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4/22/2024

Bonneville Power Administration
905 NE 11th Ave
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RE: Comments Regarding: Planning for NITS Loads & Resources Workshop Series Kickoff(s) – March 20th, 2024 and April 15th 2024

We would like to thank BPA for the opportunity to provide comments on the topic of NITS service.

The addition of customer led meetings is appreciated and we believe the approach will spur productive discussion. We further appreciate Bonneville's longstanding commitment to the NT product and look forward to continued engagements.

More broadly we believe the customer engagement efforts outlined within the workshop would benefit from added time and process. BPA's proposal generally outlines efforts building up to the TC-26 effort, but they also include topics which span multiple rate periods. We believe it prudent to segment the topics into categories with clear identification of how the information fits within BPA's decision-making process and which issues are poised for discussion. By clearly identifying the issues, decision points, and workstreams, customers can come to meetings with BPA equipped with a well calibrated solution set.

BPA has multiple concurrent processes like GI reform, LLIR, LaRC, TSEP, and others that all represent a significant lift. We believe that BPA has a long history of giving time and process to efforts like these that are of strategic importance to the region.

Prior to addressing the questions posed in the workshop we believe it important for BPA to consider and clarify the following.

- Updating and expanding upon the 08/2020 NT Roadmap. (nt-product-roadmap.pdf)
- Outlining linkages between the NITS product/processes and BPA's strategic plan objectives with examples where the plan touches NITS
- Visualization of NITS projects combined with categorical system investments and estimated in-service dates.
- Visuals depicting the previous 20 years LTF awards relative to available capacity along with a forward view of service requests and NITS customer peak load for the next 20 years.
- Clarification of the proposed changes on slide 41 and 42 of the materials.

Regarding the issues within the workshop, we submit the following:

(The following information comes from page 47 of the workshop materials.)

ISSUE #1 Question - What should BPA consider as it re-examines and formalizes guidelines for NITS forecasts focusing on the nature of load growth (e.g. new Network Load, load growth, etc.)?

ISSUE #1 Response - **Any revision to the NITS forecasting guidelines and/or process should maintain a central focus on serving the NITS customer as whole.**

Additionally, there are a host of items being addressed through the forecasting process and we believe it is important to identify them and treat them individually rather than through a melded process.

Forecasting load should not be confused with requesting a new point of interconnection. Customers may have no load growth, but for operational reasons the customer may want to add additional points of interconnection. Customers routinely have “new network load”. This “new network load” may or may not require a new point of interconnection between the customer and BPA.

ISSUE #2 Question - What determines a NITS Customer’s queue time for FCRPS forecasts in various scenarios (i.e., inception v. upon receipt)?

Should there be a policy difference in planning treatment of NITS load increases depending on circumstances? If so, what defines those scenarios?

ISSUE #2 Response – Prior to offering substantive comment to the issue, we hope to learn more about how BPA anticipates serving NITS customers with the FCRPS in all of its different permutations.

Generally speaking, our core understanding of NITS service is that the product is resource and load agnostic. We additionally believe that the addition of a queuing mechanism can provide some relief to near term planning challenges, but that it also presents some long-term hurdles as well.

ISSUE #3 Question - What is the NITS business model for obtaining service in various scenarios if a transmission project(s) is(are) required? (i.e., who pays for what under various circumstances?)

ISSUE #3 Response – **We believe this issue is best addressed once BPA has identified how it intends to address system insufficiency, system replacements/renewals, long term investment, and interconnection processing.**

The question is important address, but it will likely detract from the focus understanding how BPA intends to service all of its NITS requests.

In summary, NITS is a valued product offered by BPA to its customers. We appreciate staff’s efforts to address the challenges that have been building over time. Our request is to segment the forecasting and planning question from **the larger issue of addressing NITS insufficiency**. We believe this will take significant engagement and leadership from BPA executive team. BPA’s executive team should identify how these efforts align with the agency’s strategic plan and how any human capital deficiencies will be addressed. We also support BPA’s executive team in providing it’s staff with clear direction to manage the transmission system while time is given to conduct a thoughtful process aimed at serving the region for years to come.

Thank you again for the opportunity to provide comment.

Clatskanie People's Utility District