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July 21, 2025

John Hairston  
Administrator  
Bonneville Power Administration

*Submitted electronically via [techforum@bpa.gov](mailto:techforum@bpa.gov)*

RE: Grid Access Transformation and the Future State Transition

Dear Administrator Hairston:

Mason PUD 3 appreciates this opportunity to comment on BPA's Grid Access Transformation Project workshops held on July 9 and 10. Mason PUD 3 is a non-profit, locally governed utility at the base of the Olympic Peninsula that provides electric service to over 35,000 customers. As a network preference customer, Mason 3 has a priority right to purchase wholesale power from Bonneville at cost and a priority right to transmission capacity as stipulated by the tariff. Doing so supports its mission to connect its community with safe, reliable, economical, and sustainable services, 24/7.

First, Mason 3 would like to extend its gratitude and express excitement for BPA's undertaking of the expansive and ambitious long-term reforms to enable proactive, scenario-driven planning and execution within a five- to six-year delivery window. These comments are centered around the transition to that future state, namely, the NITS forecasts, application of readiness criteria, and long-term firm queue management - all from a NITS perspective.

### **NITS Forecast**

Placing forecasts at the center of BPA's planning and shifting from reactive to proactive planning is the right approach. BPA staff made it clear in the July workshops that new large loads are a major concern when considering planning treatment and cost allocation. It was articulated that the application of a demarcation (or threshold) between trended and non-trended load growth is not intended to apply to residential or commercial load but rather those large, chunky loads associated with significantly sized industrial customers. If that is indeed the intent, then the threshold should directly be associated with that facility and not its Point of Delivery (POD). It should not be assumed that new large load from a single industrial facility will have its own POD. There could be a case where a single facility with upwards of 150 MW would still be served from an existing Mason 3 POD.

Mason 3's request is to change the proposed annual new large load threshold from 'per POD' to 'at a single facility' so residential and commercial load growth is not inadvertently impacted. Alternatively, BPA could retain the proposed 'per POD' perspective for the threshold and add

language to the business practice so that: 1) the readiness criteria is only applied to that portion of the load growth associated with the single industrial facility; 2) the forecast not associated with the single industrial facility is awarded firm service and not at risk for denial of transmission service if the single industrial facility does not meet the readiness criteria; and 3) remove the language requiring the POD be perpetually designated as a new large load for life essentially requiring commercial planning for each year's incremental load growth.

### **Readiness Criteria**

Mason 3 generally supports the addition of readiness criteria, so encumbrances are not provided for requests that will likely not convert to service. This will create an actionable queue the only includes mature long-term transmission service requests. Given the amount of time given for consideration it is unknown if the criteria proposed is sufficient. Mason 3 will likely provide comments to this end later this year.

Mason 3 looks forward to discussing the 70% or greater probability standard as it should be reconsidered given the addition of readiness criteria.

Given the severity of the outcome, it is Mason 3's suggestion that any Forecasted Transmission Service Request be evaluated by a BPA committee prior to being declined. That way it can ensure the criteria are applied fairly and consistently.

As noted in the NITS Forecast section above, any load growth on a POD not associated with a new large load at a single industrial facility should not be subject to the readiness criteria or put on a path in which it can be denied transmission service. This is not the intent of BPA's proposal so the business practice should explicitly address it.

### **LTF Queue Management**

Mason 3 generally supports BPA's proposal to initiate a disciplined transition as outlined in the workshop. As BPA pointed out, doing so will clear bottlenecks, restore queue integrity, and stabilize planning.

Finally, Mason 3 looks forward to remaining an active participant and continue the collaboration on this important work.

Thank you for your consideration of these comments.

Sincerely,

*Michele Patterson*

Michele Patterson  
Power Manager