

Submitted to techforum@bpa.gov on June 18, 2025

RE: PPC Comments on BPA's NITS Transmission Access Workshop

The Public Power Council (PPC)¹ appreciates the opportunity to comment on the Bonneville Power Administration's (BPA) Transmission Reform effort. PPC's members rely on BPA transmission in order to provide their communities with reliable, low-cost electric service. As BPA's existing transmission infrastructure ages and load continues to grow in the Northwest, the agency's ability to study, plan and construct key investments is critical to ensuring preference customers can continue to provide the high quality and low-cost electric service on which their communities rely.

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

¹ PPC is the umbrella trade association representing the interest of the Northwest's non-profit, public power utilities that have preference rights to the output of the federal system. PPC's members rely on BPA for wholesale power and transmission services to provide economic, reliable, and environmentally responsible power supply for the communities and businesses they serve at cost. PPC's members fully subscribe the firm output of the Federal Columbia River Power System (FCRPS) and a large portion of the capability of BPA's transmission system. The ability to access BPA's transmission system to deliver federal and non-federal generation to their communities is critical for PPC members.

to use both its “system assessment” and “commercial planning” processes to meet NT customer needs.

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.”²

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.

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.

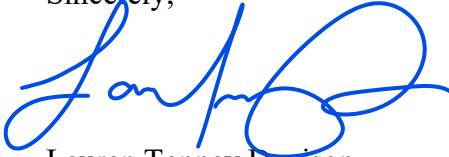
Achieving the type of transformative change that BPA is pursuing in its planning reform will take close coordination with its customers. PPC appreciates the opportunities to date to discuss the NITS forecast issues and Transmission Planning Reform more generally, but a higher level of engagement that 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

² BPA, “NITS Access to Transmission Capacity,” May 20, 2025, <https://www.bpa.gov/-/media/Aep/transmission/nt-service/Final-NITS-May-2025-Customer-Workshop.pdf> , slide 7

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.

PPC appreciates the opportunity to submit comments and looks forward to continuing to support BPA on making improvements that will ensure that PPC member utilities and the communities that they serve can have timely access to reliable electric service.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Lauren Denison', with a large, stylized loop at the end.

Lauren Tenney Denison
Director, Market Policy & Grid Strategy
Public Power Council