

COMMENTS OF THE NT CUSTOMER GROUP REGARDING TRANSMISSION PLANNING REFORM

Submitted: February 25, 2025

The NT Customer Group¹ appreciates this opportunity to submit comments regarding BPA's recent announcement that it is pausing several transmission planning processes, including its Network Integration Transmission Service (NITS) Load and Resource Forecast Evaluation and Closeout Process.

Although the NT Customer Group understands the need for BPA to reform its transmission planning process given the staggering increase in new transmission service requests that the agency has received over the last few years, we do object to BPA's decision to use the August 15, 2024 deadline to submit eligible Transmission Services Requests (TSRs) and associated data exhibits for consideration in the 2025 Cluster Study as the cutoff date for processing TSRs previously submitted by Point to Point (PTP) customers **as well as** the cutoff for processing LaRC submittals previously made by BPA's NITS customers.

The August 15, 2024 cutoff date unduly discriminates against and harms BPA's NITS customers. BPA did not provide the templates for the "in cycle" 2024 LaRC process until August 30, 2024, some fifteen days after the cutoff date announced on February 11, 2025, and the deadline to complete the LaRC forms was not until September 30, 2024. Accordingly, BPA NITS customers who met their obligations under BPA's Open Access Transmission Tariff (OATT) and transmission business practices by timely submitting their "in cycle" LaRCs for 2024 will not have their submittals processed at all due to BPA's planning pause. This is in contrast to BPA's PTP customers who met the "in cycle" August 15th deadline for the 2025 Cluster Study, who will have their TSRs processed. The net effect of this is that the most recent "in cycle" LaRCs that will be processed by BPA are those submitted in the early Fall of 2023 whereas PTP TSRs submitted in 2024 for the 2025 Cluster Study will be processed. This is not comparable treatment between these two OATT products. In addition, it raises deep concerns that BPA may not be meeting its statutory obligation to ensure that there is sufficient transmission capacity to enable BPA to meet its current and future marketing obligations to its preference customers before making any excess transmission capacity available for the transmission of non-federal power to all utilities on a fair and nondiscriminatory basis

During the February 11, 2025 meeting, it was asked what kind of feedback would be helpful for BPA regarding its proposed transmission planning reform process. BPA's response was to solicit ideas as to how BPA could better align resources and loads in its transmission planning because the size of BPA's current resource heavy transmission service queue is several times larger than the forecasted load in BPA's Balancing Authority Area. The simple answer to this request is that BPA's OATT already has a product that seeks to align loads and resources in transmission planning—NITS. Yet, paradoxically, it is the NITS product that BPA has determined to completely sideline for 2024.

¹ The NT Customer Group includes Benton PUD, Big Bend Electric Cooperative, Clark Public Utilities, Columbia River PUD, Eugene Water & Electric Board, Mason PUD #3, Umatilla Electric Cooperative, Northwest Requirements Utilities, PNGC Power, and Western Public Agencies Group.

BPA staff acknowledged that NITS and PTP are quite different products, and that BPA has been wrestling with prioritization, the right order of operations for how and when service is granted to each product, and ultimately what BPA's position is on the interplay between NITS and PTP. As BPA designs a new transmission planning model for the world we live in, it is imperative that BPA build a better foundation for its reformed transmission planning process by beginning with (i) a renewed review and commitment to the core statutory purposes of BPA's transmission system; (ii) a new emphasis and higher priority given to NITS and PTP customers who can definitively match loads and resources when submitting their LaRCs/TSRs to BPA for transmission study and planning purposes; and (iii) a review of the obligations and rights of each OATT product.

In addition, if BPA is serious about aligning loads and resources in its transmission planning, it must use the pause in its transmission planning to improve and elevate its treatment of the NITS product.² Because it is specifically designed for load service, the NITS product inherently and intentionally matches loads and resources in transmission planning. It is the product that helps BPA meet its statutory obligations to ensure that there is sufficient transmission capacity for it to meet its federal power marketing obligations to most of its preference customers. NITS can be the solution to resolving the problem of BPA's resource heavy transmission queue. The NT Customer Group is ready to engage with BPA during the pause to make sure that it is.

Thank you for the opportunity to comment.

² For example, this includes but is not limited to prioritizing the development of the Conditional Firm NT product that BPA has expressed interest in exploring with the NT Customer Group.