

October 26, 2026

RE: Comments on GAT: RAPID and Transmission Open Season BP/TC-27R Pre-Proceeding Workshop

Powerex appreciates the opportunity to comment on the presentation and workshop materials presented by Bonneville Power Administration (“BPA”) staff on October 19, 2026, regarding its Grid Access Transformation (“GAT”) process: Rapid Access Products and Interconnection Delivery (“RAPID”) and Transmission Open Season BP/TC-27R Pre-Proceeding Workshop. Powerex appreciates the workshop’s objectives—establishing durable fast track interconnection processes for large loads and more efficient allocation of transmission capacity—and BPA staff’s willingness to consider innovative approaches to the serious challenges facing the Pacific Northwest grid.

Powerex seeks to be a cooperative and collaborative partner with BPA on these challenges. However, BPA staff have unveiled significant, novel changes to critical interconnection and transmission processes with limited discussion and information, while proposing to implement them on a compressed timeframe. The volume of clarifying questions raised at the workshop shows that customers need more time to evaluate how these proposals would affect their current long-term transmission investments and future investment decisions before they can provide useful comments that will help refine the proposals into durable solutions. Powerex requests that BPA confirm that any new products or processes will protect existing customers without increasing their costs, reducing the value or usability of their existing transmission rights, or impairing their ability to renew those rights. Powerex submits the following comments for BPA’s consideration.

Schedule and Process

Powerex appreciates the need for BPA to address the large-load backlog promptly and expects an expedited process will benefit the region and existing customers. BPA’s Questions and Answers¹ from the October 19 workshop indicate that several aspects of the proposals remain under development. Powerex’s concerns are that BPA staff’s proposals are not sufficiently developed to facilitate meaningful evaluation, and that a compressed schedule applied to an incomplete design risks an uncertain outcome rather than a durable one. Powerex believes that additional time and workshops would allow these details to be developed and reviewed, so that customers can better understand the potential effects before a formal proceeding begins.

While Powerex understands that certain initiatives require an expedited process to meet the region’s goals, any expedited process must still align with BPA’s statutory and policy obligations to conduct transparent public processes when making decisions with significant financial and quality-of-service impacts on its customers.²

¹ https://www.bpa.gov/-/media/Aep/transmission/grid-access-transformation/GAT_Oct19_2026_Workshop_QA_Report.pdf

² The Northwest Power Act (“NWPAct”) establishes affirmative obligations on BPA to ensure widespread, meaningful public involvement whenever BPA formulates regional power policies or makes decisions significant to its customers. See NWPAct Sections 2(3) and 4(g)(1).

Furthermore, it has been BPA's well-established practice to assess highly impactful policy decisions through well-communicated and thorough public processes, even when time is of the essence. BPA stakeholders have come to expect that BPA will engage in a full public process before any significant policy decision. The pre-proceeding workshop process generally leads to appropriate modifications to BPA's initial proposals and heads off objections that would otherwise arise in a formal proceeding. An insufficiently developed initial proposal can lead to uncertainty in the formal proceeding, elongating timelines and undermining the purpose of an expedited proceeding. The Grid Access Transformation initiative should be no exception.

BPA's public process obligations are essential to ensuring that reforms are properly designed. BPA stakeholders need a reasonable opportunity to evaluate and inform policies like Speed to Power Requests for Interim Non-Firm Transmission ("SPRINT"), RAPID, and the Transmission Open Season to ensure they meet the region's needs and survive challenge and review as durable, thorough policies. Developing durable solutions at the outset minimizes the need for substantial modifications later and limits impacts on existing customers that may not be fully remedied after the fact.

Powerex Requests More Information

Long-term firm point-to-point ("PTP") customers require more information to understand how these proposals could affect their current transmission rights and procurement of future transmission service. Powerex appreciates the principle underlying the Ratepayer Protection Pledge referenced by BPA: that large loads should bear the costs they cause. However, it is unclear how the costs, use and allocation of the new service under an auction process may affect current transmission customers. It is important that current transmission customers have greater certainty that the new service will not diminish their ability to procure transmission service and to schedule on the BPA transmission system. In the next workshop, BPA should specifically address how transmission customers with long-term investments in the BPA system would be affected by the RAPID, SPRINT, and Transmission Open Season proposals, and how those proposals will function in detail.

BPA has also indicated that the evaluation criteria and the capacity to be offered in the Transmission Open Season remain under development, and that stakeholders are unlikely to participate in the development of these criteria given the expedited timeline. BPA has further indicated that the tariff will contain a high-level framework, with the mechanics addressed in business practices. Certainty around these elements are necessary for OATT customers to assess the impact on their current transmission rights, and Powerex requests that they be provided in time for meaningful review. BPA also noted that certain details remain under development and will require further advice from third-party consultants who have not yet been retained. Powerex believes the design of the Transmission Open Season should be developed as part of the pre-proceeding workshops rather than deferred to business practices, so that any unintended consequences of the auction process for existing customers can be identified and evaluated in the proceeding.

The types of structural tariff and rate changes proposed could materially affect existing transmission customers' rights and cost exposure, yet BPA has allotted only one additional public workshop before initiating expedited

rate and tariff proceedings, leaving customers little room to analyze, model, and provide informed feedback on these proposals.

Accordingly, Powerex respectfully requests that BPA: (1) provide more detailed, concrete proposals—including draft tariff language and auction design details—with sufficient lead time before the next workshop for customers to meaningfully evaluate them; (2) dedicate workshop time specifically to how the proposed changes would affect long-term firm PTP customers' existing rights, including the ability to renew and procure transmission, cost allocation and any potential for reductions in the value or usability of existing rights, or rate or service impacts tied to new non-firm products; and (3) consider providing additional workshops and comment periods to allow for further engagement before tariff and rate proceedings are formally initiated.

Powerex seeks to collaborate with BPA on the challenging issues the region faces, looks forward to continuing its participation in these discussions, and appreciates BPA seeking stakeholder comments on this important topic.