

NLSL Group Comments on BPA's TC-27 December/January Workshops

The NLSL Group¹ includes discrete large loads that are expected to result in a significant portion of BPA's Total Retail Load over the next decade. The NLSL Group is focused on resolving policy issues and developing plans for load service in a rapidly evolving regional landscape. The NLSL Group appreciates the significant effort that resulted in the development BPA's presentation at the recent TC-27 workshops and offers these comments regarding the development and implementation of the Large Load Facility (LLF) Policy.

LLF Policy Priorities

The NLSL Group offers the following priorities (in no particular order) that should be considered as part of the development of the LLF Policy.

- Clear documentation of the LLF Policy
 - To date, the only policy language is in presentation materials, and the NLSL Group believes that clear policy language needs to be developed that captures the rationale for developing this policy.
 - The LLF Policy needs to be clearly separated from the NLSL Policy. The NLSL Policy originated from language in the Northwest Power Act which relates to access to Federal power, not transmission. The NLSL Group believes that any connection between the NLSL Policy and the LLF Policy is inconsistent with the intent of the Northwest Power Act.
- Restarting the LARC process
 - The NLSL Group supports establishing a LLF threshold to restart processing customer LARCs as soon as possible and is willing to accept an interim threshold while the policy documentation is being developed.
- Importance of Proactive Planning
 - The NLSL Group believes that efforts to implement Proactive Planning and minimize the duration of any necessary transition phase is a high priority.
- Conditional NT Service must:

¹ The NLSL Group is comprised of BPA preference customers who serve or expect to serve retail members and customers that the Northwest Power Act categorizes as "New Large Single Loads" (NLSLs). Member utilities include: Northern Wasco County PUD, Grant PUD, Clatskanie PUD, Harney Electric Cooperative, Klickitat PUD, Eugene Water and Electric Board, and Benton Rural Electric Association.

- Allow for effective participation with Regional Resource Adequacy program and Day Ahead Markets
- Be comparable to conditional point-to-point transmission service
- Have a clear and timely path to firm service
- Consider the ability of customers to schedule from virtual points
- Cost allocation based in cost causation
 - The NLSL Group supports mechanisms to ensure that costs incurred from integrating LLFs do not get allocated to non-LLF customers.
- Efficient Use of the Transmission System
 - In their WRAP change request (2025-CRF-008), BPA has expressed concern about overbuilding eroding the efficient use of transmission and requiring customers to over-invest in transmission if it was not necessary. The NLSL Group agrees with this concern.
 - In an October 23rd 2025 letter to FERC², the Department of Energy (DOE) has developed principles “*intended to ensure efficient, timely, and non-discriminatory load interconnections*”. The NLSL Group believes that BPA LLF policy should align with these principles related to efficient use of the transmission system, which include:
 - *To the extent practicable, load and hybrid facilities should be studied together with generating facilities. Such an approach will allow for efficient siting of loads and generating facilities and thereby minimize the need for costly network upgrades.*
 - *hybrid facilities should be studied based on the amount of injection and/or withdrawal rights requested. For example, a hybrid facility consisting of a 500MW load and a 600MW generating facility may seek no withdrawal rights and 100MW of injection rights*
 - *any hybrid interconnection shall be required to install the system protection facilities necessary to prevent unauthorized injections or withdrawals that exceed the respective rights.*

² <https://www.energy.gov/sites/default/files/2025-10/403%20Large%20Loads%20Letter.pdf>

- *the interconnection study of large loads that agree to be curtailable and hybrid facilities that agree to be curtailable and dispatchable should be expedited*
- *load and hybrid facilities should be responsible for 100% of the network upgrades that they are assigned through the interconnection studies*
- *utilities serving large loads, including those at hybrid facilities, should be responsible for transmission service based on their withdrawal rights, as that value amount reflects the quantity of capacity and energy that is being transmitted across the transmission system to the load*
- *utilities serving large loads must meet all applicable NERC reliability standards and OATT provisions*

NLSL Group Specific Comments

- The NLSL Group supports NRU's proposal for a 20 MW LLF threshold mentioned in their comments on the December workshop. In addition to agreeing with NRU's rationale on abiding by DOE directives and establishing a consistent planning framework for Generator Interconnection, transmission network, and Line & Load Interconnection, the proposed 13 MW threshold was derived from the NLSL Policy and has led to confusion among customers about how the LLF Policy will be implemented. As stated previously, the NLSL Group believes that there should be no connection between the LLF Policy and the NLSL Policy and establishing a different threshold will help clarify the distinction between these two policies.
- The NLSL Group agrees with the concepts shared by UEC at the January 15th Customer Led Workshop and supports their proposal for modifying the definition of network load to consider behind-the-meter generation as a path to achieving a more efficient use of BPA's network.

The NLSL Group also believes that ensuring that unauthorized injections or withdrawals do not exceed the respective rights is necessary to maintain reliability and preserve the principle of cost allocation by cost causation.

The NLSL Group would like BPA to develop alternatives for treatment of behind-the-meter resources that serve facility load for NT customers. These alternatives should, at a minimum:

- Ensure that a facility is not required to pay for NT service and that BPA does not have to plan for any portion of it's load that is served by behind-the-meter generation
- Ensure that the LLF threshold test considers any behind-the-meter generation intended to serve facility load
- Address any changes that may be required to the LARC process
- Address policy and system changes that may be necessary to ensure reliability, preserve cost allocation by cost causation, and comparability with other NT and PTP customers
- Be aligned with WRAP, emerging organized markets, and any best practices/DOE principles that are being developed

Additional Comments

- The NLSL Group is aware of BPA's Grid Expansion and Reinforcement Portfolio (GERP) initiative and wonders whether there is any connection between the completion of the projects included as part of this initiative and the ability of BPA to complete commercial evaluation studies.
- The NLSL Group heard the brief conversation on flexible load at the January 15th and encourages BPA to continue this conversation as part of this TC-27 proceeding.

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