

NLSL Group Comments on BPA’s August 17, 2026 WRAP Load Exclusion Workshop

The NLSL Group¹ includes discrete large loads that are expected to result in a significant portion of BPA’s Total Retail Load over the next decade. The NLSL Group is focused on resolving policy issues and developing plans for load service in a rapidly evolving regional landscape. The NLSL Group appreciates the effort that resulted in the discussion of BPA’s Staff Recommendation on WRAP Load Exclusion at the August 17th WRAP workshop.

NLSL Group Interests in WRAP Load Exclusion

The NLSL Group is comprised of members with current discrete large loads and also represents the potential for load growth of several GWs within the next decade that is mostly, but not exclusively, data center load. Consistent with the policy goals of the US Department of Energy, members of the NLSL Group are interested in pathways to achieve “speed to power” while ensuring that other BPA customers are shielded from costs incurred by these large loads.

The NLSL Group has submitted comments in BPA stakeholder processes as well as several informal conversations with BPA staff regarding clarity on WRAP Load Exclusions, and we are pleased that BPA has engaged stakeholders on this question.

BPA Staff Position

At the August 17th WRAP Load Exclusion workshop, BPA announced the staff position that *“BPA should not plan to grant any requests for load exclusions during both current (RD) and future (POC) contract periods”*.

BPA also shared that the following drivers were used to reach this position:

- Customers’ Request For Certainty
- Reliability Assurance – prevents “RA Islands”
- Fosters the creation of new sustainable solutions
- Market preparedness

¹ The NLSL Group is comprised of BPA preference customers who serve or expect to serve retail members and customers that the Northwest Power Act categorizes as “New Large Single Loads” (NLSLs). Member utilities include: Northern Wasco County PUD, Grant PUD, Clatskanie PUD, Harney Electric Cooperative, Klickitat PUD, Snohomish PUD, and Eugene Water and Electric Board.

- Status Quo - Does not compromise in-flight agency efforts

NLSL Group Comments

General Comments

The NLSL Group conceptually supports BPA staff's commitment to exploring concepts that will reduce the net cost to customers for meeting WRAP requirements. For large loads, particularly with on-site backup generation and/or the ability to reduce demand, we see opportunities for true "win-win" solutions that could provide the grid with access to flexible capacity and energy during critically constrained periods while lowering costs and increasing reliability for all customers.

Customers' Request For Certainty

The NLSL Group is concerned that a final decision on Load Exclusion by September 2026 leaves insufficient time for resource acquisition or market purchases from specified resources by the time the WRAP binding season commences in 2027. Anecdotal evidence suggests that there is a limited market for WRAP qualifying products for Load Responsible Entities (LREs) to secure in time for the first WRAP binding season.

In addition, the processes by which LREs could procure BPA transmission service that meets WRAP requirements needs further development. This issue has both timing and process components. Notably, most 7-FN options are difficult and time consuming to secure while several NERC priority 6 products cannot be reserved with enough lead time for the Forward Showing deadlines. This potentially leaves the FTSR process for NITS customers; however, provisions do not currently exist to secure additional capacity for WRAP Planning Reserve Margins through this process.

Absent the ability to acquire WRAP qualified capacity and transmission service, it is the NLSL Group's understanding that the Resource Adequacy Service (RAS) provided by BPA will be the mechanism used for WRAP compliance during the current rate period. Does BPA have an estimate on the quantity of RAS that they expect to supply when the WRAP binding season begins and whether this amount is expected to come from Federal Resources?

After the current rate period, however, it is unclear whether BPA will continue to offer RAS or develop some other mechanism for meeting load and recovering costs associated with loads that do not have sufficient qualified capacity for WRAP compliance. The NLSL Group would like BPA to explain to customers their plan for subsequent rate periods before making a final decision on WRAP load exclusion.

While the NLSL Group concurs that certainty in load exclusion is desired, the preferred approach would be to grant load exclusions until at least BP-29 which will give time for BPA to get a plan for how these loads will be met, how costs will be allocated, and to provide BPA customers with additional time to acquire specified resources for WRAP compliance.

Reliability Assurance

The NLSL Group believes whole-heartedly that reliability is a critical driver to this decision, but believes that the staff position falls short for two reasons:

1. While this position eliminates the ability for a Load Following customer to create an “RA Island”, Planned Products customers are still able to exclude loads which could result in these loads being an unexpected obligation to BPA and could lead to other WRAP participating LREs subsidizing their risk and costs. If this occurs, it is unclear how BPA intends to meet these loads and recover any associated costs.
2. In low water/high load conditions, the staff proposal could result in a significant additional energy obligation for BPA that could exhaust any flexibility of Federal resources and increase the risk of an Energy Emergency Alert (EEA) declaration. The NLSL Group encourages BPA to look closely at varying amounts of loads that are not supplied by resources that are WRAP compliant at low water/high load conditions (such as January 2024 or the 2001 water year) and evaluate how the staff position would have played out with the WRAP operational program in place. BPA should also evaluate whether the application of RAS in these low water/high load conditions allows for equitable cost recovery and share these evaluations with stakeholders.

Creation of New Sustainable Solutions

The NLSL Group is encouraged by BPA's willingness to develop new sustainable solutions for serving large loads while shielding existing customers from the costs of serving these large loads. However, little information has been provided on what BPA has in mind regarding these new solutions. The NLSL Group believes that BPA should ensure the following before embarking on the development of these new solutions:

1. Collaborative approach to solution development which will be available to all customers rather than tailored for individual customers
2. A cross-agency approach to large load integration that, in addition to WRAP treatment, includes transmission products, power rate products, impacts to short-term load forecasting, approaches for participation in organized markets, and operational requirements for visibility and dispatch.
3. Evaluation and accreditation for options like demand response and on-site generation to create alternate paths for WRAP compliance.
4. Evaluation of other utilities' and grid operators' approaches to large load integration, review of FERC, EPRI and DOE direction on this topic, and adopt any emerging best practices.
5. Open-mindedness to new products and services (hybrid load following/planned products, opportunities for product switching, for example)

While solutions must ultimately be transparent and accessible to all customers, we recognize and support the need for individual customer engagement as part of the deliberative process. Many end use customers with large loads have legitimate commercial sensitivities around operational parameters that must be considered so as not to limit creativity in developing solutions.

Alternatives to the BPA Staff Recommendation

It is not clear from the presentation materials whether BPA evaluated any alternatives to the staff recommendation. The NLSL Group suggests that BPA consider an approach similar to SPP's Price Adaptive Loads (PALs) proposal or PJM's Interim Resource Adequacy Service (IRAS), which allows large loads to be excluded from a Resource Adequacy program on the condition that they would be the first curtailed in certain conditions (high prices, EEA-1, etc...). The NLSL Group believes that this approach better achieves the Reliability Assurance objective

than the BPA staff recommendation and reduces the risk of BPA being required to supply large amounts of RAS.

Market Preparedness and In-Flight Agency Efforts

Can BPA provide more information on how any alternatives to the Staff recommendation impacts these two drivers?

The NLSL Group again thanks BPA for this engagement and looks forward to further conversations on this topic.

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