



Energizing Life in Our Communities

February 25, 2025

Transmission Reform Team
Bonneville Power Administration
P.O. Box 3621
Portland, OR 97208-3621

Delivered via email: techforum@bpa.gov

Re: BPA's Proposed Transmission Planning Reform Process

Thank you for the opportunity to provide comments on the Bonneville Power Administration's (BPA) proposed transmission planning pause and reform process. As a BPA transmission customer that utilizes a significant amount of BPA firm transmission to deliver preference power to our customers, Snohomish recognizes the importance of establishing an efficient and durable methodology for processing requests for new transmission.

The public process should balance establishing a durable reform with expedience

BPA's decision to pause studying any new long-term transmission requests has impacts to all transmission customers in the Northwest, including prospective transmission customers. Snohomish understands that BPA does not want to compound the issues facing queue processing and understands the resource constraints BPA is facing. However, Snohomish encourages BPA to work through the proposed public process with as much urgency as is possible.

More frequent meetings with customers and faster internal turnarounds on proposals and analyses will help the region more quickly reach and implement a durable solution. This issue is currently one of the most significant challenges faced by the Northwest transmission system. Snohomish understands the need for a pause and seeks to be a partner in problem solving.

BPA should consider an industry survey as part of its public process

Early within its public process BPA should conduct an industry survey of similarly situated transmission providers and their processes for planning and queue management. BPA does hold a unique position as a transmission provider in the United States, but there could be comparable situations or novel approaches that transmission providers in other parts of the country utilize that could be adapted for BPA and customer benefit. Snohomish encourages BPA to conduct this survey and provide the results to customers for evaluation and recommendation. If it is helpful, Snohomish is willing to assist with or contribute to such a survey and provide it to BPA.

The Power Contract timeline and deadlines should be considered during this pause and reform process

BPA Power customers are in the process of negotiating a new contract as well as making energy service elections for that contract's duration. How utilities can best serve Above High-Water Mark load caused by load growth depends in part on how transmission can deliver federal or non-federal power. BPA must take this into account when planning the public processes for both Power and Transmission. Snohomish encourages BPA to discuss the reform process with Power customers in a Provider of Choice workshop and solicit feedback and recommendations.

BPA should consider extending the cut-off date for new requests to conform with the NT LARC submission deadline

Snohomish understands that BPA's choice of August 15, 2024 as the "cut-off" date for new long-term transmission requests was established due to the coincidence of the due date for the most recent Transmission Study and Expansion Process (TSEP) cluster study. NT customers, however, were not required to submit their Load and Resource Consolidated Data (LaRC) for consideration until September 30, 2024.

This creates an inadvertent mismatch between requests entering the queue utilizing the TSEP cutoff and NT customers providing updated forecasts for 2024. BPA has stated that it would use customers' 2023 LaRC submittals, but Snohomish would encourage BPA to consider instead extending the cut-off date to September 30th, 2024 to ensure that NT customer LaRCs for 2024 are considered and are eligible to be studied. Such an extension helps BPA and customers establish a reasonable cutoff date while also allowing for appropriate future planning to continue across customer types.

Conclusion

Snohomish appreciates the opportunity to provide feedback at the outset of BPA's proposed process. While the timeline is ambitious, Snohomish believes that with enough resources committed to the process and with thorough customer outreach and participation, the region can resolve the issues around transmission planning. We look forward to participating and partnering with BPA to help establish a durable planning process.

Sincerely,



Garrison Marr
Senior Manager, Power Supply