



Subject: TC-27 Pre-Proceeding Workshop

These comments are submitted on behalf of Umatilla Electric Cooperative (“UEC”). UEC supports the comments proffered by the NT Customer Group, the NLSL Group, the Public Power Council, and Northern Wasco PUD.

Below we provide thoughts on preferred objectives for this proceeding (or settlement), missed elements in the December 17-19<sup>th</sup> workshop, specific comments on NITS Forecast, encouragement to establish a pilot program around customer-build options to support the Future State, and a prepared TC-27 Alternatives Customer Sheet reflecting UEC’s input.

(1) Objectives for this proceeding:

- Minimize delay in resumption of designing Proactive Planning (Future State) and provide written assurance that Load Serving Entities will have their transmission needs planned for in proactive planning paradigm (PP-TS Alt. 8)
- Offer Conditional Firm service to all requests in queue order. Service not able to move ahead with a service commitment should be removed from the queue. To this end, we support BPA’s recent CFS alternative that would enable NT customers service CFS PTP service on an interim basis (IS-POPT-ALT-8c).
- Any Interim reforms ultimately adopted should impact NT and PTP services in a comparable manner, e.g., ensure that customers that cannot secure Long-Term Firm Transmission service are not disadvantaged as a result of not qualifying for Congestion Rent in Markets + operations.
- Any changes to existing policies, procedures, and tariff provisions adopted as a result of this effort must be based on organic law, uphold BPA’s long-term planning obligations for NT customers, be consistent with or superior to FERC policies and procedures, and not infringe on any transmission customer’s existing contractual rights.
- Consistent with BPA’s planning obligations, start processing all LaRC forecasts including all NT load.

(2) Missed elements in the December 17-19 workshop:

- Enabling efficiencies by separately conducting analyses for Behind the Meter load/generation that does not impact the BPA Network segment (or interties).
  - Modify or supplement Tariff definitions to encourage efficient transmission expansion where Behind-the-Meter (“BTM”) resources or co-location between load and resources involve service to “net” load rather than “gross” load.

- Modify or supplement Tariff definitions to enable use of PTP service (Long-term Firm and Conditional Firm Service) for a portion of Network Load, without double payment for services.
- Ensure timely processing of BTM resources, including those with NEWPOINT designations.
- Developing engineering standards that customers can incorporate in order to address concerns with unintended/unanticipated operational impacts.
- Plans for engaging contract engineering staff and customer-build efforts.

(3) NITS Forecasts (slides 12-25) comments by UEC will be provided in response to BPA's anticipated Business Practice on this subject.

(4) Mid-C Remote and NWH (Northwest Hub)

BPA propose seven alternatives for managing Long-term transactions involving MIDCRemote/NWHUB PORs and PODs. First, we are keenly interested in maintaining use of these points as a POR for service to load. While not optimal, we recommend that BPA adopt either ALT-2 (Offer Reassessment CFS at MIDCRemote and/or NWHub) or Alt-3 (Mixed Firm and Reassessment CFS). These two alternatives, while not optimal, will maintain these points for Reassessment CFS in the interim, or for a mixture of Firm (with a Plan of Service) to load, and Reassessment CFS (with no plan of service) from resource to NWH.

(5) Future State

We appreciate the time and effort developing and explaining the many options and approaches that BPA has considered for the purpose of processing requests and transitioning to the Future State. We appreciate BPA undertaking this effort and support the stated objectives - particularly customer-build option. We would encourage BPA to work with interested stakeholders to develop a dedicated subgroup to jumpstart this effort and identify opportunities to advance it on a more expedited timeline. Specifically, we would like BPA to push customer build options in pilot form in 2026. Establishing such a subgroup would not only facilitate more timely project builds, but would also help relieve BPA staff workload so that internal resources can focus on higher-priority construction activities for the agency.

Sincerely,

/S/ Diego Ochoa

Diego Ochoa, Power Supply and Transmission Services Manager for Umatilla Electric Cooperative

cc: Blake Weathers, Vice President Power Supply for Umatilla Electric Cooperative