

**BP-26 Rate Case & TC-26 Tariff Proceeding Workshops
Summary of Written Comments Received and BPA Staff's Responses**

Last Updated: June 21, 2024

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I. Comments Received in Response to the March 19, 2024 BP/TC-26 Kick-off Workshop

Row #	Stakeholder	Comment	BPA Staff Response
1	Harney Electric Cooperative	<p>Transmission Rates - Request for topic to be included in the workshops, led by either BPA staff or customer led:</p> <p>The Short-Distance discount (SDD) which adjusts an NT customer's Network Load calculation if it has a designated Network Resource that uses less than 75 circuit miles for delivery to the load. We wish to explore decreasing the credit limit (currently set at 40%). This discount is currently described in BPA's Transmission General Rate Schedule Provisions, but does impact the definition of Network Load.</p>	<p>The current Short-Distance Discount for the NT is set to a maximum of 60%, which BPA believes properly incents customers' behavior and reflects the value gained from locating Points of Delivery near Points of Receipt. BPA staff does not plan to propose any changes to this formula as it incents the correct customer behavior. If customers would like to present a proposal with reasons how it will maintain the customer behavior staff is seeking, staff is open to listen at a customer led workshop.</p>
2	Harney Electric Cooperative	<p>Transmission Rates - Request for topic to be included in the workshops, led by either BPA staff or customer led:</p> <p>Acknowledgement that, if a customer can demonstrate that investments in net load and/or automatic/instantaneous load shedding have been made that operationally limit (with virtual certainty) transmission service, then such operational limit is used as the billing determinant for NT charges. This encourages smart-grid investment and ensures that transmission customers are not charged for "stand-by" transmission service they cannot/will not utilize. This acknowledgement could be in the form of a simple written interpretation to NT customers, or language added to BPA's Transmission General Rate Schedule Provisions, i.e., Network Integration Rate, Section IV, Adjustments, Charges, and other Rate Provisions.</p>	<p>Thank you for your comment. BPA staff encourages Harney Electric Cooperative to submit a request to present this topic and any proposal at a customer-led workshop.</p>

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3	Harney Electric Cooperative	<p>Power Rates - Request for topic to be included in the workshops, led by either BPA staff or customer led:</p> <p>Clarifying where necessary that the wording “connected to Harney Electric Cooperative’s distribution system” within the definition of “Consumer-owned Resource” in HEC’s Regional Dialogue Power Sales Agreement includes all of HEC’s distribution system regardless of the voltage level at the point of such connection to HEC’s distribution system.</p>	<p>Thank you for your comment. Harney requested Bonneville to include a workshop topic to clarify the definition of “Consumer-Owned Resource” from the Regional Dialogue Power Sales Contract. Regional Dialogue contract language explanations are not a rate case topic and are outside of the scope of the BP-26 rate case proceeding. Bonneville encourages Harney to work with their Power Account Executive regarding questions about its Regional Dialogue contract. To the extent Harney would like to discuss changes to contract language for Post-2028, Bonneville encourages Harney to provide feedback through the Provider of Choice Policy Implementation and Contract Development phases workshops that began April 2024.</p>
4	NLSL Group	<p>As mentioned by BPA during the workshop, an NR service election has been made by a BPA customer to serve an NLSL. The NLSL Group agrees that quite a bit of education will be required to fully understand the intent and the proposed methodology of the NR Rate. BPA has stated that it plans to discuss NLSL issues at the July 30th and 31st workshops, but the NLSL Group believes that at least one follow-up workshop will be required to fully explore the intent and methodology of the proposed NR rate design and to respond to staff as well as customer questions.</p>	<p>We agree that the NR issues will likely require more than a single workshop to allow for sufficient time to understand, consider and respond. As such, we will commit to having at least two workshops that include NR-related issues prior to the release of the Initial Proposal.</p>
5	NLSL Group	<p>Most existing NLSL load is met with bilateral market purchases that are shaped to the actual metered NLSL loads using BPA’s Energy Shaping Service (ESS). In order to avoid UAI penalties, customers significantly overschedule HLH energy deliveries and must either assume plant outage risk or place significant cost risk on suppliers through non-standard liquidated damages provisions that adversely affect market liquidity. The NLSL Group is interested in exploring alternative methods for avoiding UAI penalties that will more accurately reflect costs incurred by BPA, result in more accurate scheduling practices, and result in equitable outcomes when suppliers have unplanned contingencies.</p>	<p>We intend to spend some of the NR-related workshop time on ESS and welcome customer proposed improvement suggestions for staff to consider. One of BPA staff’s main concerns with ESS is that the capacity obligations and cost of meeting those obligations are clearly defined and equitably allocated. There are often many right ways to achieve this stated result. As such, the NLSL load customers should consider presenting at a customer-led workshop to go over potential alternative approaches. BPA would be particularly interested in understanding how such approaches do, or do not, meet the capacity obligations of following NR load.</p>

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6	NLSL Group	The NLSL Group would like to explore the NR Resource Flattening Service (NRFS), which has been included in BPA's General Rate Schedule Provisions as a way to use specified resources that could be shaped by the federal system in order to serve NLSL loads. After conversations with BPA, it is the NLSL Group's understanding that BPA may or may not choose to offer this product in the future. The NLSL Group would like this service option to be discussed as part of the NLSL topic.	We will add this to the list of items to cover during our NR-related workshops.
7	NLSL Group	NLSLs generally have on-site generation and many are exploring modernizing this generating supply with resources that can be used for purposes other than back-up generation (for example, these generating resources could be dispatched to displace other generating resources or committed to provide reliability capacity). It is the NLSL Groups' understanding that a customer must pay NT service for the gross amount of load irrespective of whether there is on-site generation that is operationally netted against the gross NLSL load. As part of TC-26, the NLSL Group would like to discuss what would be necessary for the customer to demonstrate to BPA that the on-site generation is reducing the NLSL load thus justifying a reduction to the NT service billing determinant.	Currently, BPA is not considering any changes to the NT service billing determinant for NLSLs based on reductions from on-site generation. The gross amount of load is used as the billing determinant as that amount is still required to be reserved for the NLSL and might be called upon to be served at any point. If NLSL Group has a proposal, we encourage you to submit a request to present this topic and any proposal at the customer led workshop.
8	NRU	Workshop Process - NRU continues to support BPA's six step approach to customer engagement and believes it has served both BPA and its stakeholders well in past processes.	Thank you for your comment.
9	NRU	Rate Principles - Regarding the proposed Principles, of primary importance to NRU members is BPA's ability to offer an affordable and reliable power supply that maximizes the value of the Federal system for the benefit of preference customers. Given the available information, BPA's proposed BP-26 Principles appear to be aligned with that end goal.	Thank you for your comment.

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10	NRU	Tariff Principles - NRU appreciates that the proposed TC-26 Principles highlight the fact that BPA will consider differences from the FERC pro forma tariff if the difference is necessary to prevent significant harm or provide significant benefit to BPA's mission or the region, including BPA's customers and stakeholders. As BPA and its customers continue to work through the queue reform process that began with TC-25 and given the necessity of long-term firm NT access to NRU members, BPA's willingness to deviate from the pro forma tariff may be essential as we move toward day-ahead market integration and Provider of Choice contract implementation.	Thank you for your comment.
11	NRU	Power Rates - Supportive of the Power Rates Topics that BPA proposed and asks that Tier 2 Pricing and Demand Pricing be added to the list, with time set aside for discussion and consideration.	BPA will plan to discuss Tier 2 and Demand rate pricing at the July 30-31 BP/TC-26 pre-proceeding workshop.
12	Seattle City Light	Workshop Process - Suggests that the approach to complete steps 1-6 in a single workshop provides a limited amount of customer engagement and question time within scheduled meeting time, and does not leave adequate time for step 5, "Discussion of Customer Feedback" prior to the step 6 staff proposal. One option City Light recommends BPA consider is to provide customers with key questions and issues for feedback two weeks prior to the BPA workshop where the topics will be covered. BPA could provide these through a Tech Forum email and request that customers respond within one week. Alternatively, BPA could provide the meeting materials a full two weeks prior to the BPA workshop. Customers could provide feedback in the same one-week time frame to allow BPA staff time to consider and incorporate customer perspectives.	Thank you for your comment. As suggested, we will endeavor to include specific questions for each topic to help focus customers' responses; however, this does not mean customers cannot provide comments on the topic other than responding to the specific questions.
13	Seattle City Light	Rate and Tariff Principles and Workshop Process - Supports the BP-26 and TC-26 Principles and grouping in person workshop meetings on successive days to reduce travel to and from workshops.	Thank you for your comment.

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II. Comments Received in Response to the April 24, 2024 BP/TC-26 Kick-off Workshop

Row #	Stakeholder	Comment	BPA Staff Response
14	Seattle City Light	Segmentation City Light supports BPA's proposal maintaining the current methodology and segment definitions. City Light recognizes and thanks BPA for the resources and effort BPA expended on the last segmentation study.	Bonneville appreciates Seattle City Light's comments on segmentation.
15	Seattle City Light	ACS Rate for ESDs City Light supports the BPA objectives and criteria for evaluation for the ACS for ESDs. Specifically, City Light applauds BPA emphasizing equitable treatment and following cost causation principles. City Light additionally supports BPAs intent to develop an Energy Storage Device Balancing Service (ESDBS) like the existing DERBS to capture the cost of Balancing Capacity for energy storage devices that can be applied to both discharging and charging.	Thank you for your comment.
16	Seattle City Light	GI Withdrawal Penalties City Light supports BPA developing and implementing Generator Interconnection withdrawal penalties to reduce delays and costs associated with restudy.	Thank you for your comment. We will consider this as we are considering alternatives and our proposal.
17	Seattle City Light	GI Withdrawal Penalties <i>How should penalties be calculated? When should the penalty apply?</i> City Light suggests BPA follow the principle that withdrawal penalties are meant to deter non-viable projects from entering or remaining in the interconnection queue and to mitigate potential harm to other interconnection customers in the queue. City Light recommends BPA consider multiplying the study deposit for each phase of the process to calculate the withdrawal penalty for withdrawing from that phase. City Light believes this is the most transparent and easily implementable way to calculate penalties. Penalties for phase 1 should be equal to the study deposit with late phases being a higher multiple.	Thank you for your comment on how withdrawal penalties should be calculated. We will consider this as we are determining our alternatives and proposal.

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18	Seattle City Light	<p>GI Withdrawal Penalties <i>When does the penalty apply? During the Transition Process?</i></p> <p>City Light recommends that withdrawal penalties should apply to each phase of the Transition Process and after.</p>	Thank you for your comment on when a withdrawal penalty should apply. We will consider this as we are determining our alternatives and proposal.
19	Seattle City Light	<p>GI Withdrawal Penalties <i>Should there be exceptions to when a penalty applies?</i> City Light recommends limiting exemptions from withdrawal penalties to the following:</p> <ul style="list-style-type: none"> • Withdrawal does not have a material impact on the cost or timing of any interconnection requests. • Withdrawal follows an unanticipated increase in network upgrade cost estimates and the network upgrade costs assigned to the interconnection customer's requests have increased by 100% compared to the costs identified in the previous cluster study report. 	Thank you for your comment on exceptions to when a withdrawal penalty applies. We will consider this as we are determining our alternatives and proposal.
20	Seattle City Light	<p>GI Withdrawal Penalties <i>How should Withdrawal Penalty funds be allocated?</i> City Light recommends the following for allocating Withdrawal Penalty funds:</p> <ul style="list-style-type: none"> • First, to cover the costs of mitigating potential harm to other interconnection customers in the queue by applying penalty amount to the costs of the affected study phase. • Next, any remaining funds are used to offset any remaining customer's net increases in network upgrade costs caused by the customer's withdrawal (due to a previous shared funding obligation); and • Next, any remaining funds are used to offset network upgrade costs of customers participating in the cluster study; and • Finally, any remaining funds are returned to the withdrawal customer. 	Thank you for your comment on how withdrawal penalty funds should be allocated. We will consider this as we are determining our alternatives and proposal.

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21	Seattle City Light	GI Withdrawal Penalties <i>Are there other elements we should consider?</i> City Light recommends BPA consider the ramifications of requiring a withdrawal penalty greater than the amount of a requesting customer's deposits. Some type of deposit, bond, and or other credit requirements may need to be met for withdrawal penalties to be effective in each phase of the process.	Thank you for your comment. We will consider this as we are determining our alternatives and proposal.
22	Seattle City Light	GI Reform – Affected Systems City Light supports BPA developing an efficient, consistent, and sustainable process for performing Affected System studies in parallel with TSEP and interconnection studies that coordinates with neighboring Transmission Providers' processes.	Thank you for your comment. BPA staff are clarifying that the scope of this topic is limited to the large generator interconnection process and is not considering any changes to TSEP.
23	Seattle City Light	GI Reform – Affected Systems <i>What visibility of Affected System Studies do customers need?</i> Customers whose requests cause an Affected System Study need should have the same visibility into the study process as customers whose requests are directly being studied in the process. This should be true regardless of what process the Affected System Studies need is being studied by BPA. City Light suggests that BPA could include an Affected System Study segment in the needed network upgrade portion of each phase of the generator interconnection process as well as the TSEP cluster study process.	[UPDATED] BPA staff will address this comment in its presentation at the June 26 th BP/TC-26 workshop.
24	Seattle City Light	GI Reform – Affected Systems <i>What is the most efficient, consistent, and sustainable process for performing Affected System studies in parallel with the new two-phase cluster study process for requests in BPAs interconnection queue?</i> City Light recommends BPA cluster Affected System Studies needs and include those needs in the next BPA study process accessing network impacts and needs. This could be part of each phase of interconnection study as well as the TSEP cluster study.	[UPDATED] BPA staff will address this comment in its presentation at the June 26 th BP/TC-26 workshop.

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25	Seattle City Light	GI Reform – Affected Systems <i>How will BPA coordinate better with other Transmission Providers' processes?</i> Following the above, BPA should be assessing network needs and upgrades once a year. This should be sufficient to coordinate with other Transmission Providers' processes. Anything less, is likely to be seen as insufficient by both customers and neighboring Transmission Providers.	[UPDATED] BPA staff will address this comment in its presentation at the June 26 th BP/TC-26 workshop.
26	Seattle City Light	GI Reform – LGIA City Light supports efforts to align BPA's Tariff LGIA template with TC-25 reforms and/or the pro forma Tariff.	Thank you for your comment.
27	Savion	GI Withdrawal Penalties Savion, LLC ("Savion") strongly recommends the Bonneville Power Administration ("Bonneville") implement interconnection withdrawal penalties consistent with Federal Energy Regulatory Commission ("FERC") guidance...One potential deviation Bonneville should explore with stakeholders is whether there should be "penalty free" exit points in either Bonneville's Transition Cluster Study and the Durable Cluster Study Processes.	Thank you for your comment. We will consider this as we are determining our alternatives and proposal.
28	Savion	GI Withdrawal Penalties 1. Bonneville Must Establish Withdrawal Penalty Policies That Encourage Non-Viable Projects to Exit the Queue Voluntarily Consistent with FERC's final rules, Savion encourages Bonneville to implement withdrawal policies that: <ol style="list-style-type: none"> 1) Aim to minimize re-studies and cascading withdrawals that are likely to have negative impacts on other interconnection customers; 2) Escalate as customers progress through the interconnection process; 3) Allow for reasonable exceptions, exemptions; and 4) Allocate penalty funds to hold other interconnection customers harmless. 	Thank you for your comment. We will consider this as we are determining our alternatives and proposal.

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29	Savion	<p>GI Withdrawal Penalties 2. Bonneville Should Consider Specific Exit Points for “Penalty-Free” Withdrawals Before Network Upgrade Costs, Allocations are Provided.</p> <p>When considering the best way to utilize withdrawal penalties to reach the goals outlined above, Savion notes that FERC’s rules set penalty amounts that are akin to a penalty-free withdrawal before network upgrade costs estimates are allocated. For simplicity, Bonneville should consider applying withdrawal penalties only after the phase one (“P1”) study results.</p> <p>Under a pro forma tariff, if an interconnection request is withdrawn during the initial cluster study or after the initial cluster study report the customer is assessed only the higher of the study deposit or two times the actual study costs. FERC refers to this as a “withdrawal penalty” but this amount is essentially immaterial in the context of a standard large generator. Despite FERC’s unfortunate terminology, the penalty amount before network upgrade estimates are assigned does little more than compensate the transmission provider for the costs of running the study. This is not really a penalty.</p> <p>Although Savion believes that all commercially viable projects should be backed by escalating amounts that are “at risk”, any such amounts that truly seek to penalize are not appropriate until the interconnection customer has had the opportunity to review the facilities and network upgrade cost estimates associated with their projects. To that end, Savion recommends Bonneville either waive penalties during P1 or at a minimum limit cost exposure to the study deposit amount.</p>	Thank you for your comment. We will consider this as we are determining our alternatives and proposal.
30	Savion	<p>GI Withdrawal Penalties 3. Bonneville May Want to Reconsider Deposit Amounts That Are Now “At Risk” as Withdrawal Penalties to Ensure There is Sufficient Security to Give Withdrawal Penalties Meaning</p>	Thank you for your comment. We will consider this as we are determining our alternatives and proposal.

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		<p>Savion understands that Bonneville is considering implementing withdrawal penalties, which may be based upon deposit amounts established in the TC-25 settlement. Savion also notes, however, that FERC clarified in Order No. 2023-A that withdrawal penalties cannot exceed the amount collected from interconnection customers. To the extent appropriate, Bonneville should review each of the interconnection decision points to ensure:</p> <ol style="list-style-type: none"> 1) Study deposit amounts are set sufficient to recover study costs (and not set higher to help provide security); 2) Commercial readiness deposit amounts are set sufficient to demonstrate viability (and not set higher to provide security); and 3) Security postings are collected to advance beyond P1 study results where needed to ensure penalties provide sufficient “at-risk” incentives. 	
31	NIPPC and RNW Joint Comments	<p>Segmentation Our comments on Segmentation are limited to the proposed “plant in service forecast” for the years 2024-2029. BPA has decided that the BP-26 rate period will cover three years—not the normal two-year rate period for BPA rates. Historically, BPA has struggled to fully and consistently execute the capital spending program approved in the Integrated Program Review (“IPR”) during a two-year rate period. In recognition of the consistent delta between forecast and actual capital investment, BPA now incorporates into its ratemaking process a lapse factor of 10% of the forecast capital spending plan to reflect the inconsistency in BPA’s ability to fully execute its capital spending forecast. Commenting Parties suggest that the uncertainty around a three-year capital spending forecast will be greater than the uncertainty of a two-year capital spending forecast. Further analysis is needed to better evaluate what constitutes an appropriate lapse factor over a three-year rate period.</p> <p>Commenting Parties encourage BPA to apply an appropriate lapse factor to the first two years of the capital spending forecast developed in the IPR, with a higher lapse factor for the third year of the rate period. Rather than locking in higher rates based on a very uncertain capital spending forecast, BPA should rely on the Cost Recovery Adjustment Clause mechanism to temporarily increase rates if BPA is able to fully execute the capital</p>	<p>Bonneville appreciates the comments on segmentation and capital execution rates. The capital spending forecast should be addressed during the Integrated Program Review (IPR) workshops, scheduled to start June 27, as it is not directly a segmentation topic.</p> <p>Bonneville sets rates to recover its forecast costs, by statute. The Commenting Parties appear to suggest Bonneville set rates lower than necessary to recover all forecast costs and instead rely on risk adjustment mechanisms to achieve cost recovery during the rate period. The Commenting Parties’ primary focus issue is the reasonableness of BPA’s cost forecast to be discussed during the IPR process. The transmission cost recovery adjustment mechanism provides for an adjustment to rates if actual results during the rate period differ from the cost forecast at the time rates are set. It is not intended to substitute for setting rates based on that forecast.</p>

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		<p>spending plan developed in the IPR across all three years of the rate period.¹</p> <p>¹ Commenting Parties do not agree that the Revenue Distribution Clause (“RDC”) is an effective tool to provide rate relief to customers when BPA is unable to execute its planned capital spending program during the rate period. While BPA Transmission has consistently over-collected revenues from transmission customers to the point where the RDC triggers on a regular basis, BPA has also consistently used the surplus revenues for “other high value uses” rather than using those surpluses to provide the rate relief which customers seek.</p>	
32	NIPPC and RNW Joint Comments	<p>ACS Rate for ESDs Commenting Parties encourage BPA to maintain the status quo for BP-26 and not develop a use-based capacity charge for ESDs given the following uncertainties:</p> <ul style="list-style-type: none"> • BPA acknowledges that it does not yet have sufficient data on the effect of ESDs on its system to calculate the amount of balancing capacity needed. • As far as requests in the queue, BPA has not yet begun the Transition Cluster Study for interconnections; many of the requests to interconnect ESDs may withdraw or be unable to meet the requirements to remain in the Transition Cluster. • Even if ESDs come onto BPA’s transmission system, it is not clear what their impact on balancing reserves would be. Many ESDs are quite flexible...ESDs do not share the operating limitations that some thermal and renewable generators have that drive the need for imbalance reserves. • It is not yet clear how the owners of ESDs will operate those devices. 	<p>Thank you for your comments. BPA staff will consider them as we continue to evaluate the alternatives. We will address comments in further detail and present the staff proposal (steps 5-6) at the August 27-28 BP/TC-26 workshop.</p>
33	NIPPC and RNW Joint Comments	<p>ACS Rate for ESDs If the pace of installation of ESDs towards the end of the upcoming rate period and other market developments justify it, BPA can initiate a stand-alone rate case to develop its proposed use-based charge for ESDs. At that time, there may be more clarity around the day-ahead market rules that would apply.</p>	<p>Thank you for your comment.</p>

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34	NIPPC and RNW Joint Comments	<p>ACS Rate for ESDs BPA's generation inputs SMEs should prioritize updating the generation inputs rates to reflect the EIM rather than developing a new charge for ESDs without the data or analysis to support it.</p>	<p>Thank you for your comment. Please see slides 32, 34-35 of the Feb. 22 customer workshop presentation on Balancing Reserves, OCBR and OMP, where BPA staff address the BPA BA need to maintain Balancing Capacity Levels in the EIM. The slides are available in the Meetings and Workshops section of the BP-26 Rate Case webpage.</p>
35	NIPPC and RNW Joint Comments	<p>GI Withdrawal Penalties Commenting Parties share the concerns BPA has articulated regarding the impact of withdrawals from the interconnection queue, particularly on the delays in completing the cluster study. Customers who withdraw from the interconnection queue may impact other customers in a variety of ways. Customer withdrawals may create a need for additional studies/restudies and may impact the cost burden of other customers. In addition to the impact on other customers, withdrawals also strain the workload of BPA staff. Other transmission owners have noted that withdrawals trigger restudies and cost reallocations that trigger subsequent withdrawals, thus making it difficult to complete studies on schedule. The Federal Energy Regulatory Commission ("FERC") has attempted to address this problem in Orders 2023 and 2023-A by providing for withdrawal penalties in the pro forma Open Access Transmission Tariff. Commenting Parties recommend that BPA adopt a withdrawal penalty mechanism consistent with Orders 2023 and 2023-A.</p>	<p>Thank you for your comment. We will consider this as we are determining our alternatives and proposal.</p>
36	NIPPC and RNW Joint Comments	<p>GI Withdrawal Penalties <i>How to Calculate the Withdrawal Penalty</i></p> <p>Commenting Parties recommend that BPA align with FERC Orders 2023 and 2023-A with respect to calculation of withdrawal penalties.</p> <ul style="list-style-type: none"> • If a customer believes that its project is ready to enter the interconnection cluster study process, then the customer should be willing to demonstrate that confidence by having funds at risk above its share of the cost of the interconnection study (as explained further below). • The magnitude of the penalty should increase with each phase. 	<p>Thank you for your comment on how to calculate the withdrawal penalty. We will consider this as we are determining our alternatives and proposal.</p>

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		<ul style="list-style-type: none"> In the initial phase of the cycle, the withdrawal penalties should be based on a multiple of the study costs. In subsequent phases, calculation of the withdrawal penalty for any given customer should be based on a percentage of that customer's forecast network upgrade costs. 	
37	NIPPC and RNW Joint Comments	<p>GI Withdrawal Penalties <i>When to Apply a Withdrawal Penalty (Transition Cluster)</i></p> <ul style="list-style-type: none"> No withdrawal penalties should be applied to any customer who withdraws from the Transition Cluster before the effective date of the BP-26 transmission rates (October 1, 2025). Even if there are delays in the cluster study cycle, no withdrawal penalty should attach to customers who withdraw after their receipt of the initial Phase 1 Study results of the Transition Cluster Withdrawal penalties should attach only to cluster study phases that begin after the effective date of the BP-26 rates; thus, such penalties could apply to any restudies of Phase 1 or the initial Phase 2 Study. <p>Encourage BPA to provide stakeholders with additional information on how BPA envisions applying such penalties.</p>	Thank you for your comment on when to apply a withdrawal penalty. We will consider this as we are determining our alternatives and proposal.
38	NIPPC and RNW Joint Comments	<p>GI Withdrawal Penalties <i>When to Apply a Withdrawal Penalty (Durable Cluster Study Process)</i></p> <ul style="list-style-type: none"> Support BPA adopting withdrawal penalties for the durable Cluster Study process consistent with FERC Orders 2023 and 2023-A. Any withdrawal penalty that applies to the initial Phase 1 Study should be relatively low. Customer need to gain insight into the interconnection costs associated with potential projects, no matter how "ready" those projects might be. Support withdrawal penalties that escalate at each stage; the deeper into the process an interconnection customer proceeds, the steeper the penalty should be if that customer withdraws (subject to the exceptions). Penalties should attach in 	Thank you for your comment on when to apply a withdrawal penalty. We will consider this as we are determining our alternatives and proposal.

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		<p>accordance with the following penalty structure if the customer withdraws during or after the identified phase and before entering the subsequent phase on the list:</p> <p>Phase 1 Initial Study 2 times study costs Phase 1 Restudy(ies) 5% of Network Upgrade costs Phase 2 Initial Study 5% of Network Upgrade costs Phase 2 Restudy(ies) 5% of Network Upgrade costs Facilities Study 10% of Network Upgrade costs LGIA 20% of Network Upgrade costs</p>	
39	NIPPC and RNW Joint Comments	<p>GI Withdrawal Penalties <i>When to Apply a Withdrawal Penalty (Exemptions)</i></p> <p>Commenting Parties support an exemption from withdrawal penalties if subsequent studies significantly increase the customer’s projected interconnection costs. A customer should not be subject to penalties if (1) the customer withdraws after receiving the most recent cluster study report and the network upgrade costs assigned to the customer have increased 25% compared to the previous cluster study report; or (2) the customer withdraws after receiving the individual Facilities Study report and the costs assigned to the customer’s request have increased by more than 100% compared to costs identified in the cluster study report.</p> <p>Commenting Parties also support an exemption for withdrawals that do not materially impact the cost or timing of projects remaining in the cluster.</p> <p>In thinking through the potential exemptions, Commenting Parties also note that there should be some accountability and incentives for BPA to complete its interconnection studies in a timely fashion.</p>	Thank you for your comment on exceptions. We will consider this as we are determining our alternatives and proposal.

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40	NIPPC and RNW Joint Comments	<p>GI Withdrawal Penalties <i>BPA Use of Penalty Funds</i></p> <p>Consistent with FERC Orders 2023 and 2023-A, penalty funds should first be applied to fund studies and restudies in the same cluster as the withdrawing customer. If penalty funds remain after using those funds to offset study costs for those remaining in the cluster, penalties collected should be applied to offset the incremental cost increases to other customers remaining in the cluster study for network upgrade costs that the withdrawals caused, including incremental financial security requirements that are associated with higher network upgrade costs.</p>	Thank you for your comment. We will consider this as we are determining our alternatives and proposal.
41	NIPPC and RNW Joint Comments	<p>GI Withdrawal Penalties <i>Alternatives to Withdrawal Penalties</i></p> <p>Commenting Parties do not have other suggestions for mechanisms that would prevent the need for restudies as effectively as withdrawal penalties. We recognize that withdrawal penalties will not completely eliminate the need for restudies. Some customers will enter the interconnection cluster study process in good faith, but ultimately need to withdraw for any number of potential valid reasons. The withdrawal penalties will mitigate the cost shifts and other impacts to the customers remaining in the interconnection process.</p>	Thank you for your comment. We will consider this as we are determining our alternatives and proposal.
42	NIPPC and RNW Joint Comments	<p>GI Reform – Affected Systems</p> <p>When BPA is the affected system, Commenting Parties encourage BPA to comply with the Order 2023/Order 2023-A timelines for completing Affected System Studies with its neighbors. The Affected System Studies that BPA must undertake for its neighbors are just as important for the region as the studies BPA undertakes directly. To the extent possible, BPA should conduct Affected System Studies for its neighbors independently and in parallel with its interconnection cluster study processes. Orders 2023 and 2023-A require all the investor-owned utilities in the region to adopt a cluster study process for interconnection requests. Commenting Parties note that BPA’s neighboring transmission providers – at least the ones subject to FERC jurisdiction – will need to comply with the Order 2023/Order</p>	[UPDATED] BPA staff will address this comment in its presentation at the June 26 th BP/TC-26 workshop.

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Row #	Stakeholder	Comment	BPA Staff Response
		2023-A timelines when BPA identifies them as an affected system. BPA should make every effort to deliver its own Affected System Studies on the same timeline.	
43	NIPPC and RNW Joint Comments	<p>GI Reform – Affected Systems Commenting Parties also encourage BPA to coordinate and collaborate with its neighbors to develop a regional process to complete Affected System Studies. The schedule and timelines for interconnection cluster studies are known well in advance. It may become obvious in the early stages of a cluster study that a neighbor may be an affected system. Ideally, a formal request for an Affected System Study is not a surprise but rather a confirmation of earlier informal information exchanges between the transmission providers on the potential need to conduct an Affected System Study. As the region gains experience with cluster studies for interconnections, it may be appropriate to align the timing of interconnection cluster studies across the region to achieve efficiencies in Affected System Studies.</p>	[UPDATED] BPA staff will address this comment in its presentation at the June 26 th BP/TC-26 workshop.
44	NIPPC and RNW Joint Comments	<p>GI Reform – Affected Systems Affected System Study processes and timelines should be transparent. Commenting Parties suggest that when BPA is asked to conduct an Affected System Study, it should provide the transmission provider and the transmission provider’s customer(s) with the estimated timeline to complete the study, as well as regular updates on progress.</p>	[UPDATED] BPA staff will address this comment in its presentation at the June 26 th BP/TC-26 workshop.
45	NIPPC and RNW Joint Comments	<p>GI Reform – LGIA Commenting Parties agree that BPA should review and propose edits to the LGIA consistent with the TC-25 settlement.</p>	Thank you for your comment.
46	Avangrid	<p>ACS Rate for ESDs Avangrid applauds Bonneville’s proactive thinking but is hesitant to spend time musing over hypothetical problems that may or may not come into fruition during this rate period (or ever) when setting a new rate based on actual numbers would be an exponentially better approach. As a threshold matter, Bonneville sells its power at cost-based rates and the agency has yet to incur any costs to base the new rate on. Moreover, Avangrid is</p>	Thank you for your comments. BPA staff will consider them as we continue to evaluate the alternatives. We will address comments in further detail and present the staff proposal (steps 5-6) at the August 27-28 BP/TC-26 workshop.

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		<p>struggling even conceptually to see these new interconnection requests for storage as a likely balancing problem for the agency. Although Avangrid acknowledges that Bonneville must stand ready to serve batteries that in theory could charge (or discharge) quickly at inopportune times, it is hard to imagine scenarios where a battery owner would choose to go against market signals to charge, discharge at inopportune times. Normally speaking, it seems like the vast amount of charging is going to happen when prices are low (and their capacity would be welcome) and the vast amount of discharging will happen when prices are high (and the capacity would be welcome). Because Bonneville does not have any recommendations to capture diversity benefits, e.g., crediting batteries that are helping the agency attain load-resource balance, Avangrid believes a storage capacity rate is not yet ripe for consideration.</p> <p>If Bonneville decides to develop a new capacity rate for storage devices, which it should not, Avangrid asks that Bonneville review in detail the pilot program referenced at the April Workshop, which could potentially provide a path for avoiding the new capacity charge.</p>	
47	Avangrid	<p>GI Withdrawal Penalties Avangrid continues to believe that withdrawal penalties are a critical component of the interconnection queue reform that ideally should have been implemented along with the TC-25 tariff changes. To that end, Avangrid recommends Bonneville add withdrawal penalties consistent with FERC's final rules. As a matter of policy, however, Bonneville should refrain from applying any TC-26 rule changes to the transition process, including withdrawal penalties, because any such changes were not transparently discussed during the TC-25 proceeding and will not be established with any level of certainty before the transition cluster request window opens next month.</p>	Thank you for your comment. We will consider this when we evaluate the alternatives.
48	Avangrid	<p>GI Withdrawal Penalties <i>How to Calculate a Withdrawal Penalty?</i></p> <p>FERC's rules for calculating withdrawal (e.g., two times the study costs to 5 and then 10 percent of network upgrade costs) appear appropriate for Bonneville. Avangrid would</p>	Thank you for your comment on how to calculate a withdrawal penalty. We will consider this as we are determining our alternatives and proposal.

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Row #	Stakeholder	Comment	BPA Staff Response
		support a penalty fee that escalates throughout the GI process and looks forward to discussing the merits of any proposed details, deviations with stakeholders in future workshops.	
49	Avangrid	<p>GI Withdrawal Penalties <i>When Should a Withdrawal Penalty Apply?</i></p> <p>Acknowledging that Bonneville declined to implement the portions of FERC Order No. 2023 that provided public access to interconnection information, Avangrid recommends exploring with stakeholders whether there should be a penalty-free withdrawal when the first study results are provided. Without increased public access to interconnection information, submitting an interconnection request is still the only means to determine whether a proposed project can be commercially viable. If Bonneville is able to provide more information publicly later, it may be appropriate to consider removing this initial penalty free withdrawal at that time.</p>	Thank you for your comment on when a withdrawal penalty should apply. We will consider this as we are determining our alternatives and proposal.
50	Avangrid	<p>GI Withdrawal Penalties <i>Should There Be Exceptions to When a Penalty is Applied?</i></p> <p>As Bonneville explained in the April Workshop, FERC's GI rules permit penalty-free withdrawal where there is either no material impact on other requests in the queue or where there has been a significant increase in the network upgrade cost estimates. Avangrid recommends following FERC's rules (e.g., a 25% increase from the prior cluster study or a 100% increase in a facilities study report) unless Bonneville's unique process provides a compelling reason to deviate, in which case Avangrid welcomes additional discussion.</p>	Thank you for your comment on exceptions to when a withdrawal penalty is applied. We will consider this as we are determining our alternatives and proposal.

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Row #	Stakeholder	Comment	BPA Staff Response
51	Avangrid	<p>GI Withdrawal Penalties <i>Should a Penalty Apply During the Transition Process?</i></p> <p>Strongly recommends that any mid-stream rule changes should not apply until the beginning of the next cluster study process. If Bonneville does ultimately apply withdrawal penalties to the transition cluster, Avangrid asks that the agency clarify whether there was sufficient notice of any such application during the TC-25 process (or otherwise) so that parties can understand whether Bonneville might make other “midstream” changes to its GI rules during its cluster study process...applying withdrawal penalties to the transition process should have been discussed transparently during the TC-25 process if Bonneville intended to apply them to the transition cluster after they were adopted in the BP-26 and TC-26 proceeding...Moreover, the cluster-study process outlined by FERC is intended to be an annual process, which places Bonneville’s withdrawals in a different context. Bonneville’s cluster study is unlikely to achieve that cadence, but also has unique aspects that equally impact the context for its withdrawals.</p>	<p>Thank you for your comment on when a withdrawal penalty should apply. We will consider this as we are determining our alternatives and proposal.</p>
52	Avangrid	<p>GI Withdrawal Penalties <i>Should a Penalty Apply During the Transition Process?</i></p> <p>Avangrid recommends that Bonneville provide a straw proposal as soon as possible that includes clarity as to where the agency expects the transition process to be when the new tariff becomes effective to anchor this discussion. It is imperative that Bonneville set a reasonable expectation for how long the phase-one restudies will take with the agency’s unique scalable-block concept, which allocates network upgrades based on capacity rather than FERC’s impact based allocation. During the TC-25 proceeding, Bonneville argued that a capacity-based allocation would allow the agency to make changes more quickly when there is a withdrawal—and to mitigate impacts to others in the queue. Avangrid would like to better understand Bonneville’s expectations for process timing, withdrawal impacts and exceptions before weighing in. Absent any such direction, however, Avangrid simply reiterates that Bonneville should follow FERC’s rules and generally avoid mid-stream rule changes.</p>	<p>Thank you for your comment. In the April 24 workshop, BPA provided the transition process timeline and shared expectations around process timing. Although the shared timeline does not have specific dates, it does show the phases of the process.</p>

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53	Avangrid	<p>GI Withdrawal Penalties <i>How Should Withdrawal Penalty Funds be Allocated?</i></p> <p>FERC's GI rules direct that any withdrawal penalties be allocated first to cover study costs, then to offset increased network upgrades caused by the withdrawal with any remaining amounts returned to the withdrawing customer. This policy, which was fully vetted during the FERC rulemaking appears reasonable, but Avangrid would like Bonneville to explore in greater detail in future workshops how these determinations would be made by the agency, whether there would be any transparency or ability to challenge the allocations, etc. Avangrid looks forward to hearing from Bonneville and stakeholders familiar with other cluster-study implementations.</p>	<p>Thank you for your comment on penalty funds allocation. We will consider this as we are determining our alternatives and proposal. As for transparency or the ability to challenge the allocations, this would be discussed more in the Business Practice process if BPA staff proposes a withdrawal penalty in BP-26 and it is finalized in the ROD.</p>

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III. Comments Received in Response to the May 22, 2024 BP/TC-26 Kick-off Workshop [NEW]

Row #	Stakeholder	Comment	BPA Staff Response
54	Seattle City Light	Transmission Line Ratings – FERC Order 881 Implementation City Light supports BPA’s overall approach to implementation of FERC Order 881. City Light suggests that there would be value in BPA developing explanatory material supporting BPA’s decision to not follow the pro forma language.	BPA staff will address this comment in its presentation at the July BP/TC-26 workshop.
55	Seattle City Light	ROFR Queue Management City Light supports BPA’s Alternative 2 to change the Tariff to harmonize BPA’s practices fully with the Tariff.	Thank you for supporting Bonneville staff’s recommendation of Alternative 2.
56	Seattle City Light	Western Resource Adequacy Program (WRAP) City Light supports continuing the WRAP principles put in place in BP-24. City Light additionally supports the BPA proposal for Above-RHWM Load and New Large Single Loads.	Thank you for your comment.
57	Seattle City Light	Intentional Deviation in the EIM City Light suggests BPA continue to closely monitor the impacts of VERs scheduling off forecasts and consider how any future policy changes may cause cost shifts between customer groups.	Thank you for your comment. BPA staff will continue to monitor impacts of VER scheduling in the BPA BA.
58	Snohomish PUD	ROFR Queue Management Snohomish supports BPA’s “Alternative 2” proposal to change the language of Section 2.2(a) of BPA’s Tariff to align with BPA’s existing process to offer ROFR to customers who request at least five years of service...Snohomish concurs that the process to complete studies and contract approvals are inherently lengthy. Modification of Bonneville’s tariff will continue to allow BPA to accommodate new transmission service needs without procedural setbacks and will provide significant benefits and prevent significant harm when compared to the pro forma alternative.	Thank you for supporting Bonneville staff’s recommendation of Alternative 2.
59	Portland General Electric	Transmission Line Ratings – FERC Order 881 Implementation Portland General Electric Company (“PGE”) hereby respectfully submits that Bonneville Power Administration (“BPA”) should provide TTC values in compliance with FERC Order No. 881 (“Order”) for jointly owned transmission paths where BPA is the path operator...On May 22, BPA explained that it does not plan on providing TTC values that are compliant with Order 881, which would put BPA’s path ratings out of line with the rest of the	BPA staff will address this comment in its presentation at the July BP/TC-26 workshop.

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		<p>Northwest. PGE requests that BPA provide forecasted hourly AARs for the required (and now industry standard) 240 hours into the future.</p> <p>As the path operator, BPA calculates the TTC for the jointly owned paths and provides PGE its share of the TTC for All Lines in Service (ALIS) and outage conditions as part of the operating agreements for such paths. BPA's disposition towards complying with the 240 hours of hourly Ambient Adjusted TTC Ratings will impact PGE's ability to provide its transmission customers the hourly transmission capacity of its share of the jointly owned transmission scheduling paths operated by BPA.</p>	
60	NIPPC and RNW Joint Comments	<p>Transmission Line Ratings – FERC Order 881 Implementation BPA staff...proposes that BPA will not comply with Order 881's requirement to calculate and post separate daytime and nighttime transmission line ratings. BPA has a framework to determine the circumstances in which it will propose tariff provisions that deviate from the FERC pro forma Open Access Transmission Tariff ("OATT"). BPA staff, however, has not presented any analysis that explains to customers why it is appropriate for BPA to deviate from FERC's Order 881 on this issue. FERC conducted a rulemaking process and upon full consideration of the record, FERC determined the requirements of Order 881 were necessary to ensure accurate line ratings and avoid rates that are unjust and unreasonable. Based on the information presented to date, it is not clear why BPA staff has come to a different conclusion than FERC on the usefulness of separate daytime and nighttime transmission line ratings.</p>	BPA staff will address this comment in its presentation at the July BP/TC-26 workshop.
61	NIPPC and RNW Joint Comments	<p>Transmission Line Ratings – FERC Order 881 Implementation Staff also seeks to insert additional language to the definition of "Ambient-Adjusted Rating" proposed by FERC. On the one hand, it seems reasonable that BPA would "evaluat(e) the need to curtail paths or develop(e) Operating Plans to prevent/mitigate an (sic) System Operating Limit (SOL) exceedance on the network." On the other hand, that additional language does not seem to be appropriate within the definition of an Ambient Adjusted Rating. Rather, it seems to be an ongoing action that BPA would take to ensure the reliability of its system and not limited to any requirement to develop or post ambient</p>	BPA staff will address this comment in its presentation at the July BP/TC-26 workshop.

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		adjusted line ratings. Moreover, BPA has not provided any analysis under its OATT deviation framework that explains how this additional language meets that standard.	
62	NIPPC and RNW Joint Comments	<p>Transmission Line Ratings – FERC Order 881 Implementation Commenting Parties also note that BPA’s neighboring transmission systems will be complying with Order 881 and posting daytime and nighttime Ambient Adjusted Ratings for their transmission facilities connecting to BPA’s network. Commenting Parties request further explanation from BPA staff about whether its proposal to deviate from the language of Order 881 will create any unnecessary seams with its adjoining transmission providers. At this time, Commenting Parties do not have a formal recommendation as to BPA’s proposed deviations from Order 881, but simply seek to better understand BPA’s reasoning for proposing them.</p>	BPA staff will address this comment in its presentation at the July BP/TC-26 workshop.
63	NIPPC and RNW Joint Comments	<p>ROFR Queue Management Commenting Parties support Alternative 2. We agree that transmission customers who seek transmission service for five years or more should not lose their right of first refusal due to delays in BPA offering the requested service. The defining feature of rollover rights should be that the customer initially requested service for five years or more; if BPA experiences delays to the point that the term of service offered to a customer is less than the five years of service the customer requested, then rollover rights should still apply.</p>	Thank you for supporting Bonneville staff’s recommendation of Alternative 2.
64	NIPPC and RNW Joint Comments	<p>Attachment A – Conditional Firm Service Agreement Exhibit Commenting Parties support Alternative 2. We agree that the Conditional Firm Service Agreement should be included in Attachment A along with other form Service Agreements.</p>	Thank you for supporting Bonneville staff’s recommendation of Alternative 2.
65	NIPPC and RNW Joint Comments	<p>Section 4 Update to Align with Attachment C (ATC) Commenting Parties support Alternative 2. Attachment C of the BPA tariff documents BPA’s methodology for calculating Available Transfer Capability (“ATC”) and Total Transfer Capability (“TTC”). BPA recently updated Attachment C as part of the TC-24 tariff revision process. Commenting Parties agree that BPA should conform Section 4 of its OATT to reflect BPA’s practice as documented in Attachment C.</p>	Thank you for supporting Bonneville staff’s recommendation of Alternative 2.

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66	NIPPC and RNW Joint Comments	Intentional Deviation in the EIM See complete comment submitted in response to the May 22 workshop, which is posted in the Customer Comments section on the BP-26 Rate Case webpage .	BPA staff is reviewing this comment and will provide a response by the July 30-31 BP/TC-26 workshop.