



April 29, 2024

Northwest Requirements Utilities (“NRU”) appreciates the opportunity to provide these comments in response to the March 20 and April 15, 2024, Planning for NITS Loads and Resources Workshops. NRU represents the interests of 57 Load-Following preference customers located in 7 states across the region, representing 30% of BPA’s Tier 1 load, all of whom depend on Network Transmission (NT) contracts with BPA for reliable load service.

As we’ve noted previously, NRU appreciates BPA’s recent efforts to work more closely with its NT customers, and to collaborate on ways in which to improve upon BPA’s existing Open Access Transmission Tariff (OATT) NT service. Bonneville’s ability to ensure reliable delivery of preference power to preference load today and in the future is of paramount importance to our membership, and we look forward to continuing to work with you toward that end.

NRU members are entirely dependent upon BPA’s NT planning processes, and the agency’s stated inability to meet future NT customer need is, simply put, unacceptable. While significant Workshop time has been spent highlighting NT customer obligations and the need to share forecast data “early and often”, there is a concerning lack of accountability and focus on BPA’s NT planning obligations, and our transmission provider’s responsibility to utilize customer forecast data to encumber the Long Term Firm transmission necessary to meet its Network Load obligations over its ten year planning horizon. In sum, while we recognize that both the interconnection queue and the forecast level of need for Long Term Firm NT have both become untenable, BPA has an obligation to plan ahead for just one of those issues.

In addition to our significant concern for the continued viability of BPA’s NT product, we share many of the concerns voiced during the recent NITS Workshops, especially with respect to how our members’ ten-year load forecasts are used within BPA’s transmission planning processes. More specifically, when and how a customer’s load forecast would trigger a network transmission build or reinforcement, and the role that customer communications with both BPA’s Power and Transmission business lines play remain largely opaque to NRU and its members and is an area that requires significant discussion.

Without a better understanding of the problem statement and objective that BPA seeks to achieve through these NITS Workshops, NRU is regrettably unable to respond constructively to

the “Core Questions” that BPA presented. Similarly, the recent NITS Workshops left NRU with considerably more questions than answers. Regarding future meetings, while we recognize that BPA will not develop and distribute new or additional materials for the upcoming May 10<sup>th</sup> Customer-Led Workshop, it is imperative that BPA executives and staff come prepared to respond to the questions submitted herein, as well as those included in the joint NT Customer Group comments and submitted by individual NT customers and customer stakeholders. To reiterate, without a shared understanding of the problem statement any proposed modifications to the NT product and related processes are intended to address, we are simply unable to engage constructively toward a mutually agreeable path forward.

In addition to those questions called out in the joint NT Customer Group comments, which we explicitly join and endorse, we look forward to BPA’s response to the following:

- BPA utilizes a 70% threshold for new load or load growth before inclusion in its Agency Load Forecast.
  - o What specific quantifiable criteria does BPA use to determine whether a given forecast meets that 70% threshold?
  - o Given a transmission provider’s obligation to reserve existing capacity for network load growth reasonably forecasted within a transmission provider’s current planning horizon (FERC O 888), how does BPA utilize those forecast loads not meeting this threshold (i.e., its Possible Loads Forecast) to encumber Long Term Firm capacity to ensure its continued ability to meet its NT planning obligation?
- BPA’s Transmission Plan states that “ *BPA plans the transmission system to serve expected loads and load growth for at least the next ten years based on forecasts. The forecasted peak loads, plus existing long-term firm transmission service obligations, are used to determine the system reinforcement requirements for reliability.*”
  - o Given the above, it follows that NT load growth and/or “new Network Load” would require new reliability corrective action plans, in accordance with NERC and WECC standards. Why is BPA proposing to treat its obligation to serve NT customer obligations in a manner equivalent to point-to-point (PTP); i.e., by first considering path-based constraints and potential inclusion in the TSEP process?
- Several of the comments offered by PTP customer representatives at the recent Workshops illustrate a problematic lack of understanding regarding the NT product and BPA’s obligations thereto, and which we submit are more likely than not to further confuse matters going forward. What was BPA’s justification for utilizing an open forum for the Planning for NITS Loads and Resources Workshops, in lieu of the Network Operating Committee (NOC)?

Regarding the final question, above, NRU formally requests that BPA move all future Planning for NITS Loads and Resources Workshops be moved into the NOC, in the interest of ensuring continued collaborative discussion and our combined ability to work toward practical and

realistic solutions. Failing that, we would ask that BPA provide a clear justification for its refusal to do so.

Finally, it is NRU's understanding that under the SPP Markets+ day-ahead market design, eligibility to receive congestion rent for transmission is limited to firm (i.e., 7F) and conditional firm reservations. This limitation, and the resulting financial risk exposure that could result for NT customers unable to secure long term firm or conditional firm reservations for load growth or new network load, calls into question the viability of both this ongoing Planning for NITS Loads and Resources Workshop process, as well the agency's ability to successfully integrate into the Markets+ day-ahead market as it is currently envisioned.

Thank you once again for considering the above comments, and we look forward to continuing to engage with you throughout this public process.

Sincerely,

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Northwest Requirements Utilities