



## **Eugene Water & Electric Board**

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### **Eugene Water & Electric Board's (EWEB) Comments on the Draft Network Integration Transmission Service (NITS) Business Practice Version 16 & proposed revisions to BPA Transmission Business Practices Acronyms and Glossary**

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**Submitted via [techforum@bpa.gov](mailto:techforum@bpa.gov)**

#### **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.

#### **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.

## **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.