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7/21/2025

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

**RE: Clatskanie PUD comment on Transition Issues Related to BPA's Grid Access Transformation (GAT)**  
Submitted via tech forum

Dear GAT Team,

We, at Clatskanie People's Utility District (PUD), appreciate the opportunity to respond to the recent Bonneville Power Administration (BPA) transmission workshop series.

BPA has the PUDs support on a number of transmission related matters and we are committed to working with BPA and the region in the future.

As an initial item, within these comments we refer to the term "Embedded Forecast". For the purposes of these comments, "Embedded Forecast" refers to a historically accepted baseline forecast that includes: (1) historical load; (2) projected growth or decline; (3) returning load; and (4) large loads that are contingent upon readiness criteria such as permitting or notice provisions.

While additional context is warranted; we offer the following distilled comments:

Clatskanie currently supports;

1. Additional planning tools which allow BPA to accommodate traditional embedded load forecast and unknown asymmetrical requests.
2. Implementation of a "Readiness Criteria".
  - a. We request additional clarification about how BPA plans to treat "Regional Transfers", "Hybrid Resources", and "System Resources".
  - b. We believe "state and/or federal permits are a type of acceptable evidence to assert readiness.
  - c. We believe listing of a resource within any table of Exhibit A of the utilities BPA power contract is acceptable evidence to assert readiness.
3. Use of "Queue Management" tools under review to transition to the "Future State"
4. Development of a 6NN product comparable to 6CF.
5. Acceleration expansion with a 5 year target.
6. Use of all forecasted load submissions regardless of probability. We further support reasonable planning discretion when considering how portions of the load will be incorporated.
7. Inclusion of a formal "Dispute Mechanism" for an array of the processes including application of the readiness criteria, adoption of NITS load forecast, application of New Large Load status.

Clatskanie does not currently support;

1. Elimination of MIDCRemote and/or NWHub.
  - a. We believe this topic needs additional discussion and understanding before changes can be supported.
2. An annual New Large Load threshold of 13 MW per POD.
  - a. We have concerns with a simple use of “POD” as the singular reference when applying a planning threshold. As an alternative we recommend BPA apply a combination of measurement points including the POD to establish when an alternative planning process is warranted. Specifically, a combination of the cumulative utility forecast, POD forecasts and individual end use forecasts.
  - b. Given the desire to identify growth beyond what is included in the embedded forecast, we believe a series of checks will better target and track load growth outside the purview of the standard process. The checks are outlined below.
    - i. Does the parties total forecast exceed the embedded forecast?
    - ii. Do any of the individual POD forecasts exceed the greater of the embedded forecast or the previous forecast plus 13MW?
    - iii. Where the POD forecast exceeds the greater of the embedded forecast or the previous forecast plus 13MW, can the growth be attributed to an individual end-use consumer?
    - iv. When a New Large Load is being considered, is service requested within BPA’s short term planning horizon?
  - c. A spreadsheet with high level examples is attached illustrating some of the forecasted load growth scenarios and how they would be considered with a multifactor methodology.
3. Doing too much too fast.
  - a. While we support BPA “getting off pause” and processing the queue, we believe there is risk in going too far. The steps needed to move forward should be taken cautiously and in many cases on a “trial basis”.

As a final note, we would like to highlight the tone and intent of our comments. The PUD is committed to being constructive even when it's difficult; and right now it's difficult. These are big and complex issues. Staying informed and knowledgeable through this process is a big challenge. We have a large number of knowledge gaps and doesn't fully understand the consequences of our positions. With that said, we hope to learn more in the coming months and gain a better understanding of how to solve these challenges together.

Chris Roden

Director of Energy Resources

Clatskanie People's Utility District

| Utility A                                                                                                                               |                   |                   |                  |
|-----------------------------------------------------------------------------------------------------------------------------------------|-------------------|-------------------|------------------|
|                                                                                                                                         | Previous Forecast | Embedded Forecast | Current Forecast |
| Overall Forecast                                                                                                                        | 100 MW            | 165 MW            | 105 MW           |
|                                                                                                                                         |                   |                   |                  |
| POD 1                                                                                                                                   | 20 MW             | 33 MW             | 21 MW            |
| POD 2                                                                                                                                   | 20 MW             | 33 MW             | 21 MW            |
| POD 3                                                                                                                                   | 20 MW             | 33 MW             | 21 MW            |
| POD 4                                                                                                                                   | 20 MW             | 33 MW             | 21 MW            |
| POD 5                                                                                                                                   | 20 MW             | 33 MW             | 21 MW            |
|                                                                                                                                         |                   |                   |                  |
| Embedded Growth                                                                                                                         |                   |                   | 5 MW             |
| Simple senario for a small utility. Customer forecasts is below thresholds for both the overall forecast and each of the POD forecasts. |                   |                   |                  |

| Utility B                                                                                                                               |                   |                   |                  |
|-----------------------------------------------------------------------------------------------------------------------------------------|-------------------|-------------------|------------------|
|                                                                                                                                         | Previous Forecast | Embedded Forecast | Current Forecast |
| Overall Forecast                                                                                                                        | 1000 MW           | 1065 MW           | 1050 MW          |
|                                                                                                                                         |                   |                   |                  |
| POD 1                                                                                                                                   | 200 MW            | 213 MW            | 210 MW           |
| POD 2                                                                                                                                   | 200 MW            | 213 MW            | 210 MW           |
| POD 3                                                                                                                                   | 200 MW            | 213 MW            | 210 MW           |
| POD 4                                                                                                                                   | 200 MW            | 213 MW            | 210 MW           |
| POD 5                                                                                                                                   | 200 MW            | 213 MW            | 210 MW           |
|                                                                                                                                         |                   |                   |                  |
| Embedded Growth                                                                                                                         |                   |                   | 50 MW            |
| Simple senario for a large utility. Customer forecasts is below thresholds for both the overall forecast and each of the POD forecasts. |                   |                   |                  |
| Note: due to the allowable amounts being based on PODs, the amount of threshold growth is the same as the small utility.                |                   |                   |                  |

| Utility C                                                                                                                                                                                                                                                                                                                                                  |                   |                   |                  |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|-------------------|------------------|
|                                                                                                                                                                                                                                                                                                                                                            | Previous Forecast | Embedded Forecast | Current Forecast |
| Overall Forecast                                                                                                                                                                                                                                                                                                                                           | 500 MW            | 565 MW            | 520 MW           |
|                                                                                                                                                                                                                                                                                                                                                            |                   |                   |                  |
| POD 1                                                                                                                                                                                                                                                                                                                                                      | 100 MW            | 113 MW            | 100 MW           |
| POD 2                                                                                                                                                                                                                                                                                                                                                      | 100 MW            | 113 MW            | 90 MW            |
| POD 3                                                                                                                                                                                                                                                                                                                                                      | 100 MW            | 113 MW            | 90 MW            |
| POD 4                                                                                                                                                                                                                                                                                                                                                      | 100 MW            | 113 MW            | 130 MW           |
| POD 5                                                                                                                                                                                                                                                                                                                                                      | 100 MW            | 113 MW            | 110 MW           |
|                                                                                                                                                                                                                                                                                                                                                            |                   |                   |                  |
| POD Growth / Load Shift                                                                                                                                                                                                                                                                                                                                    |                   |                   | 30 MW            |
| Embedded Growth                                                                                                                                                                                                                                                                                                                                            |                   |                   | 20 MW            |
| Mid size utility senario. In this instance the utility forecast was within tolerance when looking at the total. POD 4 grew by more than 13MW. When evaluated across the other PODs the total growth was minimized due to load shifting across the PODs. The total growth is 20MW and included in the embedded forecast rather than having 30 tagged as LL. |                   |                   |                  |

| Utility D                                                                                                                                                                                                                                                                                                                                       |                   |                   |                  |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|-------------------|------------------|
|                                                                                                                                                                                                                                                                                                                                                 | Previous Forecast | Embedded Forecast | Current Forecast |
| Overall Forecast                                                                                                                                                                                                                                                                                                                                | 1000 MW           | 1165 MW           | 1150 MW          |
|                                                                                                                                                                                                                                                                                                                                                 |                   |                   |                  |
| POD 1                                                                                                                                                                                                                                                                                                                                           | 200 MW            | 213 MW            | 210 MW           |
| POD 2                                                                                                                                                                                                                                                                                                                                           | 200 MW            | 213 MW            | 210 MW           |
| POD 3                                                                                                                                                                                                                                                                                                                                           | 200 MW            | 313 MW            | 310 MW           |
| POD 4                                                                                                                                                                                                                                                                                                                                           | 200 MW            | 213 MW            | 210 MW           |
| POD 5                                                                                                                                                                                                                                                                                                                                           | 200 MW            | 213 MW            | 210 MW           |
|                                                                                                                                                                                                                                                                                                                                                 |                   |                   |                  |
| POD Growth / Returning Load                                                                                                                                                                                                                                                                                                                     |                   |                   | 110 MW           |
| Embedded Growth                                                                                                                                                                                                                                                                                                                                 |                   |                   | 150 MW           |
| Large utility with returning load. Total load growth is 150 MW and within tolerance for the overall forecast but POD 3 has a lot of returning load. Perhaps CFCT load or cyclical load. When evaulated at the individual load it is considered above the 13 MW threshold but has maintaind capacity through inclusion in the embedded forecast. |                   |                   |                  |

| Utility E                                                                                                                                                                                                                                 |                   |                   |                  |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|-------------------|------------------|
|                                                                                                                                                                                                                                           | Previous Forecast | Embedded Forecast | Current Forecast |
| Overall Forecast                                                                                                                                                                                                                          | 100 MW            | 165 MW            | 205 MW           |
|                                                                                                                                                                                                                                           |                   |                   |                  |
| POD 1                                                                                                                                                                                                                                     | 20 MW             | 33 MW             | 121 MW           |
|                                                                                                                                                                                                                                           |                   | Large Load        | 100              |
|                                                                                                                                                                                                                                           |                   | Embedded Load     | 1                |
| POD 2                                                                                                                                                                                                                                     | 20 MW             | 33 MW             | 21 MW            |
| POD 3                                                                                                                                                                                                                                     | 20 MW             | 33 MW             | 21 MW            |
| POD 4                                                                                                                                                                                                                                     | 20 MW             | 33 MW             | 21 MW            |
| POD 5                                                                                                                                                                                                                                     | 20 MW             | 33 MW             | 21 MW            |
|                                                                                                                                                                                                                                           |                   |                   |                  |
| Large Load Forecast                                                                                                                                                                                                                       |                   |                   | 100 MW           |
| Embedded Growth                                                                                                                                                                                                                           |                   |                   | 5 MW             |
| Small utility with a large load. In this case POD 1 has 101 MW of growth expected. 100 MW for a LL and 1 MW on the associated distribution system. 100 MW is determined to be a LL and the 1 MW is associated with the embedded forecast. |                   |                   |                  |

| Utility F                                                                                                                                                                                                  |                   |                   |                  |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|-------------------|------------------|
|                                                                                                                                                                                                            | Previous Forecast | Embedded Forecast | Current Forecast |
| Overall Forecast                                                                                                                                                                                           | 1000 MW           | 1065 MW           | 1150 MW          |
|                                                                                                                                                                                                            |                   |                   |                  |
| POD 1                                                                                                                                                                                                      | 200 MW            | 213 MW            | 310 MW           |
|                                                                                                                                                                                                            |                   | Large Load        | 100              |
|                                                                                                                                                                                                            |                   | Embedded Load     | 10               |
| POD 2                                                                                                                                                                                                      | 200 MW            | 213 MW            | 210 MW           |
| POD 3                                                                                                                                                                                                      | 200 MW            | 213 MW            | 210 MW           |
| POD 4                                                                                                                                                                                                      | 200 MW            | 213 MW            | 210 MW           |
| POD 5                                                                                                                                                                                                      | 200 MW            | 213 MW            | 210 MW           |
|                                                                                                                                                                                                            |                   |                   |                  |
| Large Load Forecast                                                                                                                                                                                        |                   |                   | 100 MW           |
| Embedded Growth                                                                                                                                                                                            |                   |                   | 50 MW            |
| Large utility with a large load. In this case the LL at POD 1 is 100 MW and the associated distribution system load is 10 MW. 100 MW is tagged as a LL and 50 MW is associated with the embedded forecast. |                   |                   |                  |

| Utility G                                                                                                                                                                                                                                                                                               |                   |                   |                  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|-------------------|------------------|
|                                                                                                                                                                                                                                                                                                         | Previous Forecast | Embedded Forecast | Current Forecast |
| Overall Forecast                                                                                                                                                                                                                                                                                        | 1000 MW           | 1065 MW           | 1100 MW          |
|                                                                                                                                                                                                                                                                                                         |                   |                   |                  |
| POD 1                                                                                                                                                                                                                                                                                                   | 200 MW            | 213 MW            | 220 MW           |
| POD 2                                                                                                                                                                                                                                                                                                   | 200 MW            | 213 MW            | 220 MW           |
| POD 3                                                                                                                                                                                                                                                                                                   | 200 MW            | 213 MW            | 220 MW           |
| POD 4                                                                                                                                                                                                                                                                                                   | 200 MW            | 213 MW            | 220 MW           |
| POD 5                                                                                                                                                                                                                                                                                                   | 200 MW            | 213 MW            | 220 MW           |
|                                                                                                                                                                                                                                                                                                         |                   |                   |                  |
| High POD Growth                                                                                                                                                                                                                                                                                         |                   |                   | 100 MW           |
| Embedded Growth                                                                                                                                                                                                                                                                                         |                   |                   | 50 MW            |
| Large utility with high distribution system growth. In this example the utility is experiancing a lot of growth and each of the PODs wich cary a lot of load are expcted to grow by more than 13MW. No LL is attributable to the growth. All tof the growth is attributed within the embedded forecast. |                   |                   |                  |