



3628 South 35th Street

Tacoma, Washington 98409-3192

TACOMA PUBLIC UTILITIES

Sept 25, 2026

BONNEVILLE POWER ADMINISTRATION
PO BOX 14428
PORTLAND OR 97293-4428

Re: Comments regarding BP-26 Settlement Workshop on August 31, 2026

Tacoma Power appreciates the workshop on August 31 to discuss behind the meter (BTM) and the short distance discount (SDD) for transmission on the Network segment. BPA states on slide 22 of the presentation that it has a planning obligation for all load behind a NITS Point of Delivery. Tacoma seeks clarity on how BPA would treat behind the meter NITS load if the NITS customer were in a separate Balancing Authority Area (BAA). Tacoma Power asserts that reliability and planning concerns are negated if the NITS customer was within its own BAA. The BAA, not BPA, would be responsible for rebalancing its system if a BTM resource were to fail. There would be no impact on the reliability of BPA's Network. Tacoma Power requests that BPA provide clarity and develop a policy for NITS BTM that is within a customer's BAA and therefore not the responsibility for BPA to include in planning or reserve resources to maintain.

Thank you for your consideration.

Sincerely,

/s/ Leslie Almond

Leslie Almond
Tacoma Power
Manager, Power Utility

Cc: Melanie Jackson, BPA