

From: Diego Ochoa

Sent: Friday, November 14, 2025 7:29 AM

To: Tech Forum

Subject: NT Focus Group Follow up

Greetings:

Umatilla Electric Cooperative (UEC), along with Clatskanie People's Utility District, and Harney Electric Cooperative, hosted a customer-led workshop for the BP-26 rate proceeding. The goal of that effort was to further encourage locating resources close to load by modifying BPA's Short-Distance Discount and reduce the transmission service costs applied to resources that use little, or in some cases none, of the BPA Transmission main grid (Network Segment). While we still support this effort, we recognize that it is a rate-related topic and not appropriate to discuss in the TC-27 proceedings.

However, we remain optimistic that BPA can move ahead toward a more formal and comprehensive approach to encouraging resource location close to load through the TC-27 proceeding. To this end, we recommend BPA consider two topics:

1. Modifying the OATT definition of Network Load; and
2. Including in the NITS Forecast process, distinct processing of Behind-the-Meter resources for transactions that do not involve use of BPA Transmission (Network Segment).

The OATT definition of Network Load

The OATT definition of Network Load is out of date. The existing definition results in charging Network Integration Service customers for transmission service not used. This is because the Network Load billing determinant is based on load *plus* Network Resource generation. While this is in keeping with BPA's traditional notion that it "stands by, ready to serve" when resources experience unplanned outages, that theory does not universally apply to current operations.

Charging service based on gross load even when generation is operating Behind-the-Meter and is serving load at the same electrical location undermines efforts to encourage efficient transmission expansion and upgrades. Additionally, charging for services that are not used is arguably contrary to current industry standards. Finally, these arrangements can be designed to ensure that resource operations are prevented from unauthorized use of BPA Transmission.

The goal of siting resources close to load has been embraced by BPA since TR-08 and the goal remains valid. In fact, given the current demand for BPA transmission service, and the need to pause processing load forecasts and service requests justifies prioritizing this goal. BPA and its customers benefit from siting resources close to load by reducing or in some cases avoiding Transmission upgrades and expansion. Moreover, there are power flow limiters, system protection facilities, and load shedding schemes that BPA can require to ensure that resource operations are prevented from unauthorized use of the BPA transmission system.

NITS Forecast Processing

BPA has indicated that its NITS Forecasts will be included in the scope of TC-27. Such as identified in BPA's Generation Integration Services Business Practice, where Large Generator requests may bypass Phase One and Phase Two Cluster Studies if specific criteria are met, we encourage BPA to separately process requests for resources forecast to serve load that do not impact the BPA Network Segment or cause Network Segment upgrades. By doing so, efficiencies are gained by both the Bypass Generators as well as those Large Generators that impact or require Network Segment upgrades. We also suggest that BPA clarify what we understand to be the criteria discussed in Section B.2.b.v., i.e., to allow customers to include in Large Generator resource design the necessary equipment to ensure that resource operations are prevented from unauthorized use of the transmission system, without imposing that investment or management of such on BPA. This approach would also negate the need for Transmission Service Requests (TSRs) for transactions that do not use BPA Transmission, which would bring additional efficiencies to the management of BPA's LTF Transmission Queue.

We welcome further dialogue with the appropriate stakeholders at BPA to discuss any of the topics above for clarification or further input. Adopting these recommendations, we believe, aligns BPA's tariff structure and operational practices with current and emerging market realities, accountably encourages siting and operation of resources near load, and enhances overall transmission system efficiency.

Respectfully,

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