

August 14, 2025

To: [techforum@bp.gov](mailto:techforum@bp.gov)

Re: Comments related to BPA's Grid Access Transformation ("GAT") July 29 – July 30, 2025, workshops.

PacifiCorp appreciates the opportunity to provide comments to Bonneville Power Administration ("BPA") regarding proposed business practice changes required to support the movement off pause. Business practice changes were focused on the following areas:

1. Network Integration Service ("NITS") Forecasts:
  - a. New Network Load
  - b. NITS Line & Load Requirements
2. Data Validation Readiness Criteria
3. Long-Term Firm ("LTF") Queue Management
4. Interim Service: Conditional Firm Service & Enhanced NITS Priority 6

### **Background**

In February BPA hosted a meeting to discuss transmission planning reform ("TPR"). The catalyst for this reform was that the volume of transmission requests submitted as part of the 2025 TSEP totaled over 65 gigawatts. The pause provided BPA with time to consider how they can meet the new requirements of the region.

In April BPA announced their intent to meet the region's new requirements through streamlining the overall timeline from transmission request to energization. BPA identified transitional steps intended to reduce the request queue, changes to manage the queue, and changes to move off pause and to a future state. The steps needed to move off pause included changes to NITS forecasts and how that information was used by the BPA, management of the existing queue, and development of readiness criteria.

In May BPA hosted discussion on NITS forecast changes and the need to differentiate between trended and non-trended forecasted loads. The workshop included proposals being considered by BPA in how the trended load threshold would be established. PacifiCorp supplied comments on the proposals being considered.

In June BPA renamed the TPR the Grid Access Transformation ("GAT") to recognize a wider perspective of the overall transformation required.

On July 9-10 BPA held GAT workshops providing additional details on the initiatives focused on moving off pause and to the future state. The three initiatives required to move off pause included implementation of readiness criteria, changes to NITS forecasts, and LTF queue management including the application of the readiness criteria and provision of interim service where appropriate to reduce the overall volume of the queue.

On July 29-30 BPA hosted workshops focusing on reviewing language needed within the existing business practices to support the movement off pause.

## **General Observations**

During the workshops BPA received considerable comments relating to the proposed business practices changes. PacifiCorp supports the comments customers made during the workshops. PacifiCorp also supports the comments being provided separately from other investor-owned utilities.

To ensure customers understand the full impact of changes, PacifiCorp echo's comments at the workshop that BPA provides a flow chart showing what the path to service is for each of the unique pools within the existing Transmission Service Requests queue.

## **Specific Comments**

### **Network Integration Service ("NITS") Forecasts**

To assist in the usefulness of forecasts BPA receives, BPA intends to use a 13 MW threshold per point of delivery ("POD") to determine the portion of forecasted NITS load growth that BPA will accommodate without additional studies as part of normal business.

PacifiCorp previously provided comments to the May 20, 2025, NITS Access to Transmission Capacity workshop that the BPA should consider a threshold based on tiered levels, based on customer size. A tiered approach recognizes the differences in customer size. A single threshold could disproportionately impact large customers in higher growth areas.

### **Data Validation Readiness Criteria**

BPA provided detail supporting the criteria to be used in evaluating readiness. BPA is seeking to validate evidence of transaction maturity.

BPA acknowledged that in designing updates to support readiness criteria it attempted to eliminate pain points experienced in the past. During discussions it was noted that those pain points were infrequent. PacifiCorp believes that inclusion of infrequent items only complicates the overall change required. PacifiCorp recommends only implementing those readiness criteria required to achieve immediate results within the transmission service request queue. Other changes can be proposed in future updates.

It also appears that BPA has elected to modify the security deposit requirement, and other details regarding letters of credit and reductions thereof as part of this update. PacifiCorp supports changes to deposits that streamline the ability to request and receive transmission service; however, it is unclear if these are needed for this reform effort or other desired improvements that could be considered as part of a separate overall credit practice review.

### **Long-Term Firm ("LTF") Queue Management**

In addition to providing a flow chart showing what the path to service is for each of the unique pools within the Transmission Service Requests queue PacifiCorp would like improved clarity of will be BPAs proposal should the decrease to the existing queue not materialize to a level to support continued real time studies.

**Interim Service: Conditional Firm Service & Enhanced NITS Priority 6**

In addition to providing a flow chart showing what the path to service is for each of the unique pools within the Transmission Service Requests queue PacifiCorp would like to understand the offers of service being provided to the existing pools within the transmission service request queue.

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