



Eugene Water & Electric Board

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Eugene Water & Electric Board's (EWEB) Comments on NITS Access to Transmission Capacity Workshop June 18, 2025

Submitted via techforum@bpa.gov

Thank you for the opportunity to provide comments on BPA's NITS Access to Transmission Capacity Workshop. EWEB is Oregon's largest customer-owned utility providing electricity to the Eugene community, as well as parts of east Springfield and the McKenzie River valley area. We are members of Western Public Agencies Group (WPAG), Public Power Council (PGP), and Public Generating Pool (PGP), and support comments and positions of these organizations as well as the NT Customer Group.

We are grateful to BPA transmission staff for their increased willingness to engage with NITS customers in the past year. While our comments include recommendations for improved stakeholder engagement and feedback, among other suggestions, we recognize BPA's internal resource constraints, and the effort staff have made to prioritize delivery of customer load growth.

More specifically, we were encouraged when BPA staff confirmed their commitment to plan for NITS load growth, while recognizing the need to collaborate on how that is accomplished. We also appreciate BPA's expressed willingness to guarantee firm transmission for federal and non-federal resources for trended growth. This concept would satisfy a portion of a concern we expressed in our August 14, 2024, Customer-Led Workshop¹ presentation.

Improve Customer Stakeholder Process

EWEB staff are compelled to submit comments directly as transmission planning for load service is critically important to meet future load growth. EWEB has dedicated a lot of time and energy to this issue over the past few years and are disappointed this effort went more than a year without active engagement. Reviewing our comments² submitted on 4.30.2024, many of our questions and ideas remain unaddressed.

We understand BPA staff will present a package of reforms in the July 2025 Transmission Planning Reform (TPR) workshop that will hopefully represent customer feedback provided in the last year through comments and Customer Led Workshop presentations. We look forward to this opportunity and encourage BPA staff moving forward, to provide timely responses to

¹ Slide 13, <https://www.bpa.gov/-/media/Aep/transmission/nt-service/NT-Customer-Presentation-for-081424-FINAL.pdf>

² <https://www.bpa.gov/-/media/Aep/transmission/nt-service/EWEB-Comments-on-NITS-Loads-Workshop-43024.pdf>

customer comments, increase active engagement in customer-led workshops, and create opportunities for collaborative brainstorming.

Roll NITS proposed alternatives into the TPR process

At this time, EWEB is only prepared to provide minimal input on the alternatives presented by BPA during the May 20 NITS workshop. We encourage BPA staff to further clarify the issue and define how the alternatives address the problem.

While staff have requested feedback on the proposed alternatives, it is challenging to offer informed opinions without a comprehensive understanding of the underlying issue they aim to resolve or how they might provide a solution. Additionally, without a clearer picture of the broader transmission planning and TPR discussions, it is difficult to make recommendations regarding what should proceed through the commercial planning process, especially when the future framework remains uncertain.

We respect BPA staff's need to make decisions to move forward with transmission planning and at the same time find it challenging to adopt a solutions-oriented approach when there is insufficient information about the root causes of NITS forecasting's contribution to the problem. This lack of clarity hinders our ability to assess the value and potential consequences of the proposed alternatives.

As such, we believe the proposed alternatives concept should be directly rolled into the TPR effort prior to making any decision on a specific alternative.

In that context, EWEB does have concerns about any approach that looks at an entity's combined load growth profile rather than considering single 'point source' loads or a combination of the two. For example, with EWEB's peak load of roughly 465 MW, a 1.5% cutoff for 'non-trended' would equate to roughly 7MW annual growth for EWEB.

While this may be appropriate on average, it does not account for changes in electrification patterns, or the 'lumpiness' of growth patterns. Any single 'point load', even if only a few MW (e.g. 2-4 MW), would push EWEB precipitously close to any additional load growth not being eligible for firm transmission. If BPA's transmission planning challenges are being driven primarily by large data-center or other load (e.g. over 100 MW), it would be helpful for BPA to describe these challenges and characteristics in more detail and wait to define 'trended' load in the TPR process.

The TPR process requires a holistic approach

BPA's TPR vision of a future state looks promising and in the spirit of being disruptive we strongly encourage BPA to not silo conversations. The discussions around BPA's concepts of Future State (Proactive Planning, On Demand Service, Project Execution) and Focus on Transition (NITS Forecasts, Existing Tx Queue, Readiness Criteria) need to be discussed holistically. We believe it is also important to engage in conversations around cost allocation and financing in this process.

Questions, ideas, and opportunities

We recognize the hours BPA transmission staff have dedicated over the past year to developing, researching, discussing and aligning internal management of the NITS alternatives. We ask that you bring customers along with your thinking to help answer the questions we have shared in our comments and customer led workshops. The following are offered up with the intention of attempting to increase common understanding and stimulate more dialogue:

- BPA staff have communicated its planning process can't handle the number of requests the agency has received; how would sending "non-trended" NITS forecasted loads through the commercial process specifically deliver a technical or procedural solution to the current process' inability to perform?
- How much of the problem of BPA's transmission system being very constrained in the ability to award additional LTF service is based on contractual constraints and how much of the problem is based on physical constraints?
 - Can BPA staff please provide a heat map of the transmission system to illustrate the nature of physical constraints?
- Can BPA staff please provide detail on near-term and long-term issues that are contributing to the problem statement summarized in the bullet point above? Can sense of urgency be removed from some topics that can then be approached through a robust, collaborative public process? EWEB recognizes the need and urgency to get off the TSR "pause" and seeks to avoid unanticipated consequences that could result from making quick decisions where urgency is not required.
- What correlation and impact do other BPA transmission initiatives (i.e. TPR, Evolving Grid, reliability projects) have on supporting a solution for planning for NITS forecasting?
- The Portland Area Reinforcement Study (PARS) appears to be a positive approach for customers and BPA; How might this concept be replicated and/or integrated into planning for NITS, possibly as an alternative to defining different types of load growth?
- BPA staff shared results from a benchmarking exercise in the July 10, 2024, workshop that demonstrated transmission providers use thresholds to support business requirements. The results didn't include detail as to what those business requirements entailed or facilitated beyond triggering a process where an application is required. We encourage BPA staff to do a deeper dive into how other transmission providers are developing solutions that might inform alternative approaches that BPA could take.
 - For example, CAISO identifies optimal areas for adding new resources, recommends best geographic zones for upgrades and expansion, providing load-

serving entities insight into where capacity exists or is being developed, and prioritizes requests in zones targeted for transmission upgrades³.

- The recent *Utility Dive* article, “Will ERCOT’s streamlined connect-and-manage approach work for other markets?”⁴, summarizes different planning and interconnection approaches that ERCOT, PJM, and SPP are implementing and/or exploring. In the spirit of being disruptive, BPA might be able to cut, paste, and assemble from these concepts despite geographic and organizational differences.

Summary

EWEB staff are encouraged by the vision and aspirations of the Transmission Planning Reform initiative and believe planning for NITS loads and service should be incorporated into that larger, comprehensive effort that will be successful based on ongoing stakeholder engagement and collaboration. We look forward to working together to achieve increased common understanding of the precise nature of problems that need to be solved and to leverage the collective experience, knowledge, creativity, and business acumen that exist in the region to help ensure that grid reliability, safety, and affordability are carried forward for future generations.

³ “How Transmission Planning Works Under the MOU”: <https://www.energy.ca.gov/programs-and-topics/topics/california-transmission-system/coordinated-transmission-planning-and>

⁴ <https://www.utilitydive.com/news/ercot-connect-and-manage-spp-miso-eris/749083/>