



# PUBLIC UTILITY DISTRICT NO. 1 of Cowlitz County, Washington

Submitted via email:

June 10, 2024

**RE:** NITS Access to Transmission Capacity

Public Utility District No.1 of Cowlitz County (the District) is aware of the complex and significant challenges that the BPA transmission system faces due to the considerable and rapid load-growth occurring throughout the region. The District further understands that this rapid growth has exceeded the capabilities and efforts to date by BPA staff to plan and construct the necessary transmission system expansion to accommodate such growth. Accordingly, we understand from information shared during BPA's May 20<sup>th</sup> NITS stakeholder meeting that BPA is no longer able to continue planning for all instances of load growth in the same manner and is looking for alternative proposals to triage forecasted NITS customer transmission service needs. As such, BPA presented three alternatives to NITS customers during its May 20<sup>th</sup> meeting that each identified different considerations for triggering transmission planning requirements. While the District has not fully evaluated the impacts that each of the alternatives may have on its existing or future forecasted load growth, we would like to highlight a general concern, if our understanding is correct, that the proposed BPA alternatives may force some of the District's existing legacy CF/CT large industrial customers to participate in a lengthy Commercial Planning process due to normal cyclical industry fluctuations which could drive more significant peak load variations. Such a requirement could inhibit these customers from being able to respond to cyclical product demand variations in a timely manner, detrimentally impacting their business and potentially threatening their viability and jobs in Cowlitz County. Furthermore, recognizing that the large industrial CF/CT loads in Cowlitz County are long-standing BPA Power and Transmission Services customers, that have presumably funded the existing transmission infrastructure that has historically served the requisite transmission demand, it seems principled that BPA considers some unique but possibly measured treatment of such customers.

The District appreciates the outreach and stakeholder engagement from BPA Transmission Services on this matter; however, considering the potential impact that the proposed alternatives may have on existing and future customers, we respectfully request that BPA consider a lengthier stakeholder engagement to allow more analysis and discussion.