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Bonneville Power Administration
905 NE 11th Ave
Portland, OR 97232

Submitted via TechForum

Re: Alliance of Western Energy Consumers' Comments regarding Updated 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, updated on July 22, 2026. 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.

1. AWEC maintains its prior comments to exclude CF/CT loads from Non-Trended Load Growth Facility Determinations.

As AWEC has stated in prior comments, AWEC 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, AWEC again renews its position in prior comments that CF/CT loads should be excluded from Non-Trended Load Growth (“NTLG”) facility determinations up to historically designated CF/CT amounts. BPA’s comments in response argue that CF/CT designations, while offering price protection on the power side, “does not require

special treatment or exemption from generally applicable transmission planning processes.”¹ As a matter of policy, BPA raises concerns about the amount of CF/CT designated load that could return “with minimum notice and without consideration of the impact to the transmission system threatening system reliability.”²

AWEC respectfully disagrees that excluding CF/CT loads results in special treatment from generally applicable transmission planning processes. Effectively, a NTLG-facility determination can only be applicable to two types of loads – returning CF/CT load and New Large Single Loads. As such, there is no “generally applicable” transmission planning process when it comes to facilities forecast to be at or above 13 MW for a NITS customer. As AWEC’s comments have previously argued and demonstrated, different treatment for CF/CT loads and NLSLs is warranted.

Additionally, as a practical matter, AWEC questions whether CF/CT designated loads would return with “minimum notice” and “without consideration of the impact to the transmission system threatening system reliability.” Before increasing load, CF/CT customers must both engage in internal planning processes and work with their serving utility in order to ensure that service requirements can be met. If BPA’s concern is truly about notice, then BPA should work with customers and interested stakeholders to discuss more targeted approaches to address this concern that do not result in subjecting CF/CT loads to commercial planning.

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

AWEC acknowledges the improvement in BPA’s language regarding NTLG facility determinations, moving from “sole” discretion to “reasonable” discretion and appreciates the additional detail on how information in the Non-Trended Load Growth Facility Evaluation (“NTLG Facility Evaluation”) form will be considered. However, AWEC renews its comments that NTLG determinations must be made pursuant to defined criteria applied consistently among similarly situated customers in a clear and transparent manner. Review of the updated NTLG Facility Evaluation form in conjunction with NITS Business Practice, Section E, do not by themselves provide necessary transparency or clarity. BPA’s additional guidance and clarifications should be included in the Business Practice itself.

¹ BPA’s Response to Comments – Network Integration Transmission Service (NITS) version 16 at 2 (July 22, 2026).

² *Id.*

Furthermore, the NTLG Facility Evaluation also provides that “NITS Customers may be requested at BPA’s discretion to submit a NTLG Facility Evaluation form for a facility load increase of less than 13MW, or for a LaRC forecast at a Point of Delivery that exhibits a 13MW or more increase from the previously accepted forecast.” AWEC would like to better understand why this information would be required given the limitation of NTLG to a facility determination where load growth is forecast to increase by 13 MW or more, and what impacts this may have to transmission service requests.

AWEC renews its recommendations that the NITS Business Practice should: (1) be amended to more substantively describe how NTLG Facility determinations will be made, including whether that determination will be solely based on the NTLG Evaluation Form, and if so, how that determination will be made, and (2) be amended to include a dispute resolution provision in the event that the NITS Customer has concerns with BPA’s determination.

Finally, while AWEC maintains its position that there should be an explicit carve-out for CF/CT loads from NTLG facility determinations as the most streamlined and clear way to address legacy loads that have paid to build the existing transmission system, AWEC has also reviewed the comments submitted by the NITS Customer Group and echoes the concerns raised and supports the recommendations therein.