

January 16, 2026

Submitted electronically

Northern Wasco County PUD Comments on TC-27 Pre-Proceeding Workshop Issues

Northern Wasco County PUD (NWCPUD) appreciates this opportunity to comment on topics discussed at BPA's recent workshops in the TC-27 pre-proceeding. In addition to the specific issues addressed here, NWCPUD urges BPA's consideration of the comments submitted by the NT Customer Group, the Public Power Council, the NLSL Group, and Umatilla Electric Cooperative.

NWCPUD is Load Following power customer and a NITS transmission customer of BPA. The large and growing majority of NWCPUD's total retail load is served with non-federal resources.

Mid-CRemote/NWHUB

NWCPUD appreciates BPA's consideration of the challenges and opportunities related to transmission planning from virtual points. NWCPUD agrees that the status quo is not working well for BPA planning or customer needs.

As a general matter, NWCPUD supports solutions recognizing that load service for most utilities in the North requires utilization of a diverse portfolio of resources that vary substantially on a seasonal and diurnal basis. A majority of the existing and proposed power production resources in the Northwest have seasonal and/or diurnal energy production profiles. This is consistent with the FERC Open Access Transmission Tariff (OATT), Network Integration Transmission Service (NITS) which requires that customers have the ability to integrate and economically dispatch their resources to serve Network Load. Therefore, BPA and its customers must find commercially and technically valid means to serve load using the tools and standards that currently exist for the large and diverse mix of resources in the region.

Beyond "meeting customer needs" generally, use of virtual points or hubs for transmission scheduling supports open access for buyers and sellers to economically efficient and liquid wholesale markets. This is a long-standing federal policy objective, including for the Department of Energy, and should be recognized as an objective by BPA in this process.

NWCPUD's primary goal is to have access to NWHUB (or another virtual point/hub such as ColumbiaMkt) as a long-term service product and, if necessary, secure FTSRs for the service from that POR to load. To that effect, NWCPUD strongly prefers "EC-VHUB-ALT-2: Offer Reassessment CFS at MIDCRemote and/or NWHUB" or "EC-VHUB-ALT-3: Mixed Firm and Reassessment CFS" among the presented options.

It would be ideal and more economical for there to be a path to long-term firm service, but NWCPUD recognizes that this may be challenging from a planning perspective and/or require uneconomical transmission builds. In the interim while customers use virtual points, BPA must also recognize that it will receive revenue in excess of its postage stamp rate for the NITS segment and the upstream PTP segments of the Physical Path used for power delivery - a clear incentive for NITS customers to establish long-term firm services for their loads.

The ability to obtain NT Reassessment CFS/interim service from NWHUB (or another virtual point/hub) to NWCPUD's load will meet its business needs, provided that service:

- Allows effective participation in WRAP and Markets+ (including congestion rent allocations commensurate with paying transmission rates to collect embedded costs of the system);
- Has comparable service quality and curtailment priority with PTP CFS/interim service; and
- Provides a clear path to firm service when new resources are constructed and become a long-term component of the NITS customers' supply portfolios.

Delivering/Receiving Party Validation

NWCPUD appreciates BPA addressing this issue which has been the source of some confusion and frustration for us in the past. No parties should be requesting service to our NT PODs without NWCPUD's agreement. For a valid request, NWCPUD would be ready and able to provide attestation of active negotiation. NWCPUD would certainly support "EC-PV-ALT-1: Require Confirmation of Delivering/Receiving Party Information" or "EC-PV-ALT-2: Utilize Contingent Validation" although other options may be workable as well.

Thank you for your consideration of these comments.