

NT CUSTOMER GROUP COMMENTS IN RESPONSE TO BPA'S DECEMBER 2025 AND JANUARY 2026 TC-27 PRE-PROCEEDING WORKSHOPS

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The NT Customer Group¹ appreciates this opportunity to submit comments in response to BPA's December 16-19, 2025, and January 6-7, 2026 workshop series (Workshop) where it presented its staff leaning for its Network Integration Transmission Service (NITS) Large Load Facility policy, along with a variety of alternatives related to its TC-27 proceeding and Grid Access Transformation (GAT) initiative. We expect continued and robust engagement on these items in support of BPA moving quickly to restart the processing of forecasted loads and resources submitted by its NITS customers, and urge BPA to prioritize the near-term, actionable steps it can take to begin processing its queue, followed by intermediate-term steps to accelerate activities necessary to adopt Proactive Planning.

Principles

Below we list specific principles we recommend BPA follow as it develops staff leanings for its preferred alternatives related both to the TC-27 content and other GAT reforms.

- Selected alternatives must enable BPA to restart the processing of its transmission queue as quickly as possible
 - To this end, the NT Customer Group supports the processing of trended load growth as forecasted by its NT customers alongside the processing of *de minimis* Point-to-Point (PTP) transmission requests.
- Selected alternatives must prioritize efforts to implement Proactive Planning and minimize the duration of any necessary transition phase
- Selected alternatives should ensure the efficient and effective encumbering of transmission capacity
 - Adopted policies must ensure that BPA does not needlessly encumber transmission capacity for transmission customers that are unable, unwilling, or unready to receive service. Failure to do so impairs BPA's ability to meaningfully meet its tariff obligation to plan for the forecasted load and resources of its NITS customers, and may likely cause an overbuilding of its transmission system.
- Selected alternatives must recognize and account for the specific or unique attributes of the different services that BPA offers

¹ The NT Customer Group includes Big Bend Electric Cooperative, the City of Forest Grove, Clark Public Utilities, Columbia River PUD, Eugene Water and Electric Board, Klickitat PUD, Mason PUD #3, Northwest Requirements Utilities, PNGC Power, and Western Public Agencies Group.

- As a particular example, load interconnections are likely to be much narrower in geographic scope and potential range of impacts to BPA's network. Unlike generator interconnections, which may propose potential sites over a broad and geographically diffuse area, load interconnections are less likely to misidentify system impacts. Because the network impacts are narrower, and potential number of interconnection locations smaller, BPA should be positioned to accept a reduced level of load maturity than for resource interconnections.
- In addition, because BPA charges NT customers based on measured load, it should be willing to meaningfully consider policies that foster interconnection of behind-the-meter resources or flexible loads that can reduce the impacts on BPA's network. Such policies could expedite interconnections, lessen the identified network impacts and need for transmission reinforcements, and increase available capacity to other customers. This also includes billing adjustments or other mechanisms to incentivize efficient co-location or behind-the-meter arrangements.
- Selected alternatives should prioritize NT customer eligibility for SPP Markets+ congestion rent
 - One factor that BPA must consider in its evaluation of alternatives for Interim Service is the degree to which NT customers may (or may not) be eligible for congestion rents in the impending day-ahead market. To this end, BPA must prioritize Interim Service alternatives that enable NT customers to designate network resources during such time as their transmission encumbrances progress through the commercial planning process.

Large Load Facility Policy

Although we appreciate that BPA deviated from historical norms and presented clarifying content at a customer-led workshop, we remain frustrated at BPA's insistence on maintaining a deadline of the following day for customers to provide feedback. BPA had already extended the original deadline once for comments because of its own need to conduct additional workshops and present all of its prepared content, which it recognized warranted additional time for customers to comment. Again, here, BPA found it necessary to present additional clarifying materials given the complexity and continued lack of understanding between BPA and its customers regarding the large load proposal, despite nearly two years of discussion. And, once it appeared that BPA had provided adequate information for its NITS customers to finally gain a proper understanding of the proposal's impacts, BPA was unwilling to provide for even a modest extension on even this narrow scope of the final workshop materials.

As a result, the NT Customer Group is unable to determine whether there is common alignment on this topic, one that has such a significant impact on how BPA will plan for its NITS customers. While we understand that the TC-27 and GAT timelines are tight, requiring adherence to next-day deadlines for commenting in no way fosters meaningful engagement between customers and BPA. At best, it's a simple reflection of the accelerated pace of the timeline BPA has imposed. At worst, however, it implies BPA has little intention of meaningfully considering the feedback of its customers. The NT Customer Group may provide additional feedback to BPA on this topic no later than Friday, January 23rd.

Interim Service

The interim service options identified by BPA for NITS and PTP through the January 7th workshops were not comparable. The primary interim service option for PTP, PTP Conditional Firm Service (CFS), would provide PTP customers early access to a long-term bridge to firm product with potential rights of first refusal, eligibility for congestion rent in Markets+, and first claim to available short-term firm to firm up their interim CFS. In contrast, the interim service proposals described for NITS customers present a veritable Hobson's choice of options that each come with some combination of no long-term solution, no eligibility for congestion rent in Markets+, no implementation of phase 2 of NITS on OASIS, and/or secondary rights to any short-term firm that becomes available. If there are going to be interim service options, BPA must ensure that they are at least comparable as between NITS and PTP.

For instance, and as mentioned in the principles listed above, the selected interim alternatives must prioritize NITS customer eligibility for SPP Markets+ congestion rent. To this end, BPA must prioritize alternatives that enable NITS customers to designate network resources during such time as their transmission encumbrances progress through the commercial planning process.

We were encouraged to learn at the January 15th workshop that BPA is committed to explore whether to enable NITS customers to use PTP CFS for interim service. This would put NITS customers and PTP customers on the same footing when it comes to interim CFS as it relates, for example, to rights of first refusal, eligibility for congestion rent in Markets+, and first claim to available short-term firm to firm up their interim CFS. This option may also allow BPA to implement phase 2 of NITS on OASIS when it appears that a non-pro forma NITS CFS product would not. To make this option work, it will be necessary to carve out the interim PTP CFS service from the NITS customer Network Load to avoid double payment. Once firm service becomes available, the NITS customer should be given the option to roll the service into firm NITS or to maintain it as firm PTP.

NITS Point of Delivery

The NITS customers support BPA's proposal that there should be some check-in with or demonstration of interest by the relevant NITS customer when a PTP TSR is submitted for a POD on the NITS customer's system. This will help ensure there is sufficient accurate information for BPA's planning of transmission service to the NITS customer's loads and help avoid planning that has no basis in the NITS customer's actual intentions for serving such load.

Project Cost Security - NITS

BPA proposes to determine the duration and reduction of project security for NITS customers that are determined to have new large loads based on the customer's Network Load on the hour of the Monthly Transmission Peak Load and to only reduce such security when the customer's peak load increases in amount equal to or greater than 50% of the FTSR's requested amount for one (1) month in each out of five (5) out of seven (7) calendar years. However, this approach creates a risk that the customer would not have its security reduced in circumstances where the load associated with the FTSR takes full service in the amount of the FTSR but the NITS customer loses an equal amount of load somewhere else on its system. This is because BPA's proposal would reduce the security based on the customer's full Network Load on the hour of the monthly system peak, which invites adverse netting implications that would prevent the return of security when a NITS customer both gains and loses load at the same time. This is not just unfair to the utility but also to its new large load that may have paid the security amount on behalf of the utility. BPA should instead determine the duration and reduction of security based on whether the load at the facility underlying the FTSR is equal to or greater than 50% of the FTSR on the hour of the Monthly Transmission Peak Load. To implement this proposal, BPA could require such facilities to be separately metered to the extent they are not already.