

To: techforum@bpa.gov

Date: 9 September 2026

Subject: The Rapid Access Products & Interconnection Delivery (RAPID) initiative

cc: Chris Lockman

First, we are pleased that BPA is embracing opportunities to accelerate transmission system expansion, and expansion efficiencies. The agency's multi-decade recognition that there are planning and investment efficiencies to be gained by locating resources close to load is a foundation to be built upon, embraced and enhanced going forward. We recommend that decisions already made by BPA customers that achieve these efficiencies be recognized and supported.

Second, we recommend that BPA consider having a discussion about concepts and definitions early in this effort. There are a significant number of circumstances and examples that need to be discussed and considered, and we suggest codifying a common understanding of terms such as Behind-the-Meter, Co-location, Colocation, Large Load, Dispatchable, Non-dispatchable, etc. will be necessary to ensure common agreement on solutions.

Third, we strongly encourage this process to consider what FERC refers to as Grid Enhancing Technologies (GET)¹, some of which BPA customers already employ such as the use of temporary substations, load swapping at PODs, battery storage, and back-up generation, automated monitoring and controlling of power flows, and automated load shedding for localized reliability purposes. These arrangements can supplement or displace the need for BPA's Remedial Action Schemes, commonly used on the Network segment. We encourage BPA to develop operational protocols that its customers can collaboratively pilot with BPA with the end goal of long-term program implementation. We consider the identification and implementation of localized GET as a form of customer-build.

Below we address the three topics for which BPA seeks comments.

(1) Interconnection Needs: Where do today's Line & Load Interconnection (LLI) processes slow you down?

UEC submitted comments on BPA's proposed Line and Load Interconnection Procedures Business Practice. Besides suggested clarifications and identifying potential conflicts with the NT Service Business Practice, we are quite concerned about what seems to be uncapped cost exposure for studies associated with any amount of load growth, and the lack of detailed accounting of study costs and reimbursement for collection but unused study costs.

In addition, and specifically in response to aspects of this process that causes inefficiencies and slows the process, BPA proposes that a customer withdraw an LLIR and submit a new LLIR if there is a material

¹ Docket No. EL26-67-000, Footnote 147 - For purposes of this order, alternative transmission technologies include static synchronous compensators, static VAR compensators, advanced power flow control devices, transmission switching, synchronous condensers, voltage source converters, advanced conductors, tower lifting, and dynamic line ratings. We note that the Commission has also referred to these types of technologies as Grid Enhancing Technologies (GETs).

change meaning a change that “impacts the cost or timing of other LLIRs, including impacts to the schedule of energization of other LLIRs, or requires the LLIR at issue to be restudied.” This undermines queue order, and we suggest that at a minimum, BPA should define a material change as one that [significantly] increases costs or [significantly] delays the study of other LLIRs. We also question the inclusion of a “change in voltage class” in the definition of material impact.

Most importantly, the study timelines are, simply put, unacceptable. The current LLIR procedures require completion of System Impact Studies and Facilities Studies within 60 days, respectively. The proposed Business Practices states that BPA will “endeavor to” complete these studies within 180 days. This means it will likely take more than a year for a customer to receive the requested study results after submitting an LLIR. Again, this is unacceptable.

We understand that these timelines are a result of staffing and resource constraints; we recommend that these constraints be addressed. UEC urges BPA to engage with the interconnection customers or with third-party engineering firms to close the staffing/resource gap.

Finally, BPA’s tariff obligates the Transmission Provider to “use due diligence to complete the required System Impact Study within a sixty (60) day period” and provides the same timeline for System Facilities Studies. We do not understand why an LLIR study would take longer or require more staff time and resources. As said in our comments, the business decisions and planning needs of UEC’s end-use members rely heavily on BPA’s ability to meet its study deadlines.

(2) Co-location: Appetite in this temporary interconnection service to fast track and offer non-firm service?

At this time, the demands on UEC’s system do not prioritize temporary interconnection service and interim non-firm service. If this situation changes, we will notify our BPA Account Executives and will make this known in the RAPID initiative forum.

(3) Product design: Which fast-track paths – co-location (which we define to potentially include interconnection with and potential use of the transmission grid), Behind The Meter (BTM) (which we define as not using the transmission grid), and dispatchable (which we can define in many different ways, depending upon in markets or programs in which BPA is participating, and if the purpose is for emergency conditions, constraint mitigation, and/or economic dispatch).

Setting aside dispatch for now, UEC sees immediate need for designing co-location products for loads and resources, and designing an expanded Behind-the-Meter resource product. Both co-location and Behind-the-Meter arrangements can produce significant transmission investment savings – resources located close to loads reduces the need for planning, reduces expansion investments typical of wheeling power to loads, and lowers operations and maintenance costs; Behind-the-Meter arrangements can effectively bypass the need for transmission service and directly reduce loads by netting generation against the load which reduces the need for planning, investment, maintenance, and lowers costs.

Product design for co-location of loads and resources

UEC is interested in introducing product concepts to the RAPID process. For example, to ensure that a “loss of generation” will not cause unplanned use of the transmission grid, we suggest allowing large, co-located generation source(s) to be paired with a discrete portion of Network Load, and utilizing load shedding and/or curtailment regimes (for a specified number of hours per year) in the event the large generation source is unable to fully serve the load. UEC is interested in participating in a pilot program with BPA to assess the effectiveness of this concept.

In some cases, co-located loads and resources are interconnected with the transmission grid, but do not require any or require limited transmission or ancillary services. In the latter case, a Load Following, NT customer could benefit from a product option similar to that which PJM developed, i.e., Contract Demand Limited Use. This would allow a co-located load and resource to limit its transmission service to load that is net of co-located resources. UEC is interested in piloting this type of a co-location product.

Product design for Behind-the-Meter resources

First, we start with some context to explain why the existing approach that BPA has taken to Behind-the-Meter resources has not worked. UEC is currently eligible for BPA’s Short-Distance-Discount. While this enables up to a 40% discount to transmission service only for generation during Heavy Load Hours associated with a particular resource using within 75 miles or less of BPA transmission grid, it is not appropriately capturing cost-causation. A 40% discount for service that is not purchased is not indicative of cost-causation.

Additionally, the BPA OATT remains largely based on the Order 888 proforma (1996). While important for standardization, the OATT definition of Network Load has not been implemented by BPA to allow NT customers to serve portions of Network load with PTP service or recognize Behind-the-Meter resources. More to the point, even though a number of BPA’s NT customers have loads

“at a discrete Point of Delivery”, and the tariff allows NT customers to “not designate a particular load at discrete points of delivery as Network Load”, obligating the customer “to make separate arrangements under Part II of the Tariff for any Point-to-Point Transmission Service that may be necessary for such non-designated load,”

BPA does not allow NT customers to elect less than its total load as Network Load. It has indicated willingness to allow NT loads to be served with PTP service but then double charges by not reducing the Network Load and charging for PTP service.

Finally, while the Network Load definition allows for recognition of Behind-the-Meter generation, i.e., resources that are not Designated Network Resource and do not need PTP transmission services, BPA uses the Short-Distance-Discount as a proxy for not charging for services not used. This is contrary to cost-causation principles.

We are hopeful that RAPID will identify a viable Behind-the-Meter resource product for resources not requiring transmission services, in addition to the Short-Distance-Discount for resources using short distances of BPA’s transmission grid.

UEC is quite interested in piloting a Behind-the-Meter resource product, especially to be instructive in identifying relevant differences between co-location and Behind-the-Meter products.

In conclusion, UEC believes that there are a number of efficiencies that BPA and its customers can harness through the RAPID Initiative. We suggest that it would be helpful to engage the use of Grid Enhancement Technologies that can support customer operations and improve reliability, as well as Customer-build arrangements including customer engineering, and third-party engineering options to better handle workflow. We encourage significant customer engagement in this effort, possibly a steering committee approach, including sharing sessions in order to understand circumstances that can benefit from RAPID, and operational procedures as well as hardware and software solutions that customers are currently using that may be leveraged more broadly.

We encourage BPA to include in this initiative discussions about how the region will transition operating procedures, market designs, and these TBD products into operations that include a Day Ahead market. This will require enabling the self-scheduling of resources (generation dedicated to load as some resource generation will not be available for economic dispatch), and operational protocols for resources that are to be available for economic dispatch, constraint management, and emergency conditions.

Again, we welcome this effort and look forward to engaging with BPA and other customers and stakeholders.

Thank you for requesting our comments.

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