



**Portland General Electric**

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To: [Techforum@bpa.gov](mailto:Techforum@bpa.gov)

Re: Comments related to BPA's NITS March 7, 2025, workshop

Portland General Electric (PGE) appreciates the opportunity to comment on BPA's public meeting to discuss options under consideration for expanding transmission service for Network Integration Transmission Service (NITS) customers. In the absence of a formal proposal, these comments are intended to provide BPA staff with an initial reaction to the alternatives that have been presented thus far and to highlight the need for additional meetings with a broader set of impacted stakeholders.

Many of the alternatives that BPA has proposed will result in limiting contractual rights for new Point-To-Point (PTP) customers, or shifting existing rights from PTP customers in order to provide new rights for NITS customers. Ostensibly, this introduces concerns over whether and how these alternatives comport with long-standing non-discriminatory open access principles that ensure all Transmission customers have equal access to the transmission grid. Moreover, they introduce broader questions and concerns about whether (and how) the proposals impact congestion on the BPA's system, such as increasing frequency of curtailments, and grid reliability. The solutions proposed are focused exclusively on addressing the immediate needs of NITS customers in the absence of a more holistic review of how these proposals might impact the service of other customers or exacerbate existing (and future) system constraints. PGE has provided more detailed comments that expand on these two themes of fairness and reliability on each of the proposals outlined below, this discussion should be folded into the Planning Process Pause Customer Engagement effort as the planning process for Network (NT) and PTP loads are heavily intertwined. BPA's decision to organize this meeting as a "NITS" workshop did not accurately reflect the full content being discussed or the parties that are potentially impacted, which limited stakeholder participation. Additionally, the limited comment period of 8 business days limits the opportunity for stakeholders to vet the proposals and provide BPA with meaningful feedback.

**Option A: Expand NITS customer use of monthly 6-NN by opening scheduling windows and /or eliminating capacity checks (on flow-based paths)**

- This alternative essentially allows NT customers to reserve 6NN/Secondary service monthly, without ATC capacity checks, but doesn't afford PTP customers the same monthly service flexibility.
- What is BPA's justification for removing the requirement to conduct capacity checks on 6NN monthly service but maintaining capacity checks for PTP monthly service?
- How does this proposal impact the ability for existing Conditional Firm (CF) rights held by a PTP customer to be "firmed up" at a later date/time?
- If the system becomes oversubscribed or overscheduled due to an expansion of scheduling windows and/or eliminating capacity checks, how will BPA manage reliability?
  - Will BPA administer curtailments in accordance with NERC priority requirements?
  - Will BPA curtail PTP schedules while serving NITS load?

**Option B: Provide NITS LTF service prior to reliability infrastructure being in place for base load, served from the FCRPS.**



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- As written, this could degrade the quality of service for PTP customers and pose reliability issues if BPA is providing service to NITS customers without completing the necessary planning studies to evaluate impacts on existing system commitments.
- How can BPA provide NITS LTF service without encroaching on transmission rights held by other customers if there is no capacity available and an upgrade is required?
- Please clarify whether BPA is proposing to provide NITS LTF service if load is served by the FCRPS, but not if the load is served with non-federal power. Why is BPA making the distinction between NITS load served by federal and non-federal power?
- How does this alternative provide non-discriminatory and non-preferential open-access service, when NITS customers would be awarded capacity without having to go through a planning process but PTP customers have to go through TSEP to be awarded transmission service, or alternatively a plan of service, to enable transmission service if insufficient capacity is available on the system?
- Please define “base load” in this alternative.

**Option C: Limit renewal rights on new PTP requests and reassess CFS offers**

- Limit renewal rights on new PTP Requests:
  - One of the foundational principles of PTP service is to enable customers to renew their service (subject to specific conditions and notice periods) through rollover rights. This provides customers with a level of long-term certainty that they can serve loads from resources outside their balancing authority area. Both NITS and LTF PTP transmission service, and their associated planning processes, are supposed to provide for LTF service that can be utilized and renewed in perpetuity if the customer desires. How does this alternative provide both customer types, NITS and LTF PTP, comparable and non-discriminatory service where BPA plans, designs, and builds, the transmission system necessary to enable durable firm transmission service for both NITS and PTP customers?
  - How would all new requests for PTP LTF service be assessed to determine if rollover/ROFR would be offered?
  - Looking at BPA’s existing queue, please explain how many PTP transmission requests are associated with the delivery of federal power and how many are associated with the delivery of non-federal power.
  - Please outline how this alternative is not providing preference to NT customers?
- Reassess Conditional Firm (CF) Offers
  - Please define the full breadth of options being considered for limiting renewal rights for reassessment CF offers?
  - Where in the initial terms of service is it articulated that that CFS offers could be eliminated and not based on system conditions?
  - In this alternative, it appears BPA would be changing the terms of service for CF Reassessment. This alternative would alter the commitments made under the contract and BPA’s OATT.
  - Please explain how many of the CFS contracts that may be impacted by this proposal are associated with the delivery of non-federal power and how many are associated with the delivery of federal power.



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- Please outline BPA’s non-preferential process for reviewing NITS customer load needs while analyzing system conditions for PTP customers?
- How does BPA make these determinations now? How will BPA propose to make these determinations in the future?

**Option D: Renew evaluation of pro forma NITS elements**

- In alternative D, BPA is considering an alternative available under the pro-forma construct. In alternative E, BPA is considering alternatives that deviate from the pro-forma. Has BPA changed its position outlined and adopted in TC-20 to offer open access service and provide transmission products and services that are modeled, to the maximum extent possible, on the FERC pro-forma tariff?

**Alternative E: Provide CFS to NITS customers**

- Would NITS CF give NITS customers an additional curtailment priority 6 product available to be reserved at yearly increments? If so, this would give NITS customers two products within the curtailment priority of 6, is BPA prepared to offer a comparable new product to PTP customers?
- Consistent with PGE’s question under Option A, how would this proposal impact the ability for CF rights held by a PTP to be “firmed up” at a later date/time?

As previously noted, PGE appreciates the opportunity to provide these comments to BPA on the NITS alternatives being explored and looks forward to exploring the questions posed in a future stakeholder workshop.

*Darrington Outama*

Darrington Outama (Mar 17, 2025 16:55 PDT)

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**Reference Materials**

Meeting Materials: [https://www.bpa.gov/-/media/Aep/transmission/nt-service/NITS-Offer-Options-Presentation-3\\_7\\_25.pdf](https://www.bpa.gov/-/media/Aep/transmission/nt-service/NITS-Offer-Options-Presentation-3_7_25.pdf)