



Energizing Life in Our Communities

March 19, 2025

Bonneville Power Administration
P.O. Box 3621
Portland, OR 97208-3621

Delivered via email: techforum@bpa.gov

Re: BPA's Proposed Initial Alternatives for NITS Access to Transmission Capacity

Thank you for the opportunity to provide comments on the Bonneville Power Administration's (BPA) proposed options for supporting NITS service. As a BPA transmission customer that utilizes both Point-to-Point (PTP) and will utilize Network Transmission (NT) beginning October 2025, Snohomish has significant interest in ensuring that both products are treated equitably, and that BPA can accommodate as much firm load service as is feasible.

Background

At the March 7 stakeholder meeting, BPA presented three "near-term" alternatives and two "long-term" alternatives to the problem that BPA is currently facing regarding availability of long-term firm transmission service. These alternatives were offered pending the resolution of BPA's Transmission Planning Reform and the NITS New Load/Load Growth project.

At a high level, Snohomish supports BPA's efforts to find pathways for NT customers to have certainty regarding their ability to serve load on long-term firm transmission. Further, Snohomish appreciates the work that BPA staff has put into compiling options and encourages BPA to continue working on innovative solutions to assist NT customers receive the firm service they require to serve loads. Simultaneously, BPA must balance its obligation to serve NT customers with providing non-discriminatory services to PTP customers.

Near-Term Alternatives

The near-term alternatives provided by BPA seem to offer avenues for NT customers to receive either expanded non-firm service (Expansion of 6NN service) or firm service but under very limited circumstances (Long-term firm service only for customers with base-load served by the FCRPS). BPA's final near-term alternative seems to limit exacerbating capacity constraints but does not directly lead to new offers of firm service for NT customers.

Regarding the first two near-term alternatives (A and B on Slide 4 of the presentation), Snohomish believes that these are reasonable tools to provide NT customers seeking to serve load. However, they do not address the underlying uncertainty currently faced regarding firm load service. For any NT

customer that seeks to serve load with a non-FCRPS resource, these options provide no additional firm capacity.

For the alternative focusing on rollover rights (Alternative C on Slide 5), Snohomish believes that BPA should focus more on its long-term firm NT planning process and proper encumbrance of NT loads on the system prior to restricting rollover rights for PTP customers. Restricting such rights seems to be contrary to BPA's stated goal of providing service consistent with FERC's *pro forma* tariff where possible while providing little benefit for NT customers immediate firm needs. To the extent BPA chooses to evaluate whether it should grant rollover rights, Snohomish recommends that new PTP requests that may be eligible for rollover service be evaluated against established future firm NT customer needs when determining whether the PTP request and subsequent rollover rights are able to be granted. This would have the effect of ensuring that NT customer firm needs are respected while maintaining PTP customer rollover rights when eligible.

Long-Term Alternatives

Snohomish encourages BPA to continue exploring options that provide NT customers the ability to receive benefits from BPA's participation in organized markets. As transmission becomes increasingly constrained, certain paths on BPA's system will generate congestion revenues through organized market participation; NT customers should not be excluded from receiving benefits from these revenues if they hold long-term firm capacity reservations on these paths. Snohomish requests that BPA provide analysis regarding the allocation of congestion rents across NT and PTP customers.

Regarding Conditional Firm service availability for NT customers, Snohomish would like BPA to continue exploring this option and provide analysis regarding the amount of additional capacity available to NT customers, and how this conditional service would impact other conditional reservation requests on the system.

Conclusion

Snohomish appreciates this opportunity to provide comments on BPA's proposed alternatives. These alternatives are good first steps as BPA works toward providing NT customers with firm transmission service for serving their loads. Snohomish encourages BPA to continue working with both NT and PTP customers to ensure that each product class is treated equitably and in accordance with the goals and requirements of its tariff.

Sincerely,

/s/ Garrison Marr

Garrison Marr
Senior Manager, Power Supply