

August 15, 2025

Submitted electronically

RE: Northern Wasco County PUD Comments on Grid Access Transformation Draft Language

Northern Wasco County PUD (Northern Wasco) appreciates this opportunity to comment on the draft language presented at the July 29-30 Grid Access Transformation workshops. Northern Wasco is a Load Following and NITS customer of BPA. We rely on NITS to reliably serve our load with a combination of federal and non-federal resources. In addition to these individual comments, Northern Wasco is a member of the NT Customer Group and joins those group comments. Given the tight turnaround for comments from the last workshop, please consider these comments partial and preliminary – Northern Wasco will likely have additional comments on the issues addressed below and other areas as more information becomes available and we further analyze BPA’s proposals.

Northern Wasco appreciates BPA’s responsiveness to feedback regarding the use of virtual points. Virtual points are an essential feature of efficient wholesale power markets functioning in the Northwest. We believe BPA’s approach in the draft language is moving in a positive direction that is workable for Northern Wasco. We look forward to working on more detailed implementation concepts with BPA. In Northern Wasco’s specific circumstances, we are interested in exploring use of Big Eddy as a POR/POD for NWHUB which could more accurately reflect how power is delivered to our load, and as a means to potentially reduce pancaked rates paid on the Network for load service by applying the Short Distance Discount to the NT leg of service to get wholesale power purchases to our load (in addition to the PTP leg from the generator to NWHUB).

Regarding “FTSR/TSR Data Validation Readiness Criteria” Northern Wasco supports BPA’s goal of encouraging inclusion of “mature” LLIR requests in the queue. However, we are concerned that the criteria in the draft language are too vague and may not account for delays in the LLIR process that are caused by BPA and not the customer. Northern Wasco supports Umatilla Electric Cooperative’s proposed language of “*Line/load interconnections in BPA’s balancing authority area shall be deemed to be mature if the customer has fulfilled its most current LLIR contractual and procedural obligations.*”

Another ongoing point of concern for Northern Wasco is how existing encumbrances based on previously accepted load forecasts will be treated. We believe we have heard verbally in workshop discussions that existing encumbrances and FTSRs will be honored, but would like more details on how this will be memorialized in a formal policy decision.

We appreciate BPA’s consideration of these comments and look forward to working closely with the agency as the process continues.