



January 23, 2026

Mr. John Hairston
Bonneville Power Administration
Administrator/Chief Executive Officer
Via email: techforum@bpa.gov

Re: Limited Supplemental Comments to those submitted on January 16, 2026, Concerning TC-27 December 17-19, 2025, January 6-7, 2026, and January 15, 2026 Pre-Proceeding Workshops

Dear Administrator Hairston:

Thank you for the opportunity to provide the Bonneville Power Administration (BPA) with limited supplemental comments to those submitted on January 16, 2026. Pacific Northwest Generating Cooperative (PNGC Power) is submitting comments to help further inform and shape BPA's TC-27 Tariff Proceeding. PNGC Power supports BPA moving forward with the processing of load and resource requests would support a combination of alternatives that could work together to help facilitate this goal and looks forward to reviewing the staff leaning on the combination of alternatives presented during the December 17-19, 2025, January 6-7, 2026, and January 15, 2026 Pre-Proceeding Workshops.

PNGC Power remains concerned about adopting a New Large Load (NLL) policy within the transmission business line, particularly one modeled on BPA Power's NLSL policy, which is driven by statutory requirements that do not apply to BPA Transmission. Applying a similar framework risks introducing inequitable treatment and unnecessary barriers for load-serving entities. PNGC asserts that BPA needs to clearly define in writing and strictly enforce how the NLL policy will be used in planning and operations. Through the development of the proactive planning process, the NLL policy should be re-evaluated to determine the appropriateness of the policy and the continued need for the policy. PNGC Power recommends that a sunset provision be established for the policy once the GAT reforms have been implemented, and proactive planning is achieved.

PNGC Power strongly opposes a "once a NLL, always a NLL" designation. Once a request has completed the NLL evaluation process and identified impacts have been mitigated, the NLL designation should be removed. Treating a load as permanently NLL— even when a future increase is below the NLL threshold— ignores subsequent system improvements and undermines the purpose of a de minimis threshold. This approach could also result in disparate treatment, where a new customer request may be approved as de minimis while a previously

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designated NLL customer is denied solely due to past classification, raising concerns about discriminatory outcomes.

PNGC Power appreciates Bonneville's collaborative approach to meeting the transmission service needs of its customers on a long-term, sustainable basis. It is recognized that there are no easy solutions and that difficult decisions will need to be made. BPA's obligation is to proactively plan, maintain and build a transmission system that will ensure reliable, long-term, firm service to its preference customers and the load growth customer's forecast. PNGC Power looks forward to continuing to work with the agency and its staff to resolve the current set of challenges together.

Sincerely,

/s/ Laura Dombrowsky

Laura Dombrowsky
Transmission & Power Contracts Manager
PNGC Power