

July 15, 2026

Submitted via techforum@bpa.gov

Re: Northwest Requirements Utilities Comments on Proposed Revisions to Line & Load Interconnection Procedures Business Practice

Northwest Requirements Utilities (“NRU”) appreciates the opportunity to provide these comments on BPA’s proposed revisions to its Line & Load Interconnection Procedures (“LLIP”) business practice. NRU represents the interests of nearly 60 Load-Following preference customers and one generation and transmission cooperative, all of whom depend on Network Integration Transmission Service (“NITS”) contracts with BPA for reliable load service. Given the regional economic value at stake through the timely interconnection of new loads, NRU and its members have a profound interest in the business practices and processes BPA uses to interconnect such loads. We therefore request BPA to consider these comments.

At the outset, BPA specified in the public meeting to review the business practice that a primary purpose in revising the LLIP business practice was to update and modernize the document and align it to BPA’s current practices. BPA last updated the current LLIP business practice in 2015, and since then there has been considerable advancement across the industry in the proliferation of large loads seeking more immediate interconnection. A modernization of the LLIP business practice is well overdue and appreciated, but as we note further below, aligning the business practice to BPA’s current processes is an insufficient stopping point. Additional enhancements to BPA’s load interconnection procedures remain critical given the considerable advancement in load interconnection policies across the nation.

We offer the following specific comments on BPA’s proposed business practice.

1. Section A – Line and Load Interconnection Request (LLIR)

a. Policy Applicability

At the business practice customer meeting, Bonneville staff noted that the LLIP business practice is intended to generally apply only to loads interconnecting to BPA’s transmission system. While a potential formality, we request that BPA carry this detail through section A.1 pertaining to Line & Load Interconnection Requests (“LLIRs”) for NITS Customers. Specifically, we request that BPA include the text “on BPA’s Transmission system” after “at an existing POD” in sections A.1.a.iii, A.1.a.iv, and A.1.a.v. Many of BPA’s NITS customers’ loads are interconnected solely

within another utility's transmission system and are served via transfer, and as such we believe it is important for BPA's policies to be clear in their scope to minimize unintended confusion among the diverse set of NITS Customers. Bonneville includes this language already in sections A.1.a.i and A.1.a.ii, so we recommend including this language throughout for consistency.

b. Adoption of 20 MW LLIR Threshold

In section A.1.a.iii, BPA proposes that "20 MW or more of new load at an existing POD" will require submittal of an LLIR. We request Bonneville clarify this provision, as it is unclear whether this will be triggered at any point at which a load at an existing POD exceeds 20 MW (i.e., a 14 MW load increases to 23 MW over the 10-year projected period), or instead whether the cumulative increase over the 10-year projected period exceeds 20 MW (i.e., a 35 MW load increases above 55 MW over the 10-year projected period). Our assumption of BPA's intent is the latter interpretation but would appreciate additional clarity to avoid confusion.

Further, we question the purpose of a 20-MW load increase threshold at an existing POD (proposed section A.1.a.iii) for triggering the submittal of an LLIR, alongside the proposal for BPA to require an LLIR submission for "load growth or load transfers that are not New Network Load at an existing POD if BPA determines a submission is required" in evaluating a NITS Customer's load and resource forecast (proposed section A.1.a.v). If the purpose of the 20-MW threshold is to establish consistency and a level of advanced certainty of doing business with Bonneville, any such certainty is trampled over by BPA's boundless ability to require an LLIR be submitted for any reason as part of evaluating a load and resource forecast. It is unclear when Bonneville would adhere to the 20-MW threshold when it can instead require a NITS Customer to submit an LLIR ostensibly for any reason. We urge BPA to clarify how the 20-MW threshold will coexist with what appears to be blanket discretion for BPA to require an LLIR be submitted, and request that BPA either adopt specific guardrails for BPA to "determine" the submission of an LLIR is required, or eliminate section A.1.a.v altogether.

Finally, we agree with comments submitted by others noting the timing implications of BPA's determination that an LLIR is necessary. If BPA arrives at its determination through the load and resource forecast evaluation process, it should adopt more timely deadlines for making and noticing such determination. Because that evaluation period can take upwards of six months (plus a calendar year between ordinary forecasting cycles), a NITS Customer can face significant timing penalties by waiting for its eventual conclusion. We therefore request that BPA provide notice to a NITS Customer within 15 business days of receiving an updated load and resource forecast whether an LLIR will be required for any of the identified Points of Delivery. This is especially critical given BPA's TC-27 proposal to condition a NITS Customer's ability to be studied for transmission service on first achieving specific progress in the load interconnection process.

c. Cost Responsibility

i. Section A.3.a.ii.2.a

NRU appreciates BPA's efforts to perpetuate its policy of not charging NITS Customers for interconnection study costs related to "trended" load growth, and to clarify situations that would require a NITS Customer to pay for the necessary interconnection studies. We understand certain situations may result in a NITS Customer paying for certain interconnection studies.

However, we request that Bonneville further clarify proposed section A.3.a.ii.2.a, which currently specifies "[a]n LLIR is considered 'Exploratory' when a utility customer is seeking an informational study." It is not clear how BPA defines "informational study", and one interpretation is that every interconnection study associated with every LLIR could be considered an "informational study". Ultimately, all interconnection studies will produce system impact or network upgrade information, and so it is not immediately clear what distinguishes an "Exploratory" LLIR from that which is not, and when a NITS Customer should identify the LLIR as such. Given the potential cost exposure associated with interconnection studies, we request that BPA provide further information regarding its definition for "informational" study, including when a NITS Customer should be reasonably expected to mark the "Exploratory" box of the Line and Load Interconnection Request form. Our assumption is that an "Exploratory" LLIR relates to a NITS Customer seeking a study for a prospective interconnection site located within the utility customer's service territory, but where no end use customer has been identified. To the extent this interpretation is correct, we request BPA include clarifying language in its proposed business practice to this effect.

ii. Section A.3.b.iii.1

In section A.3.b.iii.1, BPA notes that it will discuss with the NITS Customer the nature of the load needs driving the upgrade prior to a determination of the NITS Customer's advance funding obligation. Although this provision carries forward BPA's existing interconnection advance funding policy, it also leaves significant uncertainty as to the NITS Customer's ultimate advance funding obligation. And while BPA identifies "size of the load, load diversity, and the project cost estimate" as factors influencing that determination, it is not abundantly clear how these criteria relate to risk to BPA or its ratepayers. To the extent practicable we request that BPA provide additional detail regarding how the evaluation and determination of "level of risk" will be determined. For instance, will BPA consider other factors such as the level of commitment (contractual or financial) between the end use load and the NITS Customer? The progress of distribution upgrades that may be required to connect the load? Ultimately, we believe that the NITS Customer should be provided some degree of certainty regarding its potential advance funding obligation in the early stages of an LLIR submittal, and as the associated load matures over time.

2. Proposed Section D – Queue Status

NRU appreciates BPA's commitment to update the "status" field in the interconnection request queue, as the LLIR proceeds through the interconnection process. We recommend, to the extent possible, that BPA provide additional clarity for certain status designations. Specifically, we respectfully request that instead of "STUDY" and "STUDY COMPLETED" designations, Bonneville indicate which study is currently being performed, as well as which study has been completed. Given the numerous studies within BPA's interconnection processes, providing more refined status updates can help external stakeholders understand where in the process various interconnection requests are, as well as the expected general timeframe that Bonneville requires to complete its studies.

3. Proposed Sections F, G, H, and I

For the Feasibility Study and System Impact Study stages (proposed sections F and G) of the interconnection process, BPA proposes to "endeavor" to complete these sequential studies each within 180 Calendar Days, a proposed tripling relative to the status quo. Accounting for the kickoff meeting, as well as contracting processes prior to and following the Feasibility Study, a BPA interconnection customer can be expected to wait nearly a year and a half from submitting an LLIR to receive the results of its System Impact Study. For the Facilities Study stage (proposed section H), Bonneville avoids including even a perfunctory timeframe that it may need to complete this study. Lastly, for post-study agreements (proposed section I), Bonneville again proposes to "endeavor" to offer such agreement within six months of the Facilities Study review meeting. These timelines are untenable.

Although we understand that the proposed timelines are meant to reflect the current state of BPA's resource constraints and study capabilities, with which we sympathize, they will halt legitimate regional economic growth and new load addition opportunities for BPA's NITS Customers. Concerns with these interconnection study timelines are compounded by the fact that BPA also proposes through the TC-27 proceeding to require advancement in the load interconnection process before a NITS Customer will be even permitted to be evaluated for transmission service. We therefore urge BPA to restore the currently effective timelines of 60 days each to complete interconnection studies, whether Feasibility, System Impact, or Facilities Studies. Doing so would more closely align with the timelines established in sections 19 and 32 of BPA's tariff for completing System Impact and Facilities Studies, as well as the preamble to the proposed business practice itself which lists sections I, II, and III of BPA's tariff as the policy reference.

To the extent that BPA cannot adhere to the current 60-day interconnection study timelines, then we encourage BPA to assess the following alternatives:

- Allow the interconnection Feasibility, System Impact, and Facilities Studies to be completed by the interconnection customer itself or a third-party engineering firm. BPA should no longer

serve as the only source for completing these studies, when BPA's current capabilities require a potential tripling of their durations (or, in the case of Facilities Studies, contain no duration whatsoever). If executed efficiently and to BPA's required specifications, allowing others to complete certain interconnection studies could yield a higher number of completed interconnection studies in a shorter overall timeframe than if BPA were responsible for completing them all. This not only would preserve Bonneville's resources but also allow loads to interconnect at a potentially faster pace – a mutually beneficial outcome for BPA and its customers.

- Evaluate the merits of batching or clustering multiple LLIRs within load interconnection studies, where feasible.

Conclusion

Although we acknowledge that a significant driver for the proposed revisions to the LLIP business practice is to modernize the language and align it to BPA's current procedures, BPA must seek to adopt more aggressive innovation, and quickly. BPA's proposal to triple the time to complete its interconnection studies is especially concerning in light of recent rulings by the Federal Energy Regulatory Commission ("FERC") on large load interconnections in Independent System Operator ("ISO") and Regional Transmission Organization ("RTO") territories. There, a focus is on accelerating study timelines; not protracting them.¹ We therefore recommend that BPA pursue efforts to adopt best practices for the interconnection of large loads that have proved successful in other regions.

For instance, we encourage BPA to evaluate accelerated or abbreviated interconnection study processes for loads that agree to provide demand flexibility in response to grid or local interconnection constraints. This approach for loads could mimic the approach for resources utilizing the Energy Resource Interconnection Service type in the generation interconnection process, which may result in fewer identified network upgrades and reduce the timeline for interconnection. Notably, interconnecting additional load onto the existing transmission system or with only modest upgrades could have a lowering effect on transmission rates. Similarly, BPA could evaluate streamlining interconnection study processes in instances where loads will be paired with dedicated generation, and consider rate incentives to encourage such behavior where it would result in fewer upgrades, fewer impacts to BPA's transmission system, and a shorter timeline for interconnection.

We lastly encourage BPA to consider ways to plan on a more long-term, holistic basis for interconnection service, such as through its Proactive Planning initiative. Were BPA to include

¹ We note that in the FERC Orders initiating show-cause proceedings for ISO/RTOs, the Commission noted "based upon the record, it appears reasonable that such study processes, culminating in a report to the Eligible Customer with the results of the studies, including any Direct Assignment Facilities and Network Upgrades necessary to accommodate the transmission service request as well as a non-binding good faith estimate of the cost and the time to construct such facilities, should take no more than 60-90 [sic] calendar days to complete."

local interconnection areas within its long-term, proactive planning process, it could potentially identify load-area reinforcements in advance and lessen the overall burden associated with completing individual LLIR studies. We applaud BPA for taking steps to initiate long-term, proactive transmission planning – but this innovation should not be isolated to only the transmission network.

We appreciate the opportunity to provide these comments in response to the proposed revisions to the LLIP business practice. NRU members' economic viability is largely a function of Bonneville's success in efficiently completing its various transmission processes, and we look forward to working with BPA in identifying ways to enhance its effectiveness. Please reach out if you have any questions or would like to discuss anything contained in these comments.

Sincerely,

Chris Jones
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Northwest Requirements Utilities