

August 5, 2026



Bonneville Power Administration
Attn: Transmission Services
905 NE 11th Ave
Portland, OR 97232

via email (techforum@bpa.gov)

Re: Avangrid Comments on Proposed Business Practice Changes

Avangrid Power, LLC ("Avangrid") appreciates the opportunity to comment on the Bonneville Power Administration ("Bonneville") proposed revisions to its Network Integration Transmission Service ("NITS") Business Practice.¹

Avangrid appreciates that the Federal Energy Regulatory Commission ("FERC") *pro forma* Open Access Transmission Tariff ("OATT") includes an obligation for Transmission Providers to plan for and serve the reasonably forecasted needs of its Network Customers and that NITS and Point-to-Point ("PTP") transmission service are governed by different tariff provisions and planning processes. Avangrid does not oppose reasonable mechanisms for incorporating legitimate, incremental load growth into Bonneville's transmission planning. The proposed Business Practice ("BP") nevertheless raises important questions regarding how Bonneville will accommodate incremental Network load growth during a period of significant transmission scarcity, particularly where similarly situated PTP customers may remain unable to obtain service, and the broader ramifications of such policy.

Avangrid therefore requests additional clarity regarding: 1) reasonable parity among customer groups; 2) the effect of incremental Network load growth on available transmission capability and pending PTP requests; and 3) the allocation of costs associated with facilities needed to serve such growth.

I. BACKGROUND

Bonneville's NITS BP governs how Network Customers submit load and resource forecasts and how Bonneville evaluates the transmission service needed to serve those forecasts. Bonneville's proposed revisions distinguish between trended load growth and Non-Trended Load Growth, establish procedures for evaluating large or discrete load additions, and provide for the creation of Forecasted Transmission Service Requests where additional transmission service may be required.

After discussion in numerous proceedings, Bonneville issued an initial proposal in May 2026 and received comments from several Network Customers and customer groups. Those comments generally requested clearer and more objective standards for Non-Trended Load Growth determinations, appropriate recognition of existing transmission encumbrances and historical load baselines, facility-level evaluation of large-load growth, and additional procedural protections. Bonneville issued a revised proposal on July 22, 2026.

The revised BP is particularly significant because Bonneville is considering how Network load growth will be incorporated into transmission planning while substantial PTP requests remain pending and broader reforms to

¹ Additional details regarding proposed business practices is available at <https://www.bpa.gov/energy-and-services/transmission/business-practices/proposed-business-practices>.

Bonneville’s commercial and future-state planning processes are still under development. The proposal therefore raises questions not only regarding the treatment of Network Customers, but also regarding the effect of forecasted Network load on scarce transmission capability, other transmission customers, and the allocation of upgrade costs.

II. COMMENTS

As described in more detail below, Avangrid respectfully requests that Bonneville revise the proposed BP, or provide accompanying written guidance, to:

- Clearly define the scope and operation of the threshold separating trended and Non-Trended Load;
- Explain how incremental Network load growth will be prioritized relative to pending and future PTP transmission requests;
- Describe the effects of such growth on short-term firm, and long-term firm transmission availability;
- Establish safeguards against segmentation of a single large-load development into multiple increments below the applicable threshold;
- Explain how the proposal will interact with Bonneville’s paused commercial planning process and its future-state transmission planning reforms;
- Identify the cost-allocation and financial-security principles applicable to upgrades required to accommodate incremental Network load growth; and
- Provide a process for communicating material impacts on transmission capability to affected customers.

A. Bonneville Should Explain How the Proposed Treatment of Network Load Growth Will Affect Other Transmission Customers and Apply Meaningful Limits to Ensure a Fair Approach

As Avangrid understands the proposal, incremental load growth below the threshold for “Non-Trended Load” may be incorporated into Bonneville’s transmission planning and treated differently from other requests for transmission service. Bonneville should explain more precisely what this different treatment entails and how it compares to requests for PTP service.

Under the FERC *pro forma* OATT, both NITS and firm PTP service create obligations to plan for and expand the transmission system, but neither section provides incremental Network load an earlier or more effective route into transmission planning. The proposed BP appears to provide priority access to scarce existing or future capability—while PTP customers’ corresponding expansion requests remain paused, queued, or subject to materially different readiness and commitment requirements. Bonneville should identify whether and under what circumstances incremental Network load growth will be accommodated before pending requests for short-term firm, Conditional Firm, or Long-Term Firm PTP service. Bonneville should also clarify whether this treatment will continue while other transmission planning or commercial study processes are paused or undergoing reform.

Avangrid acknowledges that the tariff framework does not require NITS and PTP service to be identical. Nevertheless, the differences between those service types should not result in one customer group receiving effectively open-ended access to incremental transmission capability while another group lacks a meaningful or timely path to service. This concern is especially significant where PTP customers have submitted valid requests, demonstrated commercial interest, and remained in Bonneville’s transmission queue for extended periods.

In order to accommodate load growth in a fair manner with meaningful limits, Bonneville should therefore explain the limiting principles applicable to the accommodation of incremental Network load growth. At a minimum, the final BP should identify:

- Whether the applicable threshold is cumulative, annual, or project-specific;
- Whether multiple increments of load growth may be accommodated at the same point of delivery;
- Whether related or commonly controlled loads will be aggregated when determining whether the threshold has been exceeded;
- How Bonneville will distinguish ordinary load growth from the phased development of a single large-load facility;
- How Bonneville will prevent the threshold from being used to divide a large or speculative load addition into smaller increments that receive preferential planning treatment; and
- Whether Bonneville will consider a similar approach to incorporating growth for PTP customers in the future.

Clear standards are necessary to ensure that the proposed BP does not create unintended advantages based solely on the form or timing of a customer's load forecast.

B. Bonneville Should Provide Transparency Regarding the Effects on Available Transmission Capability

Avangrid also requests greater transparency regarding how the accommodation of incremental Network load growth will affect transmission capability available to other customers.

Incorporating additional Network load into Bonneville's planning models may reduce capability available for short-term and long-term PTP service. Conversely, facilities constructed to accommodate Network load growth may, in some circumstances, create additional capability or provide benefits to other transmission customers. The proposed BP does not adequately explain how Bonneville will evaluate or communicate these effects.

Avangrid asks that Bonneville consider describing to customers:

- How incremental Network load growth will be reflected in available transmission capability calculations;
- Whether accommodating that growth may reduce the availability of short-term firm transmission service;
- When accommodating Network load growth could affect the timing or availability of Long-Term Firm or Conditional Firm PTP service;
- How Bonneville will account for incremental Network load growth when evaluating existing PTP requests and future transmission awards; and
- Whether upgrades constructed to accommodate Network load growth are expected to create additional capability that may be made available to PTP customers.

Avangrid is not requesting disclosure of commercially sensitive customer information or detailed transmission models. Rather, Bonneville should provide sufficient process transparency for affected customers to understand whether and how the proposed treatment of Network load growth may affect their ability to obtain transmission service.

This transparency is particularly important while Bonneville is developing its Future State planning process and considering substantial changes to how scarce transmission capability will be studied and awarded. The treatment of Network load growth under this BP should be coordinated with those broader reforms rather than established in isolation.

C. Bonneville Should Clarify Who Will Pay for Facilities Needed to Serve Incremental Network Load Growth

The most significant issue that has not been discussed is the allocation of costs associated with accommodating incremental Network load growth.

Bonneville should clearly explain whether upgrades required to serve such growth will be:

- Directly assigned to the Network Customer;
- Included in embedded transmission rates paid by Network Customers;
- Socialized across Bonneville's broader transmission customer base, including PTP customers; or
- Allocated through some combination of direct assignment and rolled-in rate treatment.

The BP should also explain how Bonneville will address facilities that are initially constructed to serve Network load but later provide broader system benefits. Conversely, Bonneville should not broadly socialize the costs of upgrades that are primarily needed to accommodate a particular large or speculative load addition without demonstrating corresponding benefits to other transmission customers.

These questions are increasingly important as large-load customers consider locating within the service territories of different preference customers. A policy that permits substantial incremental loads to receive embedded-cost transmission treatment could shift material development risks and costs to customers that did not cause those costs and may not benefit from the resulting facilities.

Bonneville should therefore establish transparent cost-causation principles before implementing the proposed treatment. At a minimum, Bonneville should identify:

- The circumstances in which directly assigned versus rolled-in treatment will apply;
- Whether the size, certainty, or maturity of the underlying load commitment will affect cost allocation;
- What financial security or commitment will be required from the customer associated with the load growth;
- How Bonneville will address facilities that provide both customer-specific and regional benefits; and
- How any costs included in transmission rates will be allocated among Network and PTP customers.

III. CONCLUSION

Avangrid supports Bonneville's efforts to improve the accuracy of Network Customer load forecasts and to plan for legitimate load growth. Those objectives, however, should be implemented through a transparent framework that reasonably accounts for the interests of all transmission customers.

Bonneville should ensure that the proposed BP does not allow incremental Network load growth to consume scarce transmission capability without meaningful limits, transparency regarding impacts, or clear responsibility for associated costs. Addressing these issues now will promote equitable treatment, improve customer confidence, and better align the BP with Bonneville's broader transmission planning reforms.

Avangrid appreciates Bonneville's consideration of these comments.