Northwest Requirements Utilities

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Submitted via techforum@bpa.gov

Re: Northwest Requirements Utilities Comments in Response to BPA's December, 2025 and January, 2026 TC-27 Pre-Proceeding Workshops

Northwest Requirements Utilities ("NRU") appreciates the opportunity to provide these limited comments in response to BPA's December 16-19, 2025, January 6-7 and 15, 2026 Grid Access Transformation ("GAT") and TC-27 pre-proceeding workshop ("Workshop"), through which BPA provided its staff leaning related to the NITS Large Load Facility threshold and a host of other TC-27 alternatives. NRU represents the interests of 57 Load-Following preference customers and one generation and transmission cooperative, all of whom depend on Network Integration Transmission Service ("NITS") contracts with BPA for reliable load service. NRU and its members have a vested interest in the particular tariff provisions, business practices, and processes that BPA uses to plan its transmission system in response to NITS customer load and resource forecasts, and as such urge BPA to consider these comments in its policymaking.

In general, NRU supports the comments submitted by the NT Customer Group. Additionally, we offer limited comments here, both in response to specific questions from BPA in its December 30, 2025 Tech Forum email as well as on certain specific topics.

Responses to BPA Questions from December 30, 2025, Tech Forum Email

With respect to BPA's question on the timing of restarting the processing of load forecasts that remain below BPA's threshold for Large Load Facilities, NRU supports restarting such processing prior to the completion of the TC-27 proceeding. Preferably, BPA would begin processing and responding to NITS customers' load and resource forecasts as soon as possible, and we oppose delaying the processing of such forecasts until the completion of the TC-27 process. BPA's NITS customers must have certainty with regard to how BPA will serve their load forecasts, and further extensive delays are not acceptable.

NRU does not oppose BPA beginning to process *de minimis* transmission service requests on the same timeline as BPA begins to respond to NITS customer forecasted trended load. NRU believes this approach, where BPA would respond to portions of NITS and Point-to-Point ("PTP") customer needs on a similar timeline, is a fair and non-discriminatory approach to near-term

queue processing and would enable BPA to begin moving through its queue backlog and respond to customers in some limited fashion.

NRU has also separately submitted a completed Alternatives Worksheet, wherein we outline general feedback on alternatives presented, including with supporting rationale. Please refer to that document for more information on specific alternatives.

In general, NRU's priority interests center around the application of clear, transparent, and timely processes for NITS customer load and resource forecasts, and ensuring that BPA incorporates such forecasts as a central foundation in its transmission planning. To that end, we urge BPA to move quickly to begin processing NITS customer load and resource forecasts, and to clarify the treatment for forecasts that BPA is unable to accommodate through its reliability system assessment. Moreover, we urge BPA to minimize the duration of any transition phase, with the clear objective of accelerating the implementation of Proactive Planning as much as possible.

As we've described in prior rounds of comments, NRU supports BPA centralizing its transmission planning processes around the long-term load growth needs of its NITS customers. Continuing to plan the transmission system based on an assumption that submitted transmission requests adequately represent the primary and legitimate indicator of transmission need is flawed, antiquated, and should be overhauled. Rather, BPA should plan its system based on long-term load growth forecasts, candidate resource zones as informed by capacity expansion models and generator interconnection requests, and other drivers outside of (but informed by) transmission requests such as regional RFPs or resource requirements set forth by utility commissions or other governing bodies. BPA should identify the most cost-effective and efficient transmission projects resulting from that process, propose to construct them at embedded cost rates, and subscribe them via queued requests.

Large Load Facility Leaning

Given that BPA presented important additional detail and clarity on the staff leaning for the NITS Large Load Facility only yesterday (January 15, 2026), we are challenged to offer meaningful feedback on the specific details of BPA's leaning. NRU is disappointed that BPA is either unwilling or unable to provide for a modest extension to the deadline for this narrow issue so that its customers can consider and discuss the clarifications shared by BPA at yesterday's customer-led workshop. It is frustrating for BPA to share additional important clarifications that resulted in a robust set of discussions and questions, and require comments be submitted the following day. This is especially concerning given the extensive amount of time (over one year) that BPA and its customers have been discussing this specific topic and potential solutions, not to mention the impact that such large load threshold will have on NITS customers more broadly. We may provide supplemental comments to these in the coming weeks.

We also seek additional clarity on the rationale for permanently requiring forecasts of Large Load Facilities to proceed through BPA's commercial planning process, even for forecasted increases of less than 13 MW. This is logically perplexing in a situation where a new Large Load Facility with a load forecast of 12 MW can be processed through BPA's reliability system assessment, yet its neighbor that is an existing Large Load Facility must proceed through the commercial planning process for a forecasted 2-MW increase. These outcomes present strange and disparate treatments, to what appear to be fairly similarly-situated customers. The foundation for these policies should be logical and relate to the specific challenges of planning the transmission system for certain load increases. To do otherwise is arbitrary. We encourage BPA to treat all load forecasts below the threshold under a standard set of policies, irrespective of whether the forecast comes from an existing Large Load Facility or not.

We support and appreciate BPA's proposal to apply the threshold on a per-facility basis. This is superior to BPA's previous proposal which would have applied at a per-Point-of-Delivery basis. This aspect of BPA's revised leaning appears logical and will likely be easier to administer. Additionally, we understand and appreciate the overall intent of BPA's proposal: to standardize and simplify the process for BPA to encumber firm capacity for what BPA has historically observed to be "trended" load growth. This should provide a less burdensome process for NITS customers to have their more organic load growth served, and one consistent with BPA's obligations under its tariff.

Finally, and as we stated in prior comments, NRU urges BPA to consider adjusting its Large Load Facility staff leaning from a threshold of 13 MW to a minimum of 20 MW. This would 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. To the extent that BPA believes it must implement a MW threshold for large loads, NRU encourages it to at least align its planning thresholds across its various transmission services: Generator Interconnection, transmission network, and Line & Load Interconnection. Doing so would establish a consistent planning framework and prevent otherwise avoidable confusion.

Lastly, moving from a 13-MW threshold to a 20-MW threshold would detach this policy from the New Large Single Load ("NLSL") policy that is applied by BPA Power Services. Outside of the calculation of the line, the policy bears little connection to the NLSL policy and may cause confusion in its implementation due to customers inappropriately conflating the two concepts.

At a minimum, BPA should remain flexible with the application of any large load thresholds, and be willing to adjust such tolerances based on future policies that may be set at an industry level.

Transition Studies

NRU requests additional engagement on a limited subset of BPA's proposed transition studies alternatives (PP-TS). We are intrigued by and are initially most supportive of Alternatives 3, 6, and 8, but lack sufficient detail to offer a truly informed set of comments. We seek additional engagement on these alternatives in particular, and suggest that these should be the top remaining alternatives to transition to the future state and Proactive Planning. We do not oppose Alternative 5, such that BPA can overcome hurdles to offering additional interim service or conditional firm options, but seek to avoid this alternative impinging on meaningful development of Proactive Planning concepts. BPA should hold at least a half day workshop in the near future to further discuss these specific Alternatives, as many stakeholders continue to appear lacking important details. Doing so will increase the likelihood that BPA and its customers can find an acceptable solution and increase the likelihood that parties would agree to settle this topic.

General Comments

While we remain encouraged by what BPA has shared to-date around Proactive Planning, we want to reinforce our perspective that disruptive, out-of-the-box planning should not be constrained to only the BPA network. We urge BPA to consider broadening the scope of the Proactive Planning element beyond BPA's transmission network to also include interconnection services as well. As example, NRU recommends that BPA's Proactive Planning study include similar load-area studies as the Portland Area Reinforcement Study, and culminate in a 20-year transmission plan sufficient to enable service all the way from the designated resources to the NITS customer loads. This accomplishment would both deliver a major cornerstone of long-term, reliable load service to BPA's NITS customers and facilitate significant regional economic growth.

We would similarly not oppose BPA including studies of resource interconnection areas within its Proactive Planning process given the long-term, forward-looking nature of such process. We note that Southwest Power Pool recently submitted to FERC a proposal to merge its Generator Interconnection study process within its transmission planning process, resulting in a single holistic transmission plan that eliminates siloed transmission planning – a principle that we urge BPA to evaluate and consider pursuing in the spirit of truly disruptive transmission planning.

Lastly, we support BPA meaningfully evaluating and considering innovative concepts such as that presented by Umatilla Electric Cooperative regarding encouraging behind-the-meter resources in order to support large load interconnections and transmission service. Policies that foster reduced impacts on the transmission network can reduce the need for additional transmission upgrades, which helps to mitigate cost and rate pressure for all transmission ratepayers, while also enabling customers to satisfy their growing load needs in a more timely manner. However, it is imperative that BPA take extreme care to ensure that there are no adverse impacts to system reliability of approaches like these.

Conclusion

Despite the specific concerns and frustrations associated with certain topics, we acknowledge and appreciate the amount of time and effort that BPA staff undertook to deliver the volume and scope of content to its customers through December and mid-January. We look forward to continued engagement and urge BPA to provide sufficient time for its customers to evaluate and respond to BPA's presented content going forward. Doing otherwise jeopardizes meaningful progress made to-date toward BPA restarting its queue processing, achieving relevant regional support for its TC-27 proposals, and implementing its Future State vision. With respect to BPA's response to these comments, we believe it would be reasonable for BPA to respond to these comments as part of its next public workshop (currently scheduled for March 3-4, 2026), in lieu of separate written responses which may unduly consume scarce resources and time.

Sincerely,

Chris Jones
Director, Transmission Policy & Power Delivery
Northwest Requirements Utilities