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Submitted via BPA Public Comments Portal

Comments in response to BPA's request for public scoping comments about the proposed Montana-to-Washington Transmission System Upgrade Project

Renewable Northwest ("RNW") appreciates the opportunity to submit these comments in response to Bonneville Power Administration's ("BPA") request for public scoping input of the proposed Montana-to-Washington Transmission System Upgrade Project ("M2W"). RNW represents renewable energy project developers and power providers who are BPA transmission customers that would benefit from the physical improvements and additions to the BPA transmission system in the M2W proposal.

RNW views M2W as a critical investment to help the region meet rising electricity demand and comply with state clean energy mandates. M2W was originally launched following BPA's 2010 Network Open Season to address long-term transmission needs west of Garrison.[1] It progressed through early NEPA review but was suspended in 2014 when supporting transmission service requests were withdrawn.[2] However, the energy landscape has shifted dramatically since then.

After the original cancellation, the 2016 TSEP process revealed, "a significant number of requestors that would need access to the capacity from the M2W project."[3] In particular, the study underscored that M2W is a strategic, cost-effective way to transfer wind energy from Montana into the Pacific Northwest.

In 2015, wind and solar became the lowest-cost sources of electricity on a levelized cost of energy ("LCOE") basis and remain the most cost-effective options today.[4] Wind energy from Montana stands out as one of the most abundant, high-capacity, low-cost resources available to meet the Pacific Northwest's growing energy needs. In 2022, Clearwater Wind—a 755-megawatt wind project—began commercial operations.[5] In early 2025, the state had nearly 1,900

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[1] Bonneville Power Admin., *Montana-to-Washington Transmission System Upgrade Project*, BPA (July 10, 2025), https://www.bpa.gov/learn-and-participate/public-involvement-decisions/project-reviews/montana-to-washington.

[2] *Id*.

[3] Montana Renewables Development Action Plan, App. B, 2 (June 18, 2018).

[4] Lazard, *Levelized Cost of Energy + (LCOE +) Report*, 18th ed. (June 16, 2025)

[5] U.S. Energy Information Administration, *Montana State Profile and Energy Estimates* (last visited Aug. 1, 2025), https://www.eia.gov/state/analysis.php?sid=MT.

megawatts of wind power generating capacity in operation.[6] In August 2025, Beaver Creek wind project went online, adding another 248 megawatts of capacity.[7] Another 315-megawatt wind project, Haymaker Wind Farm, is expected to begin construction in 2026.[8] An additional 150 megawatts of wind capacity and related battery energy storage are scheduled to come online by 2027.[9] This immense capacity would help meet rising energy demand in the Pacific Northwest.[10] Over the next couple decades, electricity demand in the region is forecasted to grow 1.8–3.1% every year, and nearly every major Pacific Northwest utility has revised its forecasts to reflect a step-change in load growth.[11] Many utilities are looking to Montana to help meet demand. For example, by early 2025, the 3,000-megawatt North Plains Connector (NPC)— a high-voltage direct current line spanning North Dakota and Montana—was nearly fully subscribed by Northwest utilities, adding urgency to relieve congestion on the legacy Colstrip Transmission System (CTS) and downstream WECC Path 8.[12] As noted in the Montana Renewables Development Action Plan, "When additional capacity is required west of Garrison, M2W provides a low-cost, low-impact option compared to additional linear facilities."[13] Accordingly, NPC subscribers are intensifying calls for BPA to advance M2W.[14]

Overall, M2W could unlock additional capacity and enable the delivery of affordable, clean power throughout the region. RNW thanks BPA for continuing to move forward with this important project that moves the region towards a cleaner, more reliable energy future and encourages BPA to do so in an environmentally responsible manner that comports with applicable laws while capturing efficiencies where possible.

Sincerely,

/s/ Mike Goetz
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[6] *Id*.

[7] Puget Sound Energy, *Beaver Creek Wind Project*, PSE MONTANA https://www.psemontana.com/beavercreekwind (last visited Aug. 8, 2025).

[8] Clearway Energy Group, *Clearway Signs Long-Term Contract to Deliver Wind Energy to Puget Sound Energy* (July 23, 2024), https://www.clearwayenergygroup.com/press-releases/clearway-signs-long-term-contract-to-deliver-wind-energy-to-puget-sound-energy/.

[9] *Montana State Profile and Energy Estimates*, *supra* note 5

[10] Northwest Power & Conservation Council, *Council Releases Initial 20-Year Forecast for Pacific Northwest Electricity Demand* (May 2, 2025).

[11] *Id*.

[12] Sean Wolfe, *Another Transmission Company Joins the North Plains Connector Project*, RENEWABLE ENERGY WORLD (Jan. 10, 2025).

[13] Montana Renewables Development Action Plan, *supra* note 3.

[14] Monica Samayoa, *Bonneville Power Administration Proposes $3 Billion Projects to Improve Power Grid Across PNW*, OREGON PUBLIC BROADCASTING (Oct. 17, 2024).

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