

July 21, 2025

*Submitted electronically*

**RE: Northern Wasco County PUD Comments on July 9 and 10 Grid Access Transformation Project Workshops – Transition to Future State**

***Introduction***

Northern Wasco County PUD (“Northern Wasco”) appreciates this opportunity to comment on “Transition to Future State” issues raised in BPA’s recent Grid Access Transformation project workshops. Northern Wasco is a Load Following customer and relies on Network Integration Transmission Service (NITS) to serve load with both federal and non-federal resources. Unlike many Load Following customers, Northern Wasco serves the majority of its retail load with non-federal resources. BPA, as the host control area transmission service provider and supplier of federal power, is able to integrate its federal resources for that portion of load served by federal resources.

Northern Wasco commends BPA’s efforts to take bold, collaborative action with customers to make real reforms to its transmission planning processes. These comments are by necessity of a high level in nature, as many important details need to be resolved through specific business practice or tariff language. We urge BPA to continue working closely with customers to find solutions that work for the agency, customers and the region at large.

While Northern Wasco appreciates BPA’s desire to move quickly to get transmission processes off a “pause” state, the changes being contemplated are substantial and carry significant potential for unintended consequences. We strongly urge BPA to be flexible in its implementation going forward.

One outcome of the Grid Access Transformation Project must be a clear policy decision and record with clear measures for what “success” of the transition process looks like. BPA has characterized many potential actions as transitional in nature, and these should be clearly documented as such with explicit timelines for reevaluation.

***NITS Forecasts***

As a general matter, differentiating NITS customer loads on the basis of size is problematic and in conflict with the open access transmission principles governing the service. If BPA continues on this path, it is essential that this practice be strictly limited to the “transition” period moving towards the “future state.” Northern Wasco is relatively agnostic among the “threshold” options presented by BPA staff, but notes that any “one-size-fits-all” approach will be unlikely to work

for all customers under all circumstances. We encourage BPA to build some flexibility and discretion into its approach and believe an explicit sunset of any transitional “bright line” distinction between NITS loads based on size is necessary.

### ***Readiness Criteria***

Some kind of readiness criteria is prudent and warranted in reforming the transmission planning process. Northern Wasco appreciates the objectives and principles presented by BPA staff in the workshop and associated materials. However, we have significant concerns given the lack of detail regarding how readiness criteria would be implemented for FTSRs and TSRs that are essential to NITS customers’ access to competitive wholesale power markets.

Readiness criteria that are adopted must work with the commercial realities load service and Northwest wholesale markets. Specifically, it is rare for customers to enter into power purchase agreements to serve loads until commercial operation of these loads is imminent. Further, it is common for sellers to utilize a portfolio of network resources to meet wholesale power contract obligations, including the output of variable energy resources that is impossible to know months or years in advance. Indeed, hydro resources also have seasonal and year-to-year resource diversity that affects the mix of resources used by entities selling power to Northern Wasco.

Readiness criteria should not inhibit efficient and economic use of Network Resources for load service or prevent customers from obtaining FTSRs or TSRs or entering the queue for long-term firm service to established, non-speculative loads. BPA must adhere to the intent of Open Access Transmission Tariff that allows network customers to utilize their network resources, which can include both their own generation and other sources, to serve their network load located within the transmission provider's control area.

Northern Wasco will withhold more specific comments until seeing the specifics of proposed business language changes.

### ***Virtual Points***

While creating some planning complexity, Virtual Points are an essential feature of transmission service to facilitate efficient wholesale market transactions, and are consistent with long-standing national energy policy and the principles of open access transmission service. As described above and in more detail in our June 18 comments, single point source for firm NITS service simply does not make sense. Network **Integration** Transmission Service, as its name implies, is intended for **integration** of resources for service to loads, with cost allocated based on load, and customers billed based on their peak load.

Upon initial analysis, it appears that BPA staff’s leaning for “Alternative 3” (allow NWHub to continue to be requested in the long-term market, and deactivate MIDCRremote as a requestable

long-term point) is workable. Northern Wasco requests additional workshops to further explore how Virtual Points can be created for NITS customers.

### ***Transition Plan***

As BPA and the region transitions toward an organized market, Northern Wasco supports BPA's approach to offering less-than-firm (i.e. 6NN service for NITS customers) as an interim service solution. We look forward to development of further details on these service offerings and will likely have more specific comments when more information is available. We note that the offering of 6NN as an interim service option highlights the need to equitably resolve issues related to congestion revenue rights under an organized market framework. NITS customers paying for transmission service based on the full embedded cost of the system must be allocated a fair share of congestion revenue whether power is ultimately scheduled at Priority 6 or Priority 7.

Thank you for your consideration of these comments.