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Submitted via BPA's Tech Forum (techforum@bpa.gov)

Comments Concerning May 20th NITS Access to Transmission Capacity Workshop

Seattle City Light (City Light) appreciates Bonneville Power Administration (BPA) engagement with customers regarding NITS customer access to transmission capacity. Thank you for accepting and considering the following comments.

General Comments:

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.

Transmission Planning Initiatives:

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.

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.

Problem Context:

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.

Problem Statement:

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.

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.

Transmission Planning Threshold:

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 be high enough to prevent these being a viable business option in comparison to participating in commercial transmission expansion.

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.

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.

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.

Other Considerations:

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.

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.

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.

Seattle City Light thanks BPA for accepting and considering these comments

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cc: Melanie Jackson, Bonneville Power Administration