



# Big Bend Electric Cooperative, Inc.

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## REGARDING NITS ACCESS TO TRANSMISSION CAPACITY

Submitted: March 19, 2025

Big Bend Electric Cooperative (Big Bend) feels compelled to submit comments in response to the March 7, 2025, NITS Access to Transmission Capacity Initial Alternatives Meeting.

The above meeting began with BPA acknowledging the foundational issue – that BPA is currently unable to encumber long-term firm transmission service for many Point-to-Point (PTP) requests and Network Integration Transmission Service (NITS) forecasts due to insufficient capacity on the existing transmission system. While we appreciate the candor in BPA acknowledging this fact, Big Bend is very disheartened and concerned by this admission. Especially in light of the following points:

- Big Bend has been providing transparent, accurate and consistent load forecast information to BPA through the annual LaRC process;
- BPA's obligation under its Open Access Transmission Tariff (OATT) is to plan and construct its transmission system based on such submitted forecasts to facilitate delivery of network resources to network loads, and to reserve additional capacity for forecast network load growth within the ten-year planning horizon.
- BPA's prior acknowledgements of transmission constraints in the Tri-Cities area, particularly in the North Pasco area. Note that this is the primary service to Big Bend's preference load from the BPA Transmission system and conversations about the constraints have been occurring for a decade with virtually no remedial action taken.

With respect to the near-term options that BPA identifies for consideration. Big Bend fully supports the comments made by the NT Customer Group submitted on March 19, 2025. These comments are a good first step, but do not ultimately solve the root cause – the transmission system must be expanded and in a time frame where organic load growth is served reliably. **Big Bend is very concerned that our organic load growth will not be reliably served within this ten-year planning period.** We have presented this concern repeatedly to BPA over the last ten plus years and have not seen improvements planned, much less constructed. In fact, the Tri-Cities area has increasingly been close to reliability outages in recent years.

Big Bend strongly supports BPA's continued efforts to expand transmission capacity in the region to support the policies of the Provider of Choice, particularly the goal of integrating non-federal resources to support the growth of industries and residents in our communities. When – not if – this transmission is constructed, Big Bend's organic load growth must be given long-term NITS service regardless of the generation resource.

Sincerely,

A handwritten signature in black ink, appearing to read "John Francisco". The signature is fluid and cursive, with a long horizontal stroke at the end.

John Francisco  
General Manager/CEO