

Columbia River PUD appreciates the opportunity to provide comments in response to BPA's workshop series held on December 16–19, 2025, January 6–7, and the additional customer workshop on January 15, which included further clarifying information from BPA. In addition to the specific issues addressed here, CRPUD urges BPA's consideration of the comments submitted by the NT Customer Group, the Public Power Council.

Large Load Facility Policy:

Columbia River PUD appreciates BPA's efforts to clarify its position during the recent customer-led workshop, particularly as this approach represents a departure from past practices. However, the short turnaround time has made it challenging for us to fully evaluate both the intended and unintended consequences, which limits our ability to provide meaningful, solution-oriented feedback. Columbia River PUD does not support the application of the new large load policy to a facility on an indefinite basis under BPA current proposal. This is especially concerning in cases where a new facility connecting to the same transmission line could be allocated up to 13MW of transmission capacity, while an existing site may not be able to reserve even 1MW. Regarding the 13 MW transmission line, Columbia River PUD requires additional time to thoroughly review the policy's intent and implications, and we plan to submit further comments no later than Friday, January 23rd.

Interim service:

CRPUD advocates for establishing a level playing field for both PTP and NT customers, ensuring that neither group is disadvantaged in policy application.

Core Principle:

NT customers should have equal access to CFS and should not be required to pay both NT and PTP rates to obtain this service.

Customer led workshop:

Seattle city lights presentation

CRPUD supports Seattle City Light's presentation, particularly the focus on proactive planning. We believe their proposal to offer interim CFS—with limited exceptions—is a valuable approach that BPA should further explore, as it will help all stakeholders better understand the associated risks. Additionally, we fully endorse the recommendation to forgo commercial studies during the transition period, as this will facilitate a more efficient and effective process. Overall, we believe these ideas will help move BPA's efforts in a positive direction.

Umatilla Electric Cooperative

CRPUD generally supports UEC's position, provided that BPA is not required to serve the load in situations where the associated generation goes offline for any reason. Additionally, BPA should not bear any costs to accommodate this request; if there are associated costs, the customer should be fully responsible for them.

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