

NITS CUSTOMER GROUP COMMENTS IN RESPONSE TO PROPOSED REVISIONS TO BPA’S LINE AND LOAD INTERCONNECTION PROCEDURES BUSINESS PRACTICE

Submitted: July 15, 2026 via techforum@bpa.gov

The NITS Customer Group¹ submit these comments in support of the comments of the Northwest Requirements Utilities (“NRU”) and Umatilla Electric Cooperative (“UEC”) regarding the Bonneville Power Administration’s (“BPA”) proposed revisions to its Line and Load Interconnection Procedures (“LLIP”) Business Practice.

As the final leg of BPA’s source to load transmission planning triumvirate, the LLIP Business Practice plays an underappreciated role in meeting the region’s load growth and enabling economic development. An updated, modern LLIP Business Practice that both clearly identifies the respective Line Load Interconnection Request (“LLIR”) responsibilities of BPA and its transmission customers and is diligently and expeditiously executed by all parties, and particularly by BPA, is essential to meet the increasing load demands being placed on BPA and its NITS customers in a timely manner.

For the above reasons, the NITS Customer Group join NRU and UEC in their call for additional clarity and firmer commitments by BPA in the updated LLIP Business Practice, including, without limitation, NRU’s and UEC’s recommendations that:

- Section A.1.a be revised to provide more clarity and certainty as to when an LLIR will or will not be required, and specifically that the overly broad and commercially challenging discretion in BPA under Section A.1.a.v to require an LLIR for any load growth identified in a NITS customer’s LARC, regardless of how de minimis, be removed.²
- Section A.1.iii be revised to clarify how the proposed 20 MW load increase threshold at an existing point of delivery (“POD”) for the triggering of a LLIR will be measured and applied.³

¹ The NITS Customer Group is comprised of Benton PUD, Benton REA, Big Bend Electric Cooperative, City of Forest Grove, Clallam PUD, Clark Public Utilities, Columbia River PUD, Eugene Water & Electric Board, Klickitat PUD, Lewis PUD, Mason PUD #3, McMinnville Water & Light, Northern Wasco PUD, Snohomish PUD, Umatilla Electric Cooperative (“UEC”), Northwest Requirements Utilities (“NRU”), PNGC Power, and the Western Public Agencies Group. By joining these comments as members of the NITS Customer Group, NRU and UEC both underscore their own respective comments and express support for the other party’s comments.

² NRU LLIP Business Practice Comments, Sections 1.a, 1.b (July 15, 2026) (“NRU Comments”); UEC LLIP Business Practice Comments, pages 1-2 (July 15, 2026) (“UEC Comments”).

³ NRU Comments, Section 1.b; UEC Comments, pages 1-2.

- Section A.3.a.ii.2.a be clarified as to what constitutes an “Exploratory LLIR” and an “information study” for purposes of determining when a NITS customer will be expected to pay interconnection study costs.⁴
- Section A.3.a.ii and Section A.3.b.iii be modified to provide more certainty to NITS customers as to their funding obligations, respectively, for LLIR studies and transmission facilities.⁵
- Section G.5 be amended to reject BPA’s proposal to “endeavor” to complete System Impact Studies within 180 calendar days and instead (i) restore and maintain BPA’s commitment in the current Business Practice to use reasonable efforts to complete System Impact Studies within 60 days from its receipt of an executed System Impact Study Agreement and (ii) take such steps as are necessary to be able to meet this commitment.⁶ Adopting this recommendation will better align the proposed Business Practice with BPA’s obligation under its OATT to “use due diligence” to complete System Impact Studies within 60 days of its receipt of an executed System Impact Study Agreement.⁷ This is compared to BPA’s proposed Business Practice language, which triples the timeline and deemphasizes the level of effort required by BPA in its OATT.
- Section H be strengthened by renewing BPA’s pledge under Section G.3 of the current LLIP Business Practice to use reasonable efforts to complete Facility Studies within 60 calendar days of receipt of a customer’s executed Facility Study Agreement.⁸ Like the recommendation above regarding System Impact Studies, adopting this recommendation will also better align the proposed Business Practice with BPA’s obligation under its OATT to “use due diligence” to complete required Facilities Studies within 60 days of its receipt of an executed Facilities Study Agreement.⁹ BPA should take such steps as are necessary to ensure that it is using reasonable efforts and due diligence to meet this commitment.
- Section F.3 be revised to also include a commitment by BPA to use reasonable efforts to complete Feasibility Studies within 60 calendar days of its receipt of an executed Feasibility Study Agreement.¹⁰ Feasibility Studies are a helpful addition to the Business Practice. They are intended to be high-level and quick studies of the ability to serve the load, and BPA should be able to complete them well within 60 days.

⁴ NRU Comments, Section 1.c.i.

⁵ UEC Comments, page 2; NRU Comments, Section C.ii.

⁶ UEC Comments, pages 2-4; NRU Comments, Section 3.

⁷ BPA OATT, §§ 19.3, 32.3.

⁸ NRU Comments, Section 3.

⁹ BPA OATT, §§ 19.4, 32.4

¹⁰ NRU Comments, Section 3.

- Sections F, G, and H be amended to allow interconnection Feasibility, System Impact, and Facilities Studies to be completed by interconnection customers or third-party engineering firms approved by BPA.¹¹

In addition to the above support for the comments of NRU and UEC, the NITS Customer Group also recommends that:

- To improve consistency and provide customers with a reasonable opportunity to review and respond to requests, the Business Practice be revised to establish a standard customer response timeline of 15 business days for all customer actions. The only exception should be the Post Study Agreement response timeline, which is currently proposed as 30 business days and should remain unchanged.

We appreciate BPA's consideration of these comments in support of the comments of NRU and UEC regarding its LLIP Business Practice.

¹¹ NRU Comments, Section 3; UEC Comments, page 4.