

NLSL Group Comments on BPA’s August 19, 2026 GAT Update Workshop

The NLSL Group¹ includes discrete large loads that are expected to result in a significant portion of BPA’s Total Retail Load over the next decade. The NLSL Group is focused on resolving policy issues and developing plans for load service in a rapidly evolving regional landscape. The NLSL Group appreciates the effort that resulted in the announcement of the Rapid Access Products & Interconnection Delivery (RAPID) program that was announced at the August 19th Grid Access Transformation (GAT) Update.

NLSL Group Interests in RAPID

The members of the NLSL Group represent a potential growth of several GWs within the next decade of discrete large loads that is mostly, but not exclusively, data center load. Consistent with the policy goals of the US Department of Energy, members of the NLSL Group are interested in pathways to achieve “speed to power” while ensuring that other BPA customers are shielded from costs incurred by developing and operating these large loads.

The NLSL Group has submitted comments in several BPA stakeholder processes (WRAP, BP-26, Provider of Choice, RP-24, TC-27) since December 2022, and in nearly all of these comments we have encouraged BPA to address issues related to these objectives, especially those issues related to co-located/behind-the-meter generating resources and demand response.

RAPID

At the August 19th GAT Update, BPA announced the RAPID program which will develop *“bridge products for interconnection today, plus forward-thinking policies and products that fully subscribe generation and load to the builds considered in proactive planning”*.

BPA states that this program will be an *“An agile, cross-functional policy and product-design unit”* that will

¹ The NLSL Group is comprised of BPA preference customers who serve or expect to serve retail members and customers that the Northwest Power Act categorizes as “New Large Single Loads” (NLSLs). Member utilities include: Northern Wasco County PUD, Grant PUD, Clatskanie PUD, Harney Electric Cooperative, Klickitat PUD, Snohomish PUD, and Eugene Water and Electric Board.

- Deploy fast tracked interconnection products and services designed for speed to power
- Enforce strict cost causation
- Offer products not tied to the traditional TSR model

Slide 34 implies that the scope of RAPID appears to be specifically related Load Interconnection products and includes LLI process reform, co-located resources, operational monitoring of behind-the-meter activity and demand response.

NLSL Group Comments

The NLSL Group views the RAPID program as a very positive step in achieving the goal of speed to power while shielding costs from other BPA customers. The NLSL Group offers these comments and welcomes further engagement with BPA and other stakeholders on this program.

Priorities

The NLSL Group believes that resolving issues related to co-located/behind-the-meter generation and demand response are the highest priority to achieve speed to power goals while shielding other BPA customers from large load costs.

Further, with regard to transmission service, the NLSL group encourages BPA to develop new products and streamline TSR processes for load service to large loads, inclusive of any additional regulatory or resource adequacy requirements. This stems from challenges NLSL Group members have experienced with TSRs as well as a lack of clarity in how transmission service should be secured in advance for WRAP obligations (which includes additional transmission for Planning Reserve Margins).

Best Practices

The NLSL Group encourages BPA to evaluate other utilities' and grid operators' approaches to speed-to-power and review FERC, EPRI and DOE direction on this topic. Adopting any emerging best practices could allow some aspects of RAPID to be implemented quickly and would align with directions established by national policy.

Cross-Functional Policy and Products

The NLSL Group is very encouraged by BPA's stated intent for RAPID to be a cross-functional program. However, it is not clear how extensive this cross-functionality will span across BPA. The NLSL Group has recommended in previous comments that BPA develop a cross-agency approach to large load integration that, in addition to transmission products, includes power rate products, WRAP treatment, impacts to short-term load forecasting, approaches for participation in organized markets, and operational requirements for visibility and dispatch. We continue to stress the need for a holistic, cross-agency approach to addressing issues related to large loads and hope that BPA's intent for RAPID is consistent with this view.

Behind-the-Meter/Co-located Generation

The GAT presentation used referred to both "behind-the-meter generation" and "large loads co-located with generation". Can BPA confirm that these terms refer to the same thing, or provide a distinction between the two?

Agile Program Management

The NLSL Group is encouraged by the desire for this program to be "*agile*". In order to achieve agility, this program should engage customers on a more frequent cadence than the GAT updates. The NLSL Group proposes that BPA set up standalone RAPID workshops with stakeholders on a monthly (or shorter) cadence.

Another feature of an agile program is incremental progress tied to specific deliverables, and the NLSL Group believes that quickly enabling pilots for behind-the-meter generation and demand response is consistent with this approach and will allow for identifying implementation refinements.

The NLSL Group again thanks BPA for kicking off this important program and looks forward to engaging on this topic in the near future.

Submitted by Steve Kerns (Sandpiper Solutions, LLC), on behalf of the NLSL Group.
sandpiper@kernsfunk.net