

NT CUSTOMER GROUP SUPPLEMENTAL COMMENTS IN RESPONSE TO BPA'S DECEMBER 2025 AND JANUARY 2026 TC-27 PRE-PROCEEDING WORKSHOPS

Submitted: January 23, 2026 via techforum@bpa.gov

The NT Customer Group¹ submits these limited supplemental comments to those it submitted on January 16, 2026 in response to BPA's December 16-19, 2025, and January 6-7 and January 15, 2026 workshop series.

- As a first and primary interest of the NT Customer Group, BPA must move as quickly as possible to restart BPA's processing of the load and resource forecasts of its NITS customers. Whichever Large Load Facility approach BPA determines it must implement, it must do so swiftly in order to again provide certainty to its NITS customers on what loads BPA will plan for through its reliability system assessment and those that require additional processes. The continued delay in LARC processing, and the lingering uncertainty over how BPA will satisfy its obligation to plan for the load and resource forecasts of its NITS customers is stymieing potential economic development across the region and perpetuating concerns over how NITS customers will be able to serve their residential and other end use customers.
- 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. We appreciate that BPA has heard and understood the concerns previously expressed by its NITS customers over a per-Point of Delivery application. Application on a per-Facility basis is a more efficient and targeted approach to implementing any such large load policy. We anticipate that the administration of such a policy will be less burdensome both for BPA and its NITS customers and will more precisely account for the specific impacts to BPA's transmission system caused by specific loads.
- We oppose BPA's proposal to apply a "forever" designation to Large Load Facilities. As expressed by other commenters, such a policy may result in disparate treatment to similarly situated customers experiencing similar load growth patterns. While we understand certain concerns regarding allowing a Large Load Facility to continually increase by modest amounts without requiring additional commercial planning evaluations, we discourage a broad-brush policy such as that proposed by BPA that may inappropriately harm NITS customers in perpetuity. Instead, we recommend BPA apply a Large Load Facility designation for a finite period of time, such as over a

¹ The NT Customer Group includes Big Bend Electric Cooperative, the City of Forest Grove, Clark Public Utilities, Columbia River PUD, Eugene Water and Electric Board, Klickitat PUD, Mason PUD #3, Lewis County PUD, Northwest Requirements Utilities, PNGC Power, Umatilla Electric Cooperative, Wells Rural Electric Company, and Western Public Agencies Group.

5-year forecasting period (e.g., five consecutive LARC submittals), wherein any load increases during such period would be treated consistent with the Large Load Facility policy, even for amounts below the threshold. After such time, any forecasted load growth by that specific facility would be processed and planned for exclusively through BPA's reliability system assessment, the same as any other incremental NITS customer load growth. To the extent the same facility again forecasts specific load increase above BPA's definition of Large Load Facility, it could again be deemed a Large Load Facility and processed accordingly for the finite period established as stated above.

- Lastly, given the uncertain nature of BPA's future state and Proactive Planning vision, we oppose forever locking in the large load policy with an undefined ending. The NT Customer Group understands that, under Proactive Planning, BPA expects to plan to meet the load forecasts of its transmission customers over a long-term (20-year) horizon, with the intent of proactively identifying and installing transmission system reinforcements ahead of customers' load growth needs. As such, we are unsure of the ongoing need for BPA to maintain a large load policy as it relates to NITS within this future state. Instead, we recommend that BPA include in any business practices implementing its large load policy a sunset provision. Specifically, we recommend that BPA include a discrete period of time (e.g., ten years) that such policy would be effective, from the effective date of the business practice revisions adopting the large load policy. Such a time period would allow BPA and its customers to transition to the future state of BPA's transmission planning process and gain experience with such Proactive Planning model. After such time, BPA and its customers will be required to reevaluate the continued need for the large load policy. To the extent BPA determines that the large load policy remains necessary, it would be required to propose a revision to its business practices to extend the effectiveness of the load policy. That process would provide a transparent and open forum for BPA and its customers to discuss the ongoing appropriateness of any such policy within the Proactive Planning framework.

We would appreciate BPA's consideration of these comments as it finalizes its policy development applicable to its NITS customers' load and resource forecasts. Despite the particular circumstances leading to the submittal of these supplemental comments, we acknowledge and appreciate the time and effort that BPA and its staff have provided in identifying workable solutions for all its customers. We look forward to BPA quickly adopting the necessary reforms to begin processing its NITS customers' load and resource forecasts.