and the possible timing for setting such requirements, as we develop alternatives to discuss in the TC-27 pre-proceeding workshops.
NIPPC and RNW	NIPPC and RNW also encourage BPA to not tie readiness criteria in the Transition process to the results of utility procurement processes unless the state regulatory commissions adopt policies that allow the utilities to contract with IPPs without having secured transmission. We note that such a policy shift by the commissions must be accompanied by a willingness by the actual counterparties for such power—the utilities themselves—to accommodate this new paradigm as well. Nevertheless, NIPPC and RNW agree with BPA that customers should meet readiness criteria as a condition to submitting a transmission service request. Elements of reasonable readiness criteria could include the following: • Certainty regarding details of the request (particularly Point of Receipt and Point of	We acknowledge NIPPC and RNW's concerns regarding application of a readiness criteria in the Transition process, as discussed in our responses above. We appreciate NIPPC and RNWs suggestions of possible elements for a reasonable readiness criteria for customers submitting transmission service requests. We will consider your feedback as we develop alternatives to share in the TC-27 pre-proceeding workshops. We are interested in any specific requirements NIPPC and RNW would consider for: certainty regarding PORs and PODs, at-risk deposits, minimum terms of service, and limits on deferral rights. Additionally, we would appreciate additional detail

Commenter	Summary of Comment/Question	BPA Staff Response
	Delivery); • Reasonable at-risk deposits; • Minimum terms of service; • Providing reasonable security; • Agreeing to limit requests for Extension of Commencement of Service; and • Appropriate progress in a generator interconnection process.	on your suggestion of "appropriate progress in a generator interconnection process" to help increase our understanding.
NIPPC and RNW	NIPPC and RNW also suggest that the clearest indicator that a customer is "ready" to take service is its willingness to execute a transmission service agreement and begin paying for the service immediately. The existing structure where BPA waits for facilities to be energized before offering service agreements, encourages customers to request service early. This results in BPA encumbering transmission capacity for customers across some flow gates while BPA studies, plans, and builds expansions on other flow gates needed to satisfy the customer's request for transmission service. Even when those new facilities are energized, customers retain the right to delay the commencement of service for up to five years. It is also possible that a customer, having exhausted its options to delay commencement of service, could simply default on its contract. While BPA has the option to require customers to post security for the costs associated with construction of a plan of service, it is not clear whether BPA has required customers with transmission service requests enabled by the Evolving Grid mechanism to post security for their share of the upgrade costs of those projects even as BPA has commenced design and construction. Outside of the Evolving Grid mechanism, BPA does not require customers to post security until the completion of the Preliminary Engineering Study and any Environmental Study. The result is that customers in TSEP retain significant flexibility to delay the commencement of their service and then may face minimal financial risk in the event they ultimately decide to renege on their TSEP agreements. Accordingly, BPA is forced to encumber significant quantities of transmission capacity on some flow gates while studying expansions at other flow gates; with no guarantee that those customers will ever take service. It might be worth exploring in this process whether BPA should request security from customers whose transmission service requests depend on completion of Evolving Grid projects.	Thank you for your comments on BPA's existing structure and noting that a significant indicator of readiness is a customer's willingness to enter a transmission service agreement and pay for service immediately. We are interested in your feedback on how interim service could play this role. Further, we appreciate the suggestion that parties explore security from customers earlier than the current process effectuates. We will consider this feedback in revising the GAT proposals shared this summer and developing other alternatives to share in the upcoming TC-27 pre-proceeding. We would like to note that under BPA's current policies, BPA cannot offer a transmission service agreement until after environmental review is complete, if required, and the rate treatment is known. Additionally, in BPA's current TSEP model, there is the capability/expectation that parties will securitize their MW share of the capital costs of the required project(s). Most projects have not yet reached the point in the process where that would occur, however, as under the current model, that only occurs upon execution of the transmission service agreement for long-term firm service.

Commenter	Summary of Comment/Question	BPA Staff Response
NIPPC and RNW	NIPPC and RNW have already provided comments to BPA on the issue of readiness criteria, specifically highlighting the concern with BPA's evident intention to require a customer to establish commercial readiness only through a bilateral agreement. BPA should be prepared to provide customers with similar narrative feedback explaining in greater detail BPA's position on why such a high bar to readiness is necessary for the transition. NIPPC and RNW understand that in the next few days, BPA will be sharing with customers draft business practice language to implement the transition phase of these reforms. Many members of NIPPC and RNW have expressed concerns with the speed at which these reforms are being advanced for the transition; other members have expressed concerns with the ongoing pause on processing of transmission requests. NIPPC and RNW recognize the challenge of balancing the goal of a quick release to the pause against the goal to establish reasonable criteria for the transition phase. BPA and stakeholders will have a better sense of whether the proposed timeline is appropriate after we have had the opportunity to review BPA's proposed business practices.	We appreciate NIPPC and RNW's concerns regarding the requirements of readiness for the transition as well as the pace we were proceeding with GAT this summer. Please see our comments in the Future of GAT Stakeholder Engagement at the start of this document. We will consider NIPPC and RNW's concerns as we revise our GAT proposals and develop new alternatives to share in the TC-27 pre-proceeding workshops.
NIPPC and RNW	NIPPC and RNW agree that there is significant value for the region in allowing customers to request transmission to and from a liquid trading hub. So long as NW Hub remains an option for customers seeking to reserve transmission service to or from Mid-C, NIPPC and RNW have no concerns about removing Mid-C Remote as a scheduling point and conforming transmission service requests to or from Mid-C remote to NW Hub.	We appreciate hearing that NIPPC and RNW find that removal of MIDCRemote from the long-term market could be acceptable as long as NWHUB remains requestable in the long-term market and that conforming existing requests to NWHUB also appears workable.
Northern Wasco County PUD	Some kind of readiness criteria is prudent and warranted in reforming the transmission planning process. Northern Wasco appreciates the objectives and principles presented by BPA staff in the workshop and associated materials. However, we have significant concerns given the lack of detail regarding how readiness criteria would be implemented for FTSRs and TSRs that are essential to NITS customers' access to competitive wholesale power markets. Readiness criteria that are adopted must work with the commercial realities load service and Northwest wholesale markets. Specifically, it is rare for customers to enter into power purchase agreements to serve loads until commercial operation of these loads is imminent. Further, it is common for sellers to utilize a portfolio of network resources to meet wholesale power contract obligations, including the output of variable energy resources that is impossible to know months or years in advance. Indeed, hydro resources also have seasonal and year-to-year resource diversity that affects the mix of resources	Thank you for your comments and sharing your concerns. We recognize that additional clarity about how readiness criteria would be implemented for FTSRs is necessary. We will consider your comments as we refine our proposals shared this summer and new alternatives and identify additional details to share in the upcoming TC-27 pre-proceeding workshops.

Commenter	Summary of Comment/Question	BPA Staff Response
	used by entities selling power to Northern Wasco. Readiness criteria should not inhibit efficient and economic use of Network Resources for load service or prevent customers from obtaining FTSRs or TSRs or entering the queue for long-term firm service to established, non-speculative loads. BPA must adhere to the intent of Open Access Transmission Tariff that allows network customers to utilize their network resources, which can include both their own generation and other sources, to serve their network load located within the transmission provider's control area. Northern Wasco will withhold more specific comments until seeing the specifics of proposed business language changes.	
Northern Wasco County PUD	While creating some planning complexity, Virtual Points are an essential feature of transmission service to facilitate efficient wholesale market transactions, and are consistent with long-standing national energy policy and the principles of open access transmission service. As described above and in more detail in our June 18 comments, single point source for firm NITS service simply does not make sense. Network Integration Transmission Service, as its name implies, is intended for integration of resources for service to loads, with cost allocated based on load, and customers billed based on their peak load. Upon initial analysis, it appears that BPA staff's leaning for "Alternative 3" (allow NWHub to continue to be requested in the long-term market, and deactivate MIDCRemote as a requestable long-term point) is workable. Northern Wasco requests additional workshops to further explore how Virtual Points can be created for NITS customers.	Thank you for your feedback. We appreciate hearing Northern Wasco's perspective that continuing to allow long-term transmission access to NWHUB is workable. We are not considering the addition of new virtual points, or Hubs, in this process but we invite your feedback on this in the TC-27 pre-proceeding workshops.
NRU	NRU has consistently supported BPA's attempts to modify its requirements to ensure the prioritization of mature long-term firm service requests, and we will continue to do so. Additionally, with respect to Planning for Virtual Points, we appreciate BPA's "grandfathering" of requests that have already been submitted. That said, staff found the "Foundational Concepts" discussion on slide 48 confusing, and have a number of points we are hoping to clarify: - First, BPA states: "For any relevant generation or line/load interconnection, the electrical plan of service must be defined by the relevant transmission provider and construction contract for the project (if needed) signed and funded."	We appreciate hearing NRU's indication of support for modifying requirements to ensure prioritization of mature long-term firm service requests as well as grandfathering of previously submitted requests. We recognize the need for additional clarification of the application of readiness criteria and offers of interim service as related to NITS service. Outside of meeting readiness criteria, a NITS customer who may need an LLIR should submit it, as that portion of planning is a foundation for planning for above-threshold load growth. We are currently evaluating and revising the proposals we shared this past summer as well as developing alternatives to share in the TC-27 pre-proceeding workshops. We intend to address your questions and concerns at that time.

Commenter	Summary of Comment/Question	BPA Staff Response
	o To clarify, is BPA saying that until the Line/Load interconnection upgrades are contracted for/funded, a NITS customer cannot forecast it or submit an FTSR? § What exactly will be enabled for NITS customers by satisfying the line/load upgrade step? § Will BPA consider financial demonstrations in lieu of physical/technical readiness requirements such as executed load interconnection agreements? - With respect to sub-grid transmission constraints, are NITS customers precluded from submitting FTSRs until/unless the necessary sub-grid fixes have been addressed, even if they already meet the line/load or generator interconnection requirements? - It isn't entirely clear what the proposed readiness requirements will require of NITS customers, or what those customers will be able to do prior to satisfying those requirements. o e.g., prior to satisfying the readiness requirements, can a NITS customer do anything outside of submitting a LaRC? What about an FTSR, or line/load interconnection request, etc.? - How does BPA propose to offer the interim service included in the "NITS Planning Model" for such requests?	
NRU	Additionally, while we understand and appreciate BPA's objective and principles with enhancing customer readiness requirements, we also wish to raise one consideration for how the different elements and timing of BPA's GAT project may interact. Specifically, if BPA includes all NT Customer load forecasts (irrespective of likelihood or readiness) into its proactive planning process and identifies transmission solutions for such load, but prohibits the same NT Customer from obtaining an FTSR to encumber resulting capacity until it meets the readiness criteria, we want to ensure that there is not a risk that other transmission customers could be awarded such capacity before the NT Customer is able to meet the readiness criteria, or otherwise that no capacity remains for the NT Customer's load growth that "became ready." It is NRU's position that setting aside transmission capacity that BPA places into service in specific response to an NT Customer's load growth reasonably forecasted is a core principle of NT service, and the readiness requirements must not conflict or interfere with this foundational principle.	Thank you for raising this concern regarding the proposals for readiness criteria and NITS service. We are still developing our proposals regarding Proactive Planning, and will address your comments in a future public engagement process.

Commenter	Summary of Comment/Question	BPA Staff Response
NRU	Finally, there appears to be a contradiction in the Process Overview detailed on slide 47, and the NITS Planning Model on slide 40, wherein the Model seems to indicate that all LaRC forecasts will be included in proactive planning, including all "above the line" forecasts. Conversely, Process Overview clearly states that any failure of the applicable readiness criteria will result in a TSR being declined and removed from the LTFQ. We suspect this is due to an issue where the order of operations may be misaligned, but regardless, it is unclear how both of these can be true, and so further discussion would be appreciated.	Thank you for your question. We are still developing details regarding Proactive Planning, including how we will include NITS forecasts – both below or above the new network load threshold we are proposing. As we share our refined proposals or new alternatives in either the TC-27 pre-proceeding workshops or the future engagement for Proactive Planning, we will be able to clarify the treatment of above the line forecasts and application of any proposed readiness criteria.
PPC	A robust discussion is needed on the proposed application of readiness criteria. If applied, such criteria should balance the interests of removing "speculative" requests with the need to not overly constrict the ability of the region to integrate new generation and load. PPC understands that BPA is considering a financial readiness metric which is likely an appropriate inclusion in the policy to allow some level of additional flexibility. We look forward to hearing more perspectives on appropriate readiness criteria from stakeholders and BPA in the next workshop. During the upcoming business practice discussions, we would also appreciate BPA clarifying which readiness criteria requirements are as proposed as interim solutions and what policies are anticipated to continue on into the future state.	Thank you for these comments. We appreciate PPC's perspective that inclusion of financial criteria is important and looks forward to additional discussion in the TC-27 pre-proceeding workshops as we share refined proposals and new alternatives. In addition, we are currently refining and developing our proposals for the future state and intend to share those in future workshops.
PSE	With respect to BPA's proposed readiness criteria, on slide 48 of its July 9 workshop materials, BPA proposes its foundational concepts for readiness and says that for any relevant generation or line/load interconnection, the electrical plan of service must be defined by the relevant transmission provider and construction contract for the project (if needed) signed and funded. PSE seeks clarification on how BPA defines a "construction contract". Does BPA's definition include contracts other than an executed and funded Large Generator Interconnection Agreement (LGIA)?	Thank you for your questions. We recognize a need to provide additional clarification. We are currently revisiting our GAT readiness requirement proposals from the summer and determining if there are new alternatives to propose in the TC-27 pre-proceeding workshops. We will consider your questions and clarify as we share alternatives in the workshops any evidence of contracts that are proposed.

Commenter	Summary of Comment/Question	BPA Staff Response
Seattle City Light (Final)	Objective – City Light supports BPA's main objective to prioritize requests that reflect uses of the transmission system that will occur and align them with transmission system encumbrances and system need by establishing a consistent information protocol for entry to its long-term firm transmission queue. City Light requests BPA consider that in Readiness Criteria, PTP customers with their own resources may need new transmission requests that are not only source to load. These may be needed for access to market hubs, in combination with existing rights for load service, and/or future intertie opportunities for load service and resource balancing.	We appreciate SCL's support for processes that reflect the use of the transmission system that will occur and efforts to align encumbrances of the transmission system through information requirements for queue entry. We recognize that there are multiple ways in which customers use the transmission system, including from market hub, which is reflected in the GAT proposal shared this summer to continue to have NWHUB remain as an active point in the long-term firm transmission market. We also note that existing rights for service are not impacted by the GAT proposal. As we share refinements to our GAT proposals and/or new alternatives in TC-27 pre-proceeding workshops, we look forward to hearing more specifics that SCL would like BPA to consider.
Seattle City Light (Final)	Principles – City Light thanks BPA for acknowledging that virtual paths and new-point requests have been affecting NWACI capacity usage. We support BPA addressing the issues by recognizing impacts when planning physical infrastructure that impacts NWACI facilities. City Light supports BPA no longer allowing information uncertainty in the transmission queue if BPA expeditiously transitions to the future state where requests are granted initial service upon request. Customer Comments – City Light supports and applauds BPA proactively reaching out to State regulatory bodies regarding the shift to interim service and a proactive transmission planning model.	We would like to clarify that our GAT deliberations do not opine on impacts of existing service on NWACI. However, we do note that when BPA develops plans of service, part of that process always involves assessment of potential impacts to other transmission providers' facilities. Those other transmission providers then determine whether the long-term firm service that is being sought has an impact to their system that needs to be mitigated prior to BPA awarding the requested firm service. We appreciate SCL indicating support of additional information clarity to better enable accurate plan of service development and recognizes that our customers are seeking timely resolution of these issues.
Seattle City Light (Final)	Readiness Criteria Areas for Focus - Bilateral Transaction Requirements – These should be equitable for both NITS and PTP requests as applicable. Bilateral Agreements - City Light suggests BPA allows entities to prove readiness through proving business need and not just evidence of bilaterial agreements. BPA may additionally consider a long-term service deposit in lieu of bilaterial agreement. Criteria for loads and resources outside the BPA balancing authority – City Light suggests requiring specific loads or resources outside of the BPA Balancing Authority Area to validate a transmission service request is not necessary and may negatively impact an entity's ability to participate in intertie bidding.	Thank you for your comments on readiness criteria. We are considering your feedback on readiness requirements for: NITS and PTP requests, evidence of and deposits in lieu of bilateral agreements, and loads and resources outside BPA's Balancing Authority Area. We acknowledge that additional discussion regarding readiness requirements for NITS and PTP is necessary. Our proposal this past summer did include a long-term service deposit in lieu of demonstration of bilateral arrangement, and we would appreciate any specific feedback SCL would like to provide. Finally, we are further developing specifics of criteria for loads/resources outside of the BPA balancing authority area. Those criteria are different from those for loads/resources inside the BPA balancing authority area. As we refine our GAT proposals and develop new alternatives to share in the TC-27 pre-proceeding workshops we will consider your comments and offer additional opportunity for you to provide feedback.

Commenter	Summary of Comment/Question	BPA Staff Response
Seattle City Light (Final)	Readiness Criteria: Foundational Concepts - City Light requests that BPA define sub-grid transmission constraints as constraints on facilities that are less than 100kV. City Light supports BPA limiting deferral of service and limitations on extensions for commencement of service rights. City Light believes there should be exceptions for cases where entities are not taking service due to a BPA delayed Generator Interconnection or Line/Load Interconnection.	We would like to clarify that sub-grid constraints on BPA's system refer to constraints for any element of the system that is not associated with a currently managed path. Thank you for sharing SCL's perspective regarding extensions for commencement of service. We will continue to be interested in your input regarding extensions for commencement of service as we share alternatives in the TC-27 pre-proceeding workshops.
Seattle City Light (Final)	Readiness Criteria for FTSRs and TSRs - City Light supports BPA using mature line and load interconnection/generator interconnection plans of service with any necessary agreements to initiate the project signed/funded as one method of proving readiness. City Light supports BPA using evidence of a bilateral agreement or intent as one method of proving readiness. City Light suggests BPA consider a deposit for long term service in lieu of proving readiness. City Light recommends BPA consider that entities have transmission needs associated with connecting to existing transmission rights, strategically investing in transmission originating in areas of future resource development, balancing loads and resources, and participating in intertie bidding / markets. None of these transmission requests would necessarily have a bilateral agreement. City Light request BPA consider that a service deposit could be used to show readiness.	We appreciate hearing that SCL supports a number of elements of the GAT transmission readiness criteria for transmission service request data exhibit validation. Our GAT proposal shared this past summer includes the potential to use a financial approach in lieu of ability to demonstrate bilateral agreement. We look forward to further discussion regarding these criteria in the TC-27 pre-proceeding workshops.
Seattle City Light (Final)	Planning for Virtual Points - City Light supports Alternative 3; Allow NWHUB to continue to be requested in the long-term market and deactivate MIDCRemote as a requestable point in the LTF market (would remain available in the short-term market, but such requests would ONLY be eligible for reassessment CFS transmission).	Thank you for sharing SCL's support for this proposal.

Commenter	Summary of Comment/Question	BPA Staff Response
Seattle City Light (Final)	Readiness Criteria Additional Concepts – City Light requests BPA considers that entities have transmission needs that do not have associated existing bilateral agreement, specific generating resource, or specific load delivery point outside the BPA system.	We would appreciate more clarity regarding SCL's thoughts in what new or revised requirements we should consider for entities that do not have an existing bilateral agreement, specific generating resource or specific load delivery point outside BPA's system.
Seattle City Light (Final)	Requests for Feedback - Is there any additional evidence of the two parties' intent to execute a specific transaction that BPA should explicitly add? – Yes, BPA should consider accepting an entity's attestation of business need and intent.	Thank you for this input. We are interested in hearing more about SCL's definition of "business need and intent".
Shell Energy	SENA is supportive of more stringent eligibility requirements for Transmission Service Requests (TSRs) based on commercial maturity and feasibility as a means of reducing the volume of speculative "shotgun" transmission service requests in the queue, but find that requiring a finalized Power Purchase Agreement (PPA) as a condition for TSR study or eligibility would create a fundamental timing conflict with existing utility procurement practices in the region, where Requests For Proposals (RFPs) typically require transmission service to be in place before a project can bid. This creates a circular dependency for entities who must secure transmission service to compete in RFPs yet would be unable to do so without a PPA. This requirement would effectively invert the established procurement sequence, exclude viable market participants and disadvantage non-utility competition. SENA urges BPA to ensure continued access to transmission access for merchant entities that may not own generation or load but facilitate energy delivery between third parties. The new rules should accommodate diverse business models which may not necessarily have a single dedicated generator or bilateral contract at the time of TSR submission.	Thank you for sharing SENA's support for more stringent readiness criteria and your concerns about requiring a PPA. We are open to approaches that do not involve an executed PPA and appreciate any alternative proposals SENA may provide in the TC-27 pre-proceeding workshops. Further, we acknowledge the challenge created by current regional RFP business models and are interested in regional input regarding ways to address that issue.
Shell Energy	To complement BPA's readiness criteria and further deter speculative "shotgun" TSR submittal, SENA recommends that BPA consider establishing optional readiness pathways that allow entities to demonstrate commercial seriousness through financial commitment alone. Specifically, BPA could permit entities without a PPA or interconnection agreement to satisfy readiness requirements by posting a letter of credit, cash deposit, or other acceptable financial security. This approach may provide an indication of market intent by using financial backing as a proxy for commercial maturity.	In our proposals shared this summer, we included an option of use of financial mechanisms in lieu of ability to demonstrate a bilateral transaction. We anticipate further discussion around the use of financial mechanisms in lieu of demonstration requirements such as evidence of a bilateral transaction.

Commenter	Summary of Comment/Question	BPA Staff Response
Shell Energy	Additionally, SENA suggests that BPA consider higher financial commitments to accompany TSR submissions. Increasing the cost to submit and hold a request may be an effective way to discourage "shotgun" submission strategies. SENA is supportive of a higher application deposit, perhaps with non-refundable portions, which may encourage a more deliberate approach to TSR submittal. As a part of this approach, BPA may consider a flat fee increase, or an escalated commitment based on the number of TSR submittals per customer.	Thank you for this input. BPA has recently updated its non-refundable processing fee to enter the queue from $2,000 to $10,000. We will continue to examine the various financial mechanisms associated with submittal of transmission service requests into the long-term queue and are considering your feedback as well.
Shell Energy	Finally, there may be opportunities for BPA to identify duplicative, or similar TSRs at a customer level and enforce a limit on the number of submittals per customer/project within a certain window or necessitate the consolidation of multiple requests through the same flow gate.	BPA currently uses "cumulative demand" as articulated in its business practices to limit the TSRs that a customer can move forward with after completion of a study to the nameplate MW associated with the cited generation source although BPA does not limit associated with the number of TSRs. If SENA has additional ideas in this arena, we would be interested in hearing more about those ideas.
Shell Energy	<u>Support for Alt3 – Removal of Mid-C Remote with Preserved Flexibility</u> SENA recognizes the complications associated with planning around virtual MidC Remote point and does not foresee losing any significant functionality in conforming MidC Remote requests to Northwest Market Hub (NWHUB). SENA incorporates the use of these hubs as a means of matching up supply plans to load customers without disrupting network requests that these customers have made and finds that this functionality provides the flexibility necessary to resolve the temporal mismatch between network load service and merchant supply plans. SENA is supportive of Alt3 provided that it is implemented as described and NWHUB remains available as a long-term point. Alternatively, SENA is also supportive of maintaining the status quo as outlined in Alt4 with the understanding that this approach, while not addressing the inherent complexities of the planning process, may be workable if combined with the appropriate business criteria.	Thank you – we appreciate hearing that SENA finds the proposal would continue to provide the necessary flexibility or that SENA would also support Alternative 4.
Tacoma Power	Additionally, BPA is considering options in its awarding of transmission service that run afoul of FERC's Open Access Transmission principles, which BPA has adopted in its OATT. On Slide 46, BPA suggests that it will establish different readiness criteria for different types of transmission requests. Additionally, on Slide 50, BPA suggests that "Other formal indications that the transaction will be used to serve load that exists or will exist during the period of the contract" be used as a metric to determine if a PtP award should be granted. Because PtP service is requested and granted for a fixed amount over the term of the TSR, and that is what the customer pays for, it is irrelevant and discriminatory to require the customer to provide any sort of indicator that the service will be used to serve	Thank you for providing Tacoma's thoughts on the proposed readiness criteria for long-term firm transmission service request data exhibit validation. Please see the Future of GAT Engagement at the start of this document for more information on our decision to shift to a tariff proceeding process to allow more time to consider concerns, such as the ones Tacoma is raising in its comments. We acknowledge Tacoma's concerns regarding our proposals for readiness criteria. We are considering Tacoma's feedback as we consider revisions to our proposals shared this past summer and new alternatives we are developing to share in the TC-27 pre-

Commenter	Summary of Comment/Question	BPA Staff Response
	load. For developer projects that have gone through BPA's interconnection process, BPA has already collected readiness criteria for those projects, through the FERC Order 2023 terms that BPA has adopted into its OATT. Beyond the requirements for requesting transmission in its OATT, which BPA should consistently follow, additional information concerning the readiness of a transmission request, whether it be for NITS or PtP service, and then adjudicating that information based on the type of request, is capricious and discriminatory.	proceeding workshops. We do want 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.
Tacoma Power	Tacoma understands and appreciates BPA's concern with virtual points and the complexities and planning requirements that they entail. Modifications to the treatment of these points must be thoroughly vetted and carefully detailed in BPA's plans as the region heads towards Day-Ahead Markets and Resource Adequacy Programs. While Alternative 3 proposes a workable solution, BPA must consider those who hold firm rights to MIDCRemote and the unintended consequences that may arise from the future inability to acquire long-term firm service at this point. Furthermore, careful detail must be taken to define and determine what short-term versus long-term means in this context, and if a phased approach may benefit transmission customers. There may be unintended consequences such as a supplier may have transmission to NWH and the power supply purchaser has short-term, non-firm transmission away from MIDCRemote, creating a curtailment risk. These complex intricacies must be contemplated by Bonneville in their entirety. Additionally, related to Issue #2, if only Reassessment CFS transmission in the short-term market is available for MIDCRemote, it may harm the credibility of Conditional Firm Service if these reservations are subject to more curtailments than current conditions.	Thank you for raising these concerns regarding our proposals for virtual points, including implications in the short-term versus long-term. We will consider your feedback as we develop alternatives and/or refine our proposals from this past summer to share in the TC-27 pre-proceeding workshops. Additionally, we will continue to coordinate with other BPA initiatives, including Day Ahead Market, and as necessary we will discuss impacts of our proposals and invite subject matter experts from those initiatives to workshop discussions. We would appreciate any additional input Tacoma would like to provide regarding the relationship between our proposals regarding virtual points, Day-Ahead Markets and Resource Adequacy Programs.
TransAlta	TransAlta opposes BPA's currently proposed readiness criteria, which is unduly focused on evidence of a power purchase agreement in one form or another, and which excludes entities who are willing and able to contract long-term firm service, such as for energy marketing purposes. TransAlta recognizes that BPA is trying to reduce the transmission queue to make it more manageable. However, that goal does not justify such narrow criteria and excluding customers who are otherwise ready to take service. BPA must work with the region to	We appreciate TransAlta's concerns regarding our proposals for readiness criteria. Our GAT proposal did include the option of using a financial mechanisms in lieu of ability to demonstrate a bilateral arrangement. We acknowledge additional discussion is necessary for these proposals and anticipate further discussion as we share alternatives in the TC-27 pre-proceeding workshops. We continue to be open to other suggestions.

Commenter	Summary of Comment/Question	BPA Staff Response
	include other forms of readiness, such as reasonable security or deposit requirements, and links to interconnection requests or service.	
TransAlta	TransAlta is still considering BPA's questions regarding virtual points, because providing transmission service to and from the region's liquid hubs remains critically important. We tentatively support alternative 3 described on slide 51, but request that BPA revisit Northwest Market Hub (NWHUB) and MIDCRemote in a future workshop, and consider how centroid concepts (that might be applied to these virtual points) are modeled by BPA in other contexts.	Thank you for providing TransAlta's input regarding this proposal. We remain open to further discussion on this topic.
Umatilla Electric Cooperative	BPA is also proposing to apply "readiness criteria" to NT Load service. Under this proposal, NT Customers must demonstrate that their line and load interconnection requests and 10-year load and resource forecasts are supported by "mature" line and load interconnection/generator interconnection plans of service, power purchase agreements, notice of award from request for proposal, and/or letters of intent signed by both parties. If NT Customers are unable to meet the readiness criteria, then their requests will not be included in BPA's transmission queue. This means that BPA will not assess whether sufficient transfer capability is available, but perhaps more importantly, BPA will not conduct a study to determine the facilities necessary to serve the NT Customer's load. BPA seems to rely on FERC's Order 2023 as a rationale for applying readiness criteria for service to NT Loads. But, this reliance is misplaced because Order 2023 only mandated that readiness criteria be applied to generation interconnection requests. BPA also seems to ignore the fact that its OATT already applies readiness criteria for Network Resources—an NT Customer must attest that it owns the resource, has committed to purchase generation pursuant to an executed contract, or has committed to purchase generation where execution of a contract is contingent upon the availability of transmission service when designating Network Resources. BPA's proposal to apply readiness criteria to 10-year load and resource forecasts will not only hamper BPA's ability to meet its NT planning obligation, but it will also reduce the amount of information sharing and analysis between BPA and its customers.	Thank you for your feedback and raising your concerns. Our proposal is to apply readiness criteria to evaluation of NITS forecasts that are above the proposed new network load threshold, not all NITS forecasts. But, we acknowledge additional discussion is necessary regarding proposing and applying readiness criteria to NITS. We intend to share revisions to our GAT proposals and/or new alternatives for readiness criteria in the upcoming TC-27 pre-proceeding workshops and will address Umatilla's concerns at that time.

Commenter	Summary of Comment/Question	BPA Staff Response
Dynasty Power	Second, we suggest that readiness criteria be applied prospectively—to new TSRs going forward—not retroactively to those already in the queue. Developers made investment and development decisions based on current rules. Imposing new readiness thresholds on existing requests could unfairly penalize projects that are otherwise progressing and needed for regional reliability and clean energy goals.	Our GAT proposals do not include applying readiness criteria to transmission service requests that have already been studied. This protects investments in forwarding transmission projects identified as necessary to support those previously studied requests. The focus of our reforms is on new or unstudied requests for transmission service for which similar investments have not been made.
NewSun Energy	The New Point mechanism, developed by BPA, must remain a valid and accessible tool for demonstrating transmission needs and securing service. BPA has a unique opportunity to align its queue management processes with the region's resource development and liquidity requirements. CRC eligibility criteria should be expanded to include, and not be limited to: • Active generator interconnection (GI) agreements, negotiations, or study phases. • Submission to Requests for Proposals (RFPs). • Prior funding commitments (e.g., Preliminary Engineering Agreements, feasibility studies, EAs, and other forms of financial commitments). • Willingness to pay Engineering, Procurement, and Construction (EPC) costs. • Commencement of construction activities (e.g., site control, equipment procurement, groundwork). • Active negotiations between counterparties. • BPA must not use CRC reform as a vehicle to restrict generator access to the Mid-Columbia (MIDC) trading hub, which is vital for regional liquidity and renewable integration.	Thank you for sharing NewSun's thoughts on the readiness criteria of our GAT proposal. We do 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 *which have not been studied* due to the rapidly growing transmission service request queue which is no longer leading to solutions which support the region's needs. In addition, we are not intending to mix readiness requirements for generation interconnection and proposed readiness requirements for transmission service requests. As we revise our proposals for readiness or consider alternative proposals to share in the TC-27 pre-proceeding workshops, we will consider the criteria proposed by NewSun. Additionally, we do remain interested in further discussion regarding transmission service request data exhibit validation criteria, particularly as related to its two key goals for this information: (1) ability to effectively study the necessary plan of service and (2) maturity for offers of interim service. Finally, in regard to your feedback on the MID-C trading hub, if there are transactions that could not be effectuated using NWHUB rather than Mid-C in the long-term market with MidCRemote remaining active in the short-term market, we would appreciate any specific information you could provide.
PRITCA	*BPA's proposals are discriminatory:* PRITCA believes that many of the BPA proposals, such as requiring oppressively large deposits, will bias transmission system usage in favor of large new mega-loads, like data centers, tied to large balance sheet developers. The proposal relies in significant part on BPA-T's speculations about which IPPs and loads are "real," which may ultimately hinder LSEs seeking to serve their own existing or growing loads.	Thank you for sharing your concerns. Our focus has been to propose changes to our transmission study processes for requests which have not been studied due to the rapidly growing transmission service request queue which is no longer leading to solutions which support the region's needs. Our proposals are not intended to favor particular customers or types of loads. We acknowledge that additional discussion is necessary around our proposals, including readiness criteria. We look forward to further discussion as we share refinements to our proposals from this summer and new alternatives we propose in the TC-27 pre-proceeding workshops.

Commenter	Summary of Comment/Question	BPA Staff Response
PRITCA	Comments on specific reform proposals. 1. BPA's Application of Commercial Readiness to LTF PTP Transmission Service and Open Access is Inherently Flawed, Inherently Discriminatory and Asserts Commercial Judgments by a Transmission Provider about legitimate uses of the transmission system. BPA's approach, as discussed above, inherently inserts judgments about which type of requesting party, which type of business model, which class of company, and which type of load, and which type(s) of commercial transactions are legitimate, even permissible. There is not a record to support these conclusions. Nor is there any demonstration of how these conclusions can be squared with BPA's statutory obligations.	Please see the response in the row above.

VI. Interim Service

Commenter	Summary of Comment/Question	BPA Staff Response
Brookfield Renewables	As part of its "Future State" proposal, BPA proposes to offer interim service to those that request long-term transmission service. As understood by Brookfield Renewable, BPA would offer some form of interim service in the period between the time a transmission service request is submitted and the anticipated 5-6 year to plan-in-service date (i.e., start date of long-term firm service). Specifically, as shown in the slide below (see slide 30 from BPA presentation), BPA outlines three possible types of interim service. At the July 10th meeting, BPA clarified its intent to offer interim service during the transition period as well, i.e., for those existing queued requests that pass readiness validation. As noted in the slide below, provision of firm service on an interim basis would likely result in a lower quality firm service for both customers taking the interim service, as well as existing customers. Since BPA proposes to offer interim service without degrading existing customer's rights, provision of firm interim service appears unlikely. In addition, while BPA proposes to possibly offer some form of new interim product (third option below) on a long-term basis, such a new service would require a tariff change. Since BPA has stated that it will not contemplate tariff changes during the transition period (BPA states that it plans to hold to its policy that it will only make tariff changes as part of a change in rates; which is not planned prior to October 2028), provision of any form of new interim service is also unlikely during the transition period. Therefore, based on the above, it appears that with respect to the provision of interim service during the upcoming transition period, BPA will only be able to provide conditional firm service (Priority 6).	Please see the Statement on the Future of GAT Engagement and Future State Solutions located at the beginning of this document, which describes our decision to shift to conduct a TC-27 tariff proceeding process for GAT. We acknowledge additional engagement is necessary around our proposals for interim service, which we will have as part of the TC-27 pre-proceeding workshops. We will address Brookfield's comments and questions regarding interim service in that process.
Brookfield Renewables	Recognizing that many details have yet to be discussed and worked out with stakeholders, Brookfield Renewable supports BPA providing conditional firm service on an interim basis, while existing and qualifying queued transmission requests await the provision of long-term firm service based on an approved plan-in/to-service date. As acknowledged by BPA (see slide 33), Brookfield Renewable also understands that by providing interim service to qualifying requests, that: •Congestion may increase (both because of the provision of interim service and increased flows in the markets); •BPA may need to limit the ability of customers to extend their commencement of service;	Thank you for your comment. We agree more discussion is warranted and we look forward to work with customers on possible deferral limitations, our concerns with NWACI and how these will interact with possible interim service or other solutions that might be determined as we collaborate with customers in the TC-27 pre-proceeding workshops.

Commenter	Summary of Comment/Question	BPA Staff Response
	•Transmission service requests (TSRs) with a "newpoint" request that impacts Northwest AC Intertie (NWACI) facilities may be ineligible for interim service; and •There could be possible market settlement impacts from the extension of interim service to more customers. Brookfield Renewable recommends that BPA facilitate further discussion and dialogue with stakeholders on these and other issues regarding the provision of conditional firm interim service. While Brookfield Renewable understands there may be difficult to predict outcomes regarding the level of congestion and market settlement impacts from the provision of interim service (risks that must be assessed and managed by transmission customers), Brookfield Renewable needs to better understand the limitations BPA may impose with respect to deferral of service rights and possible impacts on NWACI facilities. Specifically, Brookfield Renewable requests that BPA provide more information on the timeline and requirements for commencement of transmission service based on approved/validated plan-in-service dates for planned generation projects and how deferral of service requests could impact the provision of conditional firm interim service. In addition, while Brookfield Renewable recognizes that certain requests could impact the rights/service to existing NWACI rightsholders, under flow-based system modeling, many TSR requests could feasibly impact NWACI flows/facilities. The question is, to what degree and whether that impact is material. Further discussion of this point is warranted.	
EDP Renewables	EDPR encourages BPA to allocate interim transmission service to new generators through a competitive process if it cannot accommodate the full volume of service request it has received. A competitive approach will help ensure the efficient allocation of scare transmission capacity. A comprehensive competitive scorecard could incorporate indicators of commercial interest, such as a short list or power purchase agreement as well as other key project development milestones like land acquisition, permitting, interconnection agreements, and equipment procurement. These categories are verifiable and together provide a more robust framework to assess which projects are best positioned to receive interim service. This competitive process would ideally be run after a cluster of new generators complete their facilities study and before they execute their Large Generator Interconnection	Thank you for your suggestion, however, we would need more information in order to better understand the proposal and look forward to learning more as we collaborate together.

Commenter	Summary of Comment/Question	BPA Staff Response
	Agreement (LGIA). This would reduce the number of requests because generator's with prohibitively expensive interconnection costs will not seek service because their interconnection impacts and required mitigation costs are studied and known. Based on recent BPA materials, the transition cluster projects are slated to complete their facilities study by Q4 2027, and the first cluster study projects should be completed Q1 2029.1 Once allocated interim service, new projects are ideally situated to move on to participate in the load serving entities competitive processes with bids offtakers can rely upon for relative cost and timing certainty.	
EDP Renewables	EDPR requests the following clarifications on interim service: • How will BPA preserve the quality of service for existing transmission rights holders if the interim service product is an equal level of service (conditional firm or 6NN) and will create additional congestion? • Can BPA identify whether each of the new and existing interim service offerings are sufficient for load serving entities to utilize to comply with their RA obligations? • Can BPA specify at what point in the process an entity receiving interim service will know the costs of the firm service and the expected date the interim service will turn firm? • How does BPA plan to manage transmission delays during the interim service period? Is it possible for a project to lose interim service? How would costs incurred due to delays be identified, managed and assigned? • How much capacity does BPA believe it can offer as interim service over the next 5-6 years while the future state is stood up?	Thank you for your questions and suggested analytics. We look forward to working with you to consider options with our customers as part of the TC-27 pre-proceeding workshops.
Grant PUD	Customers seeking new transmission service must assume that BPA will only offer Interim Service for the next several years. The rates for Interim Service have not yet been discussed with customers, and new rates may be necessary given the nature of Interim Service. BPA should consider the need for rate discounts (or some form of credits) associated with Interim Service, if such service is offered only on a non-firm basis. Currently, non-firm PTP service is available on a daily and hourly basis, and with no discount on the rates for firm daily and hourly service. Interim Service customers will presumably face a higher risk of curtailment than Conditional Firm Service (CFS) customers. Due to the higher risk of more frequent and longer curtailments without certainty around the duration of the Interim Service being in place, customers should not be required to pay the full firm service rate for Interim Service during the Transition period.	Since the proposed interim service would be firm service, we do not agree that there would need to be a change in rates.

Commenter	Summary of Comment/Question	BPA Staff Response
Grant PUD	The relationship of Interim Service to Day-Ahead Markets (DAMs) should also be discussed and clarified. Curtailments of Interim Service will likely increase reliance on redispatch in DAMs and perhaps also Energy Imbalance Markets (EIM), which will have financial consequences and could complicate discussions of, and changes to, the allocation of congestion rents in DAMs as Interim Service grows. Interim Service customers should be able to develop means to manage such financial consequences and should be exposed to DAM settlements on a comparable and not unduly discriminatory basis. Getting ready for Interim Service will take time, planning and most likely investments. Individual Interim Service customers will presumably need to develop back-up plans (e.g., reliance on DAMs and/or other spot markets). Such plans could confer benefits on other customers in the form of additional transmission revenues and/or different/postponed costs of capacity expansion, which should be taken into account when pricing Interim Service and developing the rate parameters associated with it.	We acknowledge Grant's concerns, but we disagree with this statement. Our proposal for interim service is not any different than any other firm product that is subject to congestion rent in the market with any other utilities. And, as we refine our proposals for interim service, we will continue to coordinate with other BPA initiatives, including Day Ahead Markets. As necessary, we will discuss impacts of our proposals and invite subject matter experts from those initiatives to TC-27 pre-proceeding workshop discussions.
Northern Wasco County PUD	As BPA and the region transitions toward an organized market, Northern Wasco supports BPA's approach to offering less-than-firm (i.e. 6NN service for NITS customers) as an interim service solution. We look forward to development of further details on these service offerings and will likely have more specific comments when more information is available. We note that the offering of 6NN as an interim service option highlights the need to equitably resolve issues related to congestion revenue rights under an organized market framework. NITS customers paying for transmission service based on the full embedded cost of the system must be allocated a fair share of congestion revenue whether power is ultimately scheduled at Priority 6 or Priority 7.	We agree and look forward to collaborating with customers on looking for solution sets for the TC-27 pre-proceeding workshops that can address those concerns.
PPC	Additional clarity is needed on the interim service solutions that will be sought in the short term as compared to the long-term, and whether decisions made in the short-term transition process will serve as a precedent in the longer-term future state discussion. Again, PPC applauds BPA's willingness to consider novel solutions to enable service for its customers but wants to ensure that there is robust discussion and analysis around these solutions to avoid any potential unintended consequences. For example, we anticipate it will be difficult to provide feedback on proposed changes to BPA's conditional firm methodologies without understanding 1) the magnitude of requests that may be offered under an updated approach and 2) the duration where such conditional firm service offers may apply. More information from BPA is needed to help	Thank you. We agree there should be more of a holistic approach and time to share impacts and timing of the impacts so that customers can better understand the decisions being made. We will consider PPC's comments as we develop information and alternatives to share in the TC-27 pre-proceeding workshops.

Commenter	Summary of Comment/Question	BPA Staff Response
	analyze impacts on existing service, which should be a key criterion in determining whether to move forward with proposed changes. It is also critical that as BPA considers how to make interim service offers, the agency prioritizes establishing parity between NT and PTP service offerings. For example, 6 NN and 6 CF are not comparable products.	
PSE	Additionally, among the concepts, BPA says that sub-grid constraints would need to be addressed to meet the readiness criteria. The Puget Sound region has a sub-grid limitation that has a plan of service that is projected to go into service in 2035 (Schultz-Olympia). PSE seeks clarification on how BPA would manage the award of interim service for transmission service requests delivering to Puget Sound customers before the Schultz-Olympia upgrade has been completed.	Thank you for your comment. We plan to share a proposal on how we might manage sub grid constraints for interim service in TC-27 pre-proceeding workshops.
Seattle City Light (Final)	Transmission Requestors are rational actors reacting to business needs or perceived opportunities for high-return investment in an uncertain future. BPA providing immediate interim service that cannot be delayed and will eventually lead to firm permanent service will allow those rational actors the opportunity to re-evaluate their requests and business choices. This choice will be clearer if BPA additionally requires a 5-year service deposit. Those requestors with mature business needs will execute their interim service agreements.	Agreed. Thank you for your comment.
Seattle City Light (Preliminary)	<u>Interim Service and LTF Queue Management.</u> Seattle City Light, (City Light) believes these areas are intertwined and need to be addressed wholistically. We believe BPA's initial informal idea of granting initial service to mature, verified transmission service requests without transmission planning study was the correct step forward for the transition process and the future state. City Light suggests that the various study steps outlined in the discussed-on slide 63 are unnecessary for an initial offering. This includes if BPA intends for TSR's not yet studied to be required to participate in Preliminary Engineering Agreements and Environmental Study Agreements related to the existing Evolving Grid 2.0 projects or future projects. These cost sharing pools can be allocated by existing path impacts by agreement without study. While not an exact accounting, for a transitional process granting initial less than firm service that leads to firm long-term service, very few serious requestors will object to	Thank you for your suggestion. We will consider this in our future proposal.

Commenter	Summary of Comment/Question	BPA Staff Response
	this methodology in our opinion. We understand as a BPA Transmission customer that accepting this initial offering of service would be paid for under the existing rate structure. We suggest that the first step in the process be to limit the deferral of service to 12 months (or less) with no exceptions. This influx of additional funds should be applied to accelerating transmission expansion projects and limiting future rate increases.	
Seattle City Light (Preliminary)	City Light believes from an operational perspective that the availability and current use of non-firm by Point-to-Point (PTP) customers and 6NN by Network (NT) customers greatly mimics customer choices and grid flows that would occur with this new initial product. We understand that BPA Operations would be naturally opposed to this change due to the perceived risk. City Light suggests that the risks are minor, acceptable, and in keeping with good engineering judgement and within regulatory operating limits. City Light additionally suggests limitations to BPA curtailment tools are likely limited to specific areas of the BPA system and can be operationally addressed. BPA is already proposing to not allow initial offerings to request that affect NWACI as an example. City Light suggests that if BPA Operations needs additional risk avoidance, the new initial offering could have a stipulation that it must be scheduled prior to 1400 hours the day prior to use. This would allow for the scheduled flows to be considered in next day plans and reviews.	Thank you for your suggestion. We will consider this in our future proposal.
Tacoma Power	One of BPA's stated solutions on Slide 10 is an Interim Service plan, to provide earlier access to the grid, via the use of Conditional Firm or 6NN awards, with informed risk (i.e. without being studied). BPA highlights on Slides 32-33, that number of hours and MWs BPA has curtailed since 2020, highlighting the stability of its Priority 6 products, Conditional Firm and 6NN. The stability of BPA's Conditional Firm product is such that it has been included as a viable product for demonstrating firm capacity commitments for the Western Resource Adequacy Program (WRAP), which is then used to meet the capacity requirements for Markets+. There is an active effort ongoing to have 6NN included as well to meet these capacity commitments. However, BPA's Interim Service plan, which would allow it to issue Conditional Firm and 6NN service without a study and before firm service is available, substantially increasing the amount of Conditional Firm and 6NN granted, will likely result in a spike in curtailment of both products. BPA's plan is to grow the grid and, in the longer term, be able to firm up	Thank you for the feedback. BPA will be clear on which CF it plans to offer, and when, in the future and will consider your feedback in our future proposal.

Commenter	Summary of Comment/Question	BPA Staff Response
	these offers into Long Term Firm and Network service. However, it is unknown how long that process will realistically take and if confidence is lost in the firmness of the Conditional Firm product, it very well may be removed as a viable product to demonstrate WRAP compliance. Tacoma Power asks BPA to carefully review its granting of Conditional Firm and 6NN to ensure that the system can sustain these awards. Tacoma Power also notes that BPA discussed Conditional Firm as a singular product at the July 9-10 workshops, but in reality, BPA has two conditional firm products, Bridge and Reassessment. It is unclear from the meeting materials which Conditional Firm award (or both) BPA is considering issuing under its Interim Service paradigm, but the products are treated separately under the BPA Conditional Firm Service Business Practice. Tacoma Power notes that this Business Practice is currently out for revision, but also asks for clarity on the two types of Conditional Firm products would be awarded and then firmed up under BPA's Interim Service paradigm. If It is BPA's intention for the two products to remain available to customers, with one on a trajectory to faster firm service, Tacoma Power encourages BPA to be clear with customers on this strategy.	
Dynasty Power	Third, we encourage BPA to ensure that interim and short-term products provide a meaningful pathway to long-term firm service. Most renewable energy projects require 10- to 15-year Power Purchase Agreements (PPAs) to be financeable. Without firm, long-term transmission rights—and the ability to roll over or convert service—projects face increased risk, potential non-compliance with regulatory obligations, and the prospect of stranded investments. A short-term product (less than five years) with no rollover right does not meet the planning or financing needs of project developers or load-serving entities.	Thank you for your comments, we will consider your feedback in our future proposal. We would like to clarify that under our OATT, "Short-Term" refers to a term of less than one year while requests for long-term transmission service of 5 years or more are eligible for rollover. BPA uses long-term products as a pathway to long-term firm service (e.g. Bridge Conditional Firm Service).
NewSun Energy	BPA's approach to interim and conditional firm service must preserve flexibility and avoid penalizing projects that are awaiting grid upgrades or that have already participated in the TSEP process. All requests—whether paused during TSEP or submitted thereafter—must be evaluated transparently under the new framework, with clearly articulated criteria for inclusion. They must have a pathway to LT Firm Service because that is what the region requires for load service, resource development, to meet compliance programs obligations, to finance projects and transmission investments, and provide essential liquidity to the market.	Thank you for your comments. As we clarified in other responses above, 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 with GAT is to propose changes to our transmission study processes for requests *which have not been studied* due to the rapidly growing transmission service request queue which is no longer leading to solutions which support the region's needs. We agree that BPA should continue to have a pathway to firm for customers.

VII. Queue Management

Commenter	Summary of Comment/Question	BPA Staff Response
Mason 3 PUD	Mason 3 generally supports BPA's proposal to initiate a disciplined transition as outlined in the workshop. As BPA pointed out, doing so will clear bottlenecks, restore queue integrity, and stabilize planning.	Thank you for the comment.
NewSun Energy	BPA's proposed reforms must reflect the scale and urgency of renewable energy integration. As demonstrated in Elaine Hart's study on queue congestion, the current queue size is a direct response to the region's decarbonization and electrification needs, not speculative behavior.	Our focus with GAT has been to propose changes to our transmission study processes for requests which have not been studied due to the rapidly growing transmission service request queue which is no longer leading to solutions which support the region's needs. We acknowledge that decarbonization and electrification needs are a driver behind the exponential growth in the energy industry and fully recognize how those policies can lead to speculation in BPA's long-term firm transmission service queue.
NewSun Energy	We strongly oppose the removal of rollover rights and deferral flexibility, which are essential for project financing and long-term planning. These mechanisms are particularly critical for clean energy developers navigating complex permitting, interconnection, and financing landscapes.	Thank you for raising your concerns regarding rollover rights and deferral flexibility. We are not proposing to change our practice regarding rollover rights, but we may consider possible changes to deferral rights for our proposals. We will consider your feedback and concerns in our future proposal to share in the TC-27 pre-proceeding workshops.
NewSun Energy	Furthermore, BPA must not retroactively alter or invalidate TSRs that have already undergone requests and are in the Transmission Service Evaluation Process (TSEP). These TSRs represent substantial investments and planning efforts, regardless of whether a confirmed offer has been issued or requests are still in the study process. This is another example of why this process needs to ensure enough time for people to engage with BPA effectively, so we can create a viable path to transmission and resource development in the region. We must be very conscious and respectful of these proposed changes so that we do not unduly discriminate against those who have long been in the queue, waiting on BPA, and funding existing requests. Serious damage can occur if we alter the assumptions and expectations customers made to invest in the development the region desperately needs.	As we state in responses above, GAT is focused on proposing changes to our transmission study processes for requests *which have not been studied* due to the rapidly growing transmission service request queue which is no longer leading to solutions which support the region's needs. Additionally, a transmission service request has not entered TSEP until it has been validated and a customer has signed and funded a Cluster Study Agreement. Based on our requirements for submission of a transmission service request, prior to funding the cluster study, the "substantial" investment of a request for long-term firm service is a very modest $2,000 per request (recently increased to $10,000). As we share revisions to our proposals in the TC-27 pre-proceeding workshops, we encourage NewSun, or other customers, to share their specific concerns of the impacts of proposals on requests.

Commenter	Summary of Comment/Question	BPA Staff Response
NewSun Energy	We must be very conscious and respectful of these proposed changes so that we do not unduly discriminate against those who have long been in the queue, waiting on BPA, and funding existing requests. Serious damage can occur if we alter the assumptions and expectations customers made to invest in the development the region desperately needs.	As we explain above, transmission service requests are not funded, studies and expansion projects are funded. Our proposal is to establish a standard so requests may be studied in a manner that will produce meaningful system expansion projects for regional development. Additionally, 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). Those previously studied transmission service requests will not be removed from the queue as a result of our proposals.
NRU	As noted above, NRU is generally supportive of more robust standards for queue management, both with respect to readiness, and as a tool to bring BPA to its desired future state. That said, as we'd also noted above, additional clarity is necessary as to how the new readiness requirements will be applied to the 13,131 MW of unstudied NITS requests in the queue. Specifically, is BPA going to require all FTSRs for "above the line" NITS loads to have signed/funded construction agreements for load upgrades, or they will be removed from the queue? How does this work within the framework proposed by the NITS Planning Model slide, which clearly states that "All forecasts have a path forward to firm service"?	Thank you for the comment. BPA acknowledges there are aspects of the proposal for setting the 13 MW new large load threshold which need to be discussed in the upcoming TC-27 pre-proceeding workshops. BPA will consider and address NRU's questions in our final proposal.
PSE	Lastly, with respect to BPA's proposal for its long-term firm queue management, in order to provide the transitional element of BPA's larger proposal to move to a future state, it will be critical for BPA to consider the utilities' near term resource acquisition needs. To that end, PSE requests BPA provide assurance that it will coordinate its process with the near-term (next two years) request for proposal timelines of load serving entities so those are be considered in the processing of the long-term firm queue.	Thank you for the comment. We are interested in feedback from utilities conducting RFPs on how BPA could coordinate with load serving entities, and any specific information or concerns BPA should consider for its final proposals.
Seattle City Light (Final)	City Light supports BPA's approach to reorient the queue from a passive intake system to an actively managed pipeline. <u>Objectives -</u> City Light supports there being a clean cut-off between transition state process and future state process. City Light suggests that BPA consider the objective: All TSRs remaining in the queue are under an interim service agreement or post-study agreement.	Thank you for the comment, we will consider Seattle's feedback as we develop specific details regarding the transition and future states for our proposals.

Commenter	Summary of Comment/Question	BPA Staff Response
Seattle City Light (Final)	Principles - City Light supports the principle to avoid requiring customers to resubmit TSRs under the new policies.	Thank you for the comment.
Seattle City Light (Final)	Principles – City Light suggests those requests in the queue with a plan of service that has deferred service or extended commencement of service should be subject to new policies limiting these time periods to one year or less and be subject to requirements for a service deposit.	We are considering proposing limits on deferrals of service, however, we are unlikely to apply such changes to requests for long-term firm service that are already under contract.
Seattle City Light (Final)	Customer Comments - City Light supports the NRU comment that "BPA could consider offering all unstudied transmission requests mandatory conditional firm service as a means to ensure it is planning only for those customers that are ready to take service." City Light believes BPA should offer mandatory conditional firm service with a five-year service deposit for requests. This would incentivize less mature FTSRs and TSRs to withdraw their requests. These deposits would be credited back to customers on a monthly service cost basis.	Thank you for the comments.
Seattle City Light (Final)	Transition to Future State - City Light recommends that BPA consider that the six steps to transition to the future state should be: 1. Update Business Practices (4 months) 2. Apply updated Policies & Criteria to LTF Queue (6-8 months) 3. Commit All TSRs with a plan of service to Interim Service (3-4 months) 4. TSRs that do not accept Interim Service are removed from the queue. (2 months) 5. Apply Capacity from EGPs to models, Conduct Study, & Tender updated Agreements in queue order. (10-12 months) 6. Future State where granting interim service occurs within 90 days of the request.	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. We will share more details of a transition to the future state and will consider Seattle's recommendations.

VIII. Transition to Future State

Commenter	Summary of Comment/Question	BPA Staff Response
Clatskanie PUD	**Clatskanie does not currently support;** 3. Doing too much too fast. a. While we support BPA "getting off pause" and processing the queue, we believe there is risk in going too far. The steps needed to move forward should be taken cautiously and in many cases on a "trial basis".	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.
NIPPC and RNW	NIPPC and RNW encourage BPA to consider the following reforms as part of the transition to the future state: 1. Conduct a "reverse open season" to allow customers with confirmed or pending transmission service requests to release the transmission capacity that BPA has encumbered on their behalf for reallocation (in queue order) to customers with an immediate need for transmission service; a. Allow customers with existing transmission service agreements to release their rights back to BPA; b. Allow customers with TSEP agreements (including Preliminary Engineering Agreements and Environmental Study Agreements) to withdraw their requests in return for reimbursement of the deposits the customer posted for their Preliminary Engineering Agreement and/or Environmental Study Agreement; 2. Conduct an Open Season process for customers who agree to; a. Provide a deposit to cover their share of Preliminary Engineering and/or Environmental study costs (calculation of the amount of deposits should take into account any refunds made to customers as part of the reverse open season); b. Provide additional non-refundable deposits; c. Establish commercial readiness through: i. Evidence of a contractual commitment between a generator and load (as proposed by BPA); or ii. Executing an agreement with BPA to take "as available" service until plans of service are complete; 1. Consider alternative rate treatment for customers who take "as available" service; 2. Customers who take "as available" service could receive a refund or credit equivalent to the short-term firm rate for periods when they are curtailed; or	Thank you for the feedback, much of which has similarity to BPA's proposal. BPA looks forward to evaluating and developing detailed implementation specifics with customers. BPA would like to hear more from NIPPC and RNW on their proposals for a transition to the future state, in particular on allowing "customers with existing transmission service agreements to release their rights back to BPA".

Commenter	Summary of Comment/Question	BPA Staff Response
	3. Explore other mechanisms to tie the cost of "as available" service to its actual availability; d. Agree to limit the ability to Extend Commencement of Service; i. Instead of five one-year options to delay, consider allowing each customer a single option to delay commencement of service for either two or three years; e. Agree to a minimum term of service (10-20 years); and f. Provide security for the contract amount.	
NIPPC and RNW	NIPPC and RNW agree that an executed power purchase agreement or other proof of a contractual off-taker could be one mechanism to establish commercial readiness in the Future State. But reform of utility procurement processes will require the state Commissions to run their own formal stakeholder processes to implement those reforms. BPA will need to be prepared to allocate staff time and resources not only to engage with state Commissions informally, but also to actively participate in those formal proceedings to ensure alignment and consistency of the state reforms with BPA's reforms. NIPPC and RNW anticipate that coordination will take longer than BPA has set aside to complete the Transition process. We also note that such state regulatory reforms typically must address inherently adversarial positions between, on the one hand, incumbent vertically-integrated monopolies that have a fiduciary responsibility to maximize rate base and, on the other hand, the independent generators (the members of NIPPC and RNW) competing with the incumbents to build, own, and operate resources to serve the incumbent's load. We anticipate such a dynamic could hold true on this subject matter as well, given how much sway a load-serving entity's procurement choices could play in determining future transmission service. As a practical matter, it typically takes state commissions longer to make decisions in the face of such disputes between stakeholders.	Thank you for the information. We are considering NIPPC and RNW's suggestions and are engaging in other forums as possible.
NIPPC and RNW	NIPPC and RNW are also concerned with the proposals to require "mature" interconnection plans of service. BPA recently completed its interconnection queue reform process in TC-25. NIPPC and RNW recognize that an executed LGIA could be one method of establishing commercial readiness for transmission service, but again the timing of this Transition process and the Transition Cluster Study do not align. Phase One of the Interconnection Transition Cluster Study is currently underway. It is unlikely that the Interconnection Transition Cluster Study will be complete in time to	Thank you for sharing these concerns. We recognize that many of the requests in our transmission service queue are for resources that are potentially years away from construction. We also recognize the uncertainty time places on the development of resources. It is because of these issues that we are looking to change the importance of TSR queue priority. Resources should be sufficiently developed before submitting a TSR. This provides better information for studying the request, identifying system constraints, assessing the needs of the system, and lowering the risk of constructing hundreds of

Commenter	Summary of Comment/Question	BPA Staff Response
	allow projects to get to an executed LGIA within the timeline of the Transition Cluster Study process. It is possible that some customers in the Serial Transition process may have agreements that are sufficiently certain to meet the proposed readiness requirements. In any event, too few customers are likely to complete interconnection agreements within the timeline of the Transition process to justify making evidence of a customer's interconnection status a realistic readiness requirement for the Transition Process.	millions of dollars of projects for flows that might not occur if the resource does not energize. When a resource is developed sufficiently that it is ready to take service, BPA will provide interim service. We do appreciate NIPPC and RNW's concerns about our proposed requirements and the timelines of the current interconnection transition process. We are considering your feedback in refining our proposals or developing alternative approaches which we will share in TC-27 pre-proceeding workshops. We are also coordinating with other BPA initiatives, including the implementation of the TC-25 Generator Interconnection reforms and will include SMEs from that process as necessary in pre-proceeding workshop discussions.
NIPPC and RNW	Likewise, NIPPC and RNW object to the proposal to require evidence of a bilateral agreement as a requirement to establish commercial readiness. As noted above, many procurement processes in the region generally require customers proposing to sell energy to support their proposal with firm transmission service. While the region should be able to adapt to new requirements for the future, it is unlikely that the market in the region will be able to adapt quickly enough to apply to the Transition process. NIPPC and RNW agree that evidence of a bilateral transaction would be evidence of a customer's commercial readiness, but BPA must allow for additional options which provide alternative indications of certainty. In that vein, NIPPC and RNW suggest that customers who are willing to execute a take-or-pay transmission service agreement as part of an Open Season described above should be able to establish commercial readiness for the Transition process.	As discussed in our responses above, we acknowledge NIPPC and RNW's concerns regarding application of a requirement for evidence of a bilateral agreement as readiness criteria in a Transition process. We appreciate NIPPC and RNWs suggestions in their comments, including considering additional options for readiness such as a willingness to execute a take-or-pay transmission service agreement as part of an Open Season. We are looking for ways to tender interim service agreements with take-or-pay provisions earlier in the process, but this may come after establishing a request's readiness to take service. We will consider your comments as we develop alternatives to share in the TC-27 pre-proceeding workshops.
NIPPC and RNW	Finally, NIPPC and RNW seek to underscore a concern raised in prior comments regarding any proposed requirement for a contractual commitment between a load and resource as a pre-condition to a request for transmission service. Such a requirement could simply encourage vertically integrated load-serving entities to contract with themselves for utility owned assets thereby negatively affecting wholesale competition. This is a particular concern for the Transition process where agreements between a utility's load and merchant affiliates are likely to be the only agreements that could be completed within the Transition period; it takes much less time to execute an agreement with an affiliate than to complete a competitive procurement process under state Commission rules. NIPPC and RNW would strongly	Thank you for the comment. BPA will evaluate this risk further and consider it in finalizing our proposals.

Commenter	Summary of Comment/Question	BPA Staff Response
	discourage any transmission provider, including BPA, from creating such a mechanism that would suppress supply-side competition.	
PPC	PPC appreciates that BPA has acknowledged the tension that exists between the need to move quickly to "get off pause" and the need to carefully and thoughtfully develop holistic solutions to its transmission challenges. The two-part approach developed by BPA, which includes near term work to "transition" BPA's planning processes and a longer-term "future state" to implement more transformative change, makes sense to address this tension. At this time, it is unclear to PPC whether BPA's November timeline for adopting changes to facilitate the transition portion of the agency's plan is reasonable or achievable; this is due to the somewhat limited information available on the scope of the changes that BPA will be pursuing in its upcoming business practice revisions. We hope to have a better sense of the chance of success after BPA publishes its "pink line" business practices at the end of this month. With BPA's two-part approach, the agency should clarify which issues that are being addressed in the transition phase will be open for discussion once the agency turns its attention to the future state and which, if any, issues will be considered "closed." BPA must provide some assurance to customers about when and how changes adopted to meet transition needs will be revisited to ensure they fit holistically into the future state.	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.

IX. Future State

Commenter	Summary of Comment/Question	BPA Staff Response
EDP Renewables	Across the country the regions that are faring best are the ones that have integrated all the electricity planning and operational processes into a cohesive structure. The key features of these regimes are that they create a consistent, trustworthy, and competitive process that stakeholders can trust. Ultimately, the best way to reduce speculative behavior is to create a process that developers can follow where they know they will be evaluated based on transparent and objective metrics. The key features of that type of process are: • Transmission capacity is proactively expanded to meet long-term forecasts. • Consistent resource adequacy studies and metrics to ensure regional reliability. • Competitive generation interconnection processes ensure the best projects move forward to resource solicitations. • Resource procurement frameworks are aligned with the resource, interconnection and transmission service timelines. • Flow based transmission operation supports regional day-ahead and real time market signals to optimize generation dispatch. EDPR congratulates BPA staff because they have already completed much of the work required to build each piece of this type of process. The Evolving Grid and WestTEC projects are excellent examples of the types of projects/programs needed to proactively expand transmission capacity. The Western Resource Adequacy Program (WRAP) program contains the shared metrics and requirement to ensure reliability and respect jurisdictional differences of stakeholders. BPA has refined generation interconnection process over the last year and is now seeking to create a new transmission service process. Outside of the details of how transmission service will work, the biggest outstanding question is how these processes can be coordinated to enable a competitive development landscape to help the region meet rapidly growing load in the most cost competitive manner.	Thank you for your comments.

Commenter	Summary of Comment/Question	BPA Staff Response
Grant PUD	Grant supports pro-active planning and accelerated expansion as discussed during the workshop, with the understanding that cost recovery for accelerated expansion must be discussed further. For example, building in advance of requests for new service may be justified in terms of benefits to BPA's customers in the form of congestion management costs and DAM settlements; however, the relationship to how the benefits may be rolled into rates of general application needs additional discussion because many customers (perhaps even most or all) will benefit from such accelerated construction.	Thank you for your comments. We expect to initiate some discussions about Future State solutions for Proactive Planning and Accelerate Expansion in future workshops, which we will expect to initiate concurrently with the TC-27 pre-proceeding workshops. In addition, as necessary, we will engage on topics related to the Future State in the upcoming TC-27 pre-proceeding workshops. We will consider your feedback as we develop information to share at those future workshops outside the TC-27 pre-proceeding workshops.
Grant PUD	All sources of funds and potential counter-parties for accelerated expansion should be considered and clarified. If BPA is considering that customers and/or third parties will provide funds for new facilities, clarity is needed on contracts both for financing in advance and for reimbursement once the new facilities are integrated into the BPA Network.	Thank you for your feedback. We will consider your comments as we develop proposals to share in future Accelerate Expansion workshops outside the TC-27 process.
Seattle City Light (Final)	Seattle City Light thanks BPA for accepting, understanding and applying customer comments concerning the desired outcomes and principles in the Grid Access Transformation. City Light suggests BPA consider that Tx Expansion Delivery, Customer Interconnections, and Reliability Projects should not be separate siloed transmission planning processes. These are all parts of meeting customers' needs and have interlocking dependencies. They should be coordinated and transformed together. In the future state, it is likely that there are redundant steps and tasks that can be streamlined.	We appreciate Seattle's feedback and as we are developing our Proactive Planning proposals, we are discussing how to allow for coordination or integration of processes. A consideration for our development plan is to allow time for adjustments to be made in the first few years and to gather feedback internally within BPA and externally from stakeholders on where we can improve processes and coordination.
Tacoma Power	Foundationally, Tacoma Power questions why reliability planning is separate from BPA's efforts towards proactive planning. On Slide 5, BPA clearly indicates that Reliability Projects, including System Assessment and CRISP (Customer Reliability Improvement & Service Program) are in a different bucket/process from the Grid Access Transformation process. However, system reliability and reliability planning have to be the foundation, and indeed the starting point, for transforming to the grid of the future. BPA's efforts to proactively plan, consider NITS forecast needs and accelerate expansion need to be encompassed in the guise of system reliability. Tacoma is concerned that BPA intends to keep its planning processes separate, with	One of the concerns BPA has with long-term planning is the accuracy of the input data and the associated results of studies using a 20-year future. We plan on developing study processes that will include reliability based practices but will rely on other inputs for decision making in the 20-year future.

Commenter	Summary of Comment/Question	BPA Staff Response
	individual, highly-siloed groups completing different stages of planning, as BPA does today, with the transparency and efficiencies that BPA discussed at the workshop lost. If BPA is truly committed to its statements that it wishes to be more transparent in planning, that transparency needs to start with its reliability studies, including its annual TPL report. BPA's new Proactive Planning process, outlined on slides 21-23, sounds like what BPA should already be doing under its Attachment K process. Attachment K, a regulated reliability planning process that BPA has included in its OATT, involves studying both local system needs and potential solutions to those needs. There is an annual report and customer meeting on the Attachment K needs and solutions. FERC Order 1920, which BPA has indicated it intends to partially follow, includes reasonably extensive new rules on stakeholder participation in order for utilities to better understand and include stakeholder-driven needs and solutions in developing local transmission growth. Tacoma is concerned that BPA is trying to develop a new proactive planning process counterintuitive to the rules it already has in place for Attachment K reliability planning. Tacoma Power suggests that BPA include its Grid Access Transformation as part of its reliability planning, especially its NITS forecasts, proactive planning and accelerate expansion solutions. Tacoma Power realizes that BPA's efforts to get through its transmission queue do not at this point fall under the transmission reliability framework, but if BPA is successful in transforming to its grid of the future, reliability planning will fully encompass the solution framework BPA has established.	
TransAlta	TransAlta supports proactive planning. We underscore that much more detail and regional engagement is needed to establish the "Key Expansion Drivers" and we contend that the effort should occur sooner than the five-year period suggested on slide 21. Specifically, TransAlta suggests that one driver must be Operationally Informed so today's problem flowgates are addressed (those that experience curtailments and hourly sales stoppages, for example).	We are actively working on the proactive planning process and expect draft processes will be available well before 5 years, but there will need to be assessments of these processes before they are finalized, during and after process cycles. Cycles are likely to require 2-3 years to complete so the 5-year estimate is to allow for these adjustments along the way for a fully mature process. BPA is taking the concept of operational congestion into consideration in developing the methodology of this process.

Commenter	Summary of Comment/Question	BPA Staff Response
TransAlta	Also on the presentation's slide 21, it is unclear what BPA means by running the "Request Informed process on a 2-3 years cycle". Is that on par with how frequently NITS forecasts will be evaluated?	We have several considerations in determining a study cycle for the proactive planning process. Some of these factors are study cycles of FERC 1920, FERC 1000, WECC base case development of 20-year cases, staff resources, etc. NITS forecasts will be used in this effort, but they will also be used in several other study efforts with different study cycles.
TransAlta	Finally, we encourage BPA to recognize that expanding the transmission system cannot be perfect. To be truly proactive and keep pace with increasing needs, BPA should err on the side of modest over-building of transmission capacity, which should generate less regret than allowing scarcity and firm transmission shortfalls to persist.	Project selection criteria are being developed as part of the proactive planning process development effort. We will be presenting the criteria at a future workshop and look forward to working with stakeholders on fine tuning the criteria.
TransAlta	Given resource constraints mentioned at slide 26, TransAlta requests that BPA escalate the third area of focus, which is customer-built BPA network assets. Option-to-Build is a successful method utilized elsewhere in the country where Interconnection Customers build and transfer ownership of interconnection substations (Network Upgrades) to local Transmission Owners, who are equally concerned with ensuring safety and reliability as BPA. What prevents those established practices from being leveraged here?	Thank you for your feedback. We will consider your comments as we develop proposals for Accelerate Expansion, which we will discuss in a future engagement process that will be initiated in parallel with the TC-27 process.
PRITCA	*BPA's future state is undefined:* BPA noted that these proposed business practices would be to 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. Having not yet defined what the future state will be, it is hard to know if this transitional approach will help get us there. Further, many of the proposed reforms appear more targeted at what BPA envisions as the future state rather than targeted at how to meet the needs of customers who entered the queue under the current paradigm.	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. We anticipate addressing Proactive Planning and Accelerate Expansion in future engagement processes that will be stood up in parallel with the TC-27 process.

X. Miscellaneous

Commenter	Summary of Comment/Question	BPA Staff Response
Brookfield Renewables	Brookfield Renewable strongly supports BPA's intent to accelerate transmission expansion by increasing both its capital execution capacity and redesigning its processes to prioritize schedule (see slide on next page). In this period where BPA's customers face the need to satisfy both state clean energy standards and pressing capacity needs, robust and timely transmission expansion is critical and, unfortunately, at present, a very real roadblock to meeting those goals. Combined with new and evolving tax rules with pressing deadlines, it is imperative that BPA reinvent its processes to expedite expansion. To that end, Brookfield Renewable also supports BPA's intent to establish an effective customer-build option for needed new transmission infrastructure. The BPA tariff already includes and permits a customer build option – what is needed now are revisions to BPA's business practices; revisions that will ease the path toward an effective self-build process by removing unnecessary steps and roadblocks. Ideally, BPA would establish clear specifications and standards and let customers execute the necessary permitting, equipment procurement, and construction, with appropriate, and as necessary, checks along the way. The process can be as simple as: (a) BPA issues off-the-shelf generic design and equipment specifications; (b) BPA issues a list of approved engineering and construction companies (EPCs) and environmental consultants; (c) The developer contracts with EPC/consultant to advance surveys, design, permitting and long-lead equipment order; (d) The EPC completes design, obtains final BPA approval (must be subject to time limit), and proceeds with construction at developer cost; and (e) Once constructed and accepted by BPA, but prior to being placed in service, assets are transferred to BPA ownership. Brookfield Renewable, along with many other developers, has hands-on experience constructing stand-alone network facilities in other markets. Attachment A to these comments provides an overview of some of the rules and processes in place in other	Thank you for your comments. We will address accelerate expansion in a future engagement series outside the TC-27 process.

Commenter	Summary of Comment/Question	BPA Staff Response
	regions; regions where Brookfield Renewable has successfully executed a self-build of transmission facilities.	
Brookfield Renewables	Brookfield Renewable recommends that BPA move forward immediately with the necessary revisions to its business practices to facilitate the self-build option. Based on the discussion at the July 9-10th workshops, and the scope of transition plan business practices up for discussion at the planned July 29-30th workshops (see slide below), it is unclear whether BPA views discussion of the self-build option as part of the "Future State" or the "Transition to Future State." Brookfield Renewable strongly recommends that it be part of latter. Brookfield Renewable recommends that BPA either include it for discussion at the upcoming deep-dive workshops or schedule a separate workshop shortly thereafter.	Thank you for your comment.
NIPPC and RNW	BPA has indicated that it proposes to consider reforms to the SCM and customer build options outside the scope of the transition. NIPPC and RNW, however, encourage BPA to pursue reforms to SCM and customer build in parallel with the GAT. NIPPC and RNW recognize that some of the areas that BPA has highlighted for reform of SCM will take time. NIPPC and RNW suggest that other changes – including the customer build option – could and should be developed and prioritized on a shorter timeline. Similarly, BPA should implement incremental changes to the SCM as those changes are feasible instead of waiting to implement those changes as part of a package at a single point in time in the future. Ideally, BPA would develop changes to the customer build outside of the GAT on a timeline consistent with the transition process.	Thank you for your feedback. We will hold Accelerate Expansion discussion in a future engagement series outside the TC-27 process, but run in parallel. We will consider your comments as we develop information to share in those meetings.
NewSun Energy	The proposed removal of deferral rights, rollover rights, and backward-looking changes sets a dangerous precedent that could: • Undermine project financing and investments. • Reduce market competition and liquidity. • Increase costs and reliability concerns for end-use loads. • Result in the cancellation of viable projects. BPA must ensure that its generator interconnection and transmission access processes are aligned to support diverse business models and uphold the principles of open access and non-discrimination. Now is the time to come together to facilitate the grid of 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 into considerations.

Commenter	Summary of Comment/Question	BPA Staff Response
PRITCA	PRITCA is also concerned about the consequences of BPA's proposals for public preference customers. The proposals undermined the rights of such customers to pursue or hold certain transmission projects, which may undermine the ability of numerous public power customers to seek PTP service themselves and/or secure new power from non-BPA sources. This is a particularly important consideration for preference customers given the improbability of BPA-Power successfully and/or timely meeting the new generation supply needs of the region and its customers. This makes IPP generation development, and the stable transmission and investment platform necessary for IPP development, all the more important for public power. The implications of BPA's ability to adequately serve those public power customers needs, and to meet its statutory obligations to those customers, therefore must be fully analyzed. *If BPA-Power doesn't meet the COUs need for more power supply, where will it come from? How will it be financed? If the terms of PTP transmission at no longer secure and rollover rights cannot be relied upon, how will power be delivered to COUs in 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 into consideration in the TC-27 tariff proceeding process.
PGP	1. BPA's project plan should include a product-change window to mitigate equity concerns. While PGP is encouraged to see such a comprehensive scope of work for this process, the proposed solution set may introduce equity issues between customers. To help mitigate equity concerns, BPA should include a product change window in the project plan now so that participants can consider that as they participate in the reform. BPA should discuss the appropriate timing for a product change window with power customers as soon as possible.	We appreciate PGP's suggestion and are open to discussing a conversion window between NITS and PTP products in the upcoming TC-27 pre-proceeding workshops.
Tacoma Power	Tacoma Power requests that BPA consider opening another window for transmission customers to be able to change products. The last time such windows were open, BPA was not facing the constraints that it is now and there was no real difference in being able to obtain firm transmission through either NITS or PtP. How the utility paid for that transmission service was the main factor to consider in choosing a product. As that paradigm is shifting, BPA should allow an opportunity for its customers to engage in a product switch, if such a switch is beneficial for the utility.	We appreciate Tacoma's suggestion and are open to discussing a conversion window between NITS and PTP products in the upcoming TC-27 pre-proceeding workshops.