

**Response to Comments
Northwest Requirements
Utilities Proposal and
Decision – TSR Evaluation**

BPA Transmission Business Practice

Modification to Version 5

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Response to Comments Northwest Requirements Utilities Proposal and Decision– TSR Evaluation

Modification to Version 5

This document contains comments, responses, and Bonneville's decision regarding the Northwest Requirements Utilities proposal to change Version 5 of the TSR Evaluation Business Practice. The proposal was posted for comment from June 6 through July 14, 2026.

This is Bonneville's final agency action in regard to this business practice proposal.

For more information on business practices out for comment, visit the BPA [Proposed Business Practices webpage](#).

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A. Northwest Requirements Utilities Proposal Summary

This section contains a summary of the Northwest Requirements Utilities (NRU) proposal compiled by Bonneville. The Proposed Transmission Business Practice Request form and any associated proposal materials submitted to Bonneville by NRU are available on the Proposed Business Practices webpage for 1 year following the posting of this document.

This proposal affects Sections B.3.a.ii and B.3.a.iii of Version 5 the TSR Evaluation Business Practice.

NRU stated, "This request will update BPA's TSR Evaluation Business Practice to reflect the Provider of Choice power sales agreement that many of BPA's transmission customers have executed with BPA Power Services," and that, "The change will ensure that BPA's existing policies will continue to apply to its NITS customers."

NRU proposed the following revisions to Sections B.3.a.ii and B.3.a.iii:

“3. Other considerations when requesting NT Transmission Service:

- a. A net positive impact will be considered *de minimis*, regardless of whether the PTDF of the impacted path is greater than 10 percent, if it is less than or equal to 10 MW for the following:
 - i. For TSRs to Designate Network Resources intended to serve network load encumbered via a CONFIRMED FTSR.
 - ii. For TSRs determined to ~~serve~~ Above Rate Period High Water Mark Load in accordance with the Regional Dialogue or Above Contract High Water Mark Load in accordance with the Provider of Choice power sales agreement.
 - iii. For TSRs to serve Network Load growth for NITS Customers that do not have a Regional Dialogue or Provider of Choice power sales agreement.”
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B. Clatskanie PUD

Clatskanie offer the following as comments regarding the TSR Eval V5 proposal.

We support the revisions as described by NRU and believe they offer beneficial clarification without altering the applied business practice. In consideration of further clarification we offer the attached language with the hope of better aligning power and transmission terminology.

3. Other considerations when requesting NT Transmission Service:

- a. A net positive impact will be considered *de minimis*, regardless of whether the PTDF of the impacted path is greater than 10 percent, if it is less than or equal to 10 MW for the following:
 - i. For TSRs to Designate Network Resources intended to serve network load encumbered via a CONFIRMED FTSR.
 - ii. For TSRs determined to ~~serve~~ ~~Above Rate Period High Water Mark~~ Requirements Load in accordance with ~~the Regional Dialogue~~ a current BPA power sales agreement.
 - iii. For TSRs to serve ~~Network Load growth for NITS~~ Network Load ~~that do not have a Regional Dialogue power not described with a current BPA power~~ sales agreement.
 - b. This *de minimis* consideration will not be applied to any additional TSRs submitted within a 12 month period by the same Customer with the same Source and contract number as a TSR already submitted by that Customer.
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BPA Response

Bonneville acknowledges Clatskanie PUD's support for the NRU proposal.

Bonneville will not adopt the proposed reference to "Requirements Load" in B.3.a.ii as that term would expand the scope of the business practice to apply to all load eligible to be served by BPA rather than limiting the scope to Above-Rate Period High Water Mark or Above-Contract High Water Mark load under respective Regional Dialogue or Provider of Choice power sales agreements.

Bonneville will not adopt the proposed language, "current BPA power sales agreement" and will retain identification of the specific power sales agreement(s) in B.3.a.ii and B.3.a.iii as the terms are specific to each agreement.

Bonneville will not adopt the proposed language in B.3.a.iii; referencing TSRs "not described" in a power sales agreement and replacing "Network Load growth" with "Network Load." Bonneville will retain the language, "that do not have" a power sales agreement and "Network Load growth" as the proposed language would change the scope of the business practice.

Please see Section C, Bonneville's Decision.

Bonneville thanks Clatskanie PUD for their comments.

C. Bonneville's Decision

Bonneville will adopt the language as requested in NRU's proposal updating Version 5 of the business practice to include Provider of Choice power sales agreements. Bonneville has finalized Version 6 of the TSR Evaluation Business Practice with the following language:

"3. Other considerations when requesting NT Transmission Service:

- a. A net positive impact will be considered *de minimis*, regardless of whether the PTDF of the impacted path is greater than 10 percent, if it is less than or equal to 10 MW for the following:
 - i. For TSRs to Designate Network Resources intended to serve network load encumbered via a CONFIRMED FTSR.
 - ii. For TSRs determined to serve Above Rate Period High Water Mark Load in accordance with the Regional Dialogue or Above Contract High Water Mark Load in accordance with the Provider of Choice power sales agreement.
 - iii. For TSRs to serve Network Load growth for NITS Customers that do not have a Regional Dialogue or Provider of Choice power sales agreement."