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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.

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.

Sincerely,

Doug Gilmore
Power Resources Manager

Cc:

Attn: Chris Lockman, BPA, Transmission Account Executive

Attn: Jeff Kugel, PNGC Power, Sr. Director, Power & Operations Trading

