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Submitted to BPAMarketInitiatives@bpa.gov

RE: UEC Comments in Response to BPA's August 17 Western Resource Adequacy Program (WRAP) Large Load Exclusion workshop

Umatilla Electric Cooperative (UEC) is a Load Following and Network Transmission customer of the Bonneville Power Administration (BPA) and serves a significant amount of New Large Single Load (NLSL) demand. By statute, NLSLs are not preference load. Accordingly, BPA's Load Following service applies only to non-NLSL load, while UEC remains responsible for securing and managing non-federal resources to serve its NLSLs. In this respect, service to NLSLs is more analogous to BPA's planned product customers, which must independently acquire resources to meet their load obligations.

On August 17, 2026, BPA staff proposed to not allow large load exclusion for NLSLs of Load Following customers. This was the first definitive position BPA has taken on the long-standing question of how Load Following customers' NLSLs will be treated under BPA's participation in WRAP. The question of treatment of Load Following customers' NLSLs has been posed repeatedly over the years with no decisions made by BPA.

Ongoing BPA Delays and Uncertainties

In addition to the prolonged uncertainty regarding large load exclusion, BPA customers face several unresolved issues that directly affect resource planning and WRAP compliance.

First, BPA has not determined which day-ahead market, if any, it will join or when that participation would begin. This uncertainty also raises questions regarding BPA's continued participation in WRAP.

Second, BPA has paused transmission planning and queue processing while evaluating potential changes to how it plans, funds, and constructs transmission infrastructure. As a result, utilities lack visibility into when new transmission capacity will become available. This is particularly significant because firm transmission is a prerequisite for WRAP compliance.

Third, BPA has delayed both transmission expansion projects and the interconnection of new generation resources, including battery energy storage projects. These delays directly hinder the development of resources that could contribute to WRAP compliance.

Finally, if BPA remains a WRAP participant, Load Following customers will be required to demonstrate Forward Showing compliance approximately one year before the applicable binding season. This shortens an already constrained timeline for securing qualifying resources.

Despite these significant uncertainties, one key milestone remains unchanged: implementation of BPA's new Provider of Choice contracts on October 1, 2028.

BPA Should Provide Resource Adequacy Service for Load Following Customers with NLSLs in BP-29

UEC requests that BPA commit to include in its BP-29 Initial Proposal a Resource Adequacy Service for NLSLs comparable to the service currently included in Section II.AC.2 of the BP-26 Power General Rate Schedule Provisions. Alternatively, BPA could commit to making an FPS or BPA trading floor product available to Load Following customers with NLSLs to satisfy WRAP compliance requirements.

Such a commitment would provide a reasonable transition period while BPA resolves outstanding policy and market issues, including transmission planning, transmission service availability, generation interconnection delays, day-ahead market participation, and the treatment of WRAP compliance under the Provider of Choice framework.

Longer-Term Potential Solutions

A commitment by BPA to provide a Resource Adequacy Service for Load Following customers with NLSLs in BP-29 would create the necessary transition period for BPA, customers, and WRAP stakeholders to collaboratively develop durable, long-term compliance solutions.

UEC supports the potential solutions proposed in the Public Power Council's comments, including:

- Accreditation for back up on-site generation as a resource through WRAP.
- Developing demand response policies that could exclude or reduce forward showing obligations related to serving that load.
- Eliminating or reducing the application of the program's Planning Reserve Margin (PRM) to flat or stable loads.
- Allowing limited waivers or temporary load exclusion for initial entry into the program as entities work to procure sufficient resources.

Risk of Cost Shifts from Planned Product Customers

BPA does not require planned product customers to participate in the WRAP, despite remaining the supplier of last resort for such customers within its Balancing Authority Area. This creates

the potential for costs and risks associated with resource adequacy obligations to be disproportionately borne by Load Following customers.

UEC requests that BPA evaluate the potential cost and risk shifts resulting from this policy distinction and, at a minimum, include a mechanism in the BP-29 Initial Proposal to mitigate any resulting inequities.

Conclusion

Given the significant uncertainties surrounding WRAP participation, day-ahead market decisions, transmission availability, and resource development timelines, BPA should provide a practical compliance pathway for Load Following customers with NLSLs during the initial Provider of Choice rate period. This would also improve equity between BPA's treatment of planned product customers and Load Following customers with NLSLs.

Thank you,

A handwritten signature in black ink, appearing to read "Megan Stratman", followed by a long horizontal line.

Megan Stratman
Manager of Power Supply

CC: Lindsay Bleifuss, Power Account Executive