

Thank you for the opportunity to comment on the BPA April 15<sup>th</sup> workshop regarding Proactive Planning & Accelerate Expansion. CRPUD is a non-profit, locally governed utility serving Columbia County, Oregon. Our service area is approximately 30 miles northwest of Portland, Oregon, and we provide electric service to around 21,000 customers. As a preference customer, we have a priority right to purchase wholesale power from Bonneville Power Administration (BPA) at cost. This arrangement supports our mission to deliver quality services at the lowest practical cost. Additionally, we are a Network Integration Transmission Service (NITS) customer, which means BPA has an OATT obligation to plan for reasonably forecasted load.

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Michael J. Sykes

## **Proactive Planning**

To begin, CRPUD fully supports BPA's transition to a proactive planning paradigm, and we believe this is the direction BPA should pursue. However, we have observed that NITS customers receive insufficient attention in BPA's proactive planning efforts. It seems that proactive planning is primarily benefiting PTP customers, generation customers, and investor-owned entities, which is disappointing considering BPA's statutory obligation to plan for NITS customers. We were particularly concerned to see that initiatives such as LARS (Local Area Reinforcement Studies) are being deferred to the second phase of proactive planning. Since LARS is specifically designed for NITS customers and BPA is obligated to plan for us, we strongly believe it should be included in phase one. Additionally, we encourage BPA to utilize all available data from NITS customers' LARC, including items with less than a 70% likelihood in the new and growing loads tab.

Over the past five years, Columbia River PUD has received many requests for new electric service for which LLIRs have been submitted. In most cases, those companies withdrew after learning BPA's existing transmission system cannot serve them without upgrades. Those upgrades currently estimated to take several years beyond when they need it. Without added transmission capacity, our community will continue to lose prospective employers and the family-wage jobs they bring.