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Bonneville Power Administration

Submitted electronically via techforum@bpa.gov

RE: TC-27 Pre-Proceeding Workshop Comments

The opportunity to comment on BPA's March 2026 TC-27 pre-proceeding workshop is appreciated. Mason PUD 3 is a non-profit, locally governed utility at the base of the Olympic Peninsula that provides electric service to approximately 35,000 customers. As a preference customer, we have a priority right to purchase wholesale power from Bonneville at cost. Doing so supports our mission to connect our community with safe, reliable, economical, and sustainable services, 24/7.

First, I want to express our gratitude for all of the hard work that has and is being done by BPA staff on this important topic. Next, I want to provide strong support for the public comments submitted by Northwest Requirements Utilities (NRU) and Western Public Agencies Group (WPAG). Finally, I wanted to take time to highlight just a few of the issues.

Processing NITS LaRCs

BPA has a statutory obligation to plan for Network Integration Transmission Service (NITS) customers' existing and future load but yet BPA decided to 'pause' all transmission planning as of August 15, 2024. For us, this means the last forecast BPA has accepted was in 2023, this is because the 2025 cycle was not even due until after the cut-off date. So, two years of forecasts have not gone through transmission planning. Clearly, it is just not acceptable to continue in this manner and BPA should make great effort to get off of pause.

It was stated BPA would start processing NITS customer LaRCs once the related business practice is updated but that it would likely be in July – just one month before the next cycle of forecasts would start. It is our position that this is too late in the scheme of things. At the very least, a draft business practice should be shared as soon as possible with the public process starting soon after. That way NITS customers have a deeper understanding of BPA's intent.

NITS Large Load Facility Threshold

Mason 3 is not supportive of BPA's leaning to maintain the 13 MW 10-year cumulative threshold. Using this threshold means it will inevitably impact large commercial customers that just so happen to steadily ramp up their load over a longer time period. During this process BPA staff repeatedly stated the intent was not to impact small and large commercial customers but yet the leaning being proposed will have that effect.

There are a number of different ways to approach the issue; I will provide three from most to least favored:

1. Abandon the line

BPA is obligated to plan for and provide NITS transmission service. To put it simply, just do it. Continue to use existing processes to the extent possible. If a request is not workable given the capacity available using the existing process, then flag it and kick it into another process. In these cases, consider applying a PARS-esque (Portland Area Reinforcement) type of model.

2. Change to 20 MW

NRU provided a strong argument for shifting from a 13 MW threshold to 20. Mason 3 supports this approach.

3. Use a hybrid approach

Use a combination whereby the threshold is determined exceeded when either the year-to-year change within a new LaRC forecast exceeds 13 MW **or**, when comparing the new LaRC forecast to the prior year's LaRC forecast, the cumulative growth in a specific year exceeds 20 MW.

We are supportive of the BPA staff leaning to implement the threshold on a per-facility basis rather than POD basis and to reset the threshold once identified transmission upgrades are completed. BPA's movement on these two issues is appreciated.

Financial Security for NITS Customers

The amount of security and length of time it would be held is not reasonable or workable. NRU and WPAG made excellent points on this issue and we strongly support both.

Thank you for your consideration of these comments.

Sincerely,

Annette Creekpaum

Annette Creekpaum (Apr 9, 2026 10:25:56 PDT)

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CEO

[AC/mp]