Eugene Water & Electric Board
4200 Roosevelt Blvd.
Eugene, OR 97402-6520
541-685-7000
www.eweb.org

Eugene Water & Electric Board (EWEB) Comments on March 18-19 TC-27 Pre-Proceeding Workshop

Submitted April 10, 2025, via techforum@bpa.gov

EWEB applauds the time and effort BPA staff have dedicated to compile, examine, and narrow down a wide range of alternatives for getting off the transmission planning pause and developing an interim process for studying and responding to transmission service requests. It is clear that BPA reviewed stakeholder feedback and staff did a good job of illustrating how it's proposal lines up with stakeholder input. We support the objectives BPA outlined for the Transition on slide 6, which can be generally summarized as "Get off Pause", develop a feasible study to award an equitable interim product for those ready to take service, and stand-up a transition process until BPA implements and execute the Future State model.

BPA staff's proposal stimulated a lot of discussion and feedback. EWEB is a member of Public Power Council (PPC), Western Public Agencies Group (WPAG), and the NLSL Group and aligns with comments submitted by these groups. Additionally, we are offering comments on some specific topics.

Policy needs to be clear, comprehensible, easy to summarize, and efficient to implement.

Over the past two years of transmission planning policy reform discussions, stakeholders have at times received mixed messages, a natural consequence of evolving proposals, technical complexity, and the pace of the work. As we enter settlement, we strongly encourage BPA to prioritize internal alignment before engaging externally. Proposals should leave as little room for misinterpretation as possible, and implementation should be designed to be clearly understood by executives, technical staff, customers, and potential end-use customers alike.

We seek clarity and detail on what is being proposed in the Transition Business Model versus the Grid Access Transformation (GAT) Future State model.

In the workshop and presentation, the vision of the 'Transition' was described as something in between untenable (where we are now) and the Future State (where we are going). This is a reasonable target given the magnitude of requests and the complexity of the work, and it implies settling for something for a period of time until the broader vision is built out.

On slide 8 the TSR transition business model is described as, "The process under which BPA responds to eligible long-term firm PTP service requests and NT forecasts on BPA's network prior to implementation of Proactive Planning and future state commercial studies". However, it appears some elements of the proposal are intended to carry forward into the Future State rather than conclude at implementation. Slide 36 illustrates a Future State Cut-Off, yet it is not clear which elements of the Transition Business Model would no longer be employed, and which might carry beyond.

A good example is BPA staff's leaning on Load Maturity, specifically, EC-LM-ALT-2: Facilities Study required to be completed. If this is intended solely for the Transition, to establish a manageable study size and enable service to be offered to those ready to take it, it may be a reasonable interim approach between the current and Future State. If this approach is intended to carry into the Future State, it is neither practical nor reasonable. Requiring prospective customers to complete interconnection studies, a process that could take years, before they can even begin requesting transmission service is not a standard the industry should accept. If there is a path to settlement, it must include clarity and transparency as to which terms will be temporary as part of the Transition, and which are intended to be permanent in the Future State.

Clear proposals for Non-Trended Load Growth (NTLG) Threshold and Facility Check to determine a Large Load Facility (LLF) are essential to settling TC-27 and enabling BPA and customers to implement the policy efficiently and successfully.

We understand BPA staff are working on updating the NITS Business Practice to define what constitutes NTLG. We encourage BPA staff to provide draft language to stakeholders so they can clearly understand which facilities would be planned for in System Assessment and which would be planned for in Commercial Studies.

In the Dec 17-19, 2025/Jan 6-7, 2026, workshops, BPA presented indicative criteria for a Facility Check to identify if a facility will be a LLF (slide 15). This summary is general and leaves room for BPA discretion, creating uncertainty and questions for customers around what BPA is trying to define.

Between May 2025 and January 2026, BPA and customers discussed BPA's proposed 13 MW NTLG threshold extensively and there have been various interpretations of how 13 MW would be measured. BPA staff evolved the concept from 13 MW growth in a 12-month period, to 13 MW growth over the 10-year LaRC forecast which raises questions about what problem is BPA trying to solve? EWEB's original understanding was BPA was concerned with a large amount of load showing up in a short period of time. As a Transition concept, we can see how applying a NTLG threshold might be a reasonable way to address a large facility seeking near-term service.

In the January 15, 2026 workshop, BPA presented NTLG threshold as any 13 MW or more LaRC forecast increase annually attributed to a single facility. A new facility without a previous forecast would have a baseline of 0 MW in each of the ten years in the baseline LaRC forecast. A facility could add 12 MW in year 1of the updated forecast and it would be viewed as 'trended' and be planned for in System Assessment, assuming it would be served by the FCRPS. However, if the facility planned to add 12 MW in year 1, then 1 MW in year 10, it would be designated as NTLG because year 10 would have 13 MW compared to a baseline of 0 MW. It is not clear how this second scenario of adding 13 MW over the 10-year LaRC forecast is exacerbating the problem, nor how requiring commercial planning for incremental growth up to 13 MW over ten years provides a reasonable solution. In the example provided, 1 MW added in 10 years could tip the scales significantly regarding time and expense in how the load would be planned for. BPA's proposed solution would effectively establish a process that might be appropriate for identifying planning necessary for new large data center or manufacturing loads, but it could discourage economic development, or at a minimum create a lot of confusion for existing or new businesses that might seek or experience a growth trajectory that approaches the NTLG threshold.

Given the complexities and confusion around the 13 MW threshold, we encourage BPA staff to consider how this policy will be implemented. Under the proposed construct, a facility could be

defined as a NTLG LLF and not have metering visible to BPA, and in fact could have multiple revenue meters, which may not even be aggregated into a single load measurement. How does BPA propose to monitor and evaluate the facility under these circumstances?

EWEB requests that BPA staff consider revising the NTLG threshold so that it is easier to understand, implement, and monitor. We propose defining NTLG by either of two tests, (1) 13 MW added at a facility over a 12-month period, or (2) adding 20 MW of incremental load at a facility over the ten years of the LaRC forecast. The first test aligns with how BPA staff initially presented the concept and would guarantee metering would be in place where BPA would have visibility because the load would be a NLSL. Alternatively, the second test aligns with the size threshold that appears to be an emerging industry standard, though perhaps more conservative in the application across a 10-year forecast. Both tests would be much easier to explain to a new or growing retail customer than BPA's current proposal, and this solution would more appropriately identify near-term new and growing loads that might be more challenging to plan for, meanwhile establishing a logical cap that may be acceptable across the range of BPA stakeholders.

We appreciate BPA staff's dedication and public engagement.

BPA staff have significantly improved the public process leading up to and applied at the TC-27 Pre-Proceeding workshops. The shift over the last year from listening-only to active dialogue and response to input has been noticeable and is greatly valued. It is clear that staff have put in a lot of effort into the work. Continued engagement with stakeholders, with the next step being careful consideration of comments by submitted by EWEB and our trade organizations, will help staff establish policy and business practices that are logical, effective, and efficient.