



Umatilla Electric Cooperative
750 W. Elm Ave.
PO Box 1148
Hermiston, OR 97838
Phone: (541) 567-6414

August 15, 2025

Re: Grid Access Transformation

Umatilla Electric Cooperative (“UEC”) is a load serving entity located in eastern Oregon. UEC is an electric cooperative made up of residential, commercial, irrigation, and industrial loads, and is owned by the members it serves. UEC is a preference customer of the Bonneville Power Administration (“BPA”) with a Network Integration Transmission (“NT”) Service Agreement and Regional Dialogue Power Sales Agreement.

On July 29-30, BPA presented draft business practice language that proposes different treatment of NT Customers depending on the characteristics of the NT Customer’s load growth. BPA also introduced “readiness criteria” and long-term firm queue management procedures to be applied to an NT Customer’s 10-year load and resource forecasts and line and load interconnection requests.

BPA must clearly articulate in writing how it intends to honor its existing contractual and Open Access Transmission Tariff (“OATT”) obligations. To this end, BPA needs to specifically identify which vintage of 10-year load and resource forecasts will be used to apply the yet to be implemented New Network Load definition. Currently, UEC’s Network Integration Transmission Service Agreement defines Network Load as any loads submitted to the Transmission Provider by September 30th of each year. Thus, BPA should use the 10-year load and resource forecasts that NT customers will submit in September 2025, and then compare this LARC submittal to the NT customer’s next submission to determine if any loads meet BPA’s New Network Load definition. UEC strongly believes this approach is the only way that BPA can meet its current OATT and contractual obligations, which requires BPA to plan and construct its transmission

system based on the Network Load submitted by customers prior to any business practice changes going into effect.

Under the “FTSR/TSR Data Validation Readiness Criteria”, BPA proposes to eliminate FTSR/TSRs associated with a specific Line and Load Interconnection Request (“LLIR”) unless the LLIR ‘contract has been fully executed’. This is too vague, as there are several contract actions associated with the LLIR process. Additionally, BPA consistently misses its own LLIR study deadlines, which are no fault of the customer. Said differently, BPA is often the barrier to an LLIR request moving from an initial LLIR submittal to the potential construction of a new transmission facility. Thus, UEC proposes that BPA deem any line/load interconnections in BPA’s balancing authority area to be mature if the customer has fulfilled its most current LLIR contractual and procedural obligations. UEC believes similar treatment should be applied to generation interconnection requests.

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.

BPA’s proposed business practice changes make no mention of Behind The Meter Resources and only acknowledge FTSRs and TSRs as having transmission encumbrances when applying its proposed New Network Load definition. From a contractual perspective, Behind The Meter Resources must meet the attestation requirement outlined in section 29.2 of BPA’s OATT and are similarly situated to any Network Resources that are interconnected to BPA’s system except that a customer must only notify BPA via email to include a Behind The Meter Resource in the customer’s NT service agreement. This means that Behind The Meter Resources have no associated FTSR or TSR on BPA’s Open Access Same Time Information System. Thus, UEC proposes that BPA include language to provide similar treatment for Behind The Meter Resources that is similar to a forecasted or designated Network Resource that has been previously been granted a transmission encumbrance.

UEC generally supports 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.

Thank you,

A handwritten signature in blue ink, appearing to read "Blake Weathers", with a stylized flourish at the end.

Blake Weathers
Vice President of Power Supply