BPA Staff Responses to Comments Received from the May 20, 2025 NITS Access to Capacity Workshop

The comments summarized in this document are available in their entirety on the Additional Resources section of BPA's NT Product webpage.

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As the Pacific Northwest region continues to electrify and innovate, BPA's Network Integration Transmission Service (NITS) customers have accordingly forecasted new and large loads. Across the nation, transmission providers are grappling with demands of significant new transmission infrastructure to quickly to serve residential, commercial, and large industries.

BPA first engaged customers formally on the Planning for NITS Loads and Resources effort in March 2024 ("Planning for NITS Loads & Resources Workshop Series Kickoff"). It has more recently been referred to as NITS Access to Transmission Capacity. BPA sought to address growing challenges and complexities in BPA's transmission planning with a focus on NITS, including defining these challenges and engaging with customers. The original goal of this effort was to make discrete policy changes to facilitate planning for the transmission needs related to large load forecasts where policy did not exist, in order to make incremental improvement to BPA's forecasting processes.

BPA's existing policies around NITS service allowed BPA to integrate growing loads in nearly all instances. When large load forecasts started to become normal occurrences, BPA quickly learned that treating all load growth in the same manner, consistent with established practices, would jeopardize its ability to serve load reliably. Absent a change, BPA's planning processes (accepting and planning for NITS forecasts regardless of magnitude) left it with a choice between jeopardizing reliability or infringing on the rights of other customers.

Initially, BPA intended to host meetings at a cadence so customers could also engage on Provider of Choice and markets topics, and BPA had optimism that the project could offer solutions by Fall 2024. As BPA began looking into the NITS large load problem, BPA conducted an industry scan to find a landscape still in formation; NERC's large load task force is still underway, and FERC has yet to issue guidance on addressing large new loads. After kicking off the meeting series, BPA began running into timeline constraints—realizing that there would be more work ahead in order to deliver a new process for addressing large transmission loads. While describing and analyzing the issue of NITS load growth, the team realized that the effort would need scope refinement and more engagement with customers.

In the initial meeting in March 2024, BPA provided an in-depth overview of its forecasting and planning processes. Then, in July 2024, BPA elaborated on the problem, sharing its view of the desired end state of the project and draft decision criteria. In August 2024, BPA hosted a customer-led meeting in which customers acknowledged the problems identified in BPA's March and July presentations and presented six customer experiences related to load growth challenges those customers had faced. In addition to the acknowledgement of BPA's stated large load growth problem, though, customers also raised questions related to BPA's power marketing obligations, OATT obligations, the Network Operating Committee, BPA's past strategic intent statements, commercial and regional planning processes, line and load interconnection processes, forecast assumptions, and more.

BPA attempted to be responsive to this feedback from customers, but this caused project timelines to shift again, and BPA staff struggled to maintain focus on the original, discrete issue of large load forecasts.

As this unfolded, it became apparent that BPA was facing a growing number of inter-related transmission challenges and, in an effort to holistically approach a solution, began the Grid Access Transformation (GAT, formerly TPR) program series.

As the transmission provider, BPA has the obligation to endeavor to plan for network load growth. This effort has sought to clarify with customers BPA's obligation and further define "reasonably forecasted load growth." BPA acknowledges that this process has been frustrating and longer than the original projected timeline. We value all of the comments and the

partnerships formed with each commenter. Thank you for taking the time and effort to submit comments throughout this process. In response to those comments, and in order to create a better solution, continuing work on the NITS Loads & Resources Workshop Series is being absorbed by GAT, and the bulk of the comments will be responded to through GAT. For customer comments received in the NITS Load & Resources Workshop Series prior to May 20, 2024, BPA will not formally respond in order to maintain focus on the GAT program. We appreciate all of the engagement so far and look forward to working on this issue in the new venue.

I. General Comments

BPA appreciates the support of our customers and stakeholders and looks forward to collaborating on the transmission reforms. We have a long history of coming together to address the challenges facing BPA and the region. BPA is excited to continue the conversations regarding transmission reforms in the GAT process.

Commenter	Summary of Comment	BPA Staff Response
Grant PUD	Grant starts with certain principles. (1) There should be no undue discrimination between NITS and PTP service. (2) BPA should comply with FERC standards to the greatest extent possible. (3) BPA should avoid deviating from FERC pro forma provisions to the greatest extent possible. (4) All retail loads served by power delivered over federal transmission capacity should be considered "Native Load" with equal or equivalent quality of federal transmission service. (5) BPA should not create unduly discriminatory advantages for NITS service (or a part of NITS service) over PTP service. (6) Management of forecasted NITS load growth should take into account the impacts on applications for both PTP and NITS service that are already in the queue and any TSRs properly submitted in future. On all counts, Grant is concerned that these principles would be violated by the alternatives being considered for special new treatment of "trended NITS load".	Thank you for these comments. 1) Pro forma open access transmission service is based on customer choice between PTP and NITS, and customers must choose the attributes that best suit their needs. We agree there should be no undue discrimination, but disparate treatment between customers that are not similarly situated does not constitute discrimination. 2), 3) BPA remains committed to following FERC standards and pro forma standards where possible, 4) BPA has operated under the premise that federal power deliveries do not constitute native load since BPA adopted the OATT and agreed with customers that the pro forma service offerings of NITS and PTP better aligned with customer needs, 5) again, different treatment does not constitute undue discrimination, 6) management of NITS forecasts does take into account the impacts of other queued requests. We don't agree that these principles (or the standards listed in them) would be violated by the alternatives and would point to the draft decision criteria shared in the July 2024 workshop and the additional responses in this document.
PNGC Power	Thank you for the opportunity to provide the Bonneville Power Administration (BPA) with the following comments. The Pacific Northwest Generating Cooperative (PNGC Power) comments are intended to help further inform and shape BPA's Network Integration Transmission Service (NITS) capacity planning process. PNGC Power believes it is imperative that BPA move expediently to develop solutions that will ensure reliable, cost-effective load service over the long term for all NITS customers. BPA's transmission system faces many challenges ahead, and we expect that changes will be disruptive and difficult decisions will need to be made. We encourage BPA to explore all options while keeping laser focused on its load service obligation to its preference customers. The purpose of PNGC Power's comments are twofold: to reinforce our support for the broader comments submitted by the larger NT Customer group on June 18, 2025, and to provide BPA with additional substantive points that are important to the PNGC Power membership.	Thank you for your comments. BPA appreciates the support and the suggestions.

Commenter	Summary of Comment	BPA Staff Response
Public Power Council	As a general matter, PPC supports BPA's concept of exploring creative ideas to enhance the quality and responsiveness of the agency's transmission services consistent with the goals of the Transmission Planning Reform effort. Communities in the Northwest are relying on BPA to continue to provide reliable transmission service throughout the region consistent with its historic mission to electrify the Northwest. To best serve consumers of the Northwest, the agency should focus on the region's load service needs as the core use of its transmission system and prioritize meeting those needs in a timely manner. Matters related to the allocation of costs and risks associated with the continued growth of BPA's transmission system are important and must be addressed holistically as part of a larger discussion on how the agency will plan for and prioritize new transmission projects and how capacity related to those new projects will be allocated. PPC is confident that through working closely with public power and other BPA customers, the agency will be able to find a path forward that meets the region's needs. Addressing longstanding issues related to ongoing uncertainty around NT service is critical to achieving the larger objectives put forth in the Transmission Planning Reform initiative. BPA should fold the NT issues related to "NT Access to Service" into the larger Transmission Planning Reform effort. This will help ensure that all planning topics are approached with a similar creative, transformative, and open approach as is being adopted for transmission planning reform. Additionally, it is important for NT customers to understand how commercial planning will be conducted so that they can provide feedback on whether they support how BPA intends to use both its "system assessment" and "commercial planning" processes to meet NT customer needs.	Thank you for your comments. BPA has a strong history of working together with public power. BPA agrees that costs and risk ought to be considered in a larger discussion. For that reason, these concepts are being explored more holistically in the larger Grid Access Transformation project, formerly titled Transmission Planning Reform. BPA will engage with customers to explain commercial planning processes as those changes are proposed.
Seattle City Light	City Light thanks BPA for increasing the planned schedule of Transmission Planning Reform workshops to allow for additional collaborative discussions regarding between BPA and Customers. We recommend that large policy changes require additional communication and time for questions, feedback, and discussion.	Thank you for your comment. NITS Access to Transmission Capacity workshops have been rolled into the Grid Access Transformation Project, formerly titled Transmission Planning Reform, which will continue to evaluate these challenges.
Snohomish PUD	Snohomish expects to have mild to moderate load growth over time Snohomish's most recent load forecasts anticipate that Snohomish will experience mild to moderate load growth over its thirty-year integrated resource planning horizon. This load growth is expected to be relatively smooth over time with few instances of large or sudden additions. Snohomish expects and plans to serve this load growth using a combination of behind-the-meter resources and resources brought to load using firm NT transmission.	Thank you for your comments. BPA relies on customer provided forecasts in the annual Load and Resource Process.

II. Stakeholder Engagement

Generally, stakeholders acknowledged that the NITS series required more time than originally anticipated, asked for more engagement, and increased collaboration. Stakeholders hope to see increased customer conversations and commitment to dialogue. Some comments asked for BPA to provide more written material, and others asked BPA to engage in more dialogue with customers. BPA is hopeful that the GAT effort will provide stakeholders with additional meaningful engagement opportunities. BPA hears the message from customers to solve the problems deliberately and correctly.

Commenter	Summary of Comment	BPA Staff Response
Cowlitz PUD	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.	NITS Access to Transmission Capacity workshops have been rolled into the Grid Access Transformation project, formerly titled Transmission Planning Reform, which will provide further opportunities for stakeholder engagement. BPA encourages continued customer engagement in its public workshops.
EWEB	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 comments 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 customer comments, increase active engagement in customer-led workshops, and create opportunities for collaborative brainstorming.	We disagree that our engagement over the past year has not been active, but acknowledge that there have been frustrations with the complexity of the subject matter and the changing context that this effort has worked within. NITS Access to Transmission Capacity workshops have been rolled into the Grid Access Transformation project, formerly titled Transmission Planning Reform, which will allow for continuing engagement between BPA and stakeholder. We encourage continued participation in public workshops.
NITS Customer Group	As an initial matter, while we continue to appreciate BPA's engagement on this important issue, the dearth of written materials detailing BPA's concerns and positions, and perhaps most importantly the problem statement those positions are seeking to address, have been minimal. The great majority of the information exchange to date, while comprehensive and detailed, has been verbal. This has led to more than a few misunderstandings and misinterpretations, and has made it difficult for participants to respond effectively when asked. In the interest of ensuring clarity and providing the opportunity for efficient and effective engagement for all parties, we respectfully request that BPA provide as much written detail as possible going forward.	Thank you for the feedback. We don't share the opinion that there has been a dearth of written materials, having prepared and presented extensive written materials, but understand this comment in light of the complex subject matter and sensitive nature of example scenarios that have guided BPA in recognizing the need to develop policy in this area. As expressed above, it has been challenging to maintain the intended narrow focus of this effort while also being responsive to customer requests for additional education on existing processes and requests to address topics outside of the intended scope. We will continue to work to improve communication and provide additional detail in the

Commenter	Summary of Comment	BPA Staff Response
		continuing GAT engagement. Recent workshops have also been recorded so that customers may review them, in addition to the written materials available on BPA's website.
NITS Customer Group	Additionally, we note that BPA presented its various NT-related planning processes and challenges over a period of nearly two years (beginning with its June 2023 presentation titled "NT Load Growth 101" and starting in earnest in March of 2024 with the kickoff of this workshop series). Similarly, NT customers have provided many rounds of comments, including customer-led presentations, as part of these discussions. And yet, despite the significant effort expended both by BPA and its customers over this period, the NT Customer Group remains confused both on the basis for BPA deciding to propose bifurcating its NITS load planning obligation, and how the options presented at the Workshop assist BPA in addressing its problem statement associated with large loads. We identify the following concerns we share as a group on both procedure and substance. <u>Procedural Concerns</u> Generally, the NT Customer Group believes that the current stakeholder engagement process has lacked effectiveness and urges BPA to adopt a more collaborative approach. The process that BPA has used to date largely results in written information passed back and forth with few opportunities to engage in robust policy discussions on a collaborative, real-time basis. As examples: • Slide 5, July 10, 2024 workshop: "Portion of Customer comments will be addressed today but BPA recommends Customers elect to hold a Customer-led meeting to provide a forum for that discussion." • Customer-led workshop held August 14, 2024, where BPA staff were in listen-only mode and did not engage in discussion. • "Summary of Customer Themes" workshop in October 2024 resulted in most responses as "BPA is considering these comments as it develops alternatives." • At the most recent May 20, 2025 workshop BPA indicated that customers can respond in writing, BPA would respond to all comments in writing and then offer a final decision. This approach is ripe for misunderstanding and missed opportunities. Further, the speed and sequence of BPA's transmission engagement process does not foster innovation, trust, or optimal outcomes. We encourage BPA to adopt a public stakeholder process similar to that which it used in the Provider of Choice initiative, which in our perspective should become the standard by which BPA engages stakeholders on large-scale, regionally important issues such as these.	Thank you for this feedback. As we have attempted to explain, it has been challenging to maintain the intended narrow focus of this effort while also being responsive to customer requests for additional education on existing processes and requests to address topics outside of the intended scope. The Planning for NITS Loads & Resources/NITS Access to Transmission Capacity workshops have been rolled into the Grid Access Transformation Project, formerly titled Transmission Planning Reform. BPA encourages continued customer engagement in its public workshops, and will take this feedback into account as it develops a deliberate and organized process for stakeholder engagement.

Commenter	Summary of Comment	BPA Staff Response
Northwest Requirements Utilities	NRU is generally supportive of the comments submitted by the NT Customer Group as they relate to the procedural aspects of BPA's current planning reform efforts. In its Workshop, BPA proposes to move certain aspects of NITS policy reforms ("NITS Offer Types" and "NITS Load Forecast 70% Rule") into the Transmission Planning Reform ("TPR") initiative while maintaining "Planning for NITS Load & Resource Forecast" as a separate workstream. Although we may not fully understand BPA's rationale for separating the NITS Access to Capacity initiative from the broader TPR initiative, we infer from BPA's communications that it is primarily intended to facilitate an accelerated resolution to how BPA would provide firm transmission for a portion of load forecasted by its NITS customers (i.e., the "trended" portion). While we greatly appreciate enhanced certainty for how BPA may serve "trended" load growth, we share the concerns described by the NT Customer Group over how BPA would serve all other load growth. We therefore would support BPA consolidating this issue within the broader TPR initiative, to the extent feasible, given the impacts that TPR will inevitably have on the loads that won't be served through the "trended" definition. Additionally, we support the comments of the NT Customer Group and encourage BPA to consider a more robust stakeholder engagement process - one that extends beyond a single session to hear BPA's identified options – followed by a subsequent (and final) workshop to hear BPA's final decision. Given the importance of BPA's planning process on NITS customers' ability to meet their customer needs, we agree with the comments of the NT Customer Group suggesting BPA adopt a public stakeholder process similar to the Provider of Choice initiative, or otherwise a process that would enable more fulsome engagement between BPA and its customers and stakeholders. Lastly, we also support the comments of the NT Customer Group related to the preliminary nature of these options. As is noted in those comments, while we tentatively support BPA identifying a preferred option here, we do so only on the condition that such preference is non-binding and is subject to change as more information is shared on the remainder of the TPR effort.	Thank you for these comments. As expressed above, it has been challenging to maintain the intended narrow focus of this effort while also being responsive to customer requests for additional education on existing processes and requests to address topics outside of the intended scope. The NITS Access to Transmission Capacity workshops have been rolled into the Grid Access Transformation Project. This will allow for continued engagement and for BPA and stakeholders to work through details of proposals. BPA encourages continued customer engagement in its public workshops.
Portland General Electric	PGE requests BPA reconsider the current NITS workshop timeline as it appears too aggressive if the NITS reform is to be a collaborative public process. If customer comments are due on June 18, BPA will probably not respond to customer comments until early July. I would adjust the schedule so that after BPA responds to customer comments, there is another workshop in mid-July, before there is a final decision and final workshop. This additional workshop will allow customers and BPA to hear arguments on both sides and discuss leanings prior to a final decision. This could all occur without impacting the Transmission Planning reform schedule.	Thank you. BPA has reconsidered the timeline presented on May 20, 2025 and the NITS Access to Transmission Capacity workshops have been rolled into the Grid Access Transformation Project. We encourage continued participation in those meetings and workshops.

Commenter	Summary of Comment	BPA Staff Response
PNGC Power	Procedurally, given the long delay between workshops, absence of the acknowledgement of previous customer proposals or the incorporation of customer comments, and the lack of meaningful reform represented by BPA Staff's proposal shared on May 20th, the proposed timeline which would conclude this process in less than 60 days is simply unacceptable. It is neither fair nor equitable for BPA to force customers into a contracted timeline that provides no meaningful opportunity to be heard, let alone develop a consensus proposal that both BPA and its NITS customers can support. Such a hurried process introduces additional concerns that the conflicts between the work product developed in different forums will create roadblocks and further complicate transmission planning and future load service under NITS.	Thank you. BPA has reconsidered the timeline presented on May 20, 2025. It has been challenging to maintain the intended narrow focus of this effort while also being responsive to customer requests for additional education on existing processes and requests to address topics outside of the intended scope. The NITS Access to Transmission Capacity workshops have been rolled into the Grid Access Transformation Project. We encourage continued participation in those meetings and workshops.
Public Power Council	Achieving the type of transformative change that BPA is pursuing in its planning reform will take close coordination with its customers. PPC appreciates the opportunities to date to discuss the NITS forecast issues and Transmission Planning Reform more generally, but a higher level of engagement that includes real-time brainstorming and perspective sharing is needed. During the May workshop, some customers pointed to BPA's Provider of Choice process as a potential model. Interactions between BPA and customers during the NITS and TPR process need to occur regularly, include open and constructive back-and-forth dialogue, and provide the opportunity for more in-depth technical discussions on certain elements of BPA's planning policies. The BPA workshops and customer led workshops that have occurred to date have been decent conversation starters, but BPA's hesitance to engage with customer ideas and perspectives in real-time or soon after meetings have been a significant hinderance to making process and gaining customer support. PPC looks forward to working with BPA to develop an engagement structure that works for both the agency and its customers, ensuring that there is the ability to partner on solutions to these important transmission issues. In instances that BPA does seek traditional written comments, customers need at least 3-4 weeks to develop comments on new proposals given the extent of changes likely through this process and the benefits of having additional time to coordinate among customers.	Thank you. This effort was initiated with a sense of urgency to provide NITS customers with greater clarity as to how their forecasts would be reviewed and replied-to without interrupting the annual forecasting cycles. Since then, the need for broader reform efforts was identified and those reforms have largely subsumed this discrete planning challenge. This has been an evolving effort. The NITS Access to Transmission Capacity workshops have been rolled into the Grid Access Transformation Project (formerly TPR). This will provide for a more robust engagement structure and customer experience, and we encourage continued participation in those meetings and workshops.
Seattle City Light	City Light commends BPA for committing resources and time to work with Network Integrated Transmission Service (NITS) customers on various processes and practices BPA uses to plan and provide transmission service. City Light agrees with BPA's plan to close out the Planning for NITS Load & Resource Forecast process with a "Bright Line" policy for separating trended load from larger commercial load.	Thank you for your comments.

Commenter	Summary of Comment	BPA Staff Response
Snohomish PUD	**Snohomish recognizes that planning for customers' load growth represents a challenge for BPA** With BPA's transmission system and firm capacity inventories becoming increasingly constrained, Snohomish recognizes the challenges that BPA is facing and we encourage BPA to continue this process to find a mutually acceptable solution. Customer input will be vital to help ensure that this significant shift in NT planning processes does not have unintended consequences and is implemented in an equitable fashion. Snohomish encourages BPA to continue conversations and discussions with customers on this issue; while BPA is endeavoring to align its various transmission initiatives and their respective timelines with this process, it is critical that this issue be solved correctly rather than quickly.	Thank you. This effort began with an intentionally narrow focus and goal to address large load forecasts in a timely manner to provide customers with greater clarity into their forecasts. This proved challenging and the need for broader and more holistic reform efforts became apparent. NITS Access to Transmission Capacity workshops have been rolled into the Grid Access Transformation Project. We encourage continued participation in those meetings and workshops.

III. Education

Comments were offered asking for more robust customer education. Some asked for additional clarity on BPA technical planning, constraints, and processes, while pointing out that BPA's concurrent transmission processes create interdependence on shared solutions and requesting additional industry scans. BPA recognizes that NITS education is critical to meaningful discussions on NITS topics, and is hopeful that there will be more opportunities for this in GAT and beyond.

Commenter	Summary of Comment	BPA Staff Response
EWEB	The following are offered up with the intention of attempting to increase common understanding and stimulate more dialogue: • 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?	Thank you. A map of constraints on BPA paths was provided in the March 20, 2024 workshop materials as well as a Long-Term Original Inventory Map designed to provide a visual display of commercial assessment of a customer request. We would like to work with customers to provide information that is helpful or, if necessary, to develop additional information. As discussed above, the NITS Access to Transmission Capacity workshops have been rolled into the Grid Access Transformation Project (GAT (formerly TPR)). The GAT project will continue to explore these challenges and should allow for a collaborative public process as well as the triage approach to urgent and less-urgent topics described in these comments. BPA is committed to balancing urgency in resolving transmission matters with the necessity that the solutions be comprehensive and accurate.
EWEB	The following are offered up with the intention of attempting to increase common understanding and stimulate more dialogue: • 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.	Thank you for your comment. The industry is currently shifting to address the development new large loads and BPA is committed to doing an industry scan in the future as common standards are developed. BPA is actively involved in the NERC large load task force and maintains awareness of industry changes as transmission providers grapple with new large loads.

Commenter	Summary of Comment	BPA Staff Response
Public Power Council	The discussion at the May 20 workshop related to how BPA conducts its system assessment was very helpful. This back and forth demonstrated that there is additional need for education on BPA's current planning processes to ensure that customers and stakeholders can provide useful feedback to the agency as part of the NITS and Transmission Planning Reform processes. Additional written materials describing the system planning process and how BPA evaluates NT load forecasts today would be helpful to further inform customer feedback. PPC acknowledges there was some discussion in this vein last year and appreciates the materials that were developed as part of that process; however, the discussion on May 20 was evidence that additional discussions and clarification would be helpful. Providing more detail in writing and/or pointing to areas where policies are formally captured is important to ensuring a common understanding. We look forward to working with BPA to identify potential opportunities for additional education.	Thank you for your comments. BPA encourages review of the materials provided in March and April 2024 and to participate in our annual Attachment K process workshops. See also BPA's Attachment K Page (https://www.bpa.gov/energy-and-services/transmission/attachment-k). BPA also encourages interested parties to participate in the Grid Access Transformation workshops. As that process started and those workshops got underway, we had some concern about dedicating time and resources to explaining processes that had become subject to change. But we agree that the need for education on planning processes is ongoing.

IV. Grid Access Transformation (GAT)

The NITS Loads & Resources Workshop Series is being absorbed by GAT, and the bulk of the comments will be responded to through GAT. We appreciate all of the engagement so far and look forward to working on this issue in the new venue.

Commenter	Summary of Comment	BPA Staff Response
Columbia River PUD	CRPUD greatly appreciates BPA's efforts in conducting the NITS initiatives and the three alternatives presented May 20th. While we value this effort, an alternative should genuinely address the root cause of the dilemma the region faces today. In our opinion, this alternative should be a highly collaborative effort that truly builds for the future. BPA is currently running a pilot program called PARS, which CRPUD sees as a potential model. Currently, the PARS initiative examines local reinforcements; it can be expanded to consider the broader Bulk Electric System. A highly collaborative effort, such as PARS, ensures that customers submit a reasonable forecast, allowing BPA to make an informed determination rather than working in a silo without all the necessary details. In our opinion, without an approach like PARS, BPA will never meet the five-year timeline you are striving to achieve. A line, as described in the three alternatives, in our view, bases load growth on historical trends and does not meet BPA's planning obligation of planning for reasonably forecasted loads, which is future-looking. Additionally, it creates a scenario where utilities lose potential economic opportunities that will be developed outside our region. Utilities will then focus on loads that can grow within those parameters to the point where BPA ultimately cannot catch up. While the approach mentioned above may require more staff time and be more expensive, it will ensure customer needs are met as long as we continue to engage with BPA.	BPA has heard the positive feedback regarding PARS and the requests that PARS-like studies be expanded to evaluate transmission needs on the Bulk Electric System. PARS is a unique study that looks at the local area needs, not the main transmission paths. The Grid Access Transformation - Accelerated Expansion Program is charged with looking at how BPA can develop "least regrets" plans of service across a broad number of scenarios for a 20-year planning horizon. BPA encourages interested participants to engage in the Grid Access Transformation workshops.
EWEB	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.	In an effort to holistically approach BPA transmission topics, NITS Access to Transmission Capacity workshops have been rolled into the Grid Access Transformation Project. BPA encourages continued customer engagement in its public workshops.

Commenter	Summary of Comment	BPA Staff Response
EWEB	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?	The Grid Access Transformation Project (formerly known as TPR) will continue to explore these challenges. The need to establish policy around NITS large load forecasts is related to but is not the same challenge as the total number of requests in the transmission service queue.
EWEB	○ 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 upgrades. ○ The recent Utility Dive article, "Will ERCOT's streamlined connect-and-manage approach work for other markets?", 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.	Thank you for your comment. The Grid Access Transformation - Accelerated Expansion Program is charged with looking at how BPA can develop "least regrets" plans of service across a broad number of scenarios for a 20-year planning horizon. BPA encourages interested participants to engage in the Grid Access Transformation workshops.
NITS Customer Group	Additionally, we are unsure of both the rationale and benefit to either NITS customers or BPA of segregating the issue of defining trended load growth from the remainder of the TPR effort. Here, BPA is proposing to plan differently between trended and non-trended load growth, where we must assume that non-trended load growth would be met through the reforms under consideration in TPR. Requesting stakeholders to comment on BPA's options for defining "trended" load growth should not be done in a vacuum, especially where the consequences for load growth that is not trended are currently unknown. For example, BPA stated in its initial TPR workshop that it may provide "on-demand" service via unlimited Network Non-Firm ("6-NN") availability. BPA and customers must assess this proposal in conjunction with defining trended and non-trended load growth. While we appreciate BPA's attempts to clarify the treatment for trended load growth, it comprises only a portion of the issue. Remaining undiscussed are issues like risk tolerance and cost allocation. These are likely to have significant impacts on NT load service as a whole, and these items must be afforded appropriate space and time for deliberation within BPA's TPR workstreams. Moreover, it isn't clear what criteria or principles BPA will use in selecting a "leaning" here. Will BPA use the same criteria that it proposed in the July 2024 workshop, or will BPA use an updated set of criteria that incorporates more recent instruction for BPA Transmission to be "disruptive" in addressing its planning challenges? We request that a thorough discussion about the criteria that will be used in identifying a preferred option given the passage of time and changed circumstances since BPA last identified its anticipated decision criteria.	Thank you. The NITS Access to Transmission Capacity project has been an evolving effort. It was originally intended to fill a specific policy gap in BPA's NITS forecasting process, prior to the commencement of the TPR project (now GAT). We agree that these things cannot be done in a vacuum, and this effort will be part of GAT. New large loads are an industry challenge, we will continue to learn and watch industry trends and will reevaluate as needed. The criteria for BPA's NITS Forecast Staff Leaning was shared in the July 9-10, 2025 GAT workshop.

Commenter	Summary of Comment	BPA Staff Response
PacifiCorp	BPA proposed three alternative measures to be used to determine whether forecast load growth was trended or non-trended. The workshop included an open discussion of concerns about whether BPA can properly act on load growth forecast information it receives from customers. BPA has not shown how classifying load growth through these alternatives, or any alternative, will ultimately improve how the information is used to plan for this growth. The workshop briefly discussed the use of NITS forecast 70% rules role in planning for transmission resources. However, this process is not part of the Planning for NITS Load and Resource Forecast process and instead will be reviewed as part of the overall TPR. We are hopeful that the overall TPR will result in improvements in providing needed transmission resources to customers. It is important that all aspects of forecasts be considered in the TPR.	Thank you for the comments. The proposals and staff leaning are based in part on the goal to provide customers with greater clarity of the likely outcome of forecasts and to improve responsiveness and transparency. We are managing the intersection of various efforts and the Grid Access Transformation Project (formerly known as TPR) will continue to explore these challenges.
PacifiCorp	The workshop included discussion of commercial assessment. The discussion included that the timeline for when long-term firm service would be available was not known and would be determined during the TPR. Without knowledge of the timeline, it is difficult to analyze whether the proposed process change will result in the outcome desired. There is value to BPA establish clear and distinct paths for resolution of forecasted load. The proposed process change does not highlight how the change will remedy customer concerns over existing limitations in supporting loads identified in forecasts and included in previous system assessments completed by BPA. The use of alternatives to improve gatekeeping into trended and non-trended paths does not address what will become of the substantial pool of paused transmission service requests ("TSRs"), BPA has received. BPA has not shared how a threshold will impact the number of commercial assessments BPA currently supports.	The need to establish policy around NITS large load forecasts is related to but is not the same challenge as the total number of requests in the transmission service queue. The Grid Access Transformation Project (formerly known as TPR) will continue to explore these challenges.
Public Generating Pool	**1. BPA should sequence and resolve upstream issues in the Transmission Planning Reform process to enable effective solutions to NITS Access challenges** PGP appreciates BPA's efforts to address the critical need to provide incremental transmission service in a time of increasing uncertainty. The issues BPA is addressing in the NITS Access to Transmission Options have material linkages to the broader Transmission Planning Reform (TPR) process. It is and will continue to be challenging to address NITS Access issues before several foundational issues are resolved. These issues include: 1) the need for immediate access to service and related product design; 2) proactive planning for growth and how to incorporate all load service obligations; , 3) the need for ongoing development of least-regrets core system expansion processes; and 4) process and transparency improvements in how transmission needs of loads on the system will be met. The impacts of new large loads coupled with an evolving resource mix affect all BPA transmission customers and new processes are needed across the board to adapt to the changing landscape.	Thank you for this thoughtful comment. The NITS Access to Transmission Capacity workshops have been rolled into the Grid Access Transformation Project. BPA encourages continued customer engagement in its public workshops.

Commenter	Summary of Comment	BPA Staff Response
	The reforms resulting from the TPR should ultimately enable clarity on what, if any, specific costs or service needs are specific to NITS customers. A NITS process can focus on NITS-specific problems and compatibility with related processes and risk- and cost-allocation frameworks. PGP therefore strongly recommends that BPA sequence the NITS Access options and scope within the reforms contemplated in the TPR.	

Public Generating Pool	**2. Specific challenges and risks associated with new large loads should be defined in greater detail and should be addressed in the context of other drivers of uncertainty and impacts to all BPA customers**
	
	BPA's stated rationale for a proposed solution that separates NITS load into "trended" and "large load" categories has to do with its inability to serve these loads without system expansion. BPA has further explained that this approach is based on the "size, timing, risk profile, and impacted transmission paths" and the large loads could be addressed through the commercial process. While not directly addressed, the implication of this approach is the direct assignment of costs to individual customers to manage stranded cost risk within a NITS framework that generally socializes costs and risks. To understand the degree to which this is appropriate and actually manages the risks associated with new large loads, customers and stakeholders need a much more detailed articulation of the risks being managed and how costs might be assigned directly to individual customers versus incorporated into an embedded rate.
	
	When the specific risks and concerns introduced by new large loads are defined in greater detail, solutions can be tailored to address the specific risks identified. If there is a risk specific to addressing NITS customers with new large loads, then this should be the lens for development of solutions. PGP strongly suspects that the challenges and risks are broader, and if so should be addressed holistically within the broader TPR context of impacts to all customers.
	
	A more detailed evaluation of the risks associated with new large loads could include answering the following:
	
	• What are the specific stranded costs risks and system upgrades that relate to single large load facilities?
	• What types of expansion are eligible for direct assignment and why?
	  ○ Are there specific infrastructure types that are used for large single facility load service only, and which of these are site-specific?
	  ○ How do these infrastructure needs and associated risks differ from the dispersed risk profile of growth of the existing utility customer-base?
		Thank you. This effort was not intended to address cost allocation principles in commercial planning. As things progressed and TPR (now GAT) commenced, it became apparent that we would have to develop a holistic approach to the present challenges. The NITS Access to Transmission Capacity workshop series has been rolled into the Grid Access Transformation program (formerly known as TPR) which will continue to explore these challenges. Details of the Planning for NITS Forecasts objectives were provided in the May 9-10, 2025 Workshop and discussion related to the questions presented here will be ongoing.

Commenter	Summary of Comment	BPA Staff Response
	○ Once in this category, what is BPA's role, if any, in management and allocation of risk between the utility and its large load customer? ○ What mechanisms can be voluntarily put in place to put single customer risk and the management thereof in control of BPA customers and their specific large loads, reducing the need for BPA to manage the risk or have concerns about building out any necessary infrastructure? ○ Are there voluntary or cost-sharing mechanisms that could enable large customers to get access to service by reducing the costs shared by broader rate classes? ○ How does the evaluation of large load risks differ for expansion of an existing load or site vs a new load? Does this change the costs exposed to potential direct-assignment of costs? ○ Assuming new system expansions are designed for the greatest pool of benefits and therefore socialization of costs, could there be mechanisms for a utility to buy-down or opt-in to site specific cost allocation to get it to a defined benefits or cost-socialization threshold?	
Public Generating Pool	PGP urges BPA to improve the linkages between the NITS Access and TPR processes and to appropriately allocate the broadly applicable issues to the TPR process and NITS-specific issues to the NITS Access process. PGP believes that BPA has a significant opportunity within the TPR process to further explore the uncertainties, including large loads, that are driving the need for transmission expansion as well as creating challenges with respect to the provision of NITS service. While NITS service has some unique design considerations, any enhancements and improvements should result in greater adaptability and be examined fully for applications to other customer types and transmission needs. We look forward to seeing how some of these issues can be addressed with the full suite of BPA transmission customers in the TPR to enable BPA to continue to provide critical transmission services to NW utilities and their customers.	Thank you for your comment. The NITS Access to Transmission Capacity workshop series has been rolled into the Grid Access Transformation program (formerly known as TPR). The Grid Access Transformation Project Planning Program and the Accelerated Expansion Program are charged with looking at how BPA can develop "least regrets" plans of service across a broad number of scenarios for a 20-year planning horizon, and to more quickly construct and energize those plans of service. We encourage interested participants to engage in the Grid Access Transformation workshops.
Public Generating Pool	1. Several key questions embedded in the NITS Access dialogue could appropriately be addressed in the broader TPR process There are several ways in which the NITS Access process has highlighted some ways in which BPA may be able to address uncertainties in load growth and resource development. PGP suggests that BPA consider the following questions as it develops the TPR process: • Can exercises such as the Portland Area Reinforcements pilot be translated to broader scenario analysis in the system assessment process?	Thank you for your questions. The NITS Access to Transmission Capacity workshop series has been rolled into the Grid Access Transformation program (formerly known as TPR). BPA has heard the positive feedback regarding PARS and the requests that PARS-like studies be expanded to evaluate transmission needs on the Bulk Electric System. The Grid Access Transformation - Accelerated Expansion Program is charged with looking at how BPA can develop "least regrets" plans of service across a broad number of scenarios for a 20-year planning

Commenter	Summary of Comment	BPA Staff Response
	• Particularly when "trended growth" is expected to increase substantially (above historic trends) in the longer term, what planning horizons need to analyzed to understand this issue? • How does the location of expected resource development impact this analysis and are there mechanisms that could better link the load and resource portions of the system planning functions? • Can BPA provide additional information to differentiate low-barrier projects from high barrier projects on both the loads and the generation side to proactively improve the quality of requests and likelihood of success? • Best practices indicate it is better to evaluate and socialize portfolios of projects vs try to isolate one off projects with limited beneficiaries. Can expanded use of scenarios and portfolio analysis disseminate stranded cost risk sufficiently to reduce the need to add new thresholds and categories to BPA's existing process segmentation? • • Multi-value analysis frameworks that align better with utility-level planning and decision-making can also support the identification of a greater pool of benefits for any upgrades that are required. BPA should offer greater transparency around benefits and avoided costs that are evaluated for feedback from the broader TPR stakeholder community.	horizon. We encourage interested participants to engage in the Grid Access Transformation workshops.
Public Generating Pool	2. The interim service concept provides a path to increase the certainty of new loads in advance of system expansion and should be discussed early in the process to support System Assessment improvements The disconnect between the speed at which a new load or generation can come online and the time needed to expand the transmission system appears to be a key consideration. Further evaluation of this specific issue should be addressed in multiple areas. The concept of the short-term/immediate access to 6NN or conditional service could help to address this gap while enabling loads and resources to come online with certainty of access at some level. Further explanation of this product and how it could be designed may provide an opportunity to add certainty to loads that are growing by eliminating the holding pattern that contributes to making loads uncertain, which is the need for immediate transmission service. Such a concept may also apply to generation resources with the use of a provisional product, enabling BPA to know with certainty that the load and resource is indeed real. Depending on the design and conditions, such limited service may even be sufficient for the long-term for some parties, and this may provide opportunities for cost reductions and the buildout of a more efficiently used system as long as incentives to do so are transparent and meaningful. Given that this product provides a potential opportunity to manage the development timeline disconnects, stranded cost risk, and reduce uncertainty in what the system needs really are, it should be explored more fully within the TPR and included more comprehensively in any final NITS Access proposal.	We agree that load can come online relatively quickly, but transmission takes longer to construct. BPA is exploring additional paths to service in the Grid Access Transformation - Accelerated Expansion Program.

Commenter	Summary of Comment	BPA Staff Response
Public Generating Pool	3. New mechanisms to address BPA resource constraints should be part of any proposed solutions Beyond planning better, both the NITS Access process and the TPR indicate resource constraints on the BPA side, which may be exacerbated in the current political climate. Discussions in the TPR for how to enable more customer-build options on both the load and the resource development side, or other mechanisms to address supply chain, permitting, and environmental review delays may also provide meaningful opportunities to alleviate resource constraints while also reducing risk for BPA. While not clearly articulated as in-scope for the TPR, the challenge of how to actually build out the system in the target timeframe is an important piece of the overall solution set and will be critical to addressing the ongoing need for system expansion. To the extent that customer-build options could be introduced in the NITS Access discussion as a means to expedite infrastructure build out, minimize costs, and allocate risks in alignment with NITS principles, these should be pursued as well.	The Grid Access Transformation – Accelerate Expansion Program is charged with looking at how to significantly reduce the time to bring expansion projects on-line. The entire plan, design, build process including permitting, environmental review and procurement are within the GAT Accelerate Expansion Program scope. Exploration of customer build options are also within scope. BPA encourages interested participants to engage in the Grid Access Transformation workshops.
Public Generating Pool	4. BPA should analyze and explain any potential market development impacts on the system use and translate learnings into the TPR process PGP members are similar in that they all own and operate their own resources, while some take power services from BPA. Non-BPA resources may use BPA transmission either as Point to Point or be classified as Designated Network Resources. Due to these non-BPA resources and historical BPA power product selection (ex. Slice and Block products), many PGP members currently participate in bilateral energy trading, and some anticipate direct participation in the day-ahead organized markets. Tacoma Power and Seattle City Light also participate in the EIM today. This current and anticipated market participation introduces the intersection of BPA transmission product offerings and market design. For example, as noted in the TPR customer workshop, the expanded use of 6NN for load service, without a corresponding congestion allocation, presents the potential for new price exposure in nodal markets that may not be commensurate with the current use and value of NT transmission. This also increases the importance of limiting how long interim service use is relied upon to meet BPA's core obligation to NITS customers. Similarly, the concept that BPA transmission customers who want to participate in a market other than Markets+ or have no market participation have the ability to "opt-out" transmission for these alternative uses, the congestion allocation for Point-to-Point service used in the market, and the development of markets in general may reduce BPA and transmission customer access to unscheduled short-term transmission. PGP recommends further analysis on these expected changes to inform customers on expected impacts and incorporate these impacts	BPA acknowledges the likelihood of interactions and is actively exploring impacts between the changes contemplated by the Grid Access Transformation Project and BPA's participation in Market+. BPA will be working with SPP and stakeholders as the market is implemented to best minimize market price exposure to customers.

Commenter	Summary of Comment	BPA Staff Response
	into any ongoing discussions and planning reform, especially if the expanded use of 6NN is going to be assumed to meet BPA's core service obligation. Finally, the transition to nodal pricing and participation of many resources in the different markets could provide new information to drive participant behavior that may inform planning processes in new ways, as envisioned and experienced by Regional Transmission Organization development across Eastern markets. The Markets+ design does not require new resources to have transmission rights to participate in the market, which may change the number of TSR requests that BPA receives over time, and the volume of merchant facility requests on the system. In alignment with the overarching core objective of transmission development for load service, the prioritization of project interconnection that adds certainty to load forecasts (through utility or contract linkage prioritization, as done in the CAISO Transmission Planning Process) may provide a new opportunity for interconnection and load service request prioritization that addresses some of the problem statements raised in the NITS Access discussion while meeting the core obligations of any expansion of BPA Transmission, which is to enable transmission customers to serve their load.	
Seattle City Light	City Light supports BPA focusing on Transmission Planning Reform for all transmission customers while continuing discussions regarding NITS offer types and NITS Load Forecast 70% Rule. City Light recommends BPA consider that the Portland area study pilot process should provide lessons learned for transmission planning reform in general. City Light recommends BPA collaborate across its entire footprint with all customers in a similar fashion as part of its Transmission Planning Reform. A slowly rotating small area study process is not a wholistic or equitable way to address customer transmission issues.	Thank you for your support. NITS Access to Transmission Capacity workshops have been rolled into the Grid Access Transformation Project which will continue to evaluate these challenges. The Portland Area Reinforcement Study has received positive feedback and BPA will consider this suggestion.
Seattle City Light	City Light suggests that BPA consider that a root problem is BPA not executing a transmission strategy to serve all customer transmission needs in a timely manner. BPA and customers both have responsibilities in this process. City Light requests BPA provide actionable reform options that result in planning, executing and completing transmission expansion projects in the 5–6-year time frame.	NITS Access to Transmission Capacity workshops have been rolled into the Grid Access Transformation Project which will continue to evaluate these challenges and work toward the request-to-service goal described in this comment. We appreciate Seattle City Light's comments.

V. Trended Load Growth (General)

Commenter	Summary of Comment	BPA Staff Response
NITS Customer Group	Preliminarily, we wish to offer comments in support of the limited aspects of BPA's proposals where the NT Customer Group shares common agreement. To this end, we understand BPA's proposal as discussed at the Workshop to be forward-looking; i.e., that BPA will continue to honor the existing firm encumbrances per the terms included in prior closeout letters issued by BPA to its NITS customers, even if such encumbrances or load forecasts would currently be subject to any of the options discussed at the Workshop. We view this as paramount and would therefore support some changes to how BPA plans for NT customer load and resource forecasts only on a prospective basis, and with an effective date to be determined. Additionally, we understand and support that any option BPA selects with respect to defining "trended" load growth will be preliminary in nature only and used to inform BPA and stakeholders' evaluation of all other aspects of BPA's Transmission Planning Reform (TPR) effort as a holistic package. While we tentatively support BPA identifying a preferred option here, we do so only on the condition that such preference is documented "in pencil", and not ink. There must remain the ability to adjust how (and whether) BPA will define "trended" load growth as more information is shared during the remainder of the TPR effort.	BPA's NITS Forecast Staff Leaning shared in the July 9-10, 2025 GAT workshop as proposed would not be retroactively applied to existing or previously encumbered loads. This is an industry challenge, we will continue to learn and watch industry trends and will reevaluate as needed. With the transition to the Grid Access Transformation project, discussions around implementing any policy changes, including effective date, will be ongoing in that venue.
Northwest Requirements Utilities	Uncertainties over the treatment of "non-trended" load growth notwithstanding, we support and greatly appreciate BPA's commitment to ensuring long-term firm transmission capacity for "trended" NT load growth, which BPA indicates it will provide irrespective of whether the particular resource is a federal or non-federal resource. In our view, this is a critical pledge by BPA and is directly responsive to a significant concern raised by many of its NITS customers, especially as NRU members approach the deadline to make decisions regarding Tier 2 commitments in 2026. Moreover, this should provide equal footing to NITS customers in accessing regional resources and reduce the likelihood that parties could allege that BPA is favoring its merchant resource. In the Workshop, BPA stated that forecasted load growth below its definition of "trended" would be served through its system assessment process, which is the process that BPA uses to meet its reliability planning obligations and ensure that the transmission system can meet customer loads over a ten-year horizon under a range of system contingencies. Through this process, we understand that BPA will assume the obligation to plan its system to serve the "trended" load growth, including implementing any necessary corrective action plans or transmission solutions, without subjecting its NITS customers to any contractual or financial requirements. As described above, we applaud BPA for this commitment and recognize this as a significant	BPA appreciates your support for its approach to trended load growth. BPA notes that trended load growth may still require a line and load interconnection request or other customer participation, but the goal is certainly to simplify processes.

Commenter	Summary of Comment	BPA Staff Response
	positive step not only in providing certainty in how BPA will meet its tariff obligations, but also in simplifying the method for NITS customers to obtain firm transmission capacity. Establishing a simpler process by which BPA can more quickly ensure access to firm transmission for the "trended" portion of NITS customer load growth can also help unencumber BPA resources to conduct any additional planning efforts necessary to address "non-trended" load growth.	
Portland General Electric	It's not clear how the 3-alternative discussed on May 20 will get any closer to solving the problem of having enough Transmission capacity to serve both NT and PTP non-discriminatorily. 1. All the load growth data is already required by customers. These three proposals just put more work on BPA's side to slice and dice how they deal with the load forecasts, specifically with big chunky load growth. 2. PGE supports BPA's current policy of planning for NITS loads that meet the 70% viability rule. In addition, we support BPA's effort to try and distinguish between true load growth versus large, new load growth. 3. To solve the NT and PTP transmission Capacity issue, BPA needs to build more Transmission quickly. As a load serving utility, BPA is responsibility to providing sufficient Transmission to meet customer needs. **PGE supports BPA's effort to delineate new large network load growth from native load growth** 1. There was a lot of discussion among NT customers at the May 20 meeting, concerned that they can't serve their new large load growth, and they don't want it to go through the Transmission expansion process. a. As a PTP customers waiting in BPA's 68 GW Transmission Queue for new service for years, we understand the concern others have about going through this process. However, PTP customers also have load service obligations that we are nervous about meeting due to the current timeline it takes to process requests in the queue. b. BPA holds 75% of the Transmission in the region, they have an obligation to reliably operate and, when necessary, upgrade the system to integrate new resources and serve the load of all of BPA's customers. We need to discuss the actual planning reform vs queue management. 2. If a NT customer must go through the Commercial study, if their load growth is less than the 70% viability threshold, their fall back is 6NN service and going through the Transmission expansion process. a. This is a sufficient option for NT customers as it treats both PTP and NT customers consistently. 3. BPA's strategy for serving customers load growth should be equitable.	The Grid Access Transformation Project (GAT, formerly known as TPR) will continue to explore these challenges. The GAT - Accelerated Expansion Program is charged with looking at how BPA can develop "least regrets" plans of service across a broad number of scenarios for a 20-year planning horizon. BPA encourages interested participants to engage in the Grid Access Transformation workshops.

Commenter	Summary of Comment	BPA Staff Response
Public Power Council	With respect to the "Planning for NITS Load and Resource Forecast" topic, which was specifically addressed at the May 20 workshop, additional development of the issue is prudent before finalizing a preferred alternative. At the May 20 workshop, BPA provided "context" that it "is not able to continue planning for all instances of load growth in the same manner." Further clarification on why BPA is unable to do so and explanation of the anticipated benefits of separate planning standards for different "instances of load growth" would be helpful. As part of clarifying its problem statement, the agency should also include evaluation criteria it will use to assess alternatives and explain how BPA's proposed approach will address customers' concerns about the agency's ability to provide NT customers with firm service. As discussed at the workshop, it will be important for BPA to explain how its preferred alternative advances or is consistent with the larger objectives being pursued as part of the transmission planning reform, including BPA's ability to provide reliable service to customers in a timely manner.	Thank you for your comments. Planning for NITS Load & Resource Forecasts has been rolled into the Grid Access Transformation program (formerly known as TPR) which will continue to explore these challenges. The criteria for BPA's NITS Forecast Staff Leaning shared in the July 9-10, 2025 GAT workshop was shared at the same workshop.
Seattle City Light	City Light agrees that BPA should not continue to plan for all instances of load growth in the same manner. While BPA, like their electric utility customers, has an obligation to serve, that obligation is constrained by reasonable and just cost sharing principles. BPA's economic development benefits should be equitable between their electric utility customers. City Light supports BPA distinguishing between trended load growth and large commercial load growth.	Thank you for your comments.
Seattle City Light	City Light greatly supports BPA's proposition that there needs to be a bright line delineating when new large Network load growth is commercial instead of trended. Commercial load growth should participate in transmission expansion as a commercial endeavor. This should include participating in transmission expansion application fees, costs, and processes according to cost causation principles. While enabling economic growth in the region is a BPA principle, BPA's support for economic growth should be equitable between products and customers.	Thank you for your comments.
Snohomish PUD	**Any BPA alternative establishing planning standards for firm capacity must fairly treat customers with relatively smooth load growth profiles** As NT customers continue to grow and request firm service, BPA will need to implement planning standards that fairly and equitably represent the reality of planning for and allocating firm service across BPA's transmission system. These planning standards must account for customers that have load growing at consistent rates and those whose load experiences spiky or sudden growth. Snohomish believes that BPA has the statutory obligation to adequately plan for all NT customers' load growth and Snohomish expects BPA's planning policies to reflect practices that accomplish this in an equitable fashion.	Thank you for your comment. BPA's NITS Forecast Staff Leaning shared in the July 9-10, 2025 GAT workshop is a variation on the Alternative 1 using a POD rather than facility based on ease of implementation and administration. The proposed alternatives and staff leaning are intended to provide clear business rules and simplify processes for customers. As the NITS Access to Transmission Capacity workshops have been rolled into the Grid Access Transformation Project we will continue to work with stakeholders on the details of the proposal. This is an

Commenter	Summary of Comment	BPA Staff Response
	Snohomish is not initially opposed to the concept of a planning threshold Each of BPA's alternatives features some kind of planning threshold that differentiates load growth patterns and how BPA expects to establish planning, either through system assessment or through its commercial assessment process. Snohomish is not opposed to such a threshold but cautions BPA that implementing such a policy will require significant consideration and fine-tuning. Where such a threshold would apply is a critical component that will distinguish between equitable and inequitable outcomes and Snohomish asks that BPA carefully consider with customers where such a delineation is appropriate. Snohomish does not believe any current alternative properly captures the needed equity but is open to further discussions and analysis supporting BPA's alternatives or any customer-proposed alternatives.	industry challenge, we will continue to learn and watch industry trends and will reevaluate as needed.
Umatilla Electric Cooperative	At the May 20 workshop, BPA asserted that it is unable to meet its NT load service obligations in all instances. BPA then presented the following problem statement—"how should BPA differentiate forecast treatment based on different load growth scenarios to plan for local capacity and transmission capability?" This problem is predicated on the unsupported conclusion that distinguishing between different load growth rates is the singular cause behind BPA's inability to meet its entire NT load service obligation. BPA has provided no evidence nor has it articulated how different load growth scenarios are incompatible with its current NT planning process. For example, BPA's first alternative proposes that any forecasted loads greater than 13 MW during any year at a single facility must participate in TSEP. BPA has not provided any information to customers that demonstrates whether loads greater than 13 MW contribute to its inability to adequately plan and reinforce its transmission system, or how loads above 13 MW are incompatible with its existing transmission planning process.	BPA appreciates the questions raised. The forecasted NITS load growth is at a historic high consistent with national trends associated with data centers and other energy intensive loads. BPA's policies and transmission planning processes were not structured for such rapid load growth. BPA's NITS Forecast Staff Leaning shared in the July 9-10, 2025 GAT workshop is in part based on an industry survey. This is an industry challenge, we will continue to learn and watch industry trends and will reevaluate as needed.

VI. Trended Load Growth Alternatives

Commenter	Summary of Comment	BPA Staff Response
Clark PUD	While it is understandable that the diverse NITS Customer Group may not have a definitive preference within the BPA's proposed alternatives, Clark Public Utilities would like to express our preference for "Alternative 1: New large load threshold per facility". Alternative 1 provides the simplest, clearest guidance with the least administrative burden. Aligning this threshold roughly with the New Large Single Load threshold from the Power Services side may be the correct magnitude. However, as was commented on during the June 5, 2025, NITS Focus Group meeting, it is paramount that both the selection of the alternative and the threshold values be a starting point in this process and not the definitive end result. In addition, the other considerations noted on Slide 8 of the May 20th presentation (timing, risk profile, and impacted transmission paths) should be evaluated for inclusion in determining the planning process requirements.	Thank you for your comment. BPA's NITS Forecast Staff Leaning shared in the July 9-10, 2025 GAT workshop is a variation on the recommendation using a POD rather than facility based on ease of implementation and administration. As the NITS Access to Transmission Capacity workshops have been rolled into the Grid Access Transformation Project we will continue to work with stakeholders on the details of the proposal. This is an industry challenge, we will continue to learn and watch industry trends, will reevaluate as needed.
Cowlitz PUD	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.	BPA intends to address load forecast decreases in a future policy decision that will include customer engagement. As proposed, BPA's NITS Forecast Staff Leaning shared in the July 9-10, 2025 GAT workshop will not be retroactively applied to existing or previously encumbered loads. As the NITS Access to Transmission Capacity workshops have been rolled into the Grid Access Transformation Project we will continue to work with stakeholders on the details of the proposal.
EWEB	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.	Thank you for your preference. BPA's NITS Forecast Staff Leaning shared in the July 9-10, 2025 GAT workshop is not based on a fixed percentage of load growth. The Grid Access Transformation Project (formerly known as TPR) will continue to explore these challenges.

Commenter	Summary of Comment	BPA Staff Response
Grant PUD	In the “NITS Access to Transmission” process, BPA proposes alternatives for a new sub-class of transmission service: “transmission for trended NITS future load growth”. This sub-class would create and amplify potential discrimination both within the NITS class and between the NITS and PTP classes, without adding any transmission capacity to the grid and without differentiating the transmission rate paid for the new, preferred service provided to future NITS loads. The new sub-class is not clearly tied to available capacity on the federal grid, because the eligible trended loads would be exempt from Commercial Planning Assessments. BPA proposes that new long-term firm (LTF) transmission rights be granted to “trended NITS load growth” using certain criteria, including customer-specific thresholds, inclusion of the trended loads in System Assessments, and identification of Designated Network Resources (DNRs) for the trended load growth. These new LTF rights would apparently not be publicly documented in the same manner as other LTF rights. Trended amounts of forecasted NITS loads would not be subject to Commercial Assessments but would be included in System Assessments. Although all regional loads are or should be included in BPA’s System Assessments, only identified NITS and PTP customers hold the right to use BPA’s transmission capacity, in both cases for fixed terms with the possibility of rollover rights. NITS customers hold transmission rights based on their actual and forecasted loads and resources; PTP customers submit transmission service requests (TSRs) and, if the requests are granted, acquire specific transmission rights between Points of Receipt and Delivery. BPA’s three proposed alternatives for identifying the “trended forecast of NITS loads” would each create a new “super-preferred” sub-class of NITS, exempt from Commercial Planning. None of the three proposed alternatives to defining trended load growth would address the root cause of transmission constraints, although all might improve the ability of some (but not all) NITS customers to serve future load growth by exempting that growth from Commercial Assessments. Exempting some but not all forecasted loads from Commercial Assessments appears to constitute undue discrimination and could violate FERC standards if not applied to other Transmission Service Requests.	We disagree with this characterization of BPA's planning processes. Please refer back to the descriptions of current planning processes shared in the March and July 2024 workshops. An important factor missing from Grant's characterization of BPA's proposal is that BPA has an obligation to plan, construct, and operate its transmission system to transmit NITS customers' designated resources to the customers’ load and forecasted load growth. Experience has informed BPA's proposal to continue to meet this obligation for trended load growth through its system assessment planning studies, and to provide a more direct path to needed infrastructure for the new type of rapid load growth some customers are experiencing. BPA believes this will provide greater certainty for customers forecasting growth. Grant's comments include several suggestions that NITS and PTP should be treated the same, whether it be by treating all retail load as BPA's native load, or exempting all trended load growth from commercial study participation regardless of the type of service taken. These suggestions ignore FERC's clear guidance that NITS and PTP are distinct offerings, with different attributes. NITS customers are required to forecast loads and resources annually, and these forecasts are foundational to BPA's ability to plan the transmission system and BPA's proposal to manage trended load growth that has been consistently forecasted by NITS customers over time. FERC has been clear that customers must choose between point-to-point and network services, each of which has its own advantages and risks. Grant broadly states that customers without trended load will be disadvantaged, but following this and other lines of reasoning reflected in Grant's comments would devalue the forecasting process that is foundational to NITS. Grant's comments appear to argue for the exact same treatment of customers regardless of the customers' choices or whether the customers are similarly situated. Simply put, BPA identified an area of its planning processes requiring policy development and clarification due to the changing nature of NITS load growth. Grant asserts that proposed and existing policies are arbitrary, presumably

Commenter	Summary of Comment	BPA Staff Response
		because they may require engineering judgment, but a clearly defined threshold for what can reasonably be managed provides clarity and transparency and is based on BPA's experience in working with customer forecasts. Transmission planning is the tariff obligation of each transmission provider, and as such, ultimate responsibility for planning remains with transmission providers.
Grant PUD	The new sub-class of NITS loads would be exempt from the analyses and outcomes of BPA's Commercial Planning processes. Trended NITS load would have new advantages over both "untrended (above-the-line) NITS load" and loads served by new PTP rights, effectively discriminating both within the NITS class and between a part of the NITS class and the PTP class. BPA thus proposes three classes of service but cites no FERC standards for the new third class. The proposal to carve out part of NITS load for "trended service access" increases the likelihood that undue discrimination will occur (both between NITS and PTP and within NITS) and increases the likelihood that the new sub-class will be formally challenged, because trended NITS load would effectively have "super-preferential" access to federal transmission capacity due to the weaker planning standards.	BPA has an obligation to plan for forecasted NITS load growth and may reserve existing capacity for reasonably forecasted Network Load growth. Grant's comments seem to disregard this obligation or the NITS customer obligation to forecast load growth needs. These obligations are in place to ensure that NITS load will be served when forecasted needs arise. The proposed requirements for new network load that is forecasted are intended to aid in adapting BPA's planning processes to the changing nature of NITS forecasts (and load growth in general). BPA is not alone in implementing thresholds for load growth, which have been approved by FERC.
Grant PUD	Commercial Planning Assessments (CPAs) differ from System Assessments (SAs) in important ways. Commercial Planning Assessments identify potential changes in infrastructure, including timing and cost. System Assessments are also agnostic to transmission rights but study the ability of regional resources to meet regional loads irrespective of obligations to serve. Forecasted NITS load above the suggested trends would remain subject to Commercial Planning Assessments, including the additional effort required to consider specific large loads, infrastructure additions, timing of additions to infrastructure, and the cost and risk of required investments. In effect, "trended NITS load" converts part of a load forecast into a right, unlike "trended PTP load", which would still require a new TSR to be submitted to the BPA queue. Exempting some NITS loads from the obligation to engage in Commercial Planning Assessments enhances the risk of undue discrimination because making awards of LTF transmission service to trended NITS loads (e.g., slides 12, 15 and 18) would negatively affect decisions about TSRs in the queue. New LTF service awards to trended NITS loads would, all else equal, reduce the amount of transmission capacity available to entities in the queue. After "LTF Service Awards" to trended future NITS loads, future Commercial Planning studies and System Assessments would assume that the trended NITS loads will be served from and thus encumber existing	This comment highlights the need for different treatment for large load forecasts. These types of forecasts trigger the analyses listed in Grant's comment ("additional effort required to consider specific large loads, infrastructure additions, timing of additions to infrastructure, and the cost and risk of required investments"). Conversely, trended load growth is the type that has already been planned for. BPA has utilized extensive public processes to develop and implement the NITS planning structure used today and historically used for many years. BPA has found that this process must be adapted to account for the transmission needs driven by the changing nature and magnitude of forecasted NITS load growth. BPA is proposing to adopt a planning process that adds additional requirements in these instances. This is not an exemption for some NITS loads, this is a new limitation on NITS load growth that could impact reliability or the rights of other customers if left unchecked.

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	transmission capacity, increasing the likelihood that entities in the transmission service queue would be required to make new TSR-specific investments to gain access to the federal grid. All of the alternatives proposed by BPA would allow trended load growth to escape the obligations of Commercial Planning, effectively creating a new sub-class of NITS service. Further, future trended NITS loads could receive new LTF service even if such service triggered investments in other parts of the federal transmission system. Undue discrimination might be avoided if the "trended load growth" of PTP customers enjoyed the same access, but that is not BPA's proposal. Carving out specific "trended" NITS loads and subjecting those loads to lower standards and/or fewer reliability, feasibility and economic tests (i.e., those considered in CPAs but omitted from SAs) would be discriminatory, perhaps unduly so.	
Grant PUD	Further, the three Alternatives for defining "trended load" all include certain values that are subject to interpretation and judgement (e.g., a 3 MW threshold, an 80% load factor, a combination of fixed/variable amounts over time, a maximum number of MWs and a 70% probability of load going on-line as forecast based on information provided on an application for service). All of these values are arbitrary and would have to be applied in case-specific determinations, which could therefore also be subjective and arbitrary and could lead to assigned or assumed rights to some forecasted NITS loads, no rights to other forecasted NITS loads, and no rights to forecasted PTP loads without a successful TSR. Essentially arbitrary values for "including trended load in system assessments" would undermine the validity of System Assessments and would affect the queue and thus access to federal transmission capacity by entities without such trended service. Awarding LTF service would affect the power flow studies required for making decisions on TSRs in the queue, notwithstanding the arbitrary and subjective nature of the trended NITS load.	We disagree that establishing bright line rules or applying criteria to the analysis of forecasts are arbitrary acts. Applying reasonable judgment is inherent in transmission planning. That said, the proposed alternatives would all serve to reduce the necessity for the application of judgment to forecasts. As presented in July 2024, the desired end state of this effort includes the goal that customers are provided clear, transparent business practices that better define roles and responsibilities for BPA and its customers. Absent a change, large load forecasts require significant evaluation in order to determine impacts to available capacity and other queued transmission service requests. NITS customers have expressed frustration with delayed responses to their forecasts and with the lack of clear paths to access capacity. Establishing a policy for large load forecasts is intended to respond to these customer concerns, recognizing that there are limits to the load growth that BPA can reasonably be expected to integrate without risking adverse impacts to reliability or other customers.
Grant PUD	BPA's proposal for "trended NITS loads" would also not be available to power customers who rely on combinations of federal PTP transmission service and non-federal NITS transfer service for the delivery of power to their retail loads. BPA cannot compel non-federal utilities to offer trended NITS service, so transfer customers that rely on combinations of federal and non-federal transmission capacity would be disadvantaged relative to those offered trended NITS service by BPA. The subset of BPA power customers who might actually	We have conducted analysis which indicates that the majority of NITS customers' are unlikely to be impacted by any of the proposed alternatives because they are continuing to forecast the trended load that BPA has been planning for. This is not a proposal to create a new subset of "super-preferential" customers, this is proposing to place a

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	benefit from "super-preferential NITS" has not been revealed or discussed. Identification of eligible and ineligible customers and their retail loads might reveal the loads that would receive super-preferential treatment at the expense of disadvantaged customers and their retail loads. It is not clear that BPA's authority includes the ability to pick retail winners and losers in this manner, especially given the arbitrary and subjective nature of the eligibility criteria. If trended NITS service could be provided to some loads, such service would clearly be discriminatory compared to both untrended NITS and long-term firm Point to Point service if the power supply and the transmission path from the FCRPS system to a point of interconnection with another BA adjacent to BPA's system were the same for all relevant transmission customers. Such discrimination might violate relevant statutes and FERC policies.	limit to the load growth that BPA can reasonably be expected to integrate without risking adverse impacts to reliability or other customers. This is due to the changing nature of NITS load forecasts as data centers and other large load sinks are being forecasted. BPA does not dictate the requirements of other transmission providers. BPA has offered transfer service in order to enable deliveries of federal power without undertaking redundant infrastructure projects, but this does not mean that transfer service will always be provided on an identical basis to service for directly connected customers. Also, while BPA is proposing rules around large load forecasts, neighboring transmission providers have already put such rules in place. Please see the industry scan information that BPA presented on July 10, 2024 to compare these transmission providers' rules with BPA's proposed alternatives.
Grant PUD	The new NITS sub-class also could create problems at the end of Transmission Service Agreements (TSAs). All TSAs have end dates, both NITS and PTP. What happens when we get to the end of a fixed term for a NITS customer? Will trended future NITS loads hold rights beyond the end of a given TSA? Would the duration of the "trended load forecast" instead shrink to avoid granting NITS rights after the end of NITS agreements? How will trended NITS loads beyond a specified end-of-service date be treated relative to rollover rights of PTP customers? Will BPA limit or deny PTP rollover rights in favor of trended NITS loads, even if such limits are contrary to FERC standards?	The rights of NITS customers are tied directly to their service agreements. BPA plans for continuing transmission service in the event customers exercise rollover rights. If BPA considers limiting PTP rollover rights it will do so by mutual agreement with the PTP customer in the PTP service agreement, and in accordance with FERC standards.
Grant PUD	Moving "trended NITS load" into a category that could trigger investments in the grid without granting comparable access to additional transmission capacity effectively would create a new sub-class of service with superior rights paying the same Network rate while avoiding costs that would otherwise be directly assigned. Non-trended NITS loads and all PTP loads would pay for such new transmission capacity without any path to get to new long-term rights to use the new capacity because it is effectively "reserved" for the trended NITS loads. The result would be socialization of new costs without comparable access because the trended load would "use up" at least some of the new capacity and also provides superior rights on the transmission system while simultaneously conferring lower risk to some NITS customers and their loads. In the event of a technological shift or demand shock resulting in load reductions, the transmission costs paid by NITS customers would fall	The appropriate venue to raise concerns about rate treatment would be a BPA rate case. But, the risk in demand shift is a factor that has been considered in proposing the alternatives for treatment of large load forecasts. Absent a change, demand shift or disappearing load due to technological changes could lead to investments in specific projects being socialized across rate payers and expose ratepayers to the risk of stranded asset costs. One of the reasons for the proposed alternatives is to require some financial commitment for these loads that may be subject to shifts in technology or demand.

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	with the lower peak loads, and the cost of PTP service per MW would increase, all else equal. The risk of the network demand shift would be borne in part by PTP customers who would not only continue to pay for their contracted PTP volumes but would face increasing costs as total network usage and system utilization falls, notwithstanding the super-preferential access granted to the trended NITS loads.	Financial requirements for infrastructure investments have not been considered in this NITS Access to Transmission Capacity workshop series, but will likely be an important element in the continuing GAT program series.
Grant PUD	Grant is concerned about potential impacts on BPA's TSR queue and requests for "untrended" NITS loads and new PTP service; all three alternatives may work for NITS customers but with different impacts on plans of service, construction, the queue, and rights awarded to NITS and other customers. These impacts are difficult to predict but cannot and should not be ignored. Any decisions on new treatment of forecasts of NITS loads should take into account impacts on non-trended NITS loads and applications in the queue for new PTP rights. Granting new firm rights to transmission capacity simply because the growth is "trended" based on arbitrary criteria should be avoided, and a "new queue" for preferred treatment based on trended load growth should also be avoided. BPA should instead redirect its efforts to planning, construction, energization and power delivery for all transmission customers on a non-discriminatory basis.	The treatment of NITS load forecasts will continue to take into account impacts on non-trended NITS loads and applications in the queue for new PTP rights. BPA is working to find an appropriate balance between its obligation to plan for reasonably forecasted NITS load growth and other uses of the transmission system. This is not mutually exclusive from efforts to plan and construct improvements to the transmission system in order to ensure firm delivery for all uses of the system, such as the proposed Accelerated Expansion and Proactive Planning components of the Grid Access Transformation (GAT) program series. BPA encourages interested participants to engage in the GAT workshops.
NITS Customer Group	<u>Substantive Concerns</u> The specific aspects of load growth that is not "trended" and that present challenges to BPA remain opaque to the NT Customer Group. We understand and agree with BPA that access to long-term firm service on its transmission system is constrained – that much is clear. However, BPA has not yet described the specific challenges posed by "non-trended" loads to form a sufficient foundation to plan for them differently. Is it the size, the speed, the location, and/or the risk profile of these loads that pose challenges? Is it the scale of new transmission infrastructure that would be necessary to provide firm service? Are there study or modeling challenges as suggested by WECC's Large Load Risk Assessment? Some combination of these attributes? We believe BPA has not yet met the burden of justifying why it needs to plan or otherwise differently treat load that is trended from that which is not, and request that BPA better define the problem statement beyond the fact that its system is constrained. We also urge BPA to better explain how the proposal to subject NITS forecasts to different planning processes comports either with its tariff or with its statutory obligations to its preference customers who purchase NT service.	BPA appreciates the questions raised by the NITS Customer Group. As we have attempted to explain above, for years BPA's existing policies around NITS service have allowed BPA to integrate growing loads in nearly all instances. When large load forecasts started to become normal occurrences, BPA quickly learned that treating all load growth in the same manner, consistent with established practices, would jeopardize its ability to serve load reliably. Absent a change, BPA's planning processes (accepting and planning for NITS forecasts regardless of magnitude) left it with a choice between jeopardizing reliability or infringing on the rights of other customers. BPA consistently recognized its obligation to plan for NITS customers. Experience has informed BPA's proposal to continue to meet this obligation for trended load growth through its system assessment planning studies, but to provide a more direct path to needed infrastructure for the new type of rapid load growth some

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	Further, while we greatly appreciate BPA for committing the time and resources to identify specific options for consideration, especially in light of its current resource limitations, we don't yet understand how these options would improve how BPA plans its transmission system. In what ways would these options accelerate expansion or create additional capacity to enable timely load service? We request a discussion about how these somewhat arbitrary and widely different options or alternatives developed (one targets load of a specific size at a single facility, whereas the other options consider general load growth changes between forecasts) would help address an overarching problem statement relating to a constrained transmission system and inability to meet NITS load growth. Posed another way, in what way(s) is BPA's current planning process insufficient to serve NT loads that are not "trended"? Absent additional discussion, we remain unconvinced as to how the proposed options would help BPA better meet its planning obligations to NITS customers or address BPA's problem statement. In light of the uncertainty around how these options relate to the problem statement, the unknowns of how load growth that is not trended will be treated, and how this issue fits within the overarching TPR effort, the NT Customer Group does not currently have an aligned position regarding the options that BPA presented at the Workshop. We instead recommend and support additional and collaborative engagement with BPA to address the discrete concerns described above.	customers are experiencing. BPA believes this will provide greater certainty for customers forecasting growth. We understand that there are areas of uncertainty, though, and will continue to provide opportunities for engagement. NITS Access to Transmission Capacity workshops have been rolled into the Grid Access Transformation project, formerly titled Transmission Planning Reform. BPA encourages continued customer engagement in its public workshops.
Northern Wasco County PUD	Northern Wasco is relatively agnostic among the three specific options presented at the May 20th workshop for a NITS "Planning Threshold" assuming existing transmission encumbrances remain intact. However, we note that a fixed threshold will likely not fit all NITS customers well and therefore fixed threshold options create the potential for conflicts and unintended consequences. Regardless of the specific threshold chosen, it is essential that BPA and customers work together to ensure that NITS load that enters the Commercial Planning process is handled in a way that meets customer needs. Northern Wasco and other load serving entities have an obligation to serve load placed on us by our end use customers, and that in turn requires being able to obtain firm transmission service from BPA in a predictable, timely, and cost-effective manner regardless of whether that load is studied through System Assessment or Commercial Planning processes.	BPA's NITS Forecast Staff Leaning shared in the July 9-10, 2025 GAT workshop will not be retroactively applied to existing or previously encumbered loads. This is an industry challenge, we will continue to learn and watch industry trends and will re-evaluate as needed. BPA is evaluating our transmission planning processes as part of the Grid Access Transformation program.

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Northwest Requirements Utilities	Although NRU currently remains uncertain whether a bright-line threshold for defining "trended" load growth is ultimately the best solution, of the options presented we would favor Option 1 ("trended" defined as any load growth from one forecast to the next that is less than 13 MW at a single facility).... Option 1 appears to most directly address the problem statement identified by BPA, insofar as NRU understands it. BPA articulated that its transmission system is constrained, and BPA is generally unable to plan for "significant" load growth without further system expansion, but at the same time it seeks to ensure firm transmission for load growth that is "trended." As a result, BPA intends to differentiate "trended" load growth from "non-trended" load growth. BPA notes on slide 8 of its Workshop presentation that considerations for differentiating load growth could include the size, timing, risk profile, or impacted transmission paths of the forecasted load. To NRU, this suggests that BPA intends to plan differently for loads that are larger than typical, would more likely arrive with shorter advance notice than is typically provided through a NITS customer's 10-year load and resource forecast, and/or that present a different risk profile than more typical load growth patterns. Because Option 1's definition of "non-trended" targets facility-specific load increases of a certain amount (13 MW or greater), we believe that this approach would best capture the type of load growth challenging BPA's current planning processes and that BPA identified in its problem statement. It would allow BPA's resources to focus on addressing the discrete load increases that may require additional study or transmission network upgrades, or that may present timing or other risk profile challenges, without unintentionally including portions of more traditional or organic load growth that might more likely occur under Options 2 or 3. Option 1 may also prove to be easier to implement, as BPA would need to focus only on discrete and specific loads at single facilities, rather than administering above/below the line tracking like in Options 2 or 3 and that might fluctuate over time. Stated another way, all load growth that is anything but a single facility of 13 MW or greater would simply be treated as "trended," which in our view would allow for a more efficient planning process. Additionally, Option 1 presents a viable pathway for BPA to assure firm transmission service to a significant portion of its NITS customers' load forecasts (i.e., the "trended" portion) through BPA's system assessment process. This appears to be an option that best balances BPA's tariff obligation to endeavor to place into service sufficient capacity in response to reasonably forecasted NITS loads and also addressing certain atypical loads through a more rigorous study or transmission upgrade process. For these reasons we prefer Option 1 over the other options.	Thank you for your preference. BPA's NITS Forecast Staff Leaning shared in the July 9-10, 2025, GAT workshop is a variation on the recommendation using a POD rather than facility based on ease of implementation and administration. This is an industry challenge, we will continue to learn and watch industry trends and will re-evaluate as needed. NITS Access to Transmission Capacity workshops have been rolled into the Grid Access Transformation project, formerly titled Transmission Planning Reform. We encourage participation in those meetings and workshops.

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	However, we note that while Option 1 includes a specific size consideration, it does not appear to account for other considerations that BPA identified, such as timing or risk profile. Specific loads of 13 MW or greater forecasted in year 10 of a forecast may not present the same planning challenge as the same load forecasted to arrive in year 4 or 5 of the forecast. BPA could consider incorporating a timing element to account for this or to incentivize greater advanced notice. Similarly, we would appreciate a more robust discussion regarding whether and how BPA may incorporate the risk profile of these types of loads in its decision making and transmission planning processes.	
Northwest Requirements Utilities	We disfavor Option 2 ("trended" defined as forecasted load that remains below a fixed annual MW threshold) in that it incorporates a low MW ceiling and excludes a percentage change, which may more often push historically traditional, organic load growth of larger NITS customers into "non-trended" commercial planning processes. We contend that any definition of "trended" load growth should in some way account for the size of the utility, and not disadvantage larger utilities given both small and large utilities encounter "trended" load growth. Moreover, Option 2 appears to present considerable administrative complexities in tracking and monitoring the cumulative MW increases between various years of updated load and resource forecasts. We disfavor Option 3 ("trended" defined as a change in load from one forecast to the next that is below the higher of 1.5% or 5 MW) because, although it includes a percentage change, like Option 2 it also may risk more often including more traditional load growth that may be spread across the entire system of utilities that are experiencing higher-than-anticipated load growth, and that which is not driven by specific loads at single locations. We are unsure whether BPA's intent with Options 2 and 3 is to subject this type of organic, historically more traditional load growth to its commercial planning processes. Further, Options 2 and 3 may present higher administrative burden in the event that a portion of load growth would be processed under the system assessment process, and the remainder processed through the commercial planning process. Unlike Option 1, which would subject an entire single, specific load to the commercial planning process in full, Options 2 and 3 appear to accommodate load growth under the threshold pursuant to the system assessment process, and load growth above the threshold pursuant to the commercial planning process. This may result in large, specific loads being processed through two different planning processes. In the event that there is a single specific load that both falls below and above the 1.5% threshold, it is not clear which process would govern identified upgrades necessary to provide firm service. This could produce administrative complexities that are not present in Option 1 and that BPA and customers would prefer to avoid.	BPA largely agrees with reasons against Options 2 and 3. BPA's NITS Forecast Staff Leaning shared in the July 9-10, 2025 GAT workshop is a variation on the Option 1 using a POD rather than facility based on ease of implementation and administration. NITS Access to Transmission Capacity workshops have been rolled into the Grid Access Transformation project, formerly titled Transmission Planning Reform. We encourage participation in those meetings and workshops.

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Northwest Requirements Utilities	Lastly, while we acknowledge that BPA proposes a 13 MW threshold under Option 1 by relying on aspects of the definition of "New Large Single Load" under the Northwest Power Act, we discourage BPA from maintaining any further connection between how BPA defines "trended" load growth for purposes of transmission planning and the statutory definition of "New Large Single Load."	BPA's NITS Forecast Staff Leaning shared in the July 9-10, 2025, GAT workshop does not rely on or directly relate to the New Large Single Load statutory definition.
PacifiCorp	**Alternative 1: Annual New Large Load Threshold per Facility** BPA proposed that any load growth more than an established threshold or relating to a new large load ("NLL") be designated as non-trended growth. The use of a single MW threshold does not reflect the diverse nature of BPA NITS customers. Any single MW threshold could benefit some customers while harming others. Benefit being the avoidance of a delay in gaining long-term firm service, and avoidance of costs associated with having a commercial assessment. BPA used a 13 MW threshold derived from grossing up 10 MW at 80% load factor. 10 MW represented a common load used for new large single loads ("NLSL"). The alternative used a 10-year forecast and compared like years between the current and previously accepted forecast, to determine the change. Example 2028 of the 2023 10-year forecast is compared to 2028 of the 2024 forecast. If the 2028 change (2028 from 2024 forecast subtracting 2028 from 2023 forecast) is greater than 13 then that would be non-trended growth. BPA's examples included NLL. We would like to see an example without any NLL to better understand the trigger of the threshold. This alternative was based on forecasted facility – there was discussion if service point was more appropriate, however the facility point supported the NLSL 10 MW.	Thank you for your comment. The examples provided in the May 20, 2025, workshops indicate how the 13 MW limit would determine whether a portion of a forecast that would be subject to commercial planning. BPA's NITS Forecast Staff Leaning shared in the July 9-10, 2025, GAT workshop is a variation on the recommendation using a POD rather than facility based on ease of implementation and administration. NITS Access to Transmission Capacity workshops have been rolled into the Grid Access Transformation project, formerly titled Transmission Planning Reform. We encourage participation in those meetings and workshops.
PacifiCorp	**Alternative 2: Annual MW Threshold that Varies by Year** Similar to alternative one, alternative two uses a specific MW however the MW varies by year. In the examples discussed there was a threshold of 5 MWs in year 1-2 of the forecast, 7 MWs of year 3-5, and 10 MW in years 6-10. The threshold amounts were for discussion purposes. As with alternative one a generic MW threshold, even if it varies across years within the 10-year forecast could benefit some customers while harming others. Benefit being the avoidance of a delay in gaining long-term firm service, and avoidance of costs associated with having a commercial assessment. BPA should avoid complex alternatives. These can be difficult to implement with no	BPA largely agrees with reasons against Alternatives 2 and 3. BPA's NITS Forecast Staff Leaning shared in the July 9-10, 2025, GAT workshop is a variation on the Option 1 using a POD rather than facility based on ease of implementation and administration. NITS Access to Transmission Capacity workshops have been rolled into the Grid Access Transformation project, formerly titled Transmission Planning Reform. We encourage participation in those meetings and workshops.

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	clearly provided benefits supporting the additional complexity. In this alternative the amount over the threshold is considered non-trended load growth whereas in alternative one the full amount if it exceeded the threshold was identified as non-trended. BPA did not explain the difference in treatment. Proposed alternatives should provide detailed explanation of benefits using the specific approach for informed decisions. **Alternative 3: Larger of Percentage of MW Threshold** Alternative three used the greater of a fixed percentage growth from the prior forecast or a fixed annual MW threshold. For discussion BPA used 1.5% from the customers' prior forecast with a 5 MW annual threshold. BPA calculated the average growth rate from the 10-year annual growth rate for all NITS customers, removing outliers to derive the 1.5% rate used. By using the higher of either % or the fixed MW threshold BPA believed that individual customers received the best overall representation. Like alternative two BPA should avoid complex alternatives. These can be difficult to implement with no clearly provided benefits supporting the additional complexity. In this alternative the amount over the threshold is considered non-trended load growth whereas in alternative one the full amount if it exceeded the threshold was identified as non-trended. BPA did not explain the difference in treatment. Proposed alternatives should provide detailed explanation of benefits using the specific approach for informed decisions. Careful analysis is needed to determine if thresholds to ensure customers are treated fairly. • A smaller customer may benefit from the proposed alternative as they would default to the higher MW threshold and thereby avoid any load growth having to go through commercial assessment. • A larger customer could see more of their loads go to commercial assessment under the proposed alternative. For this customer, while the % MW result would be larger than the MW threshold, it is still a limit (1.5%), so in this case the 1.5% MW threshold is likely to be used.	
Portland General Electric	1. PGE supports alternative 3: The Larger of Percentage or MW Threshold for the following reasons: a. The 5MW annual threshold is large enough to allow for local economic growth. b. This is based upon a 10-year average, so it allows for dips and peaks in annual load changes. c. The administrative implementation would not be too labor intensive with limited staff. 2. PGE would also like to see a discussion/outline on how you are planning for the resources associated with these new loads. 3. Please provide a definition of a single facility and/or per facility. If the definition is like that used in Provider of Choice, please share that in your proposal. 4. Please also publish the definition of the 70% viability rule.	Thank you for sharing your preference. BPA's NITS Forecast Staff Leaning shared in the July 9-10, 2025, GAT workshop is a variation on the recommendation using a POD rather than facility based on ease of implementation and administration. The Grid Access Transformation program (formerly known as TPR) will continue to explore these challenges. We encourage participation in those meetings and workshops.

Commenter	Summary of Comment	BPA Staff Response
PNGC Power	PNGC Power was deeply disappointed by the options presented on May 20, 2025. BPA's proposed approach is to bifurcate the identified transmission planning initiatives (Planning for NITS Load & Resource Forecast, NITS Offer Types, and NITS Load Forecast 70% Rule) associated with NITS by shifting two of the three initiatives to the Transmission Planning Reform Process. The shifting of the Offer Types and the 70% Rule to the Transmission Planning Reform (TPR) is done without explanation in writing of how this decision was made, why it is necessary and what the benefits would be of bifurcating these issues. These issues are very intertwined and PNGC Power believes that it is not possible to evaluate these issues in separate forums and achieve a successful solution that is beneficial to BPA or its customers. This concern was demonstrated during the workshop when BPA staff repeatedly responded to issues outside the narrow scope of their preferred discussion to refer parties to the Transmission Reform Process. Transmission planning is a critical element of the process that results in the development, deployment and energization of system elements required to meet the needs of BPA's preference customers who purchase NITS. Planning changes cannot be implemented in isolation from the wider reform process without increasing the risk to current and future load service by BPA's preference customers. PNGC Power respectfully reminds BPA that it bears the statutory obligation to plan for and meet the transmission needs of all preference customers, an obligation BPA appears unable to meet at this time.	Thank you for these comments. As expressed above, it has been challenging to maintain the intended narrow focus of this effort while also being responsive to customer requests for additional education on existing processes and requests to address topics outside of the intended scope. NITS Access to Transmission Capacity workshops have been rolled into the Grid Access Transformation Project which will continue to evaluate these challenges. We will continue to work to improve communication and provide additional detail in the continuing GAT engagement and encourage participation in those meetings and workshops.
Seattle City Light	Alternative 1: City Light recommends against using single value only based Transmission Planning Threshold. This is a "one size fits all" approach. This approach would not recognize the magnitude of customer size variations.	Thank you for your comment. BPA's NITS Forecast Staff Leaning shared in the July 9-10, 2025, GAT workshop is a variation on the Alternative 1 using a POD rather than facility based on ease of implementation and administration. This is an industry challenge, we will continue to learn and watch industry trends and will re-evaluate as needed. NITS Access to Transmission Capacity workshops have been rolled into the Grid Access Transformation project, formerly titled Transmission Planning Reform. We encourage participation in those meetings and workshops.
Seattle City Light	Alternative 2: City Light suggest that a Transmission Planning Threshold that is different for certain forecast years, is administratively burdensome and could encourage entities to over-forecast.	Thank you for your comment. BPA agrees and is one reason for BPA's NITS Forecast Staff Leaning shared in the July 9-10, 2025, GAT workshop.

Commenter	Summary of Comment	BPA Staff Response
Seattle City Light	Alternative 3: City Light supports Alternative 3, which includes the greater of a fixed annual MW threshold or a fixed percentage annual MW threshold. We suggest a 6MW annual threshold is large enough to allow for local economic development. We also suggest the 2.0% per year fixed annual percentage threshold is low enough to limit inequitable economic benefits between customers. City Light thanks BPA for the detailed statistical analysis of load growth that led to the proposed 1.5% threshold. City Light recommends rounding this up to an even 2.0% to account for increased regulatory factors impacting load growth.	Thank you for your comment. BPA's NITS Forecast Staff Leaning shared in the July 9-10, 2025, GAT workshop is a variation on the Alternative 1 using a POD rather than facility based on ease of implementation and administration. This is an industry challenge, we will continue to learn and watch industry trends and will re-evaluate as needed.
Umatilla Electric Cooperative	UEC assesses BPA's proposed alternatives through a straightforward lens—how do the proposed alternatives improve BPA's NT planning process? BPA has failed to show how the proposed alternatives expedite BPA's ability to plan for and reinforce its transmission system to serve NT load growth. More importantly, BPA provides no assurances that the alternatives will achieve the BPA Administrator's stated goal of constructing transmission reinforcements within 5-6 years. The proposed alternatives do not provide any more certainty or clarity regarding how NT load growth will be planned for and served. UEC must conclude that the proposed thresholds are simply arbitrary, do not improve BPA's ability to plan for and serve NT load growth, and the proposal to move these loads into TSEP will only slow BPA's ability to serve NT load growth and create additional uncertainty for NT customers (i.e., reoccurring TSEP pauses and delays). BPA's proposed alternatives will also result in two negative and discriminatory outcomes that are ignored by BPA's problem statement. First, the alternatives allow BPA to decouple a portion of NT loads from its current NT load service obligation and apply the TSEP study and cost allocation principles to larger NT loads. This will also allow BPA to more easily allocate the costs for network reinforcements directly to some NT customers, but not others based on an arbitrary threshold. Second, the proposed alternatives will relieve BPA of its NT planning obligation within its system assessment process for a significant portion of NT loads, but not others. This will effectively treat certain NT customers the same as BPA treats its Point-to-Point customers in the assessment and planning for transmission service requests.	BPA staff's proposal to provide different planning paths for NITS forecasts based on the megawatt amount of the forecast is indeed intended to expedite BPA's ability to plan for load growth and to provide customers with certainty and clarity around how their forecasts will be planned for. BPA proposes to largely maintain its status quo planning process for what it considers trended load growth (below the proposed megawatt threshold). This entails review of forecasts and inclusion in BPA's long-term system assessment planning study. In BPA staff's experience, this has been more than sufficient for trended load growth, which tends to be gradual or smaller incremental growth related to traditional commercial or residential NITS customer load. However, this experience has also shown that forecasts that are larger and more rapid would be better accommodated with the more direct path to infrastructure projects provided by BPA's commercial planning processes. In the past, the Transmission Service Request Study and Expansion Process (TSEP) was one such process. The NITS Access to Transmission Capacity workshops have been rolled into the Grid Access Transformation Project, which are intended to result in improved commercial processes that may or may not resemble TSEP. BPA encourages continued customer engagement in its Grid Access Transformation Project public workshops. Whatever commercial process is employed in the future, BPA staff believe that it will provide greater clarity and certainty into how large forecasts are being planned

Commenter	Summary of Comment	BPA Staff Response
		for by providing a direct link between the customer forecasts and specific infrastructure projects, providing clarity and customer choice related to project participation. BPA does not believe the proposed alternatives or the preferred megawatt threshold alternative result in discriminatory outcomes. Cost allocation for future study processes for NITS customers has not yet been determined but this will be done in collaboration with customers. While not the primary driver for the proposed changes, cost allocation is certainly a factor that it is appropriate to consider with input from all NITS customers, those that have been experiencing significant technology-driven growth and those that have not experienced this type of growth but have supported the growth of others through their payment of transmission rates. And while future commercial study processes and cost allocation mechanisms have not yet been determined, BPA disagrees that processes such as TSEP that reflect FERC's pro forma study processes are discriminatory. BPA continues to strive for processes that are consistent with or superior to pro forma. Regarding BPA's system assessment process, UEC's comment seems to reflect a misunderstanding of BPA's proposal. Forecasts that are over the threshold will still be reflected in the system assessment, they will also be on the more direct path to system upgrades provided by BPA commercial processes.

VII. Other Considerations

Commenter	Summary of Comment	BPA Staff Response
EWEB	The following are offered up with the intention of attempting to increase common understanding and stimulate more dialogue: • 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 has heard the positive feedback regarding PARS and the requests that PARS-like studies be expanded to evaluate transmission needs on the Bulk Electric System. PARS is a unique study that looks at the local area needs, not the main transmission paths. The Grid Access Transformation - Accelerated Expansion Program is charged with looking at how BPA can develop "least regrets" plans of service across a broad number of scenarios for a 20-year planning horizon. BPA encourages interested participants to engage in the Grid Access Transformation workshops.
Northern Wasco County PUD	Because over 60% of Northern Wasco's load is served by non-federal resources, our most pressing concerns relate to utilities being able to effectively utilize transmission encumbrances to serve load with non-federal resources. The current reality of wholesale power markets is that sellers are often using a portfolio of resources on the BPA network and net interchange into the balancing authority to fulfill their obligation under firm wholesale power contracts (such as WSPP Schedule C transactions). This includes the output of variable renewable energy resources that is impossible to know months or years in advance. Although this can present some challenges from a transmission planning perspective, this is a desirable and economically efficient use of generating and transmission resources in the BPA balancing authority. Under current practice, this reality makes it extremely difficult in many instances for Northern Wasco to specify upstream PORs for wholesale power contract purchases and in turn obtain firm transmission based on our FTSRs for Mid-C to our load on a long-term basis. The current Network Integration Transmission Service Request Data Exhibit is particularly ill-suited to this type of transaction. Beginning with Order 888, FERC described NITS as a transmission service that allows Network Customers to efficiently and economically utilize their Network Resources (as well as other non-designated generation resources) to serve their Network Load. Northern Wasco urges BPA to focus efforts achieving the goal of the "integration" concept embedded in the Open Access Transmission Tariff.	While BPA appreciates the comment, the specific changes regarding forecasting, designating, and scheduling of Network Resources are outside the scope of this workshop series. BPA will send this comment to Transmission Planning, and please continue to engage with BPA in the Grid Access Transformation program series to share ideas on how we can enhance products and services.

Commenter	Summary of Comment	BPA Staff Response
	We would like to work collaboratively with BPA on creative solutions to enable customers to use a dynamic portfolio of network resources to serve load, rather than the current paradigm which resembles a PTP system of NITS. One potential solution is to enable the use of contiguous PORs (e.g. similar to MidC Remote, PACW and the FCRPS). Is a specific upstream source really necessary for BPA Transmission to determine whether a NITS request is feasible on a planning basis? TSRs are currently path specific, but if the System Assessment looks at a contiguous POR such as the FCRPS, then could TSRs be granted on that basis? We believe this is similar to how BPA Power uses its portfolio of generating resources to meet its preference marketing obligations on the network. We have heard a clear message from BPA leadership that the agency is committed to pursuing disruptive and novel approaches to the transmission challenges of the region. We share the goal of assuring the Pacific Northwest has a transmission system that is adequate to the task of integrating and transmitting power from federal and non-federal generation on an economical and reliable basis to meet customer needs. This goal can best be achieved by close collaboration between BPA and customers. Northern Wasco stands ready to be a partner in this effort.	
Northwest Requirements Utilities	As an additional consideration to the options presented at the Workshop, we would also suggest as an approach to ensuring sustainable load service on a long-term basis that BPA replicate its Portland-Area Reinforcement Study (“PARS”) to other load pockets on its system. While we recognize that PARS was not intended to model the broader network’s transfer capability or provide equivalent flowgate capacity to PARS participants’, evaluating the system upgrades necessary for groups of geographically situated NITS customers simultaneously may be a more efficient path toward the desired result. Though not fully complete, the PARS model appears to demonstrate an effective approach to planning in collaboration with a subset of BPA’s NITS customers to identify local load area transmission reinforcements, which would provide adequate transmission capacity to meet significant load growth in that load area over a long-term horizon (i.e., at least 20 years). Our understanding is that these types of capacity increases would accommodate both “trended” and “non-trended” loads, and may help alleviate challenges that may arise from BPA applying different planning processes and requirements between these types of load growth. We therefore strongly recommend BPA committing to conducting these types of studies as part of BPA’s ongoing obligation under its tariff to endeavor to construct facilities on behalf of its NITS customers’ forecasted loads and resources.	Thank you for your comment. BPA has heard the positive feedback regarding PARS and the requests that PARS-like studies be expanded to evaluate transmission needs on the Bulk Electric System. The Grid Access Transformation - Accelerated Expansion Program is charged with looking at how BPA can develop "least regrets" plans of service across a broad number of scenarios for a 20-year planning horizon. BPA encourages interested participants to engage in the Grid Access Transformation workshops.

Commenter	Summary of Comment	BPA Staff Response
PacifiCorp	Other alternatives to consider would include the use of a tiered threshold based on customer size. The tiers could be determined, after careful analysis, and annually BPA could then determine and communicate what each customer's threshold is based on publicly filed information. This alternative would avoid complexities of higher of logic, or varying MW threshold over a 10-year forecast period. Additionally, this alternative would provide a scaled approach representing customer size. A minimum MW could be established to avoid issues purely driven off size. Example Customer 1 – 1000 MW load in 2023, would use threshold B in 2024. Customer 2 – 150 MW load in 2023, would use threshold A in 2024. MW determined from Publicly supplied data. 0-500 MW Threshold A 500-1000 MW Threshold B 1000-5000 MW Threshold C	Thank you for providing the additional alternative and examples. BPA believes its staff leaning, as referenced previously, is preferable in that it more directly addresses the challenges created by the increased load forecasts the region is experiencing.
PacifiCorp	BPA acknowledge during the workshop that it is possible that customers may attempt to avoid commercial assessment and delays in gaining long-term firm service. BPA noted that they may consider implementing an unreserved transmission penalty to incentivize accurate forecasts. Forecasts are only as accurate as the information available and accurate only at a specific point in time. BPA should partner with customers to improve the development of forecasts and through analysis identify those that fail to improve for corrective action measures.	BPA's forecasters actively collaborate with NITS Customers. Please refer to our March 2024 workshop for more details.
Portland General Electric	1. On May 20, there was discussion regarding NITS customers who must go through the Commercial Study/Transmission expansion process if their load doesn't meet the 70% threshold. a. If both Forecasted Transmission Service Reservations (FTSRs) and PTP requests are being studied in a Commercial Study, PGE recommends that FTSRs should also have to pay the $10k per request TSR deposit. Requiring NITS customers to pay the TSR deposit would be consistent with the pro forma tariff requirements. b. BPA recently increased the TSR request fee from $2k to $10k with justification that the studies are becoming increasingly complicated. PGE requests BPA to apply consistency for all parties participating in the Commercial Study. Why is one group bearing the burden of a study that benefits all.	Thank you for the comments. Because NITS customers pay different rates and have different planning requirements than PTP, the costs associated with the load forecasting process including creation of any necessary FTSRs is rolled into NITS rates. Study costs for Commercial Studies are allocated proportionately to all participants in the study based on MW amounts. We appreciate PGE's acknowledgment of the complexities that large load forecasts raise with respect to payment of study costs and participation. There will be additional opportunities for engagement in the continuing Grid Access

Commenter	Summary of Comment	BPA Staff Response
	2. BPA requires cluster study participants to cover all cluster study costs and requires customers to provide funds in advance for its share of the estimated study costs on a MW-share basis. Participants are also required to share the costs of any required plans of service, and they are required to fund costs of Direct Assignment Facilities, per the TSEP BP. In addition, participants pay for preliminary engineering, environmental review, must provide BPA with financial security to support the construction associated with the plan of service. a. What studies are you performing for FTSRs? How are you recovering those study costs? b. Please outline how cost allocation for NITS and PTP customers will be consistent in the Commercial study process. 3. NITS customers will rebuke any alternative that requires them to use the Transmission expansion process due to cost causation and having to pay for upgrades to the system beyond their NT rate. PGE supports BPA's recognition that the magnitude of the customer load size should dictate the study process they follow, and it should be consistent with PTP commercial study costs/process.	Transformation project, formerly titled Transmission Planning Reform. We encourage participation in those meetings and workshops.
PNGC Power	In terms of the substance of BPA staff's proposal, PNGC Power finds little that is worth preserving. The proposal appears to simply segregate loads primarily based upon their size and adds more process for larger loads without any commitment to more expeditious planning or commitments to improve the processes that are required to develop and energize additional system elements to meet its NITS customers' needs, as articulated each year in our Load and Resource Consolidated Data Collection Tool submissions (LaRC). Instead, PNGC Power encourages BPA planning staff to consider instead the following questions as drivers of our next discussion. *1. What process leads to the fastest deployment of the bulk electric system elements required to meet NITS customers' load forecasts?* This requires NITS planning reform to occur as part of the wider transmission reform process and not in isolation. Adding layers of additional process will not achieve the shared goal of reliable load service and certainly is not the "disruptive" approach the BPA Administrator has encouraged all of us to embrace, as cited repeatedly during the workshop.	Thank you. The Grid Access Transformation Project Planning Program and the Accelerated Expansion Program are charged with looking at how BPA can develop "least regrets" plans of service across a broad number of scenarios for a 20-year planning horizon, and to more quickly construct and energize those plans of service. BPA encourages interested participants to engage in the Grid Access Transformation workshops.

Commenter	Summary of Comment	BPA Staff Response
PNGC Power	...PNGC Power encourages BPA planning staff to consider instead the following questions as drivers of our next discussion. *2. Why is it appropriate for BPA to devalue the accuracy of NITS customers' load forecasts?* The "70% rule", which is not to be found in statute, formal BPA Policy, BPA's OATT, or transmission business practices appears to be a source of uncertainty rather than efficiency. It is not unreasonable to ask BPA staff to reciprocate the trust we place in the agency to provide transmission service by trusting the load forecasts submitted by customers each year and acting expeditiously upon them.	BPA's NITS Forecast Staff Leaning shared in the July 9-10, 2025, GAT workshop utilizes the customer provided forecast in the LaRC. With respect to the 70% rule referenced in comments, BPA would like to engage further on this topic in the continuing Grid Access Transformation workshops. Some level of judgment is inherently required in forecasting and planning, but we are open to discussing the 70% criteria and to ideas on how to better balance the needs of customers.
PNGC Power	...PNGC Power encourages BPA planning staff to consider instead the following questions as drivers of our next discussion. *3. Why is it appropriate for BPA to discriminate among the retail loads of its NTIS customers?* PNGC Power is extremely concerned about bifurcation concepts (i.e., "trended" and "non-trended") that prioritize service based on BPA's categorization of the retail members/customers its preference customers serve in turn. As stated in BPA's own Open Access Transmission Tariff - requests for transmission service come with an obligation to pay; thereby negating the oft-cited and rarely experienced "stranded cost" of transmission and thoroughly undermining the proposed penalty structure for "gaming" load forecasting.	BPA appreciates the questions raised. The forecasted NITS load growth is at a historic high consistent with national trends associated with data centers and other energy intensive loads. BPA's policies and transmission planning processes were not structured for such rapid load growth. BPA's NITS Forecast Staff Leaning shared in the July 9-10, 2025, GAT workshop is in part based on an industry survey. This is an industry challenge, we will continue to learn and watch industry trends and will re-evaluate as needed. Please continue to participate in the continuing GAT workshops to collaborate with us on solutions.
PNGC Power	"...PNGC Power encourages BPA planning staff to consider instead the following questions as drivers of our next discussion. *4. What are the appropriate metrics for the work required for BPA to meet all NITS requests for service?* "Time to energization" of required system elements is one concrete example. Another would be whether BPA can grant all NITS transmission service requests at the time the request is made, based upon the forecasts submitted annually in the LaRC and in the Line and Load Interconnection Request (LLIR) processes."	Thank you for your comment and BPA appreciates the example. The Grid Access Transformation Project (formerly known as TPR) will continue to explore these challenges.

Commenter	Summary of Comment	BPA Staff Response
PNGC Power	Substantively, PNGC Power believes there are a range of possible NITS planning changes under the umbrella of evaluating "disruptive" changes can improve the planning process and achieve a faster "time to energization" than what was proposed at the May 20th workshop. For example, MISO and PJM are both taking advantage of AI-driven tools to accelerate their planning processes. See - https://pearlstreettechnologies.com/miso-collaboration/ or https://blog.google/inside-google/infrastructure/electric-grid-ai/. In this way, what is currently seen by BPA planning staff as a challenge (data center loads) could instead be an opportunity to improve their work by an order of magnitude.	Thank you for your comments and cited examples. We will continue to scan the industry for tools or concepts to improve BPA's processes and interactions with customers. NITS Access to Transmission Capacity workshops have been rolled into the Grid Access Transformation Project. BPA encourages continued customer engagement in its public workshops.
PNGC Power	Another possible approach, if the "trended and non-trended" methodology is adopted, BPA could grant all trended load growth conditional firm or firm service as submitted in NITS customers' LaRCs, without a 30% discount applied to the forecasts, as this would lessen many NITS customer concerns that today's uncertainty and lack of meaningful dialogue has created. Given current and near-term probable staffing constraints placed upon the Agency, BPA is almost certainly going to need to become "comfortably uncomfortable" with new approaches to meeting our shared goals. Whether it is on the construction side where NITS customers may be able to design, build, and energize system elements faster or more cost-effectively than BPA can today (and could transfer the system elements to BPA after energization), or joint use of BPA right-of-way and future facilities to achieve timely load service to all NITS preference customers, BPA and its NITS customers need to find a new path forward - together. Similarly, PNGC is concerned that BPA staff working on NITS matters may not be considering the regional or geographic aspect of the adjacent Transmission Service Providers, and whether there are more efficient and timely solutions that do not solely depend upon BPA. It is our understanding that the Western Power Pool's WestTec initiative is driving towards regional solutions, but do not believe there is this level of granular engagement between that process and the problem of BPA's inability to meet the needs of NITS customers going forward.	Thank you. Conditional Firm service is outside the scope of this effort but is being considered by the Grid Access Transformation program. BPA's NITS Forecast Staff Leaning shared in the July 9-10, 2025, GAT workshop uses the entire customer-submitted load forecast, and we are open to discussing the 70% criteria used for system assessment and to ideas on how to better balance the needs of customers. We will continue to monitor changes in the industry, including the progress of WestTec.

Commenter	Summary of Comment	BPA Staff Response
Public Generating Pool	After a broader discussion, BPA could reframe the NITS Access dialogue, articulated problem statement, and evaluation of any proposed solutions. The NITS-specific questions could include: • What makes these specific costs reasonable to direct assign, and how does this align with the provision of NT service? • Are there new mechanisms that can be added to the LARC process for these loads to provide sufficient certainty and duration to avoid direct assignment of costs and enable the broader NITS group to be comfortable with socialization of costs/ residual stranded cost risks? • How can "new growth" be defined in relation to clearly documented direct-assigned costs vs. adopting an arbitrary size threshold? In addition to addressing new large load risks with greater clarity and in the appropriate context, PGP recommends that BPA also consider the uncertainty driven by new large loads within the context of increasing uncertainty on the system. Other drivers of uncertainty include transportation and building electrification, the increasing prevalence of intermittent/non-dispatchable resources, aging infrastructure and retirements, and load fluctuations associated with increasing weather events. All of these uncertainties are driving the need for comprehensive reform of BPA's transmission processes. PGP recommends that the uncertainties specific to new large loads be addressed within the context of how BPA will address uncertainty more broadly. This means resolving foundational issues within the TPR processes before tackling the impact of new large loads on NITS customers specifically.	BPA appreciates the questions raised. The forecasted NITS load growth is at a historic high consistent with national trends associated with data centers and other energy intensive loads. BPA's policies and transmission planning processes were not structured for such rapid load growth. BPA's NITS Forecast Staff Leaning shared in the July 9-10, 2025, GAT workshop is in part based on an industry survey. This is an industry challenge, we will continue to learn and watch industry trends and will re-evaluate as needed. Please continue to participate in the continuing GAT workshops to collaborate with us on solutions.
Public Generating Pool	**3. Scenario planning should be used to incorporate load uncertainty within the context of the System Assessment and new mechanism should be considered to improve confidence in NITS load forecasting** In addition to tailoring solutions to specifically identified risks, BPA should consider the industry best practice approach of scenario planning to determine least-regrets strategies that benefit the system in multiple potential futures. This analysis could consider load uncertainty for NITS customers along with other variables to align the system expansion and related planning functions with all drivers of uncertainty. Scenario planning should help to reduce the perceived risk of building towards low probability outcomes. The imposition of limits on service availability based on a historical analysis and/or seemingly arbitrary size thresholds for single loads is inconsistent with the more proactive planning being pursued in the TPR. PGP therefore recommends that planning for uncertainty associated with NITS large loads be incorporated into the TPR's broader look at uncertainty and transmission reform generally. Following this assessment, BPA can consider how to assess the level of certainty around particular load in the context of the provision of transmission service generally and NITS service specifically. This should	Thank you for this comment. The NITS Access to Transmission Capacity workshops have been rolled into the Grid Access Transformation (GAT) project and will allow for a broader look at transmission reform generally. BPA encourages continued engagement in its public workshops to discuss scenario planning and other ideas. The NITS Access to Transmission Capacity workshops began with an intentionally narrow focus, which proved challenging and, in many ways, has been absorbed by GAT.

Commenter	Summary of Comment	BPA Staff Response
	enable solutions that are more clearly tailored to the level of confidence behind different loads and scenarios and avoid the need to establish subjective thresholds. Concepts to consider with respect to assessing the level of certainty around a particular load could include: • Contractual relationships between the utility and large customers (for example, the concepts used in BPAs contracted-to, committed-for (CT/CF) process) • Contractual relationships or attestations linking new loads or even trended growth to new resource provision • Expansions of an existing load site (like "trended load", the customer already exists) vs "new" customers at greenfield locations • Construction agreements or other proof of progress towards load development • Other mechanisms such as new rate structures by utilities, internal planning documents, financial planning documents, capital outlay that demonstrate project commitment • Third party or macro-level studies or evaluations of expected high levels of trended growth	
Seattle City Light	City Light suggests BPA consider the following principles to follow and evaluate transmission planning thresholds 1. The size or magnitude of the threshold should be large enough to allow for local economic development while small enough to limit economic inequality between BPA customers. 2. Transmission Planning Thresholds should be small enough to limit large loads ramping usage over multiple years to avoid transmission costs. 3. Transmission Planning Thresholds should apply to all load forecasts after August 15th, 2024. 4. Transmission Planning Thresholds should apply to all loads included in forecasts prior to August 15th, 2024, that have a planned Inservice date after September 30th, 2028. 5. Loads above the Transmission Planning Threshold should have a time stamped transmission service request entered into the queue and participate in the transmission expansion process equitably with Point-to-Pont (PTP) requests in regard to application fees, costs, and processes. 6. Transmission Planning Thresholds should be equitably applied to load forecasts regardless of entity size, geographic location, or resource development. 7. The Transmission Planning Threshold policy should consider load forecast lessons learned from the 2024 Martin Luther King weekend extreme cold weather event. 8. The charges and penalties for both exceeding reserved transmission amount and forecasted load amount need to high enough to prevent these being a viable business option in comparison to participating in commercial transmission expansion.	Thank you for your comments and these principles. BPA's NITS Forecast Staff Leaning shared in the July 9-10, 2025, GAT workshop incorporates several of these concepts. This is an industry challenge, we will continue to learn and watch industry trends and will re-evaluate as needed. Please continue to participate in the continuing GAT workshops to collaborate with us on solutions.

Commenter	Summary of Comment	BPA Staff Response
Seattle City Light	City Light requests BPA consider that an alternative to having a bright line delineating trended vs commercial load growth would be for all NITS load growth to be addressed with a Federal TSR. This would allow BPA to treat all new transmission requests equally while maintaining BPA discretion in the Line & Load Interconnection process.	Thank you for your comment. We are not sure what is intended by the reference to a Federal TSR but look forward to continued discussion engagement in the Grid Access Transformation workshops, formerly titled Transmission Planning Reform. We encourage participation in those meetings and workshops.
Seattle City Light	City Light suggests BPA consider that for Transmission Planning purposes, an entity's aggregate interconnection limits may be a better bright line metric for planning and encumbering transmission capacity. This paradigm could be bound by operating limits and overage charges. This could limit the administrative burden of yearly forecast review and planning. This would additionally align Line & Load Interconnection requirements.	Thank you for your comment. This is an industry challenge, we will continue to learn and watch industry trends and will re-evaluate as needed. BPA's NITS Forecast Staff Leaning shared in the July 9-10, 2025, GAT workshop incorporates improved clarity for when an LLIR is needed, and we will continue to work toward better alignment between in the continuing GAT workshops.
Seattle City Light	City Light recommends considering that customer "behind the meter" resources do not reduce BPA's transmission planning obligations to serve the total load when those "behind the meter" resources are not available. Since this does not reduce BPA obligations and in fact greatly complicates reliability studies, this does not reduce BPA's transmission costs and does not merit a customer discount for transmission capacity or Line & Load Interconnection.	The current discount offered for behind-the-meter resources (the Short Distance Discount) recognizes that use of behind-the-meter resources to serve customer load does not relieve BPA of the need to plan to serve the subject load. However, there are other policy considerations at play, such as encouraging the development of non-federal resources close to load in order relieve constraints. The venue in which to raise concerns about the Short Distance Discount is BPA's transmission rates proceedings.
Umatilla Electric Cooperative	UEC proposes that BPA abandon further consideration of the proposed alternatives presented on May 20 and instead focus on alternatives that improve BPA's ability to plan for all NT load growth. To that end, UEC proposes the following for consideration: 1. Identify improvements and efficiencies on the 'front end' of BPA's NT Planning process. a. Better align the timing of an NT customer's 10-year load and resource ("LARC") forecasts with BPA's system assessment processes. b. Implement efficiencies to expedite BPA's NT planning and system assessment processes to more readily identify NT load growth on a more timely basis, including more timely close-out letters. c. Increase coordination and information sharing between BPA and customers in the identification of service needs of large loads in the LARC process.	Thank you for your comment. BPA's NITS Forecast Staff Leaning shared in the July 9-10, 2025, GAT workshop is a variation on the Alternative 1 using a POD rather than facility based on ease of implementation and administration. This is an industry challenge, we will continue to learn and watch industry trends and will re-evaluate as needed. Please refer to the changes that are being considered in the Grid Access Transformation program. BPA is committed to improving its processes and appreciates the comments regarding increased coordination and efficiency. Large load forecasts have been a significant contributing factor in the time it has taken to issue close-out letters in response to customer LARCs, and we think that the proposed alternatives and the staff leaning would increase transparency and predictability when customers submit forecasts.

Commenter	Summary of Comment	BPA Staff Response
	2. Articulate BPA's procedures and obligations for large loads that cannot be served in a timely manner. a. Codify the procedures for how NT customers can serve loads that BPA cannot timely study and reinforce its system for firm load service. This could include the following: i. Unlimited use of Network Non-Firm ("6-NN") ii. ii. Implement an NT Conditional Firm product iii. iii. Encourage the use of Behind-the-Meter Resources to reduce impact on BPA's transmission system iv. Develop demand response programs specific to large NT loads b. Identify and codify construction options that may be used in lieu of BPA transmission reinforcements, specifically consideration of customer-built projects.	The additional concepts listed touch on aspects of the GAT proposal, please continue to engage and present ideas so that we may collaborate on process improvements.