



Alliance of Western Energy Consumers ♦ 3519 NW 15th Ave., #249 ♦ Portland, OR 97212 ♦ 971-544-7169 ♦ awec.solutions

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Bonneville Power Administration
905 NE 11th Ave
Portland, OR 97232

Submitted via TechForum

Re: Alliance of Western Energy Consumers' Comments on Grid Access Transformation Draft Language

The Alliance of Western Energy Consumers ("AWEC") appreciates the opportunity to provide comments on Bonneville Power Administration's ("BPA") Grid Access Transformation ("GAT") July 29th and 30th working sessions and the preliminary GAT Draft Language for Network Integration Transmission Service ("NITS") New Network Load discussed.

AWEC is a trade organization whose members include many of the Region's largest employers and consumers of electricity and natural gas. AWEC's members are responsible for providing tens of thousands of highly paid, technical, family-wage jobs across a broad range of industry sectors such as agriculture, aeronautics, air products, metals, pulp and paper, and more. As such, AWEC's members are also significant consumers of electricity, paying millions of dollars for power and transmission services each year. They take service from both public power customers of BPA as well as regulated investor-owned utilities who purchase transmission services from BPA. AWEC members' host utilities take both NITS and Point to Point ("PTP") service products from BPA Transmission. Given the energy-intensive nature of many industrial processes, AWEC members are particularly sensitive to both costs associated with electricity service and reliability.

AWEC appreciates BPA's prioritization of improving its transmission processes and working to identify both interim and long-term changes that will facilitate its provision of long-term firm transmission service to its transmission customers in a timely and cost-effective manner. Given the diverse nature of AWEC member interests and the circumstances under which they pay for transmission service, AWEC's comments are focused on a few key issues implicated in the GAT Draft Language discussed at the July 29-30th workshops.

New Network Load

In effect, BPA is proposing to tier transmission service for NITS customers, which as other stakeholders have observed, may result in discriminatory treatment due to disparate outcomes among customers. AWEC is skeptical that a "bright line rule" delineating trended load growth from non-trended load growth is either necessary for NT loads or consistent with BPA's Open Access Transmission Tariff ("OATT") for NITS.

If BPA nevertheless determines that it is necessary to delineate between trended load growth and New Network Load, then load designated as Contracted For, Committed To (“CF/CT”) pursuant to the Northwest Power Act¹ should be explicitly excluded from loads considered in a New Network Load determination. As explained by BPA in its Provider of Choice Record of Decision, “[a] CF/CT load...is a load that existed prior to September 1, 1979, that was either ‘contracted for’ to be served by a Bonneville customer, or ‘committed to’ by a Bonneville customer to be served.”² Thus by definition, these are not “new” loads, even in circumstances where the CF/CT load has been operating under its CF/CT designated amounts but subsequently increases its load to its CF/CT designation. Importantly, consumers with CF/CT loads have already paid for – and BPA has already planned for – firm transmission to serve those CF/CT designated amounts. It is therefore unreasonable to subject CF/CT loads to more onerous New Network Load requirements, which would likely result in delayed access to long-term firm transmission service, added costs including potential directly assigned costs, interim service that is less than firm, and onerous deposit and security requirements that are ultimately borne by the CF/CT end-use consumers.

While AWEC appreciates that paragraph 6 of the Network Integration Transmission Service New Network Load Section of the GAT Draft Language includes a carve-out for BPA to exercise discretion to exclude “a portion of the load at a Point of Delivery...from being identified as New Network Load” and the factors that BPA will consider – which should weigh in favor of excluding CF/CT loads – this language alone does not provide sufficient assurance that CF/CT loads that are increasing within statutorily designated CF/CT amounts will not be subject to Business Practice requirements applicable to New Network Load requirements. CF/CT loads that remain within their CF/CT designation should be treated as trended NT load growth given the unique nature of these loads and the fact that they are not, in fact, new loads to BPA. This treatment should be explicit in BPA’s Business Practice so as to ensure that CF/CT loads are explicitly excluded from being considered New Network Load, and not subject to a discretionary determination process.

In addition to a CF/CT carve-out, AWEC recommends that BPA make additional changes and/or clarifications for New Network Loads. First, BPA should only apply New Network Load requirements during the “transition” state, as opposed to continuing the practice into the “future state.” Second, BPA should not rely on a Point of Delivery as the threshold for whether such load growth should be considered New Network Load. While this may provide for a streamlined approach for BPA, AWEC shares the concerns raised by other stakeholders that there are important differences in contract PODs among customers, and reliance on Exhibit A PODs may be discriminatory among customers.³

¹ See 16 USC §839a(13)(A) (Excluding loads that are “contracted for, or committed to, as determined by the Administrator, a public body, cooperative, investor-owned utility, or Federal agency customer prior to September 1, 1979,” from the definition of “New large single load.”).

² Bonneville Power Administration, Provider of Choice Policy Record of Decision at 155 (Mar. 2024).

³ See e.g. Public Power Council’s “Preliminary PPC Comments on Transition Issues Related to BPA’s Grid Access Transformation” at 3 (Jul. 21, 2025), accessed at: <https://www.bpa.gov/-/media/Aep/transmission/Grid-Access-Transformation/PPC-Comments-on-GAT-Transition-72125.pdf>;



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Additional time and dedicated discussion on the implications of using Point of Delivery is needed so that the nuances and implications of this proposal can be fully understood by BPA.

Commercial Implications of Security Requirements

AWEC understands that BPA is interested incentivizing transmission service requests that are highly likely to materialize in provided service, however, aspects of BPA's proposed FTSR/TSR Data Validation Readiness Criteria related to security in particular raise concerns for AWEC. In addition to the significant level of security that would be required, AWEC is concerned about potential implications that variations in NT load could have on customer recovery of security. It is possible – and in some cases likely – that a utility could require that the consumer(s) driving a FTSR provide funds to cover the customer's security obligations. In order to avoid security draws, the consumer's Network Load on the hour of the Monthly Transmission System Peak Load must increase above a 50% threshold. As was discussed on the afternoon of July 30th, an NT customer with several PODs could have the large load appear as anticipated, but have significant load loss elsewhere on its system resulting in a net load amount that is less than the base year. Even though the upgrades would be used as intended, the customer – and perhaps consumer(s) would not be able to recover their security. AWEC understands BPA's perspective that the 50% threshold is intended to account for fluctuations in NT load, but this does not mitigate the situation where individual consumer fronted security may not be recovered due to circumstances outside of the consumers' control and despite the fact that upgrades are being used as intended. This is a circumstance that should be avoided.

AWEC looks forward to continuing engagement on Grid Access Transformation Transition issues.

/s/ Bill Gaines

Executive Director

Alliance of Western Energy Consumers