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Eugene Water & Electric Board's (EWEB) Comments on July 9-10 Grid Access Transformation Project Workshop
July 21, 2025
Submitted via techforum@bpa.gov

Thank you for the opportunity to provide comments on BPA's GAT Project workshop. EWEB is Oregon's largest customer-owned utility providing electricity to the Eugene community, as well as parts of east Springfield and the McKenzie River valley area. EWEB is a NITS customer, uses PTP for market transactions, and is currently only experiencing "trended" load growth. Similar to many other BPA transmission customers, we have received multiple inquiries about adding large loads in our service territory – some data center and some generic industrial. We are members of Public Power Council (PPC), Public Generating Pool (PGP), Western Public Agencies Group (WPAG), and the NT Customer Group and support comments and positions that these organizations have and continue to provide.

Due to a very tight turnaround time, these comments are focused on specific items BPA requested feedback on by July 21 and do not reflect EWEB's entire perspective on the GAT materials. We appreciate having until August 22 to weigh in on the Future State concepts.

Thank you for aligning with customer feedback

We appreciate BPA moving the Transmission Planning for NT Loads workstream into the GAT project, specifically because of BPA staff's indication that they intend to move a portion of NITS load growth into the commercial planning process. It is appropriate to discuss these proposals holistically. We recommend that BPA staff should also include all NT Planning workshop materials on the GAT project page.

EWEB feels that BPA staff have heard customer and stakeholder requests for more and better engagement and appreciate seeing that the Engagement Roadmap includes more meetings that include working sessions and Deep Dive formats. We encourage BPA to consider adding brainstorming sessions as a way to create alignment and buy in when addressing difficult issues. Bringing options to the table can be limiting and isn't always the best method for solving problems. Open dialogue, collaboration, and transparency are critical for making the right decisions at the right times and we recommend maintaining the ability to be flexible to add or modify engagement as may be necessary.

Rationale for bright line distinction for NITS Forecasts is not clear

EWEB supports the proposed treatment of awarding Long Term Firm service upon Designation of a Network Resource for "trended" growth. We recognize BPA believes the agency must create a bright line distinction to adequately plan for "trended" growth through proven and effective methods. In the July 10, 2024, Planning for NITS Loads & Resources Workshop BPA

asked, "Should BPA differentiate between load growth scenarios in order to plan for local capacity and transmission capability?" and offered considerations of size, timing, risk profile and/or impacted transmission paths[1]. We remain puzzled why BPA has not talked about considerations other than size or how creating a bright line distinction purely based on size specifically solves a problem associated with planning for NITS forecasts.

In the recent GAT workshops BPA presented that, "Applying additional planning scrutiny to transmission forecasts associated with new large loads ensures appropriate transmission access, planning treatment and cost allocation"[2]. This raises questions including:

- BPA has suggested that 13 MW may be a reasonable and appropriate size to define a bright line distinction based on drawing a parallel, with assumptions, to New Large Single Load policy. In addressing confusion raised by customers because NLSL policy is associated with BPA Power, not BPA Transmission, BPA has responded that the specific size is not important but that a bright line distinction is necessary. EWEB questions if relegating all 'non-trended' NITS load to commercial planning is appropriate based simply on this arbitrary size determination.

- Are there considerations where a larger NITS forecasted load may not need additional planning scrutiny, i.e. low risk profile, long planning time horizon, in a less congested part of the system, etc…? Is there a more specific problem associated with larger NITS loads that might be identified through more refined bright line criteria?

- Why aren't we talking about cost allocation? It is an important component of making this policy decision.

Concerns with proposed treatment of "New Large Loads"

BPA's proposal regarding establishing a "new large load" MW threshold per Point of Delivery appears to conflict with BPA staff's summary that the intent is to maintain treatment of residential and commercial as "trended" load. This is because some 'trended' commercial and residential load may be lumped in with large loads at a POD and be treated differently than other trended loads. BPA proposed working with customers that have mixed-use loads at a POD, but this seems ripe for producing a range of inconsistent and potentially inequitable outcomes. Policy should be designed to provide clarity and consistency for trended load that might develop at a POD with "new large load" growth or otherwise become unintentionally pushed into the "new large load" category. The proposal of designating a POD as a "new large load" for life once the threshold is met could perpetually exacerbate this issue and we recommend moving away from this concept.

EWEB believes BPA should reconsider revisiting defining "new large loads" by the end-use site. The potential to "game" the facility measurement could be mitigated in a number of ways and

[1] Slide 8, https://www.bpa.gov/-/media/Aep/transmission/nt-service/NITS-July-Customer-Workshop.pdf

[2] Slide 37, https://www.bpa.gov/-/media/Aep/transmission/Grid-Access-Transformation/Jul-10-TPR-Wrkshp-Presentation.pdf

identifying specific loads rather than aggregate loads at a POD appears to more closely align with how BPA is defining the problem.

BPA must ensure that transmission allocation is transferable to market paradigms

EWEB appreciates that BPA has structured the GAT project into a transition phase to address near-term needs and a future state phase focused on developing effective transmission policy that accommodates the variety of customer and stakeholder interests. We recognize there are many future unknowns, particularly around Markets + and WRAP, and that BPA may not have significant ability to influence market design. Due to these factors, it is critical that BPA establish appropriate time and engagement to assess, anticipate, and maintain flexibility as it reforms its transmission planning process. It is essential that the future state of policy align with statutory obligation as well as maintain product integrity and equity across customers. With a lot of uncertainty on the horizon, that will require a high level of due diligence, customer interaction and engagement as well as willingness to adjust and adapt policy decisions as markets become established.

Uncertainty around Future State solutions make it difficult to fully embrace the Transition concepts

At a high level, BPA's proposal to modify the transmission queue and distinguish between 'trended' and 'non-trended' growth so that the agency can prioritize appropriate builds and award transmission contracts makes sense. However, as a NITS customer, EWEB is not yet fully comfortable assigning "new large loads" into the commercial planning queue when we do not yet understand how planning for that queue will work, or how cost allocation will be implemented. We hope to see BPA leave flexibility in this policy determination, or alternately in future processes, to allow for adjustments as needed.

Consider applying continuous improvement management principles to the reform process

Applying the continuous improvement concept of Plan, Do, Check, Act (or similar tool) for the GAT project may help alleviate some of our concerns. This iterative process involves systematically testing possible solutions, assessing the results, and implementing the ones that are shown to work. It's a repeatable construct that leads to higher quality outcomes over time. Using a flexible framework such as this may provide customers with reassurance that we will not be locked into an undesirable future state, while at the same time providing BPA with the ability to continue forward progress on the GAT project.