

April 30, 2026

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

**Re: Northwest Requirements Utilities Comments in Response to BPA's April 15, 2026 Grid Access Transformation (GAT) Workshop**

Northwest Requirements Utilities ("NRU") appreciates the opportunity to provide these comments in response to BPA's April 15, 2026 Grid Access Transformation ("GAT") workshop, through which BPA provided additional information on the Proactive Planning and Accelerate Expansion elements of its GAT initiative. NRU represents the interests of approximately 60 BPA customers, comprised of Load-Following preference customers and one generation and transmission cooperative, all of whom depend on Network Integration Transmission Service ("NITS") contracts with BPA for reliable load service. NRU and its members have a vested interest in the specific processes that BPA will use to plan its transmission system in response to NITS customer load and resource forecasts, and as such urge BPA to consider these comments in the development of its planning and expansion methodologies.

**Proactive Planning**

NRU appreciates the additional details shared by BPA staff on its Expansion Planning, which it described as a sub-component of the Proactive Planning paradigm. Generally speaking, we strongly endorse BPA's intent to identify the transmission needs of its customers without relying on transmission service requests as the primary input. We agree with BPA that its prior approach to identifying transmission needs, which generally relied on the exclusive use of powerflow analyses to respond to specific sets of transmission requests, is no longer alone sufficient to assess the long-term needs of its transmission customers. Moreover, this approach was never suitable to address the long-term load growth of BPA's network transmission customers, whose needs grow at different rates over time, updated on an annual basis, and for whom BPA has an enduring obligation under its tariff to plan its transmission system. Prioritizing network transmission customer load forecasts as a central input to transmission planning is a vastly superior and more efficient approach and will better enable BPA to meet its tariff and statutory obligations to its preference customers.

We support BPA's proposal to adopt expanded analytical modeling tools, such as Production Cost Modeling and Long-Term Capacity Expansion, to provide a more robust assessment of the long-term needs of its transmission system. These tools are commonly used throughout the

industry and are increasingly relied upon for long-term assessments of scenario-based transmission planning. Moreover, the adoption of more diverse modeling tools will allow BPA to identify and quantify potential additional benefits of the various transmission solutions, such as economic or congestion-related benefits as well as tradeoffs between co-optimized resource and transmission investment choices. These tools should enable a more data driven and informed project evaluation and selection process, decisions that ultimately will significantly impact ratepayer costs over time. And most importantly, these tools will enable BPA to plan on a long-term, forward-looking basis to ensure that it can install the necessary transmission infrastructure to meet the load growth of its network transmission customers.

However, while we are encouraged that BPA continues to appear to be prioritizing load forecasts as a cornerstone input to its Expansion Planning process, we insist that the load growth inputs that BPA ultimately uses must tangibly connect to specific network transmission customer forecasts (including those included in the new and growing loads tab of the load and resource forecasting tool), and not simply be generalized abstractions that may underrepresent its customers' total needs. BPA's network transmission customers submit to BPA 10-year load and resource forecasts, with the option to forecast out to 20 years. The transmission reinforcements resulting from BPA's Expansion Planning process must always be sufficient to accommodate such loads. Failure to do so would contravene BPA's tariff obligation to endeavor to place into service sufficient transmission capacity to meet its network customer load growth, and its statutory obligation to ensure that there is sufficient transmission capacity to meet its future marketing obligations to its preference customers before making any excess transmission capacity available to all other utilities. These obligations are immutable and exist irrespective of whether the load growth is trended or non-trended, or above or below various probabilities of occurrence.

As a result, we comment here as BPA begins to flesh out its Expansion Planning proposal to demand BPA make clear and transparent how the load forecasts submitted by its network transmission customers will be incorporated, and ensure that these customers have line of sight into how capacity resulting from the Expansion Planning will be allocated among all of BPA's transmission customers. Whatever planning process BPA ultimately adopts, preservation of network transmission customer access to resulting upgrade capacity is a fundamental objective for NRU and its members. To this end, we look forward to and support BPA's proposed stakeholder engagement process underlying its Proactive Planning initiative, specifically its intent to provide quarterly updates and to engage in a collaborative approach to information exchange with its customers.

### **Load Area Reinforcement Studies**

We applaud BPA's efforts to formalize the studying of local load areas on a long-term basis, referred to by BPA as Load Area Reinforcement Studies ("LARS"). NRU believes these studies will be valuable in identifying necessary local area infrastructure to accommodate long-term

reliable load growth and urges BPA to continue to elevate the importance of long-term, local area transmission planning as a component of its load service obligation to network transmission customers. However, we seek additional clarification on this process and its placement within all of BPA's study efforts. At the workshop, BPA staff noted that the Expansion Planning studies would not likely identify transmission upgrades at the general voltage levels of the local area equipment. Rather, BPA proposes to institute a separate planning process to evaluate the long-term needs at the local areas.

While we await additional context for this approach, we urge BPA to identify ways to consolidate, not increase, its transmission planning processes. This includes evaluating local area reinforcements as part of its Expansion Planning – not separately. After all, BPA will already be evaluating transmission system impacts based on the long-term load forecasts of its network transmission customers, over the course of what we assume will be a 2–3-year study process. BPA's network customers' long-term transmission needs are not isolated only between the Point-of-Receipt and Point-of-Delivery; they include the local area facilities as well. This is why we continue to suggest that BPA evaluate the merits of embedding within its Proactive Planning such evaluations of the long-term needs of the local area interconnections, resulting in a comprehensive, long-term transmission service solution for its network transmission customers. Following this, BPA's network customers could, as necessary, submit line and load requests to pursue those local area solutions and utilize the resulting capacity.

BPA's transmission organization is already committed to a meaningful number of separate and independent planning processes, such as its annual Attachment K reliability planning, generator interconnection planning, line and load interconnection planning, transmission service request-based planning, its Customer Reliability Improvement Service Program planning, as well as regional planning efforts in support of NorthernGrid, to name a few examples. Adding another new, separate, siloed planning process on top of these others in the face of limited resources raises concerns over BPA's long-term effectiveness in delivering on such a diverse set of parallel planning programs. NRU members' long-term reliable load service is significantly dependent upon BPA's success in executing its transmission planning processes, and this perspective forms the basis of our feedback here.

We cite as a relevant example of merging transmission planning processes for the sake of both efficiency and cost-effectiveness the recent innovative proposal implemented by the Southwest Power Pool ("SPP"), wherein it consolidated its generator interconnection queue studies and its long-term transmission planning process. As support for its proposal, SPP noted that "the piecemeal build-out of the transmission system, as opposed to a holistic approach that proactively plans for the transmission needs of loads and generation, can have a compounding effect on transmission rates, ultimately resulting in higher future costs for load." BPA should similarly expand its innovative mindset and consider adopting an even more comprehensive planning process within the Proactive Planning paradigm, thereby simplifying processes and

increasing the efficiency of its resources. We appreciate BPA considering these comments as it progresses with the development of its long-term transmission planning processes.

### **Accelerate Expansion**

NRU remains supportive of BPA's efforts as outlined in its Accelerate Expansion presentation, and its commitment to provide regular public workshops to brief stakeholders on its progress. We are encouraged by the trajectory of the Transmission Infrastructure Delivery and Execution Strategy, specifically BPA's progress in increasing the number of approved third-party contractors that can bid on BPA's capital projects. We look forward to hearing more on BPA's success in this effort, once its Request for Proposals officially concludes and it can share more on the number of total vendors that BPA selected.

In addition, NRU appreciates BPA's proposal and recent efforts to develop a Customer Build option, including benchmarking with other utilities that have advanced similar proposals. It is our experience that many of BPA's transmission customers are motivated to assist BPA in its capital execution, and we look forward to additional information from BPA on the criteria that it will use to identify the types of transmission projects that it will allow its transmission customers to build. While BPA noted in its presentation that it aims for the year 2027 to adopt its Customer Build option, we encourage BPA to provide greater precision on when it aims to have this policy officially adopted. Given the level of interest in the Customer Build option, we encourage BPA to strive to implement the business practice and adopt the policy in the first half of 2027.

### **Conclusion**

Although we remain encouraged by BPA's progress in developing its Proactive Planning and Accelerate Expansion elements of the GAT initiative, BPA must continue to clarify how it will meet its tariff obligations with respect to its network transmission customers through its Proactive Planning vision. This concept will remain a primary focus for NRU and its members as BPA progresses toward the future state design, to ensure at a minimum that capacity resulting from Proactive Planning will serve BPA's network customer load growth. We look forward to the future public engagement on these topics and appreciate BPA's intent to conduct a meaningful stakeholder process.

Sincerely,

Chris Jones  
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Northwest Requirements Utilities