



July 18, 2025

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Submitted via BPA's Tech Forum (techforum@bpa.gov)

The following comments are subdivided to conform to the Tech Forum notice of July 11.

July 21: Trended NITS Load Growth

Grant continues to oppose the proposal to plan for encumbering transmission capacity for trended load growth for NITS customers, especially beyond the term of existing Transmission Service Agreements and if PTP roll-over rights are endangered. Trended load growth service as proposed by BPA will likely cause undue discrimination among NITS customers and between NITS and PTP customers, as discussed in comments previously submitted by Grant. The result of the current plan will be BPA building additional transmission capacity to stay ahead of NITS Trended Load Growth, resulting in increased pressure on transmission rates. However, no additional PTP access will be created unless the new capacity built out for NITS happens to ease a flowgate constraint or if expected power flows change and open up Available Transmission Capacity.

July 21: Readiness Criteria

Grant supports the development of additional and clarified readiness criteria in order for TSRs to remain in the queue. Unknown and New-Point PORs/PODs should be deemed speculative and removed from the queue until and unless new procedures are developed to accommodate such PORs/PODs in a realistic and timely manner.

August 22: Interim Service

Customers seeking new transmission service must assume that BPA will only offer Interim Service for the next several years. The rates for Interim Service have not yet been discussed with customers, and new rates may be necessary given the nature of Interim Service. BPA should consider the need for rate discounts (or some form of credits) associated with Interim Service, if such service is offered only on a non-firm basis. Currently, non-firm PTP service is available on a daily and hourly basis, and with no discount on the rates for firm daily and hourly service. Interim Service customers will presumably face a higher risk of curtailment than Conditional Firm Service (CFS) customers. Due to the higher risk of more frequent and longer curtailments without certainty around the duration of the Interim Service being in place, customers should not

be required to pay the full firm service rate for Interim Service during the Transition period.

The relationship of Interim Service to Day-Ahead Markets (DAMs) should also be discussed and clarified. Curtailments of Interim Service will likely increase reliance on redispatch in DAMs and perhaps also Energy Imbalance Markets (EIM), which will have financial consequences and could complicate discussions of, and changes to, the allocation of congestion rents in DAMs as Interim Service grows. Interim Service customers should be able to develop means to manage such financial consequences and should be exposed to DAM settlements on a comparable and not unduly discriminatory basis. Getting ready for Interim Service will take time, planning and most likely investments.

Individual Interim Service customers will presumably need to develop back-up plans (e.g., reliance on DAMs and/or other spot markets). Such plans could confer benefits on other customers in the form of additional transmission revenues and/or different/postponed costs of capacity expansion, which should be taken into account when pricing Interim Service and developing the rate parameters associated with it.

August 22: Pro-Active Planning and Accelerated Expansion

Grant supports pro-active planning and accelerated expansion as discussed during the workshop, with the understanding that cost recovery for accelerated expansion must be discussed further. For example, building in advance of requests for new service may be justified in terms of benefits to BPA's customers in the form of congestion management costs and DAM settlements; however, the relationship to how the benefits may be rolled into rates of general application needs additional discussion because many customers (perhaps even most or all) will benefit from such accelerated construction.

August 22: Contracting for Accelerated Expansion

All sources of funds and potential counter-parties for accelerated expansion should be considered and clarified. If BPA is considering that customers and/or third parties will provide funds for new facilities, clarity is needed on contracts both for financing in advance and for reimbursement once the new facilities are integrated into the BPA Network.

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