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Submitted via techforum@bpa.gov

Re: NRU Comments in Response to BPA's Grid Access Transformation Project Workshop

Northwest Requirements Utilities ("NRU") appreciates the opportunity to provide these comments in response to BPA's July 9-10, 2025, Grid Access Transformation ("GAT") Project Workshop. NRU represents the interests of 56 Load-Following preference customers and one generation and transmission cooperative, all of whom depend on BPA's Network Integration Transmission Service ("NITS" or "NT") product for reliable load service.

General Comments

As a preliminary matter, NRU would like to express our appreciation for BPA's responsiveness to our previous comments, and those of the NT Customer Group, requesting a more robust and engaging stakeholder process. The GAT project is extensive in both scope and potential impact, and BPA's level of engagement both in the public workshops and related NT Focus Group meetings is sincerely appreciated. Additionally, we are also grateful for the detailed responses that BPA has already provided to customers, and your commitment to provide responses to future comments. We remain optimistic about the potential benefits of the GAT project and look forward to working collaboratively with BPA to help the agency achieve its 5-to-6 year energization timeline. At the same time, we feel the need to reiterate our serious concerns with respect to the agency's ability to implement any day-ahead market solution in the future unless and until BPA is able to either guarantee that 6NN transmission would qualify for congestion rent, or, preferably, provide long-term firm transmission for all NT customers.

Given the direction provided by the July 11th Tech Forum notification, the following comments are focused only on content addressing BPA's proposed Transition to Future State; specifically, NITS Forecasts, Readiness Criteria, and the Transition Plan for the Long-Term Firm Queue.

NITS Forecasts

As a preliminary matter, there have been several discussions regarding decisions to be made at the POD level. Specifically, it was stated that the PODs in question are not "scheduling" PODs, but those listed in Exhibit A of the Contract. While this did clear up some confusion, it did not set the conversation on a level field. For some utilities, all PODs are substation delivery points. For

other utilities, some or all PODs are transmission delivery points with several substations "underneath". With BPA's intent to define a line – which is understood in conceptual terms and generally supported – the tie to a contract POD with such varied definitions is potentially, and presumably intentionally, discriminatory between customers. For instance, a utility with all PODs at the substation level, is likely to have no "trended" growth above the 13MW line. However, a utility with only a transmission POD, may easily have "trended" growth above the 13MW line.

Additionally, and to reiterate a point made several times already, NRU simply cannot support any approach that includes designating a POD as a "New Large Load" for the life of the POD, subjecting all subsequent customer load increases at that POD to Commercial Planning. Though we can appreciate the symmetry doing so would create with BPA Power's statutory New Large Single Load (NLSL) policy, the proposed approach to NITS forecasts would represent an unnecessary and unjustified burden on any customer. Moreover, there is no basis from a transmission system planning standpoint to forever designate a specific POD as "New Large Load" and subject all subsequent load growth to BPA's Commercial Planning process, when such subsequent forecasts may fall well below the 13 MW threshold. We recognize – and appreciate – the fact that BPA has recently indicated a willingness to move away from this recommendation, but felt compelled to state our position, nonetheless.

Moving on, BPA's proposal to guarantee long-term firm transmission for all NITS growth of less than 13 MW in any single year, at any single POD, is likely sufficient for the great majority of NRU members, and NT customer group overall. We would like to acknowledge and express our appreciation for the benefit that this would provide for the majority of our members. However, we submit that there are several nuances that need to be further explained and/or addressed before the alternative can be considered further.

For example, we would like to better understand how BPA intends to apply the "70% likelihood" threshold for both "trended" and "above-the-line" forecasts. While we understand that the agency is reconsidering applying the criteria at all, and appreciate the explainer that BPA posted alongside the Workshop materials titled "Application of the 70% Probability to Possible New and Growing Loads", until customers have a complete picture of how BPA will be considering NT customer load forecast data, NRU is unable to support any proposed solution. BPA staff also noted in the workshop that the "70% likelihood" threshold would continue to be utilized for (at least) the 2-year case in its System Assessment. At the same time, BPA also noted in the materials that it would defer additional conversations on the "70% likelihood" threshold to a future date. As a result, it remains challenging to provide meaningful feedback on BPA's 13 MW proposal until more detail is known about the use of this threshold.

Moreover, BPA also proposes to implement readiness criteria in order for NITS customers to obtain a forecast TSR ("FTSR") and encumber transmission capacity, while at the same time maintaining some use of its "70% likelihood" threshold. It is our perspective that the interplay

between the "70% certainty" threshold and the readiness criteria that BPA intends to implement remains opaque and would benefit from additional clarification. This is underscored by the presentation materials stating that BPA would also include all NT customer load forecasts, irrespective of readiness or likelihood, in its future proactive planning model.

Further, BPA's proposal to apply additional planning scrutiny to "chunky", "new large loads" seems reasonable, especially when considering the goals of ensuring appropriate planning treatment and cost allocation. However, subjecting all "above-the-line" requests to the Commercial Planning process is, as one customer put it, to convert all NT requests above 13 MW to point-to-point (PTP) requests. While, once again, we understand that additional planning and cost allocation considerations may be necessary, we would like to better understand why all such requests would receive a Queue Time based on receipt of the customers' LaRC. BPA has an obligation to endeavor to plan for reasonably forecasted network load growth; there is no equivalent requirement for PTP transmission requests.

Additionally, applying a "bright line" at the POD level all but guarantees the blending of "trended" and "specific" load increases and risks subjecting the "trended" load growth of a large utility to the Commercial Planning process. For example, consider a utility with a POD comprised of many different types of end use customers that is forecast to grow by 12 MW between year 5 and 6, 11 MW between year 6 and 7, and then by 13 MW between year 7 and 8 – the overall load growth is clearly "trended", but the utility will be required to participate in Commercial Planning in year 7. This treatment is in direct contrast with BPA's statement on slide 38: "*The transmission needs of NITS Customers experiencing trended load growth are differentiated from and balanced with NITS Customers experiencing large load growth*". These are just a few of the potential unintended consequences that could arise from applying a "bright line" rule to something as nuanced as load forecasting, which is why we hope that BPA will be open to reviewing the specifics of each such request on a case-by-case basis as necessary.

Finally, we remain committed to ensuring that the NITS load forecasting policies and other GAT project reforms will not unintentionally impact Transfer Service customers of BPA Power. While we cannot at this time identify any specific adverse impacts, the forecasting process of one transmission provider may result in impacts to a BPA NITS customer that is ultimately served by another transmission provider, and therefore BPA should remain willing to consider adjustments as necessary to accommodate impacts to these customers, should they be identified.

Readiness Criteria

NRU has consistently supported BPA's attempts to modify its requirements to ensure the prioritization of mature long-term firm service requests, and we will continue to do so. Additionally, with respect to Planning for Virtual Points, we appreciate BPA's "grandfathering" of requests that have already been submitted.

That said, staff found the "Foundational Concepts" discussion on slide 48 confusing, and have a number of points we are hoping to clarify:

- First, BPA states: "For any relevant generation or line/load interconnection, the electrical plan of service must be defined by the relevant transmission provider and construction contract for the project (if needed) signed and funded."
    - To clarify, is BPA saying that until the Line/Load interconnection upgrades are contracted for/funded, a NITS customer cannot forecast it or submit an FTSR?
        - What exactly will be enabled for NITS customers by satisfying the line/load upgrade step?
        - Will BPA consider financial demonstrations in lieu of physical/technical readiness requirements such as executed load interconnection agreements?
- With respect to sub-grid transmission constraints, are NITS customers precluded from submitting FTSRs until/unless the necessary sub-grid fixes have been addressed, even if they already meet the line/load or generator interconnection requirements?
- It isn't entirely clear what the proposed readiness requirements will require of NITS customers, or what those customers will be able to do prior to satisfying those requirements.
    - e.g., prior to satisfying the readiness requirements, can a NITS customer do anything outside of submitting a LaRC? What about an FTSR, or line/load interconnection request, etc.?
- How does BPA propose to offer the interim service included in the "NITS Planning Model" for such requests?

Additionally, while we understand and appreciate BPA's objective and principles with enhancing customer readiness requirements, we also wish to raise one consideration for how the different elements and timing of BPA's GAT project may interact. Specifically, if BPA includes all NT Customer load forecasts (irrespective of likelihood or readiness) into its proactive planning process and identifies transmission solutions for such load, but prohibits the same NT Customer from obtaining an FTSR to encumber resulting capacity until it meets the readiness criteria, we want to ensure that there is not a risk that other transmission customers could be awarded such capacity before the NT Customer is able to meet the readiness criteria, or otherwise that no capacity remains for the NT Customer's load growth that "became ready." It is NRU's position that setting aside transmission capacity that BPA places into service in specific response to an NT Customer's load growth reasonably forecasted is a core principle of NT service, and the readiness requirements must not conflict or interfere with this foundational principle.

Finally, there appears to be a contradiction in the Process Overview detailed on slide 47, and the NITS Planning Model on slide 40, wherein the Model seems to indicate that all LaRC forecasts will be included in proactive planning, including all "above the line" forecasts. Conversely, Process Overview clearly states that any failure of the applicable readiness criteria will result in

a TSR being declined and removed from the LTFQ. We suspect this is due to an issue where the order of operations may be misaligned, but regardless, it is unclear how both of these can be true, and so further discussion would be appreciated.

Long-Term Firm Queue Management

As noted above, NRU is generally supportive of more robust standards for queue management, both with respect to readiness, and as a tool to bring BPA to its desired future state.

That said, as we'd also noted above, additional clarity is necessary as to how the new readiness requirements will be applied to the 13,131 MW of unstudied NITS requests in the queue. Specifically, is BPA going to require all FTSRs for "above the line" NITS loads to have signed/funded construction agreements for load upgrades, or they will be removed from the queue? How does this work within the framework proposed by the NITS Planning Model slide, which clearly states that "All forecasts have a path forward to firm service"?

Conclusion

With respect to BPA transmission reform and the GAT project, at the highest level it is NRU's perspective that BPA's historic approach to NITS service was similar to the "proactive planning" that the agency described in the most recent Workshop. Specifically, BPA incorporated NT customers' forecasted needs into its base case planning and ensured that the transmission system was capable of providing reliable access to firm transmission service on a forward-looking basis. This is one of the primary reasons we remain optimistic about this project and BPA's proposals to date. We submit that this approach to transmission planning is a primary reason the region has been able to rely on BPA for reliable, affordable delivered power for as long as it has. However, the lens through which transmission planning seems to view the "growth" problem has clearly shifted over time.

Whereas, historically, the grid was built with the future load service needs in mind, we now seem to focus entirely on reactionary, path-based solutions that appear designed specifically to address the requests of point-to-point customers. While we maintain that the "proactive planning" end state is likely ideal, in the near term we would encourage BPA to reconsider the lens through which it is considering today's problems, and the statutory framework that led to the buildout of the grid we know today. More specifically, while we are cognizant of the volume of requests in the queue and the amount of generation that we all hope to see integrated, that generation is necessary because of the load it is needed to serve. It is that load service, and BPA's continued commitment to reliable, affordable delivered power, that we hope will help inform the GAT project and related processes, going forward.

We are taking the time to point this out because it seems necessary. For example, a BPA staff member recently noted that the 13 MW "bright line" for NITS forecasts is BPA's "attempt to avoid forcing all NT forecasts into the Commercial Planning process." While we acknowledge that

BPA's proposal includes the potential to process some portion of NITS customer forecasts through its Commercial Planning process, we underscore the ongoing tariff obligation that BPA has to include NT customers' network load in its transmission system planning and endeavor to construct sufficient transfer capability to deliver the NT customers' network resources to serve its network load. To this end, we support BPA policies that would minimize the proportion of forecasted load and resources that would be processed through the Commercial Planning process and instead rely on BPA's System Assessment or other processes for ensuring reliable, firm service for growing loads.

To reiterate, thank you once again for considering the above comments, for your robust engagement on these important issues, and for your commitment to respond to future comments. NRU remains committed to engaging collaboratively with BPA on the future of the NITS product, and the overall success of the GAT project. Should you have any questions regarding any of the above, please don't hesitate to contact us.

Sincerely,

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