

The preliminary draft language in this document is being shared to facilitate discussion and informal feedback from participants in Grid Access Transformation (GAT) working sessions on July 29 and 30. BPA is still evaluating whether or not this language is appropriate to implement through revisions to existing business practices or in other processes, such as a tariff proceeding. If BPA proceeds with proposing any revisions to its business practices, BPA will follow the requirements of [Bonneville's Business Practice Process](#). Additionally, if BPA determines it is necessary to implement any proposals through a tariff proceeding, or alternative process, BPA will communicate this to participants in the GAT process no later than September 2025.

Network Integration Transmission Service (NITS) New Network Load

1. A forecast for a new resource is subject to a Needs Assessment review.
2. A forecast increase for a non-federal resource that has been previously encumbered as indicated by a CONFIRMED FTSR is subject to further evaluation and may require participation in a study if the forecast indicates an increase of 13 MW or more above the previously submitted LaRC forecast for that same year (e.g. the previous in cycle LaRC forecast for 2030 is compared to the latest forecast for 2030). Only the increased portion is subject to further evaluation.
3. Results of the evaluation of a NITS Customer's LaRC will be provided to the NITS Customer and will include the following as necessary:
 - a. Identification of the NITS Customer's need to submit a Line/Load Interconnection Request. If an LLIR is required, the load cannot be served until studies and any identified plan of service is complete.
 - b. Load growth not identified as New Network Load will be identified and an encumbrance granted.
 - i. Depending on how the load is served, a new or modified FTSR may be created. The AREF for all FTSRs will be identified.
 - ii. Any restrictions for designating against the FTSR will be identified.
 - iii. FTSRs replaced as part of the LaRC process will be identified.
 - c. Load growth identified as New Network Load will be identified.
 - i. If a long-term firm transmission encumbrance for the New Network Load cannot be offered, the reason and options will be provided.
4. Sections 5-9 clarifies what BPA considers to be New Network Load or a "material change" in information relating to a NITS Customer's Network Load.

5. New Network Load is any load added to an existing NITS customer's system as the result of:
 - a. Annexation,
 - b. Condemnation,
 - c. Merger,
 - d. Conversion of Point-to-Point (PTP) Service Agreement to NITS Agreement,
 - e. Request by a Network customer to designate a particular load at discrete points of delivery as Network Load, when the Network Customer had previously elected not to designate that load as Network Load, or
 - f. Forecasted load growth that meets the criteria for New Network Load as defined in Section 6.
6. Forecasted load growth may qualify as New Network Load. The distinction between trended and non-trended load growth identifies the portion of a NITS Customer's forecasted transmission needs further evaluation and may require participation in a study. The determination of New Network Load is based on the NITS Customer's submitted LaRC and the following criteria:
 - a. A Point of Delivery is identified as serving New Network Load when a load forecast for the Point of Delivery indicates an increase of 13 MW or more above the previously submitted LaRC forecast for that same year (e.g. the previous annual LaRP for 2030 is compared to the latest LaRC for 2030).
 - b. The total amount of the current-load forecast increase is considered New Network Load.
 - i. Generally, load growth served by a Point of Delivery identified as serving New Network Load is deemed to be New Network Load. However, at BPA's discretion, a portion of the load at a Point of Delivery may be excluded from being identified as New Network Load. Factors considered by BPA may include the types of load served by the Point of Delivery, available metering, and any material change to the load or types of loads served.
 - c. Point of Delivery refers to the NITS Customer's Point of Delivery as identified in their NITSA Exhibit A and forecasted in the OATT Load Information sheet in the LaRC. It also applies to a new Point of Delivery (Newpoint).
 - d. The determination of New Network Load for a Point of Delivery is independent of Line and Load Interconnection requirements. Network Customers should consult with their BPA Account Executive and Customer Service Engineer when planning for load growth.
 - e. Section 6 does not apply to previously granted encumbrances of long-term firm transmission.

7. New Network Load needs further evaluation and may require participation in a study to determine the availability of long-term firm transmission capability from designated and forecasted Network Resources to serve the Network Load.
 - a. For a long-term firm transmission encumbrance including NITS enhanced priority 6 service, the NITS Customer must demonstrate sufficient resources to serve the New Network Load.
 - b. BPA cannot evaluate long-term firm transmission needs without a valid line/load interconnection plan of service - result of a Line & Load Interconnection Facilities Study (LLIFS).
8. Should a plan(s) of service be required as identified in a study or a LLIFS, long-term firm transmission service to serve the New Network Load will not be confirmed until the required upgrades are energized.
9. The queue time for evaluating New Network Load is the date and time BPA receives the email containing the LaRC.
10. Creation of FTSR for encumbrances and study participation
 - a. New Network Load
 - i. BPA will create an FTSR in STUDY status for each New Network Load forecast to indicate queue position.
 - b. Load Growth
 - i. Non-federal Resource: BPA will create a CONFIRMED FTSR for each accepted non-federal Network Resource forecast to encumber capacity.
 - ii. Federal Resource: BPA will inform the Customer of the accepted forecast amount. The NITS Customer's existing TSR with a Source of FCRPS noted in their contract will serve as their encumbrance.

Network Integration Transmission Service (NITS) Line & Load Requirements

1. NITS Customers must submit a Line & Load Interconnection Request (LLIR) for the following:
 - a. For any new or modified Point of Interconnection (POI) and/or Point of Delivery (POD) to BPA.
 - b. For any addition of 20 MW or more at an existing POD. MW amount is total peak for the request.
 - c. For any New Network Load at an existing POD. See Network Integration Transmission Service Business Practice Section D.
 - d. For any load increases or load transfers that are not New Network Load at an existing POD if BPA determines a submission is required.
 - e. A new point of convenience connection to BPA.

2. If the NITS Customer intends to link its LLIR with a Transmission Service Request for NITS Transmission Service it must state in the Customer Comment field of the TSR that the request is linked to an LLIR.
3. The table below is a summary for when LLIRs are required and the cost responsibility.

Circumstance	LLIR	Application Tx Services (including Deposit) & Tx Queue Postings Required	Study Cost Responsibility	Advanced Funding of Network Facilities
PTP Merchant Line	Yes	Yes	Customer	Customer
New Network Load	Yes	Yes	Customer	BPA / Customer ¹
New NITS Customer Conversion	No	Yes	N/A	Customer
Load Growth for NITS Service	No ²	No	BPA ³	BPA Transmission Services ² /Customer
Convenience Point of Interconnection	Yes	Yes, when applicable	Customer	Customer
¹ BPA may require the Customer to advance fund all or a portion of BPA Network Upgrades if the upgrade is significant and driven by New Network Load over and above the utility's general load growth. BPA will discuss with the customer the nature of the load needs driving the upgrade and the associated level of risk, including factors such as the size of the load, load diversity, and the project cost estimate prior to making a determination of the Customer's advance funding obligation.				
² BPA may identify the need for an LLIR				
³ Significant scenario analysis and studies requested by the Customer will be done at the Customer's expenses.				

FTSR/TSR Data Validation Readiness Criteria

1. A Completed Application for an Original/Redirect PTP or for an Original NT TSR or FTSR includes:
 - a. A valid TSR or FTSR on OASIS.
 - b. Required deposits and Non-Refundable Processing Fees paid and received in the timeframe specified.
 - c. A valid Data Exhibit.
 - d. Supplemental information is submitted by the specified due date, if required.
2. These FTSR/TSR validation criteria will be applied to FTSRs and TSRs on BPA's network that are not yet studied and have not yet signed agreements to support transmission projects. Requirements for a valid Data Exhibit for PTP and NT service:
 - a. The plan of service for any Source generation or new load that does not currently exist must be defined and moving forward
 - i. For generation interconnections in Northwest as defined in WECC powerflow cases (Area 40), whether the required facilities are new or involve expansion of existing facilities, BPA (or the appropriate entity) must have completed Phase 2 of the generation interconnection study, and, assuming customer contract execution is required, contract has been fully executed.
 - ii. For line/load interconnections in BPA's balancing authority area, if the required facilities are new or involve expansion of existing facilities, and assuming customer contract execution is required, contract has been fully executed.
 - b. In addition, for bilateral transactions the Customer must provide evidence of transaction maturity. Acceptable evidence includes any one of the following:
 - iii. Power Purchase Agreement
 - iv. Letter of intent signed by both parties*
 - v. Notice of award from a Request for Proposal *
 - vi. Security. If Requestor would like to supply security in lieu of demonstration of bilateral transaction agreement, refer to TSEP BP for security.
 1. Security is required by COB same day of the FTSR or TSR submittal.
 2. If customer does not execute the interim service agreement (or firm service agreement if offered instead of interim service) when tendered, BPA will draw on the security.

3. If customer utilizes security to meet data exhibit validation requirements that security can be used to meet financial requirements for offer of PTP Interim CFS or long-term NITS enhanced priority 6 service or firm service.
 4. Release of security will be as defined for securitization for an executed contract.
 - vii. (Suggestions for other evidence that the two parties have agreed to the particular transaction that requires the requested transmission path?)
- *Offer of transmission may be contingent on final execution with X period of time.
- c. For bilateral PTP TSRs for which the POD is an NT-only POD, the receiving party must agree that they are contemplating designating the PTP service to serve a portion of their load.
 - d. For FTSRs/TSRs with a POR or POD of NWHUB (Note – We are proposing to remove MIDCRemote from the LT market and retain it in the short-term market).
 - i. The available product is Conditional Firm Service or parallel NITS service.
 - ii. The contract will be structured based on interim service (Interim CFS or long-term NITS enhanced priority 6).
 - iii. Relevant Generator or line/load maturity requirements must be met. This includes relevant sub-grid or third-party transmission provider requirements.
 - iv. Start date must be within 180 calendar days of FTSR/TSR submittal (or for FTSR/TSRs with a start date in the past, within 180 days of BPA initiating the contract action).
 - v. Extensions for Commencement of Service are not available.
 - vi. BPA will not develop a plan of service to enable long-term firm 7-F or 7-FN transmission for the FTSR or TSR.
 - e. Treatment of unstudied FTSRs or TSRs with MIDCREMOTE POR or POD:
 - i. Long Term FTSRs or TSRs with a POR or POD of MIDCREMOTE that are receiving offers will need to conform to a different Source/POR or Sink/POD at time of offer. If customer fails to carry out conformance within the directed timeframe, BPA will DECLINE the FTSRs or TSRs from the queue and they will receive no further consideration.
 1. BPA will provide customers with specific instructions on how to conform Long Term FTSR(s) or TSR(s).

- ii. Newly submitted ORIGINAL or REDIRECT Long Term FTSRs or TSRs with a MIDCRemote POR or POD will be invalidated, unless it is a child REDIRECT that reflects parent MIDCRemote rights. Note: Current reservations with MIDCRemote points will not be impacted.

Existing Point on Long Term TSR in Pending Queue		Upon Offer Long Term TSR will need to Conform to Point Below	
Source	POR	Source	POR
MIDWAY230MIDCR	MIDCREMOTE	MIDWAY230GCPD	BPAT.GCPD
SICKLER230MIDC	MIDCREMOTE	SICKLER230	BPAT.DOPD
VANTAGE230MIDC	MIDCREMOTE	VANTAGE230	BPAT.GCPD
Sink	POD	Sink	POD
MIDWAY230MIDCR	MIDCREMOTE	NWMRKTHUB(NWH)	NWH
SICKLER230MIDC	MIDCREMOTE	NWMRKTHUB(NWH)	NWH
VANTAGE230MIDC	MIDCREMOTE	NWMRKTHUB(NWH)	NWH
VALHALA115MIDC	MIDCREMOTE	NWMRKTHUB(NWH)	NWH
RKYRCH230MIDCR	MIDCREMOTE	NWMRKTHUB(NWH)	NWH

- iii. After (effective date of this BP version/notice), BPA will no longer allow new Long Term FTSRs or TSRs with a POR or POD of MIDCRemote.
- f. For generation facilities or load outside of the BPA balancing authority area:
- The generator or load location must be electrically connected to BPA's POR/POD (i.e., clear identification of where and how the generation is entering/exiting BPA's system)
 - Where applicable, the customer must provide supporting evidence of the transmission transaction to demonstrate how the generator is getting to BPA's POR or POD. The information must reflect electrical feasibility.
 - The upstream or downstream FTSR or TSR, if needed, must be submitted on or before the day of TSR submittal into BPA's queue. The timeframe must match and the path must be electrically valid in BPA's determination.

- iv. TSR validity is subject to continuing validity of the upstream transmission request/reservation.
- v. The customer must provide supporting evidence of how the generation is exiting BPA's POD – must be electrically feasible. The downstream FTSR or TSR must be submitted on or before the day of BPA FTSR or TSR submittal, be electrically valid and viable within the timeframe requested – subject to BPA's determination. FTSR or TSR validity is subject to continuing validity of the downstream transmission request/reservation.
- vi. For FTSRs or TSRs with a POR of Garrison or BPA.NWMT:
 - 1. The requestor must specify the generator that will be made available for participation in a remedial action scheme and
 - 2. The generator nameplate available for RAS must provide at least 1 MW of nameplate per MW of FTSR or TSR.
- vii. FTSRs or TSRs with both a Source and a Sink of a battery are not valid.
- g. Other information
 - i. BPA may request and validate FTSRs or TSRs based on additional information required in the OATT and has sole discretion to determine the validity of that information.

Long-Term Firm (LTF) Queue Management

1. Evaluation of offering service on the existing system. If BPA determines a request for service needs a project identified in a previous study will be required to enable firm service BPA may tender a Preliminary Engineering Agreement (PEA), Environmental Study Agreement (ESA), or a conditional firm or enhanced NITS Priority 6 agreement, whichever are applicable. BPA will also determine if a request needs further study.
2. Following the completion of the Cluster Study, BPA will tender an applicable post study agreement (firm transmission service, PEA, ESA, conditional firm service, or enhanced NITS priority 6) to the customer. The Customer may decide to proceed with the identified Plan(s) of Service for the Customer's (F)TSR(s). Based on the Customer's decision, BPA may perform preliminary engineering and environmental review, as necessary.
3. Pre-Cluster Study
 - a. When a (F)TSR is evaluated for service on the existing system BPA will determine if further study of the request is required to enable firm service.
 - i. If BPA determines further study of the request is required BPA may tender a cluster study agreement, PEA, an ESA, a conditional firm or enhanced NITS Priority 6 agreement, whichever are applicable. The customer must sign, return, and fund the agreement(s) by the due date(s) to be eligible for consideration to participate in the next open commercial study.
 - ii. If BPA determines further study of the request is not required BPA may tender a firm service offer, a PEA, an ESA, or a conditional firm or enhanced NITS Priority 6 agreement, whichever is applicable. The customer must sign, return, and fund the agreement(s) by the due date (s).
 - iii. If the customer provided security in lieu of certain data exhibit validation requirements, BPA will draw on the security if the customer does not fully execute the applicable agreement(s).
4. A Customer with a TSR that will be enabled by the construction of an identified Plan of Service must provide BPA with financial security. BPA will inform Customers in advance of such requirement. Additionally, the provisions described below will be applied to a customer that utilized security to meet data exhibit validation requirements. Financial security will be in the form of a deposit or an Irrevocable Standby Letter of Credit ("Letter of Credit").
 - a. BPA will hold a deposit provided by a Customer in a non-interest bearing account. After the commencement of transmission service following energization of the Plan of Service, the deposit will be released.

- b. Letter of Credit
 - i. The Customer is responsible for timely renewal of the Letter of Credit to ensure that the financial security remains in effect throughout the security period. If the Customer does not timely renew the Letter of Credit, BPA may draw on the Letter of Credit in advance of the expiration.
 - ii. The financial institution issuing the Letter of Credit must have a Senior Unsecured Credit Rating from Moody's or Standard & Poor's equivalent to an "A" or better.
 - iii. After the commencement of transmission service, the amount for the Letter of Credit will be reduced.
- 5. The amount of the deposit or Letter of Credit provided by the Customer will be the five (5) year estimate of revenue from the Customer's request.
 - a. The calculation for security is as follows:

MW of request * current rate schedule at the time of the offer * 5 years of service
- 6. BPA will provide at least 15 Calendar Days written notice to the Customer of the deadline for the Customer to provide the initial deposit or Letter of Credit.
 - a. If the Customer fails to provide the required deposit or Letter of Credit by the deadline specified by BPA, BPA will change the OASIS status of the (F)TSR(s) to DECLINED and the TSR(s) will receive no further consideration for LTF Service.
- 7. The deposit or Letter of Credit must be in place or effect from the date it is provided or issued through any period before the commencement of service, construction, any deferral(s) of the commencement of service under Sections 15.5 or 17.7 of the OATT, five (5) years after the commencement of transmission service, and if applicable, the additional time to meet the Network Load obligation.
 - a. For example:
 - i. If the PTP Customer submits a TSR with a requested start date two (2) years in the future. The deposit or Letter of Credit must be in effect for the period of time up to the original start date, plus any period(s) of the deferral of service, plus five (5) years after the commencement of transmission service.
 - ii. If NITS Customer submits an FTSR with a requested start date two (2) years in the future. The deposit or Letter of Credit must be in effect for the period of time up to the original start date, plus any period(s) of the deferral of service, plus five (5) years after the commencement of transmission service, plus if applicable, the two additional years to meet the customer's Network Load obligation.

8. After the commencement of taking and paying for transmission service by the customer BPA will release or reduce the Customer's financial security obligation on an annual basis.

- a. For a PTP Customer taking and paying for transmission service, BPA will release or reduce the Customer's financial security obligation according to the following calculation:

$$\mathbf{12 / (60\ months) \times Total\ Security\ Provided = Annual\ Security\ Reduction}$$

- i. This methodology will ensure that the Customer's financial security will be reduced over a five (5) year service duration following the Service Commencement Date (SCD) for transmission service, provided the Customer takes and pays for transmission service throughout that period.
 - b. For an NT Customer, the customer's Network Load on the hour of the Monthly Transmission System Peak Load must increase in an amount equal to or greater than 50% of the FTSR's requested amount for one (1) month in each of five (5) out of seven (7) calendar years. For each year the customer meets its Network Load obligation, BPA will release or reduce the financial security obligation according to the following calculation:

$$\mathbf{1 / (Security\ Period\ of\ Five\ Years) \times Total\ Security\ Provided = Annual\ Security\ Reduction}$$

- i. This methodology will ensure that the Customer's financial security will be reduced over a five (5) year service duration following the Service Commencement Date (SCD) for transmission service, provided the Customer's Network Load increases commensurate with the expansion of the transmission system for a minimum of one (1) month in each of five (5) out of seven (7) calendar years.
9. If a customer utilizes security to meet data exhibit validation requirements:
 - a. That security can be used to meet the security requirements for firm service, conditional firm service, and enhanced NITS priority 6 service.
 - b. Is required to take transmission service when tendered. Failure to do so will result in BPA drawing on the security.
10. A customer that has provided security and is under more than one contract supporting the expansion of the transmission system, is required to maintain all agreements in good standing. Failure to do so will result in BPA drawing on the security. For example, a customer may have a Conditional firm or enhanced NITS Priority 6 agreement and an Environmental Study Agreement. Failure to satisfy either will result in BPA drawing on the security and the (F)TSR receiving no further consideration for long-term firm service.

Interim Service: Conditional Firm Service & Enhanced NITS Priority 6**Point-to-Point offers:**

1. Interim Conditional Firm Service does not require a CFS Study.
2. Interim service provides access to Conditional Firm Service earlier than traditional CFS, which required the completion of a Cluster or Individual Study.
 - a. Business rules remain the same for interim service, unless otherwise noted.
 - b. Offers of service would either have 8760 number of hours or system conditions on all paths – current and future - with non-de minimis impacts
 - c. Except for offers involving a POR or POD of NWH, all offers are for Bridge CFS, unless the customer fails to meet a requirement to continue on the path to 7-F service or BPA makes a decision not to build.
 - d. Offers of CFS Reassessment service will retain the 8760 number of hours requirement throughout the TSR duration.
 - i. Reassessment CFS will not be eligible for a long-term firm up or identification of a transmission plan of service.
 - ii. TSRs with a POR or POD of NWH are not eligible to convert from Reassessment CFS to Bridge CFS.
 - e. Interim service offers will require the customer to accept the offer of service. If the Customer fails to countersign and return the Exhibit within the specified timeframe, BPA will change the OASIS status of the TSR to DECLINED and the TSR will receive no further consideration.
3. Eligibility:
 - a. TSRs that have not participated in a Cluster or Individual Study as of 8/19/22 and are a valid TSR under the criteria in Requesting Transmission Service BP.
 - b. If previously studied TSRs can meet the current validation criteria, such TSR will be eligible for interim service offers regardless of whether the customer rejected previous CFS offer or never received a previous CFS offer; however, the TSR will not be removed from the queue if an offer of service is not executed.
 - c. Bridge CFS:
 - i. With the exception of NW Market HUB or requests without RoFR consideration valid TSRs will be evaluated for an offer of interim bridge service.
 1. A planning study will later determine the plan of service required for firm service.

2. When BPA tenders a Bridge CFS offer, the customer will be required to provide financial security for the expansion of the transmission system. See the Financial Security Related to the Plan of Service section of the TSR Study and Expansion Process business practice for additional details on security requirements.
- d. Reassessment CFS:
 - i. NW Market Hub: PTP TSRs with a POR of POD of NWH are only eligible for an interim service offer of CF Reassessment Service.
 - ii. Requests without RoFR consideration are only eligible for an interim service offer of CF Reassessment Service
- e. Requests with subgrid and/or 3rd party impacts require additional scrutiny regarding BPA's to reliably manage the constraint.
 - i. Reliable management may be achievable through an existing or new path or
 - ii. May require the completion of the subgrid or 3rd party project. In this case BPA may explore whether a contingent agreement may be offered.

NITS offers:

1. Overview:
 - a. LT NITS enhanced priority 6 service provides a service option until firm service is available.
2. Eligibility:
 - a. A (F)TSR queue time must be after noon on 8/19/22
 - b. (F)TSRs must meet validation requirements per the Requesting Transmission Service BP
3. Attributes of Long-Term NITS Enhanced Priority 6:
 - a. LT NITS enhanced priority 6 TSRs have priority rights to Short-Term Firm (STF) ATC along with CFS before it is released to the market for sale. STF ATC is only provided to reservations if there is enough to firm up all similarly situated reservations.
 - b. LT NITS enhanced priority 6 will be curtailed at a priority 6 unless it has been updated to firm due to ST ATC availability.
 - c. LT NITS enhanced priority 6 service may be used to award service from FTSRs and TSRs.
 - i. Existing FTSRs in STUDY status would be transitioned to TSRs that could be used for scheduling purposes upon award.

- ii. Future awards could occur either through the LaRC process or a customer submitted TSR.
 - iii. BPA would create a placeholder in the queue for later study activities
 - iv. Interim service offers will require the customer to accept the offer of service.
- d. A planning study will later determine the plan of service required for firm service.
 - i. Service with a POR or POD of NWH will not be studied for a plan of service.
 - ii. Service less than 5 years will not be studied for a plan of service.
- e. Requests with subgrid and/or 3rd party impacts require additional scrutiny regarding BPA's to reliably manage the constraint.
 - i. Reliable management may be achievable through an existing or new path or
 - ii. May require the completion of the subgrid or 3rd party project. In this case BPA may explore whether a contingent agreement may be offered.