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To: techforum@bpa.gov

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Comments on BPA's proposed version 16 of the NITS business practice

PGE appreciates the opportunity to provide feedback in this extended comment period and supports BPA's efforts to clarify application of the Non-Trended Load Growth (NTLG) policy. Below are comments PGE requests be addressed in the final version 16 of the NITS business practice:

1. Section C.2.b.

PGE assumes the "request" in section C.2.b. refers to a specific element of the forecast – either a new or increased non-Federal resource, or New Network Load – rather than a TSR, or the BPA request for a NITS Data Exhibit. PGE suggests the following edits to clarify:

- b. If a NITS Customer does not provide the NITS Data Exhibit that meets requirements within the required timeframe, ~~the request that element of the forecast~~ will receive no further consideration. BPA will continue to review the LaRC ~~without the request for only those elements of the forecast for which the NITS Customer has provided sufficient information.~~

2. Section C.3. and E.4.

It appears that sections C.3. and E.4. require NITS Customers to forecast sufficient resource(s) to serve their forecasted load(s). PGE believes a NITS Customer is permitted to rely solely on non-designated resources to serve their loads if they so choose. BPA's OATT doesn't specify the ten year forecast of resource requirements must be equal to or greater than the ten year load forecasts, so PGE requests BPA clarify why NITS Customers must forecast resources sufficient to meet the forecasted loads; or describe how a NITS Customer can forecast use of Secondary Service from undesignated resources.



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Additionally, it appears section E.4. incorrectly refers to section C.2 rather than C.3. PGE suggests BPA perform a cross-reference check of this business practice before finalizing.

PGE appreciates the efforts of BPA staff over the last two years to reach this proposed business practice update.

Thank you for consideration of these comments.

Respectfully,

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