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Submitted via email: techforum@bpa.gov

Comments on March 20th Planning for NITS [Network Integration Transmission Service] Loads & Resources Workshop Series Kickoff

Seattle City Light (City Light) appreciates BPA's efforts actively engage and be responsive to comments regarding Planning for NITS Loads & Resources. City Light would like to offer the following comments regarding the March 20th Planning for NITS Loads & Resources Workshop Series Kickoff

Customer Engagement Proposal

City Light suggests due to the complexity, varying customer knowledge, and level of process change outlined that additional full-day BPA hybrid workshops will be necessary. This would allow for greater customer/stakeholder involvement, education, and discussion.

Forecast Terms used for NITS Transmission Planning

City Light supports the BPA process of evaluating the likelihood of the Customer Provided Forecast. We additionally support any additional NITS needs for transmission capacity generating a new Transmission Service Request (TSR) that is date/time stamped in the queue. To ensure non-discriminatory treatment of transmission customers, City Light believes all new TSRs should be evaluated using the same inclusive process.

City Light understands that BPA's process of determining the likelihood of customer load growth currently provides the maximum flexibility for customers while not requiring a burdensome process for all customer load growth. City Light recommends BPA adopt a more transparent, technically defensible, and scalable process. City Light suggests that BPA consider the site control and commercial readiness criteria developed as part of the Generator Interconnection Reform process as a model. This could additionally provide a deposit-in-lieu-of method for customers to guarantee that their load projects are likely without disclosing any confidential details.

City Light suggests BPA revisit the use of a NITS P50 load profile in the Study Transmission Forecast for adequacy, reliability, and compliance study purposes. A comparison of the 2023 NITS Transmission Study Forecast P50 load profile used in the 2023 studies in relation to the January 12-13th 2024 cold snap NITS peak load would be helpful for customers to better understand the risk tradeoffs involved.

Evaluate Load & Resource Changes

City Light recommends that the process and procedure used by the Commercial Technical Panel be transparent and technically defensible. City Light suggests that all requests for additional transmission capacity that cannot be granted without study should follow the same process and proportionally share in costs and deposits.

Closeout Annual Forecast Cycle

City Light believes that queue time should be based on when a transmission customer makes a request for additional transmission regardless of the type of transmission service. For BPA NITS customers that time should be when BPA generates a Forecasted Network Resource TSR (FTSR) for the NITS customer.

City Light additionally supports the BPA practice that failure to execute an offered study agreement will result in the associated FTSR being canceled.

Grid Modeling Processes

City Light suggests that BPA consider that an improved process for evaluating the likeliness of new loads would allow for those loads to be included in the Planning Base Cases with a high degree of confidence.

Reliability Study Processes

City Light recognizes that the traditional way to model and study transmission requests is by using an identified resource serving an identified load. City Light suggests that requiring that "Loads must be supported by resources" i.e. requiring a data request with an identified resource and load for a POR-POD (Point of Receipt – Point of Delivery) combination is severely limiting customer options to support transmission expansion in a timely manner.

City Light recommends BPA evaluate allowing customers to identify a generic "Not Yet Developed Resource" from a BPA generated limited list of BPA commercial scheduling points / buses to use for load service in transmission service requests. The existing BPA research building heatmaps of resource development could be used as a starting point for generating such a list.

Line & Load Interconnection Study Process

City Light recommends BPA evaluate ways to increase the transparency and reduce the gray area concerning when a Line & Load Interconnection Request must occur. Treating a customer that has a 15% load increase forecasted to occur all in year four of a ten-year forecast period differently than customer who experiences a 15% load increase evenly over the same ten-year forecast period appears inequitable from a high level.

Core Questions

What should BPA consider as it re-examines and formalizes guidelines for NITS forecasts focusing on the nature of load growth (e.g. new Network Load, load growth, etc.)?

City Light suggest the following for BPA consideration regarding NITS forecasts.

- Considering the 12-15 years necessary for transmission expansion projects, BPA should study implementing a 20-year NITS forecast.

- Implement a process for NITS customers to guarantee how likely a load is through either meeting site control and commercial viability criteria or through financial deposits.

What determines a NITS Customer's queue time for Federal Columbia River Power System forecasts in various scenarios (i.e., inception v. upon receipt)?

- City Light believes that queue time should be based on when a transmission customer makes a request for additional transmission regardless of the type of transmission service. For BPA NITS customers that time should be when BPA generates a FTSR for the NITS customer. A NITS updated LaRC (Load and Resource Consolidated) customer-specific forecast workbook received by BPA must be evaluated and accepted prior to BPA ascertaining the exact details of the NITS transmission request. In view of this necessary evaluation, the receipt of the LaRC does not appear appropriate for the date/time stamp for the queue.

Should there be a policy difference in planning treatment of NITS load increases depending on circumstances? If so, what defines those scenarios.

- City Light recommends BPA implements policies that allow for customer differences while minimizing inequitable impacts.
- Consider this scenario: Customer "A" has a large likely load growth in year four of their updated NITS forecast that exceeds their current point of delivery capacity limit. Customer "B" has slower, but consistent load growth and will exceed their current point of delivery capacity in year 10 of their updated NITS forecast. BPA should require both customers to complete Line and Load Study Requests. However, the Line and Load Study Request business practices should differentiate between slow growth identified to reach a limit in year 9 or ten of the NITS forecast and a near term year of rapid increase in load. The business practice could offer extended timelines for customer "B" to execute the Line and Load Study Request agreement to reduce its near-term burden.

What is the NITS business model for obtaining service in various scenarios if a transmission project(s) is(are) required? (i.e., who pays for what under various circumstances?)

- City Light suggests that once a TSR is created, regardless of the type of transmission service requested, the business model for obtaining service should be the same for all customers and follow cost causation principles.

Sincerely,

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