

COMMENTS OF THE WESTERN PUBLIC AGENCIES GROUP REGARDING PLANNING FOR NITS LOADS AND RESOURCES

Submitted: April 26, 2024

The twenty-five utilities that comprise the Western Public Agencies Group (“WPAG”)¹ are each Network Integration Transmission Service (“NT”) customers of the Bonneville Power Administration (“BPA”). A working and workable NT service is essential for our utilities to be able to deliver power to the consumers and communities we serve. We are deeply concerned with BPA’s announcement in its March 20, 2024 and April 15, 2024 NT related workshops that it has a dwindling ability to award additional long-term firm NT transmission service to meet the projected load growth of its NT customers, even such load growth that was previously communicated to BPA ‘early and often’ in the ten-year load forecasts we have submitted to BPA over the years.

Congress created BPA and authorized BPA to construct the FCRTS in large part to help communities like the ones served by WPAG’s members. For instance, the Bonneville Project Act authorizes and directs Bonneville to (i) give preference and priority to public bodies and cooperatives in the sale of electric power;² and (ii) “provide, construct, operate, maintain, and improve” the FCRTS to give such preference and priority **and** “to encourage the widest possible diversified use of electric energy.”³ These statutory directives are as relevant today as they were nearly ninety years ago when they were first enacted by Congress. With respect to transmission, and since the 1990s, BPA has largely met them through its Open Access Transmission Tariff (“OATT”). Unfortunately, it now appears that it may not be able to do so going forward. This is an extraordinarily alarming development that has the potential for long-term, deep impacts throughout the region, including potentially significant economic, reliability, and environmental implications.

For the above reasons, WPAG joins and supports the comments submitted separately by the NT Customer Group and, specifically, the NT Customer Group’s proposal that the following be added to BPA’s stated objectives for future discussions on how it will plan for NT loads and resources:

1. Enhance NT load service through NT customer and agency support of BPA’s NT planning obligation.

¹ The utilities comprising WPAG include Benton Rural Electric Association, Eugene Water and Electric Board, Umatilla Electric Cooperative, the Cities of Port Angeles, Ellensburg and Milton, Washington, the Towns of Eatonville and Steilacoom, Washington, Elmhurst Mutual Power and Light Company, Lakeview Light & Power, Ohop Mutual Light Company, Parkland Light and Water Company, Peninsula Light Company, Central Lincoln People’s Utility District, Public Utility Districts No. 1 of Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Kittitas, Lewis, Mason and Skamania Counties, Washington, Public Utility District No. 3 of Mason County, Washington and Public Utility District No. 2 of Pacific County, Washington.

² 16 U.S.C. § 832c(a).

³ 16 U.S.C. § 832a(b).

2. Expedite both the inclusion of NT customer load growth into BPA reliability studies and the construction of new facilities or facility upgrades to the transmission system to place into service transfer capability sufficient to deliver the output of the Network Resources of BPA's NT customers to their respective Network Loads.
3. Support reliable NT load service and regional economic growth.

WPAG also respectfully requests that BPA address the questions submitted by individual customers in follow-up to the March 20th and April 15th workshops. In addition to those questions, we further request that BPA address the additional question of how a new Point of Delivery ("POD") that replaces an existing POD would be treated under BPA's proposal that new PODs would have a queue time associated with the submission of a load forecast update rather than a queue time associated with the much earlier execution of the subject NT customer's original NITS Agreement with BPA. For example, some WPAG members (most of whom executed their original NITS Agreement with BPA in or about the late 1990s or early 2000s) receive service at a POD where the substation at the POD is either reaching the end of its useful service life (e.g., a POD at a Utility Delivery Segment substation owned by BPA or at an ancient non-Delivery Segment substation owned by either BPA and/or the customer) and/or cannot accommodate additional load. If BPA determines that it needs to replace such a substation to continue to provide reliable service to the customer, thereby potentially creating a new POD for the customer, is it BPA's proposal that the customer's new POD would be put at the end of BPA's transmission queue rather than placed in the queue based on the date of the customer's original NITS Agreement with BPA? Does the answer depend on whether the utility is forecasting some increment of load growth that would also be served using the new POD? Would placing such a customer at the end of the queue be a reasonable or legally sustainable outcome (both under BPA's OATT and under BPA's statutes) given BPA's legal obligations to, and long-term relationship with, that customer? Would the answer be different if the customer was designated as a "Native Load Customer" rather than as a "Network Customer" under BPA's OATT? We look forward to addressing these questions with BPA and other NT customers, as well as the questions submitted by other NT customers, in future workshops.

Thank you for the opportunity to comment.