

Submitted to techforum@bpa.gov on July 15, 2026

**RE: PPC Comments on BPA's Proposed Line and Load Interconnection Procedure
Business Practice Revisions**

The Public Power Council (PPC)¹ appreciates the opportunity to provide feedback on BPA's proposed revisions to its Line and Load Interconnection Procedure Business Practice. PPC would like to express some overarching concerns with the proposed BP revisions in addition to specific concerns raised by our members and public power partners.

As consumer owned utilities, PPC members are responsible for serving the electricity needs of their local communities. A large part of this role is facilitating economic development in those communities through providing affordable, reliable, and timely electricity service. BPA plays a large role in PPC members' ability to facilitate this economic development, which can provide a meaningful difference in the economic health and growth opportunities in communities across the Northwest.

To support this through its Line and Load Interconnection process, BPA should at a minimum provide: 1) timely completion of studies and construction of facilities to integrate new and growing loads onto its system, 2) clarity around when a line and load interconnection request is needed, and 3) transparent expectations for funding of line and load interconnection facilities.

PPC is concerned that the proposed revisions to the agency's Line and Load Interconnection Procedures do not achieve these minimum threshold objectives; instead, the edits prolong timelines and establish policies that introduce the opportunity for judgement calls and interpretations, which do not provide clarity for PPC member utilities or the end use consumers they serve.

¹ PPC is the umbrella trade association representing the interest of the Northwest's non-profit, public power utilities that have preference rights to the output of the federal system. PPC's members rely on BPA for wholesale power and transmission services to provide economic, reliable, and environmentally responsible power supply for the communities and businesses they serve at cost. PPC's members subscribe nearly the full firm output of the Federal Columbia River Power System (FCRPS) and a large portion of the capability of BPA's transmission system. The ability to access BPA's transmission system to deliver federal and non-federal generation to their communities is critical for PPC members.

PPC is concerned about the extension to developing SIS studies for line and load interconnection requests. Where most of the industry is looking to decrease study time, BPA's proposal triples the time allocated to conduct its study.

Performance of these studies should be included in BPA's execution enhancement efforts to identify potential solutions. One potential solution which should be explored is allowing third parties to develop studies that meet BPA's standards. This could allow customers to invest in additional resources on BPA's behalf in instances where the agency cannot meet existing study timelines.

While we understand BPA's staffing challenges, the agency needs to continue to be responsive to its customers. PPC supports additional staffing as needed to achieve this outcome. With other processes going through large reform efforts, BPA needs to ensure that line and load interconnection study efforts remain appropriately staffed.

Additionally, as raised in comments from other public power entities, there are several areas where greater clarity is needed, and we expect BPA to work with customers to ensure that clarity is achieved before finalizing its revised business practice.

We appreciate the opportunity to comment.