

NT CUSTOMER GROUP COMMENTS IN RESPONSE TO BPA'S MAY 20, 2025 NITS ACCESS TO CAPACITY WORKSHOP

Submitted: June 18, 2025, via techforum@bpa.gov

The NT Customer Group¹ appreciates this opportunity to submit comments in response to BPA's May 20, 2025, workshop (Workshop) to discuss options regarding NITS access to transmission capacity. The manner in which BPA meets its tariff obligations to plan its transmission system in response to NITS load and resource forecasts is fundamental not only to BPA's fulfillment of its statutory obligations, but also to NT customers' ability to ensure timely and reliable load service for their retail members and customers.

General Support

Preliminarily, we wish to offer comments in support of the limited aspects of BPA's proposals where the NT Customer Group shares common agreement. To this end, we understand BPA's proposal as discussed at the Workshop to be forward-looking; i.e., that BPA will continue to honor the existing firm encumbrances per the terms included in prior closeout letters issued by BPA to its NITS customers, even if such encumbrances or load forecasts would currently be subject to any of the options discussed at the Workshop. We view this as paramount and would therefore support some changes to how BPA plans for NT customer load and resource forecasts *only on a prospective basis*, and with an effective date to be determined.

Additionally, we understand and support that any option BPA selects with respect to defining "trended" load growth will be preliminary in nature only and used to inform BPA and stakeholders' evaluation of all other aspects of BPA's Transmission Planning Reform (TPR) effort as a holistic package. While we tentatively support BPA identifying a preferred option here, we do so only on the condition that such preference is documented "in pencil", and not ink. There must remain the ability to adjust how (and whether) BPA will define "trended" load growth as more information is shared during the remainder of the TPR effort.

Areas of Concern

As an initial matter, while we continue to appreciate BPA's engagement on this important issue, the dearth of written materials detailing BPA's concerns and positions, and perhaps most importantly the problem statement those positions are seeking to address, have been minimal. The great majority of the information exchange to date, while comprehensive and detailed, has been verbal. This has led to more than a few misunderstandings and misinterpretations, and has made it difficult for participants to

¹ The NT Customer Group includes Benton Rural Electric Association, Big Bend Electric Cooperative, City of Forest Grove, Clark Public Utilities, Eugene Water and Electric Board, Grays Harbor Public Utility District, Harney Electric Cooperative, Klickitat Public Utility District, Northern Wasco County People's Utility District, Northwest Requirements Utilities, PNGC Power, Umatilla Electric Cooperative, and Western Public Agencies Group.

respond effectively when asked. In the interest of ensuring clarity and providing the opportunity for efficient and effective engagement for all parties, we respectfully request that BPA provide as much written detail as possible going forward.

Additionally, we note that BPA presented its various NT-related planning processes and challenges over a period of nearly two years (beginning with its June 2023 presentation titled “[NT Load Growth 101](#)” and starting in earnest in March of 2024 with the kickoff of this workshop series). Similarly, NT customers have provided many rounds of comments, including customer-led presentations, as part of these discussions. And yet, despite the significant effort expended both by BPA and its customers over this period, the NT Customer Group remains confused both on the basis for BPA deciding to propose bifurcating its NITS load planning obligation, and how the options presented at the Workshop assist BPA in addressing its problem statement associated with large loads. We identify the following concerns we share as a group on both procedure and substance.

Procedural Concerns

Generally, the NT Customer Group believes that the current stakeholder engagement process has lacked effectiveness and urges BPA to adopt a more collaborative approach. The process that BPA has used to date largely results in written information passed back and forth with few opportunities to engage in robust policy discussions on a collaborative, real-time basis. As examples:

- Slide 5, July 10, 2024 workshop: “Portion of Customer comments will be addressed today but BPA recommends Customers elect to hold a Customer-led meeting to provide a forum for that discussion.”
- Customer-led workshop held August 14, 2024, where BPA staff were in listen-only mode and did not engage in discussion.
- “Summary of Customer Themes” workshop in October 2024 resulted in most responses as “BPA is considering these comments as it develops alternatives.”
- At the most recent May 20, 2025 workshop BPA indicated that customers can respond in writing, BPA would respond to all comments in writing and then offer a final decision.

This approach is ripe for misunderstanding and missed opportunities. Further, the speed and sequence of BPA’s transmission engagement process does not foster innovation, trust, or optimal outcomes. We encourage BPA to adopt a public stakeholder process similar to that which it used in the Provider of Choice initiative, which in our perspective should become the standard by which BPA engages stakeholders on large-scale, regionally important issues such as these.

Additionally, we are unsure of both the rationale and benefit to either NITS customers or BPA of segregating the issue of defining trended load growth from the remainder of the TPR effort. Here, BPA is proposing to plan differently between trended and non-trended load growth, where we must assume that non-trended load growth would be met through the reforms under consideration in TPR. Requesting stakeholders to comment on BPA’s

options for defining “trended” load growth should not be done in a vacuum, especially where the consequences for load growth that is not trended are currently unknown. For example, BPA stated in its initial TPR workshop that it may provide “on-demand” service via unlimited Network Non-Firm (“6-NN”) availability. BPA and customers must assess this proposal in conjunction with defining trended and non-trended load growth. While we appreciate BPA’s attempts to clarify the treatment for trended load growth, it comprises only a portion of the issue. Remaining undiscussed are issues like risk tolerance and cost allocation. These are likely to have significant impacts on NT load service as a whole, and these items must be afforded appropriate space and time for deliberation within BPA’s TPR workstreams.

Moreover, it isn’t clear what criteria or principles BPA will use in selecting a “leaning” here. Will BPA use the same criteria that it proposed in the [July 2024 workshop](#),² or will BPA use an updated set of criteria that incorporates more recent instruction for BPA Transmission to be “disruptive” in addressing its planning challenges? We request that a thorough discussion about the criteria that will be used in identifying a preferred option given the passage of time and changed circumstances since BPA last identified its anticipated decision criteria.

Substantive Concerns

The specific aspects of load growth that is not “trended” and that present challenges to BPA remain opaque to the NT Customer Group. We understand and agree with BPA that access to long-term firm service on its transmission system is constrained – that much is clear. However, BPA has not yet described the specific challenges posed by “non-trended” loads to form a sufficient foundation to plan for them differently. Is it the size, the speed, the location, and/or the risk profile of these loads that pose challenges? Is it the scale of new transmission infrastructure that would be necessary to provide firm service? Are there study or modeling challenges as suggested by WECC’s [Large Load Risk Assessment](#)? Some combination of these attributes? We believe BPA has not yet met the burden of justifying why it needs to plan or otherwise differently treat load that is trended from that which is not, and request that BPA better define the problem statement beyond the fact that its system is constrained. We also urge BPA to better explain how the proposal to subject NITS forecasts to different planning processes comports either with its tariff or with its statutory obligations to its preference customers who purchase NT service.

² These criteria are:

1. Align with pro forma OATT to the extent possible;
2. Compliance with BPA’s statutory and legal obligations, authorities, and responsibilities supporting consistency/equity, non-discriminatory, and open-access principles;
3. Preserve safe, reliable system operations – new or increased loads must be planned for prior to coming online; and
4. Enhance transmission customer experience through transparent, efficient, and clear business practices.

Further, while we greatly appreciate BPA for committing the time and resources to identify specific options for consideration, especially in light of its current resource limitations, we don't yet understand how these options would improve how BPA plans its transmission system. In what ways would these options accelerate expansion or create additional capacity to enable timely load service? We request a discussion about how these somewhat arbitrary and widely different options or alternatives developed (one targets load of a specific size at a single facility, whereas the other options consider general load growth changes between forecasts) would help address an overarching problem statement relating to a constrained transmission system and inability to meet NITS load growth. Posed another way, in what way(s) is BPA's current planning process insufficient to serve NT loads that are not "trended"? Absent additional discussion, we remain unconvinced as to how the proposed options would help BPA better meet its planning obligations to NITS customers or address BPA's problem statement.

In light of the uncertainty around how these options relate to the problem statement, the unknowns of how load growth that is not trended will be treated, and how this issue fits within the overarching TPR effort, the NT Customer Group does not currently have an aligned position regarding the options that BPA presented at the Workshop. We instead recommend and support additional and collaborative engagement with BPA to address the discrete concerns described above.

Conclusion

In summary, while we continue to appreciate BPA's time and attention to the challenges of NITS load service, including the identification and presentation of options for defining "trended" load growth, meaningful concerns remain. We urge BPA to adopt a more collaborative stakeholder engagement process, one that allows for a holistic evaluation of the various elements of BPA's transmission planning issues and how they impact one another. We also request that BPA better clarify the relationship between its problem statement associated with planning for NITS load growth and the options presented at the Workshop. We remain committed to collaboratively working with BPA to address its challenges in meeting its NITS load service obligations.