4/30/2024

In response to the Planning for NITS Loads & Resources Workshops on March 20th and April 15th, EWEB submits the following comments:

EWEB is appreciative of the comprehensive review of BPA policy and processes around NITS forecasting, planning, and analysis that are intended to meet NT customers' service needs. These processes impact BPA's transmission expansion decisions and its ability to award firm transmission service. Moving towards a common understanding of current practices is essential for reviewing the status of NT service and meeting the challenges and opportunities that lie ahead.

BPA's system is constrained, and the agency does not appear to be able to meet NT service obligations.

Our primary takeaway and concern from the workshops is that BPA's transmission system is constrained to the point that BPA may not be able to award additional LTF NT service. Rather than address this problem directly, BPA is recommending a solution to differentiate between network loads that does not appear to be an effective or efficient remedy. EWEB believes that BPA and customers need to take a step back to address the underlying issues rather than jump to solutions that may have unintended consequences and/or be contrary to BPA's obligations as a transmission service provider.

NT customers serving load in the BPA Balancing Authority have been the consistent and reliable backbone of the BPA transmission system. We will continue to be reliable payers of BPA's transmission infrastructure regardless of market developments, or changes to commercial loads or generation technologies in the future. We would like to ensure that BPA understands and prioritizes NT product and service requirements.

BPA needs a clear strategy and roadmap to meet NT planning obligations.

BPA and customers need to establish clear objectives and principles by which we can evaluate proposed NT policy changes. These principles will help ensure that the policies we enact achieve the outcomes we desire. Additionally, these principles need to flow through planning, encumbrance, and system builds to ensure that BPA meets customer needs now and into the future. Ultimately, we do not want a 'short-term' fix that distinguishes between types of NT growth (even if this might be needed at some level), but rather a foundational shift that ensures NT service needs are properly prioritized and BPA's project execution aligns with these.

BPA should include benchmarking and alignment with OATT provisions in its analysis and decision-making.

The challenges that BPA is currently encountering are not unique, nor do they exist in a vacuum. Before we move towards identifying solutions, we need to understand how other entities have tackled similar problems, and how these options fit within BPA's obligations under the OATT. EWEB expects that BPA will conduct benchmarking studies to understand best practices, as well as map existing business practices to both the pro-forma OATT and BPA's own OATT. We would like to understand BPA's timeline and approach for conducting these analyses.

BPA needs to devote sufficient time and executive support to the NITS policy process.

The outcome of this NITS process will impact BPA and NT customers' relationship for years to come. Because of this, we need to be sure that any decisions are thoroughly vetted and well informed. To achieve this goal, we believe more time is necessary and suggest expanding the meeting schedule to allow for discussion and collaboration. We also encourage BPA staff to bring executives into the conversation to engage directly with NT customers on the large number of questions and comments that are being submitted. Our initial questions include:

- How and why BPA differentiates between federal and non-federal generating resources and how are they each modeled?
- How does BPA prioritize its reliability builds compared to other capital builds? What is the process for approval and how is reliability valued?
- How and why does BPA differentiate queue time according to new POD? What other options have been discussed internally?