Response to Comments – Network Integration Transmission Service (NITS)

BPA Transmission Business Practice

Version 16

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Version 16

This document contains comments and BPA responses regarding Version 16 of the Network Integration Transmission Service (NITS) Business Practice posted for comment from May 4, 2026, to June 9, 2026.

This is Bonneville's final agency action in regard to this version of the business practice.

For more information on business practices out for comment, visit the BPA Proposed Business Practices webpage.

Table of Contents

A. Alliance of Western Energy Consumers

Re: Alliance of Western Energy Consumers' Comments regarding Network Integration Transmission Service & related BP Acronyms and Glossary

The Alliance of Western Energy Consumers ("AWEC") appreciates the opportunity to provide comments on Bonneville Power Administration's ("BPA" or "Agency") draft Network Integration Transmission Service ("NITS") Business Practice, including related changes to BP Acronyms and Glossary. AWEC is a trade organization whose members include many of the Region's largest employers and consumers of electricity and natural gas. AWEC's members are responsible for providing tens of thousands of highly paid, technical, family-wage jobs across a broad range of industry sectors such as agriculture, aeronautics, air products, metals, pulp and paper, and more. As such, AWEC's members provide significant economic benefits to the communities in which they are located. AWEC's members are also significant consumers of electricity and include loads designated as Contracted For, Committed To ("CF/CT"), which are incumbent large loads on BPA's system, as well as New Large Single Loads ("NLSLs"). They take service from both public power customers of BPA as well as regulated investor-owned utilities who purchase transmission services from BPA. AWEC members' host utilities take both NITS and Point to Point ("PTP") service products from BPA Transmission. Given the energy intensive nature of many industrial processes, AWEC

members are focused on both costs associated with electricity service, including transmission, and reliability.

As AWEC has stated in prior comments, it continues to support principled, transparent, and legally sound options that allow BPA to begin processing transmission service requests as soon as practicable while ensuring that BPA meets preference customers' statutory rights to delivered power. However, consistent with AWEC's position in prior comments, it has concerns with the establishment of a Non-Trended Load Growth ("NTLG") Policy applicable to CF/CT loads, which are incumbent large loads on BPA's system. While AWEC appreciates that, for NITS customers, if capacity is available, "the request will be encumbered and not require a commercial study or plan of service,"[1] exclusion of CF/CT loads, as well as transparency in NTLG facility determinations for new large loads, is critical.

[1]Bonneville Power Administration, *TC-27 Pre-Proceeding Workshop* at 19 (Mar. 18-19, 2026).

1. *The definition of "New Network Load" should exclude loads designated as CF/CT.*

AWEC renews its prior comments, including those raised in its April 9, 2026 comments attached as Attachment A, arguing that loads designated as CF/CT by the Administrator should be excluded from NTLG Facility determinations up to designated CF/CT amounts. For the reasons set forth therein, these incumbent large loads should not be considered "new network load," by virtue of qualifying as "non-trended load growth" as those terms are defined within the Business Practice Acronym and Glossary and implemented in the draft NITS Business Practice. AWEC's proposed definition, edited from BPA's proposed definition, is as follows:

Non-Trended Load Growth: New Network Load added to an existing NITS Customer's system that occurs only at a specific end-user consumer facility. Non-Trended Load Growth does not include loads that were contracted for, or committed to (CF/CT) be served, as of September 1, 1979, as defined in section 3(13)(A) of the Northwest Power Act up to historically designated CF/CT amounts.

BPA Response 1
BPA thanks AWEC for their comment but does not accept the proposed change to the Non-Trended Load Growth definition. BPA determined that Contracted For Committed To (CFCT) loads will not be exempt from the Non-Trended Load Growth (NTLG) policy. As a NITS Customer provides their LaRC, BPA will evaluate their loads and apply the NTLG policy to any facility growth, including CFCTs, identified in the LaRC forecast.

BPA's rationale for this decision is CFCT loads are offered a different power rate but still require power and transmission planning when increasing their forecasts. The CF/CT designation gives clear protection to price up to the CF/CT amount; however, this designation does not require special treatment or exemption from generally applicable transmission planning processes. BPA believes it would be unwise to exempt CF/CT loads from the transmission planning process because the amount of load that a customer could bring back online, in some cases, could exceed hundreds of MWs. Some of the CF/CT loads have been operating for many years hundreds of MW below the CF/CT determination amount. An exemption for CF/CTs would mean this load could rebound with minimum notice and without consideration of the impact to the transmission system threatening system reliability. BPA

recognizes that there are CF/CTs with much lower determination levels; however, this variability between CF/CT amounts highlight why an across the board exemption does not make sense. The NTLG 13 MW threshold will accommodate significant changes in CF/CT load and does not preclude a load from gradually growing into its CF/CT load amount. BPA believes the business practice strikes the appropriate balance between allowing for meaningful forecasted load growth while encouraging customers to be working with large loads to ensure they are accurately reflected in forecasts and initiate studies when necessary.

2. *The definitions of "New Network Load" and "Non-Trended Load Growth" are circular and unclear as drafted.*

The proposed definition of New Network Load is "[l]oad added to a NITS Customer's system as the result of Annexation, Condemnation, Merger, Conversion of Point-to-Point (PTP) Service Agreement to NT Service Agreement, Request by a NITS Customer to designate a particular load at discrete points of delivery as Network Load, when the NITS Customer had previously elected not to designate that load as Network Load, or Non-Trended Load Growth (NTLG) at a specific end-user consumer facility." The definition of Non-Trended Load Growth, as provided above, is "New Network Load added to an existing NITS Customer's system that occurs only at a specific end-user consumer facility." New Network Load includes NTLG at a customer facility, but the definition of NTLG refers back to New Network Load. Neither definition provides clarity on what constitutes "new load" at a specific end-user consumer facility. Instead, this determination appears to be a creature of BPA discretion, which is discussed in the following section of these comments. AWEC recommends that the definition of Non-Trended Load Growth be modified as described above to address exclusion of CF/CT loads, but also notes that additional clarification – either in definitions or through the NITS Business Practice, as described below – is also necessary.

BPA Response 2
BPA agrees that there is a circular nature between New Network Load and the NTLG definition. BPA has updated the NTLG definition to address this concern.

3. *NTLG Facility determinations should be made pursuant to objective, transparent criteria.*

The end-user consumer facilities subject to potential NTLG determinations are businesses in competitive industries that rely on clarity and a level of certainty in regulatory treatment in order to make sound business decisions, which in some cases, may be subject to timing that is not consistent with a LaRC process. For this reason, it is critical that NTLG determinations be made pursuant to transparent criteria applied consistently among similarly situated customers.

BPA Response 3
BPA anticipates that in most cases the determination of a NTLG facility will be self-evident based on the MW amount of the forecast. BPA's NTLG form includes criteria based on factors BPA Power Services uses to determine a New Large Single Load facility. This was done in hope that NITS Customer's familiarity with the determination factors for New Large Single Load facilities would aid customer self-determination of a potential NTLG facility and streamline the evaluation of forecasts, but BPA will continue to work collaboratively with customers regarding their forecasts.

As indicated in the NITS Business Practice Section D, a NITS Customer should notify BPA as soon as possible if there is a change to the NITS Customer's load or resource forecast and can submit a LaRC at any time outside of the annual LaRC cycle.

One of the benefits of the NTLG policy is that it provides increased transparency to NITS Customers when a commercial evaluation is required.

Turning to the NITS Business Practice, Section E, like the definitions for "New Network Load" and "Non-Trended Load Growth," it similarly fails to clarify which loads added to an enduser consumer facility constitute NTLG. Section E.2. requires a customer to "provide a new or revised LaRC identifying the New Network Load (defined in Business Practice Acronym and Glossary)," but as discussed above, the definition of New Network Load as it relates to Non-Trended Load Growth is unclear. How will customers know what to provide?

Section E.6. may be aimed at providing clarity on what "load growth at a new or existing end-use[r] consumer facility will be identified as NTLG" but the Business Practice itself fails to identify which load at a specific end-user consumer facility would qualify as "new." The business practice refers to the Non-Trended Load Growth Facility Evaluation Form ("NTLG Evaluation Form") as a basis for BPA to make a determination, but also states that "[t]he determination of whether the load at the specific consumer facility qualifies as NTLG *is at the sole discretion of BPA*…." The NTLG Evaluation Form itself has a series of yes/no questions but also does not indicate how BPA will consider each of these criteria, including if/how they are weighted, when making a NTLG Facility determination.

BPA Response 4

Section B of the NITS Business Practice provides general details of what is included in the LaRC workbook. This can change from year to year based on BPA needs and improvements to the process; and is outlined in the LaRC instruction letter and reviewed with NITS Customers annually. The LaRC workbook includes ***all*** forecasted loads, not just New Network Loads, so that BPA can review the forecast and make transmission planning decisions.

The definition of New Network Load identifies multiple circumstances, including Non-Trended Load Growth, any of which require a commercial evaluation as indicated in E.3 (refers to the newly revised NITS Business Practice). As indicated in BPA Response 2, BPA will change the definition of NTLG to refer to the NITS Business Practice which points the readers to the comprehensive definition of NTLG.

The term "end-user consumer facility" is a general term to describe a NITS Customer's customer and is commonly used during forecast discussions between NITS Customers and BPA when developing the Agency Forecast, which populates the LaRC.

A NITS Customer needs to provide a NTLG Evaluation Form for BPA to accurately determine if the load qualifies as NTLG. The LaRC does not have enough details for an assessment and it would be quite onerous to both the NITS Customer and BPA to provide and review this level of information for every end-user consumer facility (residential development, commercial developments, etc.) that is included in the LaRC. At the suggestion of the NITS Customer Group, BPA is changing the language of E.6.b.iii from the "sole discretion" to the "reasonable discretion" of BPA. The section now reads, "The determination of whether the load at the specific consumer facility qualifies as NTLG is at the reasonable discretion of BPA based on information provided in the Non-Trended Load Growth Facility Evaluation form."

These questions provide BPA the information that it needs to reasonably assess if the load qualifies as NTLG. Questions are not weighted more than others but failure to answer all the questions may result in BPA not being about to conduct a commercial evaluation of the NITS Customer's request. If a NITS Customer has questions or concerns regarding their request, they are encouraged to reach out to the Transmission Account Executive.

B. Flathead Electric Cooperative

RE: Network Integration Transmission Service (NITS), BPA Transmission Business Practice v. 16

Flathead Electric Cooperative (FEC) generally supports the comments submitted by the NITS Customer Group and appreciates BPA's efforts to clarify the treatment of forecasted Network Load through the LaRC Process.

Specifically, FEC supports BPA's current approach of evaluating Non-Trended Load Growth at the individual consumer facility level rather than at the Point of Delivery (POD) level. This framework appropriately distinguishes discrete, identifiable load additions from organic load growth that is already reflected in the Agency Load Forecast.

BPA Response 5
BPA thanks FEC for their comment.

FEC also believes that organic trended Load Growth should continue to be treated as Network Load. This is particularly important where new PODs or delivery facilities are constructed to improve resiliency, redundancy, and reliability while serving forecasted load growth, including increased demand during extreme weather events. The addition of a new POD alone should not be considered Non-Trended Load Growth absent a qualifying consumer-facility-specific load increase.

FEC appreciates BPA's consideration of these comments and supports maintaining a clear and administratively workable framework for evaluating Non-Trended Load Growth and forecasted Network Load.

BPA Response 6
BPA thanks FEC for their comment.

C. NITS Customer Group

Below are comments provided by the NITS Customer Group[1] in response to BPA's proposed revisions to its Network Integration Transmission Service (NITS) Business Practice (BP). Although the NITS Customer Group maintains an overarching concern with BPA's definition of "Non-Trended Load Growth", we submit these comments with the following primary objectives:

[1]The NITS Customer Group includes Benton REA, City of Forest Grove, Clatskanie PUD, Columbia River PUD, Clark Public Utilities, Eugene Water and Electric Board, Flathead Electric Cooperative, Klickitat PUD, McMinnville Water & Light, Northern Wasco PUD, Northwest Requirements Utilities, PNGC Power, Umatilla Electric Cooperative, and Western Public Agencies Group.

(1) Enabling BPA to restart the processing of load and resource forecasts (LARCs) of its NITS Customers as soon as possible, which has been paused for nearly two years; and

(2) Providing needed clarity to the revised NITS BP to ensure that (i) its interpretation and implementation are based on the same common understanding between BPA and its NITS Customers, (ii) it can be readily explained to affected end-use consumers, and (iii) unintended consequences are kept to a minimum to the extent possible.

We understand and appreciate the tension between the two above objectives. We want BPA to both move quickly on the BP so it can restart the processing of LARCs but also require the BP to be clear, fit for purpose, and overall workable. As demonstrated by our comments below and associated redline to the draft BP, the BP as originally proposed does not fully satisfy the second objective above. Accordingly, we recommend that BPA hold another round of comments following BPA's release of an updated draft of the BP based on these comments.

Our comments generally orient around specific themes, as described below.

A. Codify and clearly articulate how BPA will apply existing encumbrances to LARCs

During the multi-year NITS BP development process, BPA stated that NITS customers will be able to apply existing firm transmission encumbrances to existing and future load growth. BPA has also made clear its intent to tie specific resources to specific loads.

Without a better articulation of the procedures under which a NITS Customer may apply its firm transmission encumbrances, BPA risks stranding these firm transmission rights, or worse yet, conducting commercial evaluations and studies that may ultimately result in double-encumbering Available Transfer Capability or lead to unnecessary commercial evaluations, studies, and transmission system reinforcements. We are especially uncertain as to how encumbrances that BPA may have provided since late 2024 will, or will not, apply under BPA's proposed section O of the NITS BP.

Therefore, we propose that BPA make specific revisions to clarify the procedures for how a NITS Customer may attribute encumbered firm transmission capacity in the form of CONFIRMED FTSRs, Designated Network Resources, and Behind The Meter Resources

toward both pending, unstudied LARC(s), including for Non-Trended Load Growth (NTLG), and to all future LARC evaluations, prior to BPA determining a need for a commercial evaluation.

BPA Response 7
BPA thanks the NITS Customer Group for their comments. Due to the breadth of comments received from the NITS Customer Group, BPA will hold a second comment period in order to provide all interested parties opportunity to review material introduced in the first round of comments or drafted in response to those comments.

BPA will continue to conduct the annual load and resource forecasting process in much the same manner it has in prior years. This means BPA will continue to work with customers to resolve any questions regarding the customer's LARC, including any questions on the intended use of forecasted resources. While some of the proposed revisions are aimed at streamlining this process and documenting customer choice points, BPA remains committed to working with customers to evaluate forecasts with a complete understanding of the customer's intent.

BPA reviews the LaRC to ensure that there are sufficient resources to serve the load and has added language to further clarify that requests that have previously been evaluated and are in "confirmed" status will not be subject to further evaluation. But some of the NITS Customer Group's proposed revisions in Section C.5 change the original purpose of the language and have not been adopted.

The NITS Customer Group comments include many insertions of "behind-the-meter resources" including "attributable" behind-the-meter resources. BPA understands the importance of this topic to NITS Customers and work is underway across BPA to be responsive to the request for policy development in this area. But in some instances, inclusion of behind-the-meter resource language in the NITS Business Practice does not make sense. Behind-the-meter resources are identified in BPA's generation integration processes.

BPA has not processed any LaRCs that were received after 8/14/2024 at 12:00 PM PPT, therefore NITS Customers will not have received an FTSR/encumbrance for these requests. As stated in Section O.1. BPA intends to process all LaRCs received between 8/15/2024 at 12:01 PM PPT and the effective date of the V16 NITS Business Practice and as described in Section C.

BPA will utilize the most recently returned NITS Customer LaRC between 9/1/23 and 8/15/24 at 12:00 PM PPT as the baseline forecast. To add clarity, a sentence has been added to Section O.3.a to indicate that this will be used as the baseline forecast for the first forecast comparison.

BPA is not currently considering documenting the multitude of ways in which customers can attribute encumbered firm transmission capacity. Flexibilities that are available to a NITS Customer upon designation of a resource are not necessarily available for a forecast. BPA will work to ensure that previously encumbered capacity is attributed accurately based on the information provided by the customer, but BPA is concerned that attempts to capture every possible load and resource encumbrance and designation scenario in the business practice will do more harm than good.

In addition, the NITS Customer Group requests that proposed Section C.4 expressly distinguish between (a) an FTSR in STUDY status, which does not yet confer firm transmission rights, and (b) an FTSR in CONFIRMED status, which does. Conditioning firm rights on energization of a plan of service — a process that can span ten or more years — is inconsistent with how firm transmission rights are recognized elsewhere in the OATT and the existing BP, and would leave load growth and new resources stranded on Secondary or Conditional Firm Service for the entire study/build/energize cycle. This is especially true given that, at the time that a NITS Customer forecasts its load growth (especially over a 20-year horizon) the resource information is not always certain. BPA's policies should be flexible to accommodate a range of resource forecast scenarios especially as BPA begins to conduct proactive 20-year transmission planning.

We have proposed revisions to section C.4 and C.5, as well as E.3 and E.4 to address NTLG, to reflect the forms of encumbrances that a NITS Customer may apply toward its LARC and that BPA should consider during its evaluation. These proposed revisions, and any other described below, have been applied to a clean version of BPA's proposed NITS BP.

BPA Response 8
BPA will address the Conditional Firm product as necessary in the Conditional Firm Business Practice as part of TC-27.

The NTLG policy allows for a 13MW change per end user facility for each annual LaRC cycle. Based on our analysis BPA does not anticipate trended or organic load growth triggering the NTLG policy. In the event that it does, the NTLG Evaluation form would help identify this load as not being Non-trended Load Growth. If BPA has additional questions, BPA will contact the NITS Customer to inform any decisions made.

Using the revised section numbers shown in the NT Customer Group's redlined NITS Business Practice:

BPA does not accept change to C.4. The intention of C.4 is to ensure NITS Customers understand that they don't have firm transmission rights for requests that haven't yet had a transmission planning evaluation. BPA added clarifying language to C.5.a that "CONFIRMED FTSRs will not be subject to additional commercial planning evaluations" to address NITS Customer concerns around how CONFIRMED FTSRs will be treated.

BPA accepts the clarifying language in Section C.5 with the exception of "its review of the LaRC." BPA is clarifying the language in Section C.5 to read "At the conclusion of the LaRC evaluation, BPA will send a response letter to the NITS Customer with the outcome and provide the following information, as applicable:"

BPA does not accept the addition of C.5.c describing behind-the-meter resources. BPA's review of a NITS Customer's LaRC does not verify behind-the-meter resource forecasts submitted by the NITS Customer.

BPA does not accept the changes to E.3. New Network Load requires a commercial planning evaluation.

BPA does not accept the change to E.4. BPA needs to evaluate the New Network Load even if sufficient resources are provided to ensure that there is adequate transmission capacity for the request.

B. Clarify queue times

Section B.5 of BPA's proposed NITS BP indicates that each year, the NITS Customer's load and resource forecast will receive a new queue time as of the date and time that BPA receives the email containing the LARC. We disagree that the entirety of a NITS Customer's LARC should receive an updated queue time with each successive LARC. Instead, we propose that the queue times vary based on the information included. For forecast load growth that is not associated with New Network Load, we propose the queue time will be the date and time of the original executed NITS Agreement. This treatment of organic, systemic load growth is consistent with BPA's existing tariff planning obligation to plan for its NITS Customers' reasonably forecast load and resources over the transmission provider's planning horizon. This obligation for load growth aligns to the original application for service and requires no update over time.

Further, we propose that the queue time for NTLG should be the earlier of (1) the email date/time stamp of the initial LARC submittal that included the NTLG, or (2) the email date/time stamp of the initial LARC submittal containing the resource that the NITS Customer identifies to serve the NTLG. We propose this modification to reflect the situation where a NITS Customer forecasts a resource prior to the inclusion of the NTLG in its LARC. Lastly, we propose that the queue time for forecasts of non-federal resources will be the email date/time stamp of the initial LARC submittal containing the non-federal resource.

The proposals described above would align better with sections 29.2 (Application Procedures), 30.2 (Designation of New Network Resources), 31.2 (New Network Loads Connected With the Transmission Provider), and 31.3 (Network Load Not Physically Interconnected with the Transmission Provider), which all govern modifications of service and the treatment of new Applications of NITS Customers.

We have proposed revisions to section B.5, D.3, and G.1.a to reflect these comments.

BPA Response 9

BPA did not accept the proposed edits to B.5 and subsequent subsections because forecasts that are processed through reliability planning, such as load growth not associated with New Network Load, are not assigned a queue time. Only forecasts that require a commercial planning evaluation require a queue time. Additionally in B.5.c, if a customer changes a resource to serve NTLG from one LaRC submission to another, the request needs to receive a new queue time because it requires a new commercial planning evaluation. See C.1.a.

BPA added clarifying language to B.5 that states a queue time is used only when a commercial planning evaluation is required.

C. Remedying deficiencies

BPA's proposed sections B.7.a and C.2 indicate that, where a NITS Customer fails to remedy deficiencies in its LARC or in a Data Exhibit, BPA will consider the entire LARC for that year null and void and not process any portion of the NITS Customer's load and resource forecast. The NITS Customer Group strongly disagrees with this proposal.

First, a NITS Customer's LARC is likely to include many different elements, including (but not limited to) load growth that is "trended", updates to existing NTLG, forecasts of new NTLG, forecast changes to existing Designated Resources, as well as forecasts of new resources. BPA must evaluate the information relevant to each element independently, and each element should be able to satisfy BPA's requirements on a stand-alone basis. As a result,

BPA should not disregard the entirety of a NITS Customer's load and resource forecast due to that customer's failure to remedy a specific deficiency relevant only to one piece of the LARC. To throw out the entire LARC, which may include satisfactory information in other areas, jeopardizes NITS Customers' ability to contract with forecasted resources and plan for their own load growth needs on a timely basis. To underscore this concern by example, a NITS Customer's forecast of a resource that otherwise satisfies all of BPA's information and attestation requirements should never be discarded because of informational deficiencies associated with a wholly different forecasted resource.

Similarly, BPA's notification to a NITS Customer that a Data Exhibit is required may occur well after the initial submission of a LARC, and after BPA has determined that the individual components of the LARC constitute a valid submission. Similarly to the preceding paragraph, BPA should never discard a NITS Customer's entire LARC, one which BPA already deemed to be valid, based on a Data Exhibit deficiency associated with a single component that may be unrelated to other aspects of the load and resource forecast.

BPA Response 10

Our intention with B.7.a and C.2 (C.2 uses the revised numbers in the NITS Business Practice provided by the NITS Customer Group) is to streamline BPA's processes and improve documentation. This also provides clarity to NITS Customers on what forecast will be used when BPA doesn't receive information in a timely manner. BPA is still committed to collaborating with NITS Customers during the LaRC and Data Exhibit process, but BPA needs to standardize processes to allow for efficiencies and transparency. If a LaRC is deficient and a commercial planning evaluation is not possible, the BPA Agency Forecaster will still review the requests and BPA will retain the forecast.

Potential transmission needs that do not have sufficient information for a commercial planning evaluation can be provided in the LaRC per the LaRC instruction letter for other transmission planning purposes.

BPA does not accept the deletion of language in Section 7.a. BPA needs to retain the original language in 7.a to make clear what forecast BPA will use if a NITS Customer does not remedy deficiencies in their LaRC. This allows for a record of the change requested by the customer.

BPA modified the proposed language in Section 7.a to add clarity on NITS Customer notification of which LaRC will be used for commercial planning evaluation.

BPA does not accept the change to C.2. A Data Exhibit may be required to enable review of the request.

BPA does accept the change to C.2.a.

BPA does not accept the change to C.2.b. This information is redundant with the Requesting Transmission Business Practice Section F. BPA works to avoid duplicative language in multiple business practices. Additionally, the suggested change alters the number of days a NITS Customer has to remedy Data Exhibit deficiencies from 5 Business Days to 10 Business Days. This conflicts with the Requesting Transmission Business Practice Section F and is beyond the scope of considered changes for the NITS Business Practice.

BPA has adjusted the language in Section C.2.b (C.2.b refers to the numbers in BPA's NITS Business Practice) to allow for more efficient processing of the LaRC.

Rather, BPA must specify in its correspondence with the NITS Customer the exact information in the LARC or the Data Exhibit that is deficient and that requires remedying. To the extent that an aspect of a NITS Customer's LARC or Data Exhibit is deficient, and such deficiency bears on BPA's evaluation of other aspects of the LARC, BPA must specify this relationship in its customer communications as well. Where the deficiency is sufficiently narrow and does not weigh on BPA's evaluation of other aspects of the LARC, however, BPA must accept all other aspects of the NITS Customer's LARC that otherwise satisfy the information requirements.

BPA Response 11
The intended purpose of these provisions is not to reject a LaRC or Data Exhibit based on ministerial errors or omissions. BPA will identify specific areas that require more information in order for BPA to review the LaRC and Data Exhibit. See BPA Response 10 for further clarification.

Finally, we request that BPA adhere to its obligation in section 29.2 of its tariff to notify the NITS Customer if any of the information in its LARC submittal is deficient within 15 days of receipt. BPA's timely evaluation and notification of the LARC's completeness will establish transparent and consistent expectations for all parties involved with the LARC Process and ensure that NITS Customers can remedy deficiencies early in the LARC Process. Moreover, aligning to this notification timeline is consistent with BPA's own reliance on this same tariff section in establishing the LARC information requirements. Similarly, we request that BPA allow for an additional 5 business days for NITS Customers to remedy deficiencies in either the LARC, Data Exhibit, or NTLG Facility Evaluation form, when requested by the customer. Because BPA's evaluation and response to a NITS Customer's LARC historically takes up to 180 days, providing for an additional 5 business days at the request of a NITS Customer (on top of BPA's proposed 10-business day response requirement) should not add meaningful length to BPA's evaluation.

We have proposed revisions to section B.7 and C.2 to reflect these comments.

BPA Response 12
BPA thanks the NITS Customer Group for this comment. BPA will continue to work to improve response times for LARC evaluations, including the identification of deficiencies, but at this time BPA will not include a 15 day response time for BPA.

BPA extended the time period for a NITS Customer to remedy their LaRC if it is incomplete or deficient from 5 Business Days to 10 Business Days in the NITS Business Practice v.16. BPA's concern with further extending this time to remedy to 15 Business Days for both the LaRC and NTLG Evaluation form is that it will result in lengthier evaluation time periods. NITS Customers have asked BPA to try and expedite the evaluation process and extending the time to remedy can further delay BPA's review of NITS Customer LaRCs.

The suggested change for the number of days a NITS Customer has to remedy Data Exhibit deficiencies is beyond the scope of the considered changes for the NITS Business Practice. The Requesting Transmission Business Practice Section F is where the Data Exhibit remedy time period language resides. BPA will work to achieve consistency and timelines that are

workable for customers, but at this time are limiting consideration to the timelines in the NITS Business Practice.

D. BPA's "sole discretion" to determine NTLGs

The NITS Customer Group is concerned with aspects of BPA's determination of a NTLG. BPA's proposed Business Practice states that the determination of whether a load at a specific consumer facility qualifies as NTLG is at BPA's "sole discretion". Though we understand BPA's interests in providing timely response and efficiently processing submitted LARCs, we urge BPA to provide additional clarity on its decision making. Because BPA's decision of whether a facility qualifies as NTLG critically influences the time and processes that may be necessary to serve such load, BPA must clarify how it will evaluate the information submitted by NITS Customers in the NTLG Facility Evaluation form.

We note that BPA lists seven yes/no questions and one question regarding the resource under the "Facility Criteria" section of the NTLG Facility Evaluation form. However, it is unclear how BPA will arrive at its decision. Will a certain number of "yes" responses trigger a NTLG designation? Do some questions hold a higher weight than others on BPA's determination? How will a NITS Customer's response to question 2.c (whether the facility may be served by the FCRPS or a non-federal resource) factor in BPA's determination? Will the responsibility for determining NTLG rest with the NITS Customer's Customer Service Engineer? A group within BPA? As currently proposed, the process for BPA to arrive at such a significant decision for its NITS Customers is unclear.

BPA Response 13

BPA anticipates that in most cases the determination of a NTLG will be self-evident based on the MW requested, but BPA may rely on a NTLG Evaluation Form to accurately determine if the load qualifies as NTLG. It may also be used to determine that growth is not attributable to a NTLG facility. The LaRC does not have enough details for a NTLG assessment and it would be onerous to both the NITS Customer and BPA to provide and review this level of information for every end-user consumer facility (residential development, commercial developments, etc.) that is included in the LaRC. At the NITS Customer Group's suggestion, BPA is changing the language of E.6.b.iii from "sole" to "reasonable." The section now reads, "The determination of whether the load at the specific consumer facility qualifies as NTLG is at the reasonable discretion of BPA based on information provided in the Non-Trended Load Growth Facility Evaluation form."

These questions provide BPA the information that it needs to reasonably assess if the load qualifies as NTLG. Questions are not weighted more than another but failure to answer all the questions may result in BPA not being able to evaluate the NITS Customer's request. BPA has updated the LaRC to require the NITS Customer to indicate what resource they plan to use for any possible new and growing loads, including NTLG facilities. This information is necessary in order for BPA to do a commercial planning evaluation, but BPA will be removing this question from the NTLG Evaluation form since it will be provided in the LaRC.

A group of BPA subject matter experts will review the information provided by the customer and engage with the customer for additional clarity, if necessary, before making a determination of NTLG. If a NITS Customer has questions or concerns regarding their request, they are encouraged to reach out to the Transmission Account Executive.

At a minimum, BPA must provide written explanation for its determination within the closeout letter to the NITS Customer at the conclusion of the LARC Process. This explanation must provide a clear, objective, consistent formulation for its decision making, as well as opportunity to meet and discuss the determination with the specific NITS Customer. The NITS Customer Group is concerned with an opaque and subjective application of the listed criteria, and the potential for inconsistent application across customers given lack of transparency on how BPA will administer and evaluate the NTLG Facility Evaluation form.

BPA Response 14
BPA anticipates that in most cases the determination of a NTLG will be self-evident based on the MW requested.

The questions in the NTLG Evaluation form provide BPA the information that it needs to reasonably assess if the load qualifies as NTLG. Questions are not weighted more than others but failure to answer all the questions may result in not being able to do a commercial evaluation for the NITS Customer's request. This information is necessary in order for BPA to conduct a commercial planning evaluation. BPA will continue to provide response letters to NITS Customers detailing the reasons for decisions made at the end of the evaluation process.

Concerns over inconsistent and/or subjective application of determining NTLG are further exacerbated by BPA's proposed revision to section E.6.c, wherein BPA may subject any increase at a POD of 13 MW or greater to "additional evaluation" to determine if the load growth is attributable to one or more specific NITS Customer end-use facilities. We believe this is unnecessary and an overreach given BPA's decision to apply the NTLG policy on a per-facility basis. It is the NITS Customer's responsibility under the OATT to forecast its load growth needs at each of its PODs; additionally, it must also submit an NTLG Facility Evaluation form for specific load facilities that are expected to increase by 13 MW or more between forecast cycles. BPA is also proposing to require NITS Customers to consult with their BPA Customer Service Engineer when planning for load growth; it is our perspective that any requirements to submit an NTLG Facility Evaluation form will occur organically through this coordination process. As a result, we recommend striking BPA's proposed section E.6.c.

BPA Response 15
BPA thanks the NITS Customer Group for this perspective. This provision was included because, based on BPA's experience, a NITS Customer may identify load increases to the POD forecast but not identify them in the associated LaRC tab for new and growing loads, which going forward will also be used to identify NTLG. But BPA agrees that resolution of questions such as this can be managed through coordination between BPA and the customer. BPA has removed Section E.6.C.

Finally, we urge BPA to provide for a specific avenue for the NITS Customer to dispute BPA's NTLG determination. Again, given the gravity of BPA's NTLG designation, the determination of whether a load is NTLG must include coordination with and the perspective of the NITS Customer, just as BPA does in determining the Agency Load Forecast.

BPA Response 16
While BPA anticipates that the determination of NTLG will in most cases be self-evident based on the MW requested, it is committed to working with NITS Customers to address questions and concerns in the forecasting process. This includes coordination with the customer's Transmission Account Executive and Customer Service Engineer.

While BPA intends to reserve discretion on the final determination of NTLG, this discretion will be reasonable, and BPA does not intend that the process leading up to an NTLG determination will be unilateral.

In the event a customer disagrees with a BPA determination, the Dispute Resolution Procedures of the OATT are available.

E. Reserving Transmission Capacity for NWHUB-related Transactions

In the TC-27 process, BPA staff is proposing to make NWHUB the only virtual point available to NITS customers in the long-term market, and remove MIDCREMOTE. This generally appears acceptable for NITS customers, except that Sections F.4.b and H.2.c of the proposed NITS Transmission Business practice requires that for designations of NWHUB as the POR, the upstream transmission service must be provided within the DNR. Unfortunately, this makes the TC-27 virtual points construct unworkable on a longterm basis as the upstream source(s) of generation for market purchases (under contracts such as the WSPP and EEI templates) vary diurnally and seasonally.

We recommend BPA strike sections F.4.b and H.2.c from the proposed business practice language to allow the TC-27 virtual points construct to be functional. We believe this approach is reasonable in support of the TC-27 policy goals, supports efficient functioning of wholesale markets, and does no harm to BPA or other parties particularly in light of the fact that service from NWHUB would be on a Reassessment CFS basis with no physical plan of service or system investments to achieve priority 7 firm service.

BPA Response 17

Due to ongoing discussions in TC-27 BPA is not addressing this comment at this time.

F. Miscellaneous

1. BPA should conduct a public stakeholder process where it proposes to revise the LARC template (see section B.2.b of BPA's proposed BP). We have proposed a revision to section B.2.b to require BPA to subject material changes to the LARC template to a public stakeholder review process.

BPA Response 18

BPA conducts at least one Network Operating Committee meeting annually that is open to NITS Customers to review any changes to the LaRC and to allow NITS Customers to ask BPA questions regarding the LaRC workbook and the LaRC process.

The LaRC is a technical document that may require changes that BPA does not consider proposals. Any changes will be communicated prior to the start of the LaRC process.

2. We propose a revision to section C.3 and L.2 to de-link specific resources from NITS loads. NITS is a service that allows load to be served from a portfolio of resources, including existing designated Network Resources, and therefore we propose a clarification to address this apparent limitation. Our clarification resembles similar existing language BPA includes in Sections E and J.7.

BPA Response 19

BPA accepts the edits to C.3 but does not accept the changes to L.2. The edits to L.2. expand the scope of the NITS Business Practice revisions necessary to implement the NTLG policy but also create ambiguity ("the portion of Network Load not designated as Network Load. . .").

BPA is also concerned that narrowing the applicability of this section to apply only to discrete Points of Delivery being served with PTP service will exclude other situations addressed by the existing language. BPA will continue to allow the use of PTP service to serve Network Load consistent with FERC policies.

3. We propose revisions to Section C.5 to specify that BPA will send a response letter following completion of evaluation of the NITS Customer's LARC, specifying the loads, resources, transmission encumbrances, and FTSRs (CONFIRMED and STUDY) resulting from BPA's evaluation, as well as the transmission impediments identified by BPA in its evaluation.

BPA Response 20
BPA accepts the clarifying language in Section C.5 (C.5 refers to the revised number in the NITS Business Practice provided by the NT Customer Group) with the exception of "its review of the LaRC" due to the redundancy of the statement. BPA is clarifying the language in Section C.5 to read "At the conclusion of the LaRC evaluation, BPA will send a response letter to the NITS Customer with the outcome and provide the following information, as applicable:"

4. We urge BPA to broaden the Section E.6.a.iii baseline, to consider situations where an existing load facility has been in operation and has yet to be specifically identified in a prior LARC. As drafted, the language gives any facility not previously identified in a LARC a baseline forecast of zero MW. This leaves at risk legacy facilities that have been in operation for years but were historically forecast at the Point of Delivery aggregate level or otherwise not itemized as a discrete facility in the LARC. The NITS Customer Group requests that a carve-out be considered that includes any existing, energized facility for which the NITS Customer can demonstrate historical operation (e.g., metered load history), and that, where such evidence is provided, the baseline be set to the higher of the historical metered peak or the existing applicable encumbrance rather than zero.

BPA Response 21
BPA does not accept this change provided in Section E.5.a.iii (E.5.a.iii refers to the revised number in the NITS Business Practice provided by the NT Customer Group). BPA added clarifying language to E.6.iii (E.6.iii uses the numbers in BPA's NITS Business Practice) to address the concern of treatment of existing loads that are currently taking Long-Term Firm service.

When a NITS Customer submits LaRC information for a Possible New and Growing Load or a NTLG, it is for the forecasted increase that they are requesting, not the total peak for a facility that is already in existence. Comparing the forecasted increase provided by the NITS Customer in the LaRC against zero allows BPA to accurately determine if the requested growth should be considered NTLG. Additionally, once any required transmission plans of service are energized and the NTLG facility is taking service the NTLG policy will start anew and BPA would compare future LaRC increases to zero. (see E.6 in BPA's NITS Business Practice)

5. We request that BPA define or clarify the following terms:
   a. "Commercial" as referred to transmission evaluation or planning, as this is not defined either in BPA's tariff or business practices (e.g., see sections C.1, C.2.b, C.5.b, E.3, F.1 of BPA's proposed business practice).

BPA Response 22
"Commercial" is a general reference to the evaluation of service requests outside the reliability planning process.

b. "End-use consumer facility" for purposes of attributing the NTLG designation (e.g., see sections E.6, E.6.a of BPA's proposed business practice).

BPA Response 23
The use of end-user consumer facility is a general term used to describe an NITS Customer's customer and is used frequently during forecast discussions between NITS Customers and BPA when developing the Agency Forecast which populates the LaRC.

c. "Accepted" as it relates to the NITS Customer's LARC (e.g., see sections C.4, C.5, E of BPA's proposed business practice). How does this term relate to BPA's conclusions about information contained in a LARC? Are portions subject to BPA's rejection? Given this uncertainty, the NITS Customer Group has proposed striking the use of this term unless BPA alternatively can clarify how the term may be used within BPA's evaluation and response.

BPA Response 24
BPA has removed the word accepted throughout E.6 (E.6 uses the numbers in BPA's NITS Business Practice) and added clarification language to E.6.a.iii (E.6.a.iii uses the numbers in BPA's NITS Business Practice) that explains how NTLG FTSRs in STUDY status are evaluated. This is the intention behind using the word "accepted forecast."

6. We urge BPA to clarify how it will evaluate and plan for the load forecast contained in NITS Customer's LARC. Specifically, we note that BPA allows its NITS Customers to forecast load growth out over a 20-year horizon. However, nowhere in BPA's proposed NITS BP is information on how BPA will plan for load growth over this longterm horizon. Currently, the purpose and value of a NITS Customer forecasting beyond 10 years is unclear.

BPA Response 25
Per the OATT, NITS Customers are required to provide 10 years of forecast data. BPA has not changed language in the OATT or NITS Business Practice to require 20 years of forecast data.

During the FY26 annual LaRC cycle BPA extended the forecast time horizon to include 20 years of forecast data using the Agency Forecast, which forecasts out 20 years, to populate the LaRC workbook. As described in the LaRC instruction letter that NITS Customers received and during the Network Operating Committee meeting that NITS Customer representatives attended, it is optional for a NITS Customer to provide 20-year load and resource forecast data for transmission planning purposes.

BPA anticipates that its Proactive Planning System Expansion effort will utilize the later half of LaRC 20 year forecast but it's premature to make changes to the OATT or NITS Business Practice until that effort is further along.

7. BPA's proposal to potentially require participation in commercial planning for forecasted non-federal resources to serve load growth that is not New Network Load removes one of the few positive changes discussed during the reform process. BPA should

reconsider this policy and include non-federal resource forecasts to serve "trended" load growth through BPA's reliability system assessment process. In particular, the NITS Customer Group requests that BPA document the basis for the asymmetric treatment in Section F.7 between trended load growth served from federal resources (handled through the existing AREF tied to FCRPS, with no new FTSR or STUDY status) and trended load growth served from non-federal resources (a new or modified FTSR with potential STUDY status and commercial-study process). Preference utilities are increasingly required to serve a portion of their loads with non-federal resources, and imposing a procedural premium on portfolios that integrate non-federal generation runs counter to BPA's open-access obligations. To the extent additional process is genuinely needed for non-federal resources (for example, to verify upstream firm transmission), the NITS Customer Group requests that BPA describe the limited triggers in the BP rather than apply a categorical procedural penalty.

BPA Response 26
The NTLG policy is resource neutral in that it is based on an analysis of projected load. New resources introduced to BPA's transmission system will continue to require commercial analysis.

BPA's requirement to conduct a commercial analysis of a new resource is not tied to the nature of the resource or magnitude of the load it is projected to serve. It is the basic requirement to review anything that proposes to add a new incremental flow to the transmission system.

The basis for requiring a commercial evaluation of new forecasted resources is that delivery of the new resource is a proposed firm use of the system and it is through this process that any necessary upgrades, local or otherwise, would be identified.

Transmission service for typical load growth served from the FCRPS is assumed to be planned for through annual system assessments (i.e., Attachment K). Circumstances of significant and rapid increases in load served by FCRPS prompted consideration of this paradigm due to potential impacts on reliability.

Enabling the integration of non-federal resources was a main driver behind BPA's establishment of the load and resource forecasting process. In many cases non-federal resources have been integrated and have modified planned FCRPS flows, but BPA needs the ability to at least analyze forecasts of new resources to ensure any reliability issues are addressed.

BPA added a clarification to 7.a.i that a New Network Load form is not required for load intended to be Non-Trended Load Growth.

8. The NITS Customer Group remains confused as to the necessity of revising the definition of "New Network Load" to include NTLG. In our view, New Network Load generally refers to load that already exists but was previously not a part of the NITS Customer's Network Load. Adjusting the definition to include NTLG stands out as an altogether different concept. Further, the revised definition of "New Network Load" now references "Non-Trended Load Growth" and the proposed definition of "Non-Trended Load Growth" references "New Network Load". These circular and self-referencing definitions are ambiguous and clarify little about what Non-Trended Load Growth actually is. Moreover, we note that BPA staff has indicated verbally that it does not

intend to capture residential or other organic loads within the NTLG policy; however, nowhere in the current proposal does BPA protect against this from occurring. We therefore recommend BPA provide additional language in the definition of NTLG to describe the type of load that the policy is designed to account for (i.e., large in magnitude, quickly arriving) to help distinguish NTLG from other types of loads and load growth and prevent unintended consequences.

BPA Response 27
BPA did an industry scan which found that New Network Load was a common and accepted method used by neighboring transmission providers to assess loads of certain magnitudes. BPA chose to utilize the definition of New Network Load to implement the NTLG policy because the existing requirements for New Network Load fit the requirements to integrate the sudden appearances of load represented by NTLG.

BPA's concern over adding abbreviated descriptions (i.e., large in magnitude, timing of load, etc.) to the NTLG definition is that these descriptions are subject to interpretation by the reader. BPA agrees that there was a circular nature between New Network Load definition and the NTLG definition. BPA has updated the NTLG definition to address this concern.

BPA provided clarifying language in E.8 (E.8 refers to the numbers in BPA's NITS Business Practice) to provide assurance that load growth such as residential and commercial load growth will not be treated as NTLG.

9. The NITS Customer Group requests that BPA restore the collaborative forecasting language deleted from Section B.1. V15 of the NITS BP provided that "[t]he data submitted and/or confirmed by the NT Customer informs BPA's Long-Term transmission planning and future TSEP cycles" and that "[t]he NT Customer's BPA forecaster works with the NT Customer to meet the annual forecast update obligation." V16 deletes both. Removing this language signals, and ultimately codifies, a shift from a collaborative forecasting relationship to a transactional compliance posture, which will be felt most acutely by smaller preference utilities that rely heavily on BPA Account Executive and forecaster support. The NITS Customer Group strongly requests that the deleted language be restored.

BPA Response 28
Section B.1.a from the NITS Business Practice v.15 was deleted because an estimated 30% of NITS Customers do not reply to the annual LaRC process. Language was clarified in B.6 of the NITS Business Practice v.16 to address this issue specifically.

Providing a list of the many uses of the LaRC throughout BPA in the NITS Business Practice can result in dated information. BPA relies on the LaRC workbook instruction letter sent to NITS Customer's annually to provide any pertinent changes of how the LaRC is informing BPA's different processes. Additionally, BPA provided public workshop materials in March 2024 that provided a detailed diagram of the many uses of the LaRC and Agency Forecast.

BPA has added back language to B.1.b to state, "The NT Customer's BPA forecaster works with the NT Customer to meet the annual forecast update obligation."

10. We recommend BPA add a graduated cure pathway, with Account Executive escalation, before BPA suspends further evaluation under Section C.2. As drafted, Section C.2 operates as a binary cutoff with no notice/cure mechanism beyond the 10-

Business-Day window. Limited to a discrete deficient resource or load, paired with AE-level escalation, this consequence becomes proportionate to the deficiency; left as a categorical “will not proceed with commercial planning” trigger, it gives BPA an all-or-nothing lever over the customer’s entire portfolio.

BPA Response 29
Our intention with C.2 (C.2 uses the revised numbers in the NITS Business Practice provided by the NT Customer Group) is to streamline BPA’s processes and improve documentation. BPA is still committed to collaborating with NITS Customers during the LaRC and Data Exhibit process, but BPA needs to standardize processes to allow for efficiencies and transparency. A NITS Customer’s delay in providing data can effect the processing of other NITS Customer requests waiting for a commercial planning evaluation.

BPA has added language to C.2.c that if a NITS Customer does not provide the NITS Data Exhibit for a request within the required timeframe, the request will receive no further consideration. BPA will continue to review the LaRC without the request.

11. We are proposing other ministerial revisions, and have noted such revisions as “ministerial.”

Thank you for your consideration of these comments.

BPA Response 30
The NITS Customer Group has provided a redline markup of the NITS Business Practice. After review of the redline, BPA has accepted the following ministerial edits. The following refer to sections in the NITS Business Practice using the revised numbers provided by the NITS Customer Group.

B.2.a
G.3
H.3.a.i
H.3.a.ii
J.2

BPA Response 31
The NITS Customer Group has provided a redline markup of the NITS Business Practice. After review of redline, BPA has accepted all or a portion of the following edits. The following refer to sections in the NITS Business Practice using the revised numbers provided by the NT Customer Group.

B.7
C.2 (original C.2)
C.3
C.5
D.3
E.5.a, E.5.a.ii (new E.5)
E.5.b.ii, E.5.b.iii (new E.5)
E.5.c (new E.5)
E.6
O.5

BPA Response 32
The NITS Customer Group has provided a redline markup of the NITS Business Practice. After review of redline, BPA has not accepted the following edits. The following refer to sections in the NITS Business Practice using the revised numbers provided by the NT Customer Group.

B.2.b
B.5, B.5.a-d
B.7., B.7.a
C.2 (original C.2)
C.2 (new C.2), C.2.a, C.2.b
C.4
C.5.c-d
E.3, E.3.a-e
E.4 (new E.4)
E.4 (original E.4)
E.5 (original E.5)
E.5.a.iii (new E.5)
E.6
E.7.a
F.4.b
F.7.a.i
F.7.b.i
G.1.a
H.2.c
H.3.a.i
L.1
L.2

The next section contains the NT Customer Group proposed BP revisions and BPA responses.

Note that comments made by the NT Customer Group are identified as “[NT CG#]” and BPA comments in response are identified as “[JC(TT#)].

Network Integration Transmission Service (NITS)

BPA Transmission Business Practice

Version 16
TBD

Network Integration Transmission Service (NITS)

Version 16

This business practice outlines processes and procedures specific to Network Integration Transmission Service (NITS).

BPA Policy References

- Open Access Transmission Tariff (OATT): Part III. Network Integration Transmission Service; Attachment G
- Transmission Rate Schedules/Provisions: Network Integration Rate

For more information, visit the BPA Transmission Business Practices webpage or submit questions to techforum@bpa.gov.

Table of Contents

A. Requesting Network Integration Transmission Service

1. Must be an Eligible Customer.
    a. Any entity that is not currently a NITS Customer must complete the steps on the Becoming a Transmission Customer webpage prior to requesting NITS.
    b. Per Section 29.2 of the OATT, an Eligible Customer seeking NITS must submit the following on OASIS (refer to the NT TSR User Guide for TSR submittal and NITS application submittal instructions):Transmission Service Request (TSR).
    c. NITS New Application on OASIS.
        i. The application parameters should reflect the Eligible Customer's executed enabling NT Transmission Service Agreement.
        ii. The application is submitted one time, prior to the submittal of any additional OASIS NITS information.
2. The Eligible Customer must also provide the following information as part of the completed application:
    a. New Network Load form.
    b. Ten-year load and resource forecast.
3. The Eligible Customer's assigned Transmission Account Executive will help coordinate the process of providing the information required in 29.2 of the OATT.

B. Load & Resource Forecasts

1. The NITS Annual Load and Resource Forecasting Process (LaRC Process) is the annual update of a NITS Customer's ten-year load and resource forecast as required by Sections 29.2 and 31.6 of the OATT and the NERC MOD-031 Reliability Standards.
    a. BPA will notify NITS Customers of the timing of the upcoming LaRC Process.
2. The Load and Resource Consolidated Data Collection Tool (LaRC) is a workbook that provides detail such as historical loads, forecasted loads, and forecasted and designated resources.
    a. BPA prepares the LaRC by populating it with current BPA forecast information ~~and~~, Forecasted Network Resource TSRs (FTSR~~) for forecasted)~~, and designated resources.
    b. BPA may change the LaRC template from time to time to improve the LaRC Process. Material changes will be proposed through a public stakeholder review process and ~~Changes~~ will be communicated prior to the start of the LaRC Process.
3. When initiating the LaRC Process, BPA will send the LaRC to all NITS Customers via email along with an instruction letter.
4. The NITS Customer must review the LaRC and provide any updates or changes by the due date specified in the instruction letter. The due date will not be less than 30 Calendar Days from when the instruction letter was sent.
    a. In the event a NITS Customer is working with a third party for planning and completion of the LaRC, the NITS Customer is responsible for ensuring the information in the LaRC is accurate and submitted by the due date.

Commented [NT CG1]: Ministerial revisions.

Commented [JC(TT21R2]: BPA accepts the change to B.2.a.

Commented [NT CG2]: Miscellaneous Comments #1

Commented [JC(TT22R2]: BPA does not accept this change to B.2.b. The LaRC is a technical document that requires changes that are not proposals. Any changes will be communicated prior to the start of the LaRC process.

b. The NITS Customer is responsible for identifying in the LaRC which resource forecasts will be analyzed as alternate resources.

5. The queue time for evaluating the load and resource forecast provided in the LaRC ~~is the date and time BPA receives the email containing the LaRC.~~will be applied in accordance with the following provisions:

   a. The queue time for evaluating load growth not associated with New Network Load will be the date/time of the original executed NITS Agreement.

   b. The queue time for evaluating New Network Load that does not include Non-Trended Load Growth will be the date and time that the NITS Customer submits the New Network Load form in accordance with Section A.2.

   c. The queue time for evaluating New Network Load that includes Non-Trended Load Growth is the earlier of:

      i. The email date/time stamp of the initial LaRC submittal that includes the Non-Trended Load Growth.

      ii. The email date/time stamp of the initial LaRC that includes the resource that the NITS Customer identifies to serve the Non-Trended Load Growth.

   d. The queue time for evaluating a forecast non-federal resource is the email date/time stamp of the initial LaRC that includes the forecast non-federal resource.

6. If the NITS Customer does not return the LaRC by the specified due date, BPA will assume no changes from the LaRC as provided by BPA to the NITS Customer during the LaRC Process and the LaRC will receive a queue time of the last day of the LaRC Process window at 11:59 PM PPT.

   a. The time period between the date the LaRC is sent to the NITS Customer and the LaRC due date is referred to as the LaRC Process window.

   b. A LaRC received after the close of the LaRC Process window will be processed as indicated in Section D after the completion of the LaRC Process.

7. Within 15 Business Days of receipt of the LaRC, BPA will notify the NITS Customer whether the LaRC is incomplete or deficient. If BPA determines the LaRC is incomplete or deficient, BPA will notify the NITS Customer ~~and the~~of the information that fails to meet the requirements or that must be corrected. The NITS Customer must remedy the LaRC within 10 Business Days of notification to enable a valid LaRC submittal.

   a. If efforts to remedy all identified deficiencies are unsuccessful, ~~the NITS Customer's LaRC will be processed as identified in Section B.6~~BPA will notify the NITS Customer of the information in the LARC will not be included for further consideration.

C. Evaluating Load & Resource Forecasts

1. BPA will evaluate a valid LaRC based on the following criteria to determine if it should be subject to a commercial evaluation and may require participation in a commercial study.

   a. Any forecast for a new non-federal resource or an increase beyond the designated capacity amount of an existing non-federal resource forecast.

   b. Any load forecast that contains New Network Load (See Section E).

Commented [NT CG3]: Section B. Clarify queue times

Commented [JC(TT23R2]: BPA did not accept the proposed edits to B.5 and subsequent subsections because forecasts that are processed through reliability planning, such as load growth not associated with New Network Load, are not assigned a queue time. Only forecasts that require a commercial planning evaluation require a queue time. Additionally in B.5.c, if a customer changes a resource to serve NTLG from one LaRC submission to another, the request needs to receive a new queue time because it requires a new commercial planning evaluation. See C.1.a.

BPA added clarifying language to B.5 (refers to the newly revised NITS Business Practice) that states a queue time is used only when a commercial planning evaluation is required.

Commented [NT CG4]: Section C. Remedying deficiencies

Commented [JC(TT24R2]: BPA does not accept this edit in B.7. Per the OATT the 15 business days is in response to a completed application, not a LaRC. (Legal/GAT Review)

Commented [JC(TT25]: BPA accepts this portion of the language change in B.7.

Commented [JC(TT26]: BPA does not accept deletion of language in section 7.a. BPA needs to retain the original language in 7.a to make clear what forecast BPA will use if a NITS customer does not remedy deficiencies in their LaRC. This allows for a record of the change requested by the customer.

BPA modified the proposed language in section 7.a (refers to the newly revised NITS Business Practice) to add clarity on NITS Customer notification of which LaRC will be used for commercial evaluation.

~~2. Additional information may be requested in order to facilitate the LaRC and Data Exhibit evaluations. If the NITS Customer does not provide the requested information within 10 Business Days, the LaRC, in its entirety, will not be considered valid and the evaluation will occur as indicated in Section B.6.~~

~~3.~~2. If BPA determines that participation in a commercial study is required, BPA may request a NITS Data Exhibit from the NITS Customer in order to evaluate the LaRC. ~~BPA may request a NITS Data Exhibit from the NITS Customer for forecasted resources or loads in order to evaluate the LaRC.~~ See the Requesting Transmission Service Business Practice Section F, Data Exhibit Submittal and Validation for LTF TSRs, for details.

a. BPA will not proceed with commercial planning for NITS Customers that do not provide a requested Data Exhibit ~~that meets current requirements~~.

b. BPA will notify the NITS Customer if the Data Exhibit is deficient within 15 Business Days of receipt. If the NITS Customer does not remedy the Data Exhibit deficiencies within 10 Business Days of BPA's notification, the forecasted resource associated with the deficient Data Exhibit will not be considered for commercial evaluation.

~~4.~~3. BPA will not create an FTSR for forecasted load without ~~a supporting resource~~ sufficient existing and/or forecasted resources~~forecast."~~.

~~5.~~4. Any portion of a load or resource forecast that has ~~not~~ previously been ~~accepted by BPA does not have~~granted a firm transmission ~~rights until evaluation and any necessary study is complete and any required plan~~encumbrance via a CONFIRMED FTSR or existing designated Network Resource, or an attributable Behind the Meter Resource included in a~~(s) of service have been energized~~ LaRC response letter, will not be subject to further commercial evaluation by BPA.

~~6.~~5. At the conclusion of the LaRC evaluation, BPA will ~~create or modify any accepted FTSR(s) and create FTSR(s) for requests~~send a response letter to ~~be studied. BPA will notify~~ the NITS Customer ~~of~~with the outcome of its review of the evaluationLaRC and provide the following information, as applicable:

a. CONFIRMED FTSRs – Identification of new FTSRs for future designation of Network Resources.

b. STUDY FTSRs – Identification of new or modified FTSRs that will require participation in a commercial study. Instructions for required next steps will be provided.

i. In the event BPA offers a study agreement, the NITS Customer may decline to participate, in which case the FTSR(s) will be DECLINED.

ii. STUDY FTSR(s) are viewable in the Long-Term Pending Queue spreadsheet that is available on the Transmission Availability webpage.

c. Behind the Meter Resources – Identification of new forecasted resource(s) internal to the NITS Customer's system or transmitted over non-federal transmission facilities.

~~c.~~d. Non-Trended Load Growth forecasts – Identification of existing and new Non-Trended Load Growth (NTLG) facilities ~~and the accepted load forecast for those facilities (see Section E).~~

~~d.~~e. Limitations, restrictions, and further instructions to address any unique or special situations.

Commented [JC(TT27]: BPA does not accept the deletion of the first sentence in section C.2.

BPA accepts the deletion of the second sentence in C.2. and has provided a clarification to C.2.c (refers to the newly revised NITS Business Practice).

Commented [NT CG8]: Section C. Remedying deficiencies

Commented [JC(TT28R2]: BPA does not accept this change to C.2. A data exhibit may be required to enable review of the request.

Commented [JC(TT29]: BPA does not accept this change to C.2.a. BPA has revision C.2.b of the newly revised NITS Business Practice to address customer concerns on processing LaRCs without Data Exhibits.

Commented [JC(TT210]: BPA does not accept this change to C.2.b. This information is redundant with the Requesting Transmission Business Practice section F. BPA discourages duplicative language in multiple business practices.

Additionally the suggested change alters the number of days a NITS Customer has to remedy Data Exhibit deficiencies from 5 Business Days to 10 Business Days. This conflicts with the Requesting Transmission Business Practice section F and is beyond the scope of considered changes for the NITS Business Practice.

Commented [NT CG11]: Miscellaneous Comments #2

Commented [JC(TT211R2]: BPA accepts the proposed clarification to C.3.

Commented [NT CG12]: Section A. Clarify treatment of existing encumbrances.

Commented [JC(TT212R2]: BPA does not accept this change to C.4. The intention of C.4 is to ensure a NITS customer understands that it doesn't have rights for requests that haven't been evaluated.

BPA added clarifying language to C.5.a that CONFIRMED FTSRs will not be subject to additional commercial planning evaluations.

Commented [NT CG13]: Miscellaneous Comments #3

Commented [JC(TT213R2]: BPA accepts the clarifying language in section C.5 with the exception of "its review of the LaRC" due to the redundancy of the statement.

BPA is adjusting the clarifying the language in section C.5 (refers to the newly revised NITS Business Practice) to read "… the outcome and provide the following…"

Commented [JC(TT214]: BPA does not accept the language in section C.5.c. BPA's review of a NITS Customer's LaRC does not verify Behind the Meter Resources forecasts submitted by the NITS Customer.

Commented [JC(TT215]: BPA does not accept this change to C.5.d. It is important to provide the load forecast amounts in the notification to the NITS customer.

BPA has modified language to remove the word "accepted."

D. Load & Resource Forecasts Outside the LaRC Process

1. A NITS Customer is required to submit a reasonable and timely forecast per the OATT, using the LaRC.
2. If there is a change to the NITS Customer's load or resource forecast the NITS Customer should notify BPA as soon as possible.
    a. The NITS Customer should send an email with an updated LaRC to: KSLF@bpa.gov.
    b. The NITS Customer's BPA forecaster and assigned Transmission Account Executive should be copied on the email.
    c. The Subject Line should be "Revision to LaRC Submittal FY(current year) – (NITS Customer Name)."
3. The queue time for evaluating a forecast ~~is the date and time BPA receives the email containing the forecast in the~~ LaRCwill be established in accordance with Section B.5.

Commented [NT CG16]: Section B. Clarify queue times.

Commented [JC(TT216R2]: BPA accepts this change to D.3.

E. New Network Load

1. The assigned Transmission Account Executive will coordinate with the NITS Customer to provide the information required in the LaRC.
2. The NITS Customer must provide a new or revised LaRC identifying the New Network Load (defined in Business Practice Acronym and Glossary).
3. The NITS Customer's New Network Load ~~requires~~will not require a commercial evaluation if the NITS Customer meets any of the following conditions:
    a. The NITS Customer cites CONFIRMED TSR(s) as provided for through a LaRC Process response letter in an amount equal to or greater than the New Network Load.
    b. The NITS Customer attests to generation in an amount equal to or greater than the New Network Load that is supplied by Behind the Meter Resource(s) as demonstrated by an accepted LaRC and as described in a LaRC Process response letter.
    c. The NITS Customer cites existing designated Network Resource capacity in an amount equal to or greater than the New Network Load.
    d. The NITS Customer includes in its LaRC a portion of New Network Load that is being served with PTP service that cites a discrete POD on its system, and a POR.
    e. The transmission impacts of the New Network Load are deemed *de minimis* in accordance with the Transmission Service Request (TSR) Evaluation Business Practice.

Commented [NT CG17]: Section A. Clarify treatment of existing encumbrances.

Commented [JC(TT217R2]: BPA does not accept the changes to section E.3. and subsequent subsections. New Network Load always requires a commercial planning evaluation.

~~3.~~4. If the NITS Customer is unable to identify sufficient resources in its New Network Load Form as defined in Section E.3, then the New Network Load may require a commercial evaluation and participation in a study to determine the availability of long-term firm transmission capability from designated and forecasted Network Resources to serve the proposed New Network Load (see Section C).
    a. BPA Transmission's evaluation of New Network Load is unrelated to BPA Power Services' New Large Single Load (NLSL) policy or NLSL determinations.
4. ~~The NITS Customer must demonstrate sufficient forecasted resources to serve a proposed New Network Load. See also Section C.2.~~

Commented [JC(TT218]: BPA does not accept the change to E.4. BPA needs to evaluate the New Network Load even if sufficient resources are provided to ensure that there is adequate transmission capacity for the request.

Commented [JC(TT219]: BPA does not accept this change to E.4. BPA needs to evaluate the resources for the New Network Load request to ensure that there is adequate transmission capacity. BPA added clarifying language to E.4. (refers to the newly revised NITS Business Practice).

~~5. The queue time for evaluating New Network Load is the date and time BPA receives the email containing the LaRC.~~

~~6.~~5. Load growth at a new or existing end-use consumer facility will be identified as NTLG under the following criteria:

a. A comparison is made of each year of the NITS Customer's load forecast to the same year of the load forecast for the prior ~~accepted~~ forecast (the baseline forecast). If the incremental increase is 13 MW or more in any year the load may be considered NTLG.

i. The baseline forecast is updated annually at the beginning of the LaRC Process.

ii. When evaluating the NTLG facility, the last year of the new LaRC will be compared to the last year of the 10-year ~~accepted~~ baseline LaRC.

iii. If the facility has not been previously identified in the LaRC, the baseline forecast is assumed to be 0 MW. This provision will not apply to any existing facility that a NITS Customer included within a LaRC prior to the effective date of the V16 NITS Business Practice.

b. A NITS Customer's end-use consumer facility that is evaluated and identified as NTLG will be identified as New Network Load.

i. The NITS Customer may provide the Non-Trended Load Growth Facility Evaluation form with their LaRC submission.

ii. BPA may request a NITS Customer complete a Non-Trended Load Growth Facility Evaluation form. If the Non-Trended Load Growth Facility Evaluation form is not ~~complete~~provided within 10 Business Days of BPA's request, the ~~LaRC~~forecast load for which BPA requested a completed Non-Trended Load Growth Facility Evaluation form will receive no further consideration (see Section C).

iii. The determination of whether the load at the specific consumer facility qualifies as NTLG is at the ~~sole~~ reasonable discretion of BPA based on information provided in the Non-Trended Load Growth Facility Evaluation form.

c. A LaRC forecast at a Point of Delivery that exhibits a 13 MW or more increase from the ~~previously accepted~~ previously submitted load forecast by the NITS Customer, for any of the ten years of the load forecast, ~~will~~ may require an additional evaluation to determine if the load growth is attributable to one or more specific NITS Customer's end-use consumer facilities.

~~7.~~6. If the load forecast at a facility has been determined to be an NTLG, any subsequent load forecast increase at that facility will also be considered an NTLG until the facility is energized and taking service. If an end-use consumer facility has been energized as of the effective date of V16 of the NITS BP, then it will not be considered an NTLG.

~~8.~~7. The determination of New Network Load is independent of line and load interconnection procedures (see the Line and Load Interconnection Procedures Business Practice).

~~a.~~ The NITS Customers and itsmust consult with their BPA Customer Service Engineer should coordinate when planning for load growth identified in the NITS Customer's LaRC.

Commented [NCG20]: Section B. Clarify queue times.

Propose to strike given proposed revisions to queue times in Section B above.

Commented [JC(TT220R2]: BPA does not accept this change to E.5. BPA receives question with regularity and wants to provide clear guidance in this section.

Commented [JC(TT221]: BPA accepts this change to E.5.a.

Commented [JC(TT222]: BPA accepts this change E.5.a.ii.

Commented [NT CG23]: Miscellaneous Comments #4.

Commented [JC(TT223R2]: BPA does not accept this change to E.5.a.iii. The NITS Business Practice V16 will be applied as described in Section O.

BPA added a clarification to E.6.a.iii and E.6.a.iv (refers to the newly revised NITS Business Practice) that explains how NTLG FTSRs in STUDY status or currently taking Long-Term Firm service are evaluated.

Commented [JC(TT224]: BPA accepts the changes from 5.b.ii. And 5.b.iii

Commented [NCG25]: Section D. BPA's "Sole" Discretion to determine NTLGs.

We recommend striking this provision as unnecessary. The NTLG designation will be based on per-facility application. It is the NITS Customer's responsibility to forecast its load needs to BPA at its PODs, including instances of NTLG through the NTLG Facility Evaluation form. Further, this provision should occur organically assuming BPA and the NITS Customer coordinate on load growth planning per proposed section E.9 below.

Commented [JC(TT225R2]: BPA accepts the changes in E.5.c.

Commented [JC(TT226]: BPA modified this suggested edit to "a".

Commented [JC(TT227]: BPA modified this suggested edit to "a"

Commented [NT CG28]: BPA - Please specify whether "facility" refers to the NTLG facility becoming energized, or instead the transmission facilities required to serve the NTLG.

Commented [JC(TT228R2]: BPA has clarified language in E.7. of the newly revised NITS Business Practice.

Commented [JC(TT229]: BPA does not accept this change to E.6. A NTLG facility may energize their load while still having an FTSR in STUDY status and utilizing Short-Term Firm. The FTSR in STUDY could potentially require a transmission plan(s) of service in order to enable Long-Term Firm.

Commented [NT CG30]: Proposing a revision to promote a shared objective of joint collaboration between BPA CSEs and NITS Customers.

Commented [JC(TT230R2]: BPA has clarified language in E.9.a. (refers to the newly revised NITS Business Practice) to address the NT Customer Groups concern.

F. Reserving Transmission Capacity for Forecasted Non-federal Network Resources and Forecasted Network Load

1. A CONFIRMED FTSR, based on evaluated and accepted forecasts, provides an assurance no further commercial study is required when the identified non-federal resource is subsequently designated to serve the NITS Customer load.
    a. An FTSR is a Long-Term Firm (LTF) NT TSR on OASIS.
        i. An FTSR contains "NT FTSR" in the Seller Comments field. Additional information may also be included in this field.
        ii. An FTSR identifies the forecasted MW per year for the next 10 years.
        iii. An FTSR in CONFIRMED status reflects capacity that has been encumbered for the NITS Customer.
2. When a NITS Customer designates against its current FTSR by submitting a designation TSR and a NITS Add DNR (TSR/NITSDNR) on OASIS and the TSR/NITSDNR are CONFIRMED, the identified FTSR will be recalled by the MW total that has been designated.
3. Multiple FTSRs may be created to reflect circumstances where a NITS Customer forecasts two or more non-federal resources to serve the same Network Load without over-encumbering transmission capacity.
    a. Each non-federal resource that is forecasted will have a separate FTSR.
    b. BPA will indicate which FTSRs are associated with alternate resources.
    c. The cumulative MW amount of the TSR/NITSDNR(s) designated cannot exceed the MW amount of the identified FTSR(s).
        i. If one or more designation TSR/NITSDNR(s) are CONFIRMED, the identified FTSR(s) will be recalled by the MW of each designation.
4. When a resource forecast is accepted for the Mid-Columbia (Mid-C) area, the FTSR will specify COLMBIA230CHPD as the Source and BPAT.CHPD as the Point of Receipt (POR).
    a. If noted in the FTSR, the NITS Customer may designate a Network Resource against the FTSR using any of the following PORs: NWH, MIDCREMOTE, BPAT.CHPD (Chelan), BPAT.GCPD (Grant), or BPAT.DOPD (Douglas).
    ~~b. For designations of NWH as a POR, the upstream transmission service must also be provided within the DNR.~~
5. A NITS Customer may not create an FTSR on OASIS.
6. A NITS Customer may designate a Network Resource against a CONFIRMED FTSR. See Section G, Designation of a New Network Resource.
    a. If a NITS Customer does not designate a Network Resource for which it has an FTSR at least 60 Calendar Days prior to service commencement date, BPA will release the encumbered capacity back to the market on a rolling monthly basis.
7. Creation of FTSR.
    a. For Non-Trended Load Growth facility – New Network Load:
        i. If a NITS Customer is unable to specify a resource under Section E.3 in its New Network Load form, ~~a~~A new or modified FTSR will be created for each NTLG facility. BPA will create a CONFIRMED FTSR for each accepted NTLG facility forecast and a STUDY FTSR for each NTLG facility forecast requiring a commercial study as indicated in Section E.

Commented [NCG31]: Section E. Reserving Transmission Capacity for NWHUB-related Transactions. Propose to strike per TC-27.

Commented [JC(TT231R2]: BPA does not accept the proposed change. Due to ongoing discussions in TC-27 BPA is not addressing this comment at this time.

Commented [JC(TT232]: BPA does not accept this change to F.7.a.i. If a NITS Customer is unable to identify the resource intended to serve New Network Load BPA is unable to provide a Commercial Planning Evaluation and create an FTSR. Per J.1 (refers to the newly revised NITS Business Practice) a New Network Load form is not required for Non-Trended Load Growth.

b. For trended Load Growth:

i. Non-federal Resource: ~~A new or modified FTSR will be created for each non-federal Network Resource.~~ BPA will create a CONFIRMED FTSR for each ~~accepted~~ non-federal Network Resource forecast ~~and a STUDY FTSR for each non-federal Network Resource requiring a commercial study.~~

ii. Federal Resource: BPA will inform the NITS Customer of the accepted forecast amount. The NITS Customer's existing AREF with a Source of FCRPS noted in their contract will serve as their encumbrance.

8. BPA uses CONFIRMED FTSRs in the calculation of capacity in accordance with the BPA's ATC Methodology.

G. Designation of a New Network Resource

1. To designate a new Network Resource, the NITS Customer must submit a new TSR/NITSDNR and add a NITS Add/Modify Resource and Add/Modify Generation if applicable on OASIS. Refer to the NT TSR User Guide for TSR submittal and NITS application submittal instructions.

a. ~~Queue~~Unless the NITS Customer receives a queue time by including the forecast Network Resource in its LaRC in accordance with Section B.5, queue time is established when the TSR is QUEUED on OASIS.

b. For LTF NT TSRs to designate Network Resources, a NITSDNR must be submitted on OASIS on the same Business Day in which the LTF NT TSR is QUEUED.

i. If a NITSDNR for a LTF TSR is deemed deficient, BPA will notify the NITS Customer to remedy the deficiency.

ii. Deficiencies must be remedied the same day as notification.

i. If efforts to remedy the deficiencies through informal communications with the NITS Customer are unsuccessful, BPA will DECLINE the LTF NT TSR and the NITSDNR on OASIS.

c. For Short-Term Firm (STF) NT TSR (Hourly, Daily, Weekly, and Monthly) to designate a Network Resource, NITS Customers must submit in accordance with the "Short-Term and Hourly TSR Process" section of the Requesting Transmission Service Business Practice. STF NT TSRs must also be submitted in accordance with the BPA reservation timelines specified in the "Reservation Timelines" section of the Requesting Transmission Service Business Practice.

d. For a STF NT TSR, a NITSDNR must be submitted on OASIS on the same Business Day in which the TSR is QUEUED, or before delivery, whichever is earlier. The STF NT TSR may be CONFIRMED over OASIS before BPA may have an opportunity to review the STF NT TSR and the NITSDNR. Therefore,

although a STF NT TSR may be confirmed, BPA considers the NITSDNR deficient if the NITSDNR requirements are not met or are not submitted within the specified deadline.

e. If a NITSDNR is deficient, BPA will notify the NITS Customer requesting service within 15 Calendar Days from the day the STF NT TSR is QUEUED and specify the reasons for such failure.

f. If, within 10 Business Days of notification, efforts to remedy the deficiencies through informal communications with the NITS Customer are unsuccessful, BPA

Commented [JC(TT233]: BPA does not accept this change to F.7.b.i. BPA may need to create an FTSR in STUDY status when additional transmission planning analysis or transmission build is required.

Commented [NT CG34]: Section B. Clarify queue times

Commented [JC(TT234R2]: BPA does not accept changes to G.1.a. The designation TSR queue time is not established by the LaRC. It is established when the TSR is QUEUED on OASIS.

will ANNUL the STF NT TSR and the NITSDNR on OASIS within the deficiency time period or before delivery, whichever is earlier.

g. For STF NT TSRs, BPA will ANNUL a TSR if the NITSDNR requirements are not met.

2. To submit a LTF NT TSR or STF NT TSR to designate a Network Resource, NITS Customers must attest to the following conditions by submitting a NITS Add/Modify Resource and an Add/Modify Generation, if applicable on OASIS.

   a. The NITS Customer owns the resource, has committed to purchase generation pursuant to an executed contract, or has committed to purchase generation where execution of a contract is contingent upon the availability of Transmission Service under Part III of the BPA OATT.

   b. The Network Resource does not include any resources, or any portions thereof, that are committed for a sale of one (1) year or more to non-designated third party load or otherwise cannot be called upon to meet the NT Customer's Network Load on a non-interruptible basis, except for purposes of fulfilling obligations under a reserve sharing program.

3. NITS Customers must have any necessary Firm or ~~Point to Point~~ Conditional Firm Service (CFS), which may include transmission arrangements with rollover rights, or must have a pending transmission service request for Firm transmission on all intermediate transmission systems, including the source system, for the duration of the TSR.

4. NITS Customers must make a Long-Term designation of Network Resources, including a designation of a forecasted Network Resource for which the NITS Customer has a CONFIRMED FTSR, no later than 60 Calendar Days prior to service commencement date.

Commented [NT CG35]: Ministerial edit.

Commented [JC(TT235R2]: BPA accepts this change. This change makes section G.3 more durable.

H. Additional Requirements for Designating Network Resources

1. When designating a previously forecasted non-federal Network Resource the following requirements apply:

   a. To designate a previously forecasted Network Resource for which an FTSR has been CONFIRMED, the NITS Customer must submit a LTF NT TSR and a NITSDNR in accordance with Section E, Designation of a New Network Resource.

      i. The LTF NT TSR must be as follows:

         1. Request type: ORIGINAL.
         2. Deal Ref: Enter FTSR AREF.
         3. Start/Stop Time: Must be within the Start and Stop Date parameters of the FTSR.
         4. Customer Comment: Enter "TSR to designate a previously forecasted Network Resource."

   b. BPA will evaluate the LTF NT TSR/NITSDNR and the associated FTSR to determine if Transmission Service can be provided.

   c. A designation of a Network Resource for less than one (1) year cannot be netted against an FTSR.

2. For the POR field of the OASIS Reservation Entry Form, the NITS Customer may use the following PORs:
    a. The POR of the identified On-System Generating Resource:
        i. The POR of the generating resource may be Newpoint (NEWPOINTBPAT) if the point is not currently modeled on OASIS. See the Requesting Transmission Service Business Practice for more information on designating Newpoint.
        ii. The POR for a generating resource located within a Load Serving Entity's distribution system is the point of interconnection between the Load Serving Entity and the BPA BAA.
    b. BAA Delivery Point:
        i. A BAA Delivery Point may only be used for Network Resources originating from outside the BPA BAA.
        ii. If the originating BAA is interconnected with the BPA BAA, the NITS Customer must use the BAA Point between the BPA BAA and the adjacent or nested BAA from which the Network Resource(s) originated.
        iii. Network Resources must be delivered to the BAA Delivery Point on Firm or on CFS for the duration of the TSR. The TSR will be DECLINED if the NT Customer is unable to provide an AREF and an attestation for the upstream transmission at the time the NITSDNR is submitted on OASIS. See the NT TSR User Guide.
        iv. If the upstream Firm or CFS contract includes rollover rights which may be exercised during the duration of the NT TSR, the NITS Customer must provide the AREF for the rollover TSR at the time the TSR is submitted and again within five (5) Business Days of the rollover being CONFIRMED in order for the NT TSR to continue to be a valid Network Resource. The notification must be emailed to TxRequests@bpa.gov.
    ~~c. The Northwest Market Hub (NWH):~~
        ~~i. To qualify as a Network Resource, the energy must be delivered to the Northwest Market Hub on Firm or CFS for the duration of the NT TSR and in accordance with iii below. The TSR will be DECLINED if the NITS Customer is unable to provide an AREF and an attestation for the upstream transmission at the time the NITSDNR is submitted on OASIS.~~
        ~~ii. If the source is physically located within the BPA BAA, the NITS Customer may only identify a single generating resource for each TSR and must provide a NITSDNR for each resource. The TSR will be DECLINED if the NITS Customer is unable to identify a specific source at the time the NITSDNR is submitted on OASIS.~~
        ~~iii. For the Start Date and the Stop Date field of the OASIS Reservation Form, the NITS Customer must use dates when the resource will be available on a non-interruptible basis to serve the NITS Customer's Network Load.~~
        ~~iv. If the Network Resource is a generating resource physically located outside of the BPA BAA, the NITS Customer must provide an AREF and an attestation that the upstream transmission arrangements are Firm or CFS and identify the BAA Delivery Point in the NITS Resource Description of the NITS DNR.~~
        ~~v. If the Network Resource is a power purchase agreement from generating resources physically located outside of the BPA BAA, the~~

Commented [NCG36]: Section E. Reserving Transmission Capacity for NWHUB-related Transactions. Propose to strike given TC-27 proposal on NWH transactions.

Commented [JC(TT236R2]: BPA does not accept this change. Due to ongoing discussions in TC-27 BPA is not addressing this comment at this time.

~~NITS Customer must also identify the BAA from which the power will originate and the BAA Delivery Point in the NITS Resource Description of the NITSDNR.~~

3. NITS Resource Demand:
    a. Federal Resource Demand:
        i. If the Source is the FCRPS and the demand varies over the term of designation, e.g.,; a Load Following or Slice/Block contract, ~~T~~the NITS Customer should input the 10-year flat peak demand as the requested demand in the MW field of the TSR or the 10-year maximum peaking capability of the related FCRPS amounts in the case of the Block and/or Slice/Block contract.
        ii. If the Source is the FCRPS and the demand is fixed, e.g.,; a 10MW contract, the NITS Customer should input the specific requested demand in the MW field of the TSR.
        iii. If the NT Customer plans to displace an existing resource that is not FCRPS, the NITS Customer should identify the resource being displaced in the Customer Comments field of the TSR.
    b. Non-federal Network Resource Demand:
        i. The NITS Customer may submit a shaped monthly capacity profile.
        ii. Each monthly MW value must be less than or equal to the peak demand listed in the associated Power Purchase Agreement.
4. The NITS Customer must specify in the Customer Comments field of the LTF NT TSR or STF NT TSR "New Network Resource."
5. The term of the TSR may not exceed the term to which the NITS Customer owns the resource or has rights to the resource.
6. The Stop date of the LTF NT TSR or STF NT TSR may be later than the termination date of the NITS Customer's NT Service Agreement (NITSA). However, if the NITS Customer's NITSA is not renewed and subsequently terminates, then the NITS Customer's NITSDNR(s) that extend past the termination of the NITSA are no longer valid.
7. BPA will evaluate TSRs submitted on OASIS for NITS to determine whether transmission service can be provided. See the TSR Evaluation Business Practice.
8. Behind the Meter Resource:
    a. If a generating resource used to serve Network Load is a Behind the Meter Resource, the NITS Customer must notify BPA by submitting a NITSDNR over OASIS, and updating its ten-year load and resource forecast.
        i. No OASIS TSR is required for a Behind the Meter Resource.
        ii. The NITS Customer must notify BPA that the resource is a Behind the Meter Resource by entering the comment "Behind the Meter Resource" in the Customer Comment field of the NITS DNR submitted on OASIS.
    b. The integrated hourly sum of generation from a NITS Customer's Behind the Meter Resources may not exceed the NITS Customer's total Network Load for any given hour.
    c. Refer to the Small Generator Interconnection Business Practice and/or the Large Generator Interconnection Business Practice for additional procedures.

Commented [NT CG37]: Ministerial edit.

Commented [JC(TT237R2]: BPA agrees and accepts this change.

Commented [NCG38]: Ministerial edit.

Commented [JC(TT238R2]: BPA agrees and accepts this change.

Commented [NCG39]: Edit to reflect FCRPS amounts for planned product deliveries.

Commented [JC(TT239R2]: BPA does not accept the changes to H.3.a.i. BPA has provided clarifying language to H.3.a.i (see revised NITS Business Practice) to meet the objectives of this comment.

Commented [NT CG40]: Ministerial edit.

Commented [JC(TT240R2]: BPA agrees and accepts this change.

I. Undesignation of a Network Resource

1. To make Third-Party Sales of one (1) year or more from a DNR, or if output or contractual rights to a DNR cease, a NITS Customer must first undesignate that Network Resource. A NITS Customer must use Point-to-Point (PTP) Transmission Service for Third-Party Sales.
2. NITS Customers may undesignate all or part of a DNR by submitting a NITS Terminate DNR request on OASIS.
3. Temporary undesignation of a DNR.
    a. See the Temporary Undesignation section of the NT TSR User Guide.
    b. The NITS Customer forfeits its transmission capacity during the period that the Network Resource, or portion thereof, is temporarily undesignated.
        i. A new TSR is required if a NITS Customer elects to re-designate a resource prior to the end date of the temporary undesignation.
    c. After the period of temporary undesignation, the NITS Customer will retain its right to Transmission Service from the original DNR.
    d. If no stop date is specified in the undesignation notice, BPA will consider the Network Resource to be permanently undesignated.
4. Permanent undesignation of a DNR.
    a. See the Indefinite (Permanent) Undesignation section of the NT TSR User Guide.
    b. The NITS Customer forfeits its reservation priority and capacity that is permanently undesignated from a DNR.
    c. Upon permanent undesignation of a DNR, to designate a new Network Resource, the NITS Customer must submit a new LTF NT TSR/NITSDNR on OASIS.

J. Designation of New Network Load

1. This section does not apply to Non-Trended Load Growth.
2. The NT Customer must submit a LTF NT TSR and a new NITSDNR for the ~~n~~New Network Load on OASIS. For detailed information on submitting NT requests, see the Requesting Transmission Service Business Practice. If applicable, the NT Customer must also submit a New Network Load form.
3. For Deposit and Processing Fee procedures and requirements, please refer to the Requesting Transmission Service Business Practice.
4. For information about submitting a new NITSDNR, see the NT TSR User Guide.
5. Queue time is established when the LTF NT TSR for a New Network Load is QUEUED on OASIS.
    a. A new NITSDNR must be submitted on OASIS on the same Business Day in which the LTF NT TSR is QUEUED.
6. The NITS Customer must specify in the Customer Comments field of the TSR "New Network Load."
7. The NITS Customer must demonstrate sufficient resources to serve the New Network Load.

Commented [NCG41]: Ministerial edit to align with section header.

Commented [JC(TT241R2]: BPA accepts the change to J.2.

8. BPA will evaluate LTF NT TSRs submitted on OASIS for New Network Load to determine if Transmission Service can be provided. See the TSR Evaluation Business Practice.
9. For detailed information on the submission and processing of TSRs, refer to the Requesting Transmission Service Business Practice.
10. For additional requirements for interconnecting New Network Load, refer to the Line and Load Interconnection Procedures Business Practice.

K. Using Secondary Service

1. The NITS Customer may use Secondary Service to deliver energy to Network Loads from resources that have not been designated as Network Resources.
2. Secondary Service is a Short-Term transmission product available in monthly, weekly, daily, and hourly increments.
3. To obtain Secondary Service, the NITS Customer must submit a TSR on OASIS.
4. The Point of Delivery (POD) must be the NITS Customer's Network Load.
5. The Source and Sink are not required.
6. The TSR must be submitted within the required reservation window as specified in the Requesting Transmission Service Business Practice.

L. Use of PTP Transmission Service to Serve Network Load

1. Pursuant to OATT section 1.60, PTP Transmission Service may be used to serve Network Load at a Point of Delivery (POD) provided that the portion of Network Load not designated as Network Load can be served using PTP service at a discrete point of delivery. In this case, the NITS Customer continues to pay the Network Integration Rate for only Network Load service and the PTP contract holder pays the full PTP Transmission Service costs. ~~Neither the Network Load nor the NITS bill will be reduced by the amount of load served with PTP Transmission Service.~~
2. ~~The NITS Customer may be required to undesignate its DNR pursuant to Section 30.3 of the OATT if the DNR has the same POR as the PTP Transmission Service and the PTP Transmission Service is used to serve Network Load for more than one (1) year.~~

Commented [NCG42]: Suggested edit to maintain consistency with treatment of Network Load.

Commented [JC(TT242R2]: BPA does not accept this change to L.1. This edit expands the scope of the revisions necessary to implement the NTLG policy.

Commented [NCG43]: Miscellaneous Comments #2. Propose to strike to avoid perpetuation of load-resource linking. In the case of non-federal resources the resource may serve a NITS POD and/or a PTP POD. Retaining the language limits the resource to only serving one of the PODs.

Commented [JC(TT243R2]: BPA does not accept this deletion of L.2. This edit expands the scope of the revisions necessary to implement the NTLG policy.

M. Reservation Priority for Network Integration Transmission Service Agreements

1. A NITS Customer with existing Firm Transmission Service may have the right to continue to take Transmission Service when its contract expires, rolls over, or is renewed. For detailed information on exercising Reservation Priority rights, please refer to the Renewal of Transmission Service (Reservation Priority) Business Practice.

N. Reservation Priority for Designated Network Resources

1. A NITS Customer with existing Firm Transmission Service may have the right to renew its DNR and associated LTF NT TSR. For detailed information on exercising Reservation Priority rights, please refer to the Renewal of Transmission Service (Reservation Priority) Business Practice.

2. The NITS Customer must submit a LTF NT TSR with a Request Type of RENEWAL and a NITSDNR on OASIS.
    a. For detailed information on submitting Renewal requests, see the NT TSR User Guide.
    b. The NITSDNR must be submitted on OASIS on the same Business Day in which the LTF NT TSR is QUEUED.

O. LaRC Implementation Process

1. All LaRCs received between 8/15/2024 12:01 PM PPT and the effective date of the V16 of the NITS Business Practice will be processed under Section O.
2. Section O shall not apply to any FTSRs with a CONFIRMED status but will apply to FTSRs with STUDY status.
3. BPA will evaluate LaRCs as described in Section C. The LaRC Process windows used for the evaluations are as follows:
    a. FY2024: The most recently returned NITS Customer LaRC between 9/1/23 and 8/15/24 at 12:00 PM PPT.
        i. If the NITS Customer did not return the LaRC, BPA will assume no changes from the LaRC provided by BPA to the NITS Customer during the annual FY2024 LaRC Process.
    b. FY2025: The NITS Customer LaRC received by BPA between 8/15/24 at 12:01 PM PPT and 9/30/24.
        i. If the NITS Customer did not return the LaRC, BPA will assume no changes from the LaRC provided by BPA to the NITS Customer during the annual FY2025 LaRC Process.
    c. FY2026: The NITS Customer LaRC received by BPA between 9/1/25 and 9/30/25.
        i. If the NITS Customer did not return the LaRC, BPA will assume no changes from the LaRC provided by BPA to the NITS Customer during the annual FY2026 LaRC Process.
    d. Should a LaRC be received between the LaRC Process windows, it will be processed as indicated in Section D.
4. The NITS Customer will receive a notification for LaRCs evaluated in the implementation process as defined in Section C.
5. To be eligible for a commercial study any FTSRs created during the implementation process or currently in STUDY status will be subject to OATT and business practice changes in TC-27.

Commented [NCG44]: Given NITS Customer Group uncertainties around application of LaRC Process Windows to previous encumbrances, establishing "baselines", NTLG Facility Evaluation forms, queue times, etc. we recommend additional discussion on this section.

Commented [JC(TT244R2]: BPA is willing to meet with a customer to enhance their understanding of Business Practice language. Please reach out to your Transmission Account Executive.

Commented [NCG45]: NITS Customer Group recommends striking this provision as unnecessary. BPA's transmission customers will always be subject to the then-effective BPA OATT and business practices, as they change from time to time.

Commented [JC(TT245R2]: BPA accepts this change to Section O.5. This section was initially provided to aid NITS Customers understanding of potential TC-27 impacts.

D. Eugene Water and Electric Board

Comments on the Draft NITS Business Practice

EWEB, as a NITS customer and member of WPAG, is aligned with the NITS Customer Group

The NITS Customer Group met numerous times to discuss and collaborate on comments, and we urge BPA staff to closely consider the feedback. To minimize the amount of content BPA staff has to review, we've elected to highlight several key points within the NITS Customer Group comments.

More discussion and collaboration are needed

EWEB appreciates BPA's efforts to establish a path forward and resume processing LaRCs as quickly as possible. Restoring a functional process is important for both BPA and its customers.

At the same time, due to the quantity and nature of customer feedback, we believe the development of this business practice needs additional engagement before it is finalized. BPA should make revisions based on feedback and provide customers with an additional opportunity to review a revised draft and comment on the updated language. A focused, follow-up workshop could be an expedient way to discuss feedback on the revised draft and work towards developing a Business Practice that is clear and reasonable.

BPA Response 33
BPA will extend the comment period 10 Business Days to allow interested parties to review and comment on latest revisions made to the NITS Business Practice based on comments received.

We seek more clarity

As drafted, this Business Practice lacks the clarity needed to be interpreted effectively by our staff or to provide clear guidance to new and growing customers. Examples that contribute to this challenge include the absence of objective criteria for identifying Non-Trended Load Growth, and limited detail regarding how BPA will evaluate and incorporate customer load forecasts into its planning processes.

Additional revisions to provide clarification would improve transparency, support more consistent implementation, and provide customers with greater certainty as they plan for future load growth.

BPA Response 34
The most obvious objective criteria for identifying Non-trended Load Growth is the 13 MW amount. The NITS Business Practice, Section E, outlines the criteria that a NITS Customer provides in their LaRC to help BPA initially identify NTLG if the NITS Customers does not self identify. In response to the customer comments, BPA has added clarifying language to the following sections: E.5.a, E.6, and E.7 to address concerns around the application of the NTLG policy to FTSRs in STUDY status, for loads currently taking Long-Term Firm service, when a NTLG facility is no longer considered NTLG and that the NTLG policy will not be applied to residential and commercial growth.

The NTLG Evaluation form questions provide BPA the information needed to reasonably assess whether the load qualifies as NTLG. Questions are not weighted more than another but failure to answer all the questions may result in BPA not being able to do a commercial evaluation for the NITS Customer's request. If NITS Customer has questions or concerns regarding their request, they are encouraged to reach out to the Transmission Account Executive. If BPA has additional questions, BPA will contact the NITS Customer to ask further details to help inform the decision.

Providing a list of the many uses of the LaRC throughout BPA in the NITS Business Practice can result in outdated information. BPA relies on the LaRC workbook instruction letter sent to NITS Customer's annually to provide any pertinent changes of how the LaRC is informing BPA's different processes. Additionally, BPA provided public workshop materials in March 2024 that provided a detailed diagram of the many uses of the LaRC and Agency Forecast.

Comments on BPA Transmission Business Practices Acronyms and Glossary

EWEB appreciates BPA's efforts to clarify and establish definitions associated with the new concept of Non-Trended Load Growth (NTLG). However, we believe additional work is needed to ensure the definition(s) are clear, objective, and capable of consistent application.

The current definitions of New Network Load and Non-Trended Load Growth create a circular reference that makes interpretation difficult

The definition of New Network Load references Non-Trended Load Growth, while the definition of Non-Trended Load Growth relies on the New Network Load description. As currently drafted, the NTLG definition effectively states that "Non-Trended Load Growth is Non-Trended Load Growth," which does not provide meaningful guidance to customers or BPA staff. Additionally, the term "specific end-user consumer facility" lacks sufficient clarity.

Based on discussions with BPA staff, it appears BPA's intent is to identify large industrial-style loads that can scale up quickly as NTLG rather than capturing normal residential or commercial growth. However, this intent is not clearly reflected in the proposed language.

We also question the need to incorporate Non-Trended Load Growth into the definition of New Network Load, particularly when its apparent purpose is only to serve as a reference point within the NTLG definition. Rather than modifying the definition of New Network Load, we believe BPA should focus on developing a more precise and distinct definition of Non-Trended Load Growth.

While we recognize there may be legal and policy considerations associated with identifying specific customer classes or industries, the current framework leaves substantial room for interpretation. By not clearly identifying the types of loads BPA intends to evaluate through the commercial planning process, there is a risk that the policy may not be applied consistently or equitably across customers.

To improve clarity and consistency, we recommend BPA develop a NTLG definition that more directly describes the characteristics of the of loads the agency seeks to identify

For example, “Non-Trended Load Growth” might be accurately defined as:

“Industrial load above a BPA-defined threshold, to be added to an existing NITS Customer’s system at a specific end-user consumer facility, that is identified in a new or revised LaRC forecast.”

A definition along these lines, with clarity on what constitutes a “specific end-user consumer facility”, would provide greater transparency regarding the types of loads BPA believes warrant review through the commercial planning process while reducing ambiguity for customers and stakeholders.

BPA Response 35
BPA agrees that there was a circular nature between New Network Load and the NTLG definition. BPA’s concern over adding abbreviated descriptions (i.e., large in magnitude, timing of load, etc.) to the NTLG definition is that it could be misinterpreted by the reader. BPA has updated the NTLG definition to address this concern.

BPA has added clarifying language to Section E.7 to address concerns around the application of the NTLG policy to residential and commercial loads.

E. Bonneville Power Administration Corrections

Bonneville identified the need for minor corrections as follows:

BPA Actions

- Section F.1.a: Removed “Long-Term Firm” and the brackets around “(LTF)”
- Changed NT to NITS in following sections: G.2.b, H.2.b.iii, H.3.a.iii, J.2
- Section H.1.a: Updated section reference
- Section H.3.a.i: Removed the word “flat”
- Section H.2.c.iv: Changed NITS DNR to NITSDNR
- Non-Trended Load Growth form: Changed “facility” to “end-use consumer facility” and removed requirement to provide the type of resource