

Columbia River PUD appreciates the opportunity to provide comments in response to BPA's workshop series in particular the Large Load Facility policy.

Large Load Facility Policy:

To the extent BPA must adopt a Large Load Facility policy, we fully support BPA's proposal to apply it on a per-Facility basis. Columbia River PUD would support a New Large Load threshold of 20MW. We believe this strikes a balance that allows an industrial customer to grow to a reasonable amount. This would also align with the Department of Energy's recent directive to the Federal Energy Regulatory Commission ("FERC") to establish standardized load interconnection procedures proposed that such large load interconnection policies should apply only to loads greater than 20 MW. A 20-MW threshold would also align with the threshold contained in the definition of a large generator under FERC's Large Generator Interconnection Procedures, to which BPA already adheres.

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CRPUD would also endorse the designation of a New Large Load provided that the facility retains this classification only for five years following the projected growth that necessitated the designation. This approach aligns with BPA accelerated expansion desired outcome of being able to construct new infrastructure in 5 to 6 years.

Columbia River PUD sincerely appreciates BPA's ongoing efforts and commitment to engaging stakeholders throughout this policy development process. We recognize the significant work involved and thank BPA for providing opportunities for meaningful input. We respectfully encourage BPA to take these comments into account as it moves forward with finalizing the Large Load Facility policy.