



Umatilla Electric Cooperative
750 W. Elm Ave.
PO Box 1148
Hermiston, OR 97838
Phone: (541) 567-6414

January 23, 2026

Re: BPA TC-27 Large Load Facility Proposal

On January 15, BPA provided further clarification to its proposed “Large Load Facility” policy. BPA stated that loads deemed to be a Large Load Facility will “remain a Large Load Facility for its lifetime”.

BPA’s proposal to designate a Large Load Facility in perpetuity is inconsistent with the basic fundamentals of NT transmission service, which is demonstrated by the following examples:

- A Large Load Facility is evaluated in BPA’s commercial study process, and BPA deems that sufficient long-term firm transmission capacity is available to serve the Large Load Facility. The long-term firm capacity transmission capacity is granted to the NT customer.
- A Large Load Facility is evaluated in BPA’s commercial study process, and BPA identifies the required system reinforcements to serve the Large Load Facility on a long-term firm basis. The system reinforcement is completed, and the long-term firm capacity transmission capacity is granted to the NT customer.

Under both examples, the Large Load Facility has been granted long-term firm transmission capacity and is now equivalent to any other non-Large Load Facility Network Load. The Large Load Facility is now part of the customer’s Network Load, and BPA is obligated to plan and serve the customer’s entire Network Load without being subject to further commercial study evaluation, including the Large Load Facility.

BPA further stated that “any future increase even if less than 13 MW” will be subject to commercial evaluation. This is disparate treatment when compared to BPA’s proposal for loads under the 13 MW threshold.

Thank you,

A handwritten signature in blue ink, appearing to read "Blake Weathers", with a stylized flourish at the end.

Blake Weathers

Vice President, Power Supply