

NLSL Group Comments on BPA’s TC-27 March 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 significant effort that resulted in the development BPA’s presentation at the recent TC-27 workshops and offers these comments regarding the development and implementation of the Non-Trended Load Growth (NTLG) Policy.

NTLG Threshold

While some members are okay with the proposed 13 MW NTLG threshold, the NLSL Group concurs with the points made by NRU regarding the preferability of a 20 MW threshold and believe that the 13 MW threshold is an unnecessary link to the NLSL Policy. The NLSL Group would like BPA reconsider the threshold or share analysis that demonstrates any reliability risk of moving the NTLG threshold to 20 MW and whether a 20 MW threshold would prevent “getting off pause”.

Fees for NITS Conditional Firm Service

BPA proposes to impose a non-refundable \$50,000 per TSR fee plus a \$1,000 per MW fee. The NLSL Group believes that any fees that are established should be intended to recover costs that are incurred to grant conditional firm service and that BPA should be transparent in how these fees are spent to ensure that customers are not overcharged.

Comparability

The NLSL Group agrees with NRU’s concerns about comparability of interim service rights and benefits between NITS and PTP customers. The NLSL Group would like BPA to address this concern or demonstrate that the proposed interim service options for NITS customers are comparable to those available to PTP customers.

NTLG Policy

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, and Eugene Water and Electric Board.

The NLSL Group has previously commented on the need for BPA clearly document the NTLG policy, which, to date, has only been described verbally and in presentation materials. BPA indicated in the workshop that they intend to provide this documentation in the forthcoming Business Practice. While the NLSL Group appreciates this commitment, it is important to note that the NTLG policy is a significant change in how BPA will implement their obligation to plan for NT load growth. As such, the NLSL Group believes that the narrative will need to offer clear and compelling rationale for why this policy change is necessary. In addition, it is important to clarify that there is no linkage between the NTLG policy and the NLSL policy. Finally, the NLSL Group supports NRU's suggestion that BPA clarify how the proposed TC-27 framework aligns with the agency's statutory and tariff obligations to NITS customers as described in the Provider of Choice Policy

Behind-the-Meter Generation

The NLSL Group has attempted to engage BPA on behind-the-meter generation and demand response in several stakeholder processes (BP-26, Provider of Choice, WRAP, TC-27) and each time we are told it is out of scope. Given DOE principles related to large load flexibility and the "Ratepayer Protection Pledge" initiative, the NLSL Group encourages BPA to engage customers with behind-the-meter generation and/or flexible load in order to develop methods for enabling large load flexibility that will reduce customer costs and improve reliability.

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