

NT CUSTOMER GROUP COMMENTS IN RESPONSE TO JULY 29-30, 2025 GRID ACCESS TRANSFORMATION DEEP DIVE

Submitted: August 15, 2025 via techforum@bpa.gov

The NT Customer Group¹ appreciates this opportunity to submit comments in response to BPA's Grid Access Transformation (GAT) Project deep dive workshop (Workshop) held July 29-30, 2025. We are grateful to BPA for committing significant resources to develop and present the framework for implementing its GAT proposals. We understand and appreciate BPA's interest in restarting its processing of the transmission service queue and LARC submissions from NT customers, and we are committed to working closely with BPA as this reform process moves forward. Below we offer our limited comments to hopefully aid BPA in determining the appropriate pace, scope, and details of its GAT reforms. Further, as we've stated in previous comments, our comments rely heavily on an understanding that BPA's GAT reforms will remain subject to change as this process evolves and we all gain additional experience (i.e., these policies will be drafted in pencil, and not ink).

At the Workshop, a number of parties expressed concern with the pace of BPA's current timeline, requesting that BPA slow down and clarify the GAT Project to allow additional time for engagement given the scope of proposed policy changes. Absent new information, the NT Customer Group would oppose any proposed slowdown of the GAT Project timeline, while agreeing to facilitating a process that offers discussion and a formal feedback loop between BPA and participants. While we certainly encourage BPA to implement reforms that are both implementable and defensible, we consider BPA's obligation to NT customers to ensure reliable load service as immediate and no longer deferrable. Therefore, we encourage BPA to continue its current implementation trajectory, at a minimum as it relates to NT-specific proposals.

Moving on, as briefly listed below, we generally either support or do not oppose much of what BPA has proposed to date.

- We do not oppose BPA's proposal to establish a New Network Load definition. We understand that this would temporarily enable BPA to more quickly process and encumber firm transmission capacity for load growth that does not fall under the New Network Load definition, which would meet a significant proportion of NT customers' needs.
- We generally support BPA's proposals as they relate to readiness criteria. Specifically, we support BPA's proposed requirement that requesting customers provide evidence of transactional maturity. Such provisions would enable

¹ The NT Customer Group includes Benton REA, Big Bend Electric Cooperative, the City of Forest Grove, Clark Public Utilities, Columbia River PUD, Eugene Water and Electric Board, Klickitat PUD, Grays Harbor PUD, Mason PUD #3, Northern Wasco PUD, Northwest Requirements Utilities, PNGC Power, Umatilla Electric Cooperative, and Western Public Agencies Group.

committed load serving and resource pairs to help direct the transmission needs for which BPA ultimately constructs new facilities.

- We generally support, despite the exception noted below, BPA's proposals as they relate to management of its Long-Term Firm Queue. BPA should move quickly to contract those parties remaining in its transmission queue to existing transmission projects or to interim service, and require relevant financial security provisions to ensure the customer's ability to pay for the service requested.
- We support BPA's proposal to develop and offer an enhanced version of priority 6NN transmission service as an interim bridge to NT customers that require transmission upgrades to enable firm service. We specifically acknowledge BPA's efforts to increase the parity between the Point-to-Point Conditional Firm service and this new priority 6NN service to NT customers, by allowing equal access to short-term firm transmission capacity. This is a significant improvement over what BPA originally proposed earlier in the GAT efforts, which would have resulted in NT customers having vastly inferior access to short-term firm transmission capacity.
- We generally support BPA's proposed "Transition to Future State" approach for the treatment of virtual points and the ability of NT customers to obtain FTSRs for long-term NITS enhanced priority 6 service for a POR of NWHUB. We look forward to working with BPA to refine details as the process progresses.

Listed below are aspects for which we request additional consideration or that we do not fully support at this time:

- Although we do not oppose BPA's proposed 13 MW-or-larger New Network Load definition, it is imperative that BPA develop an alternative approach to applying the threshold than at the Point of Delivery (POD) level. The NT Customer Group is comprised of utilities with varying electric delivery situations. Some PODs contain a number of individual substations underneath them, while others do not. Some PODs serve a variety of end use types (residential, commercial, industrial), while others do not. In keeping with BPA's intent to apply the New Network Load definition to only those load increases that represent challenges to sufficiently plan for in advance, applying this New Network Load definition on a more granular basis, such as at a facility or meter level, would ultimately prove less burdensome than BPA and NT customers having to "carve out" residential or other more organic load growth from specific PODs after the fact to arrive at what load ultimately represents New Network Load. Additionally, establishing a more granular evaluation at the outset will avoid BPA having to consider the components of a given POD-level forecast on a case-by-case basis; a process that would add unnecessary staff time and both legal and financial risk to an already burdensome process.
- BPA should also commit to sunseting the New Large Load designation in the future state once achieving the proactive planning state. As indicated, the New

Large Load designation is intended to move projects into the commercial planning queue even if they are considered network loads. If the transmission planning reform process is successful there should be no reason to maintain the NLL designation in the future.

- BPA needs to identify the 10-year load and resource forecasts that will serve as the baseline for applying the New Network Load definition. The NT Customer Group proposes using the most recent ten-year load and resource forecasts possible, prior to the New Network Load definition going into effect.
- BPA needs to revisit its proposal for how financial security is calculated and returned for NT customers. Specifically, we recommend that BPA not adopt its proposal to use the NT customer's Network Load on the hour of the Monthly Transmission System Peak Load as the basis to return its financial security. Relying on the NT customer's Network Load as a whole would mask the specific actual New Network Load that drove the need for transmission upgrades, and more likely result in the NT customer not being returned its financial security due to fluctuations and changes in the peaks of the customer's other loads, for instance such as those driven by weather or load loss due to economic factors, demand response programs, or other conditions. We suggest BPA rely on a more targeted measure for financial security purposes that focuses on determining whether the specific load(s) that caused transmission upgrades truly manifests.
- We also think that BPA should consider a risk informed approach to determining the appropriate level of security per individual project basis. The point is that BPA needs to balance risk while finding ways to minimize barriers for customers to serve growing demand in their service territories.

As noted previously, we greatly support BPA's efforts as it relates to the GAT Project. We believe that this project holds promise for the near-term and that it will result in a more effective way for BPA to respond to new transmission needs. We also look forward to working with BPA on more permanent solutions to queue reform when appropriate. Further, we encourage BPA to maintain the current timeline, at least for those areas where there is common customer support, as described herein. We very much look forward to continued engagement with BPA as part of the GAT Project.