

## **NLSL Group Comments on BPA's October 19, 2026 GAT Workshop**

The NLSL Group<sup>1</sup> is comprised of members with current discrete large loads and represents the potential for load growth of several GWs within the next decade that is mostly, but not exclusively, data center load. The NLSL Group is focused on resolving policy issues and developing plans for load service in a rapidly evolving regional landscape. Consistent with the policy goals of the US Department of Energy, members of the NLSL Group are interested in pathways to achieve “speed to power” while ensuring that other BPA customers are shielded from costs incurred by these large loads. The NLSL Group appreciates the effort that resulted in the rollout of new initiatives related to large load service at the October 19<sup>th</sup> GAT workshop.

### **General Comments**

At the October 19<sup>th</sup> GAT workshop, BPA discussed two new initiatives as part of their Rapid Access Products and Interconnection Delivery (RAPID) program

- Speed to Power Request for Interim Non-firm Transmission (SPRINT)
- Paired Load and Integrated Dispatch (PLAID)

First and foremost, BPA should ensure that these initiatives honor BPA's existing commitments and statutory obligations. Furthermore, any impact to the schedule and costs of existing initiatives should be evaluated and shared with stakeholders. Transparency on risk to commitments and statutory obligations is key in achieving success in these initiatives.

The NLSL Group enthusiastically supports the objectives of these initiatives. Bringing large loads online quickly while shielding other BPA customers from the costs of large loads has been the core of this groups' efforts since being formed in 2022. BPA's proposed direct assignment of costs appears to be a path forward, but more specific information on the mechanics will be needed before full support can be given. In particular, the requirement to commit to an Open Season for firm service without knowing the facilities investments involved may cause some to avoid participation.

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<sup>1</sup> The NLSL Group is comprised of BPA preference customers who serve or expect to serve retail members and customers that the Northwest Power Act categorizes as “New Large Single Loads” (NLSLs). Member utilities include: Northern Wasco County PUD, Grant PUD, Clatskanie PUD, Harney Electric Cooperative, Klickitat PUD, and Eugene Water and Electric Board.

BPA has made clear that these initiatives are intended to move quickly and requested that stakeholders provide comments on whether the pace could prove burdensome. The NLSL Group provides these following considerations on this point.

- Development of stakeholder comments requires coordination within the stakeholder group as well as cross coordination between stakeholder groups. Allowing one week to develop and coordinate comments will likely result in comments that are less polished, possibly confusing, and could reflect an incomplete understanding of the issues.
- As a result, one week development of comments could result in the need for additional workshops or objections during the proceedings, which may result in a longer overall process.
- The NLSL Group recommends that BPA adopt a standard 10 business day process for submitting comments.

BPA has also proposed an expedited schedule that anticipates two workshops with BPA's initial proposal released in December 2026. The NLSL Group provides these following comments on this schedule.

- It is difficult to evaluate this schedule without knowing the status of TC-27
- It is also difficult to evaluate the proposed schedule without an understanding of the scope and objective of TC-27R and BP-27R.
- On the surface, it appears that PLAID will have less overall impact on the grid and transmission customers and should be relatively straightforward to implement. In addition, given that the WRAP program will be operational in a year and that many existing large loads are struggling to find qualifying capacity, the NLSL Group suggests that PLAID be prioritized over SPRINT.

Finally, as a general comment, the NLSL Group would like to point out that granting firm or non-firm load service is the first step of many to achieve the Speed To Power objective. Development of generating resources to serve these loads involves many steps, including studies to evaluate impacts to BPA's system and adjacent systems, potential construction of contingent facilities, construction of substations and communications equipment, development of large generation interconnection agreements, remedial action schemes, NEPA processes, etc.... All of these steps involve processes both internal and external to BPA that should be

evaluated to ensure that they are as efficient as possible in order to fully achieve the overall Speed To Power objective.

## **SPRINT**

BPA stated that the goal of SPRINT is to *“get up to ~ 5 GW of new hyperscale data centers onto the BPA 500 kV grid as quickly as possible by using already existing unused capacity”*. Under this interim service, these loads will agree to be interruptible in certain conditions (Long Term Nonfirm – LTNF) and will require no network upgrades. Rather than first come/first serve, the selected loads will be *“high-value”*. The timeline suggests that some sort of bidding process will be initiated June 2027 with awards being made in August 2027. BPA stated that there may be 5 500kV substations that have unused capacity that could be used for this nonfarm service. The NLSL Group offers the following comments on SPRINT and the LTNF product:

- The NLSL Group would like additional information on the methodology used for determining surplus capacity at substations. Is the methodology the same as transmission planning studies used evaluating the transmission service request queue? Are the FCRPS dispatch assumptions the same as used for transmission planning studies?
- Additional information on how the bidding process and project selection is expected to be conducted is critical. Slide 25 identifies some potential evaluation criteria and Slide 30 lists additional evaluation criteria in order to move forward. BPA needs to be much clearer on these criteria, how these criteria will be evaluated in a bidding process, and how BPA will make a final determination of awards.
- BPA states throughout the slides that SPRINT is intended for data centers with a load of at least 50 MW. While the posted questions and answers clarified that the loads do not need to be data centers, there is very little non-data center load that approaches this threshold. The result of this proposed threshold and the proposed large load threshold of 13 MW in TC-27 is that the development of industrial load between 13-50 MW has no Speed To Power path forward. The NLSL Group sees no reason why these thresholds need to be different and recommends that BPA make the threshold identical so that there is non-discriminatory transmission service offered to all large load customers.

- Slide 25 states that SPRINT project “*must agree to non-firm interruptible service including for N-0 and N-1 system conditions*” and the posted questions and answers addresses whether a SPRINT project with LTNF will qualify for WRAP. The NLSL Group has commented in the past on the need for BPA to allow for curtailment of large loads as part of WRAP for load exclusion purposes, but BPA has made a decision to not allow load exclusions. The NLSL Group continues to believe that load exclusion with the expectation that excluded loads will be curtailed first in a WRAP operational event is a reasonable path to ensure reliability and encourages BPA to consider these SPRINT projects with LTNF load service to be WRAP excluded load.

## **PLAID**

BPA stated that PLAID is a fast-tracked interconnection process for loads with a paired generation resource that will result in interim nonfirm service. These generating resources must interconnect at the same substation as the load or within a BPA-approved electrical proximity standard, be sized at or below the load’s demand. Site control for load and generation, financial readiness, and a commitment that the generation will only be used to serve the load will all be required.

- The NLSL Group strongly supports this initiative and suggests that this be given the highest priority.
- PLAID should include demand response in addition to paired generating resources as being eligible for this interim service
- It is unclear how these pairs of generation and load will be viewed by Power Services. Can BPA confirm that this is in the scope of BP-27R?
- BPA refers to “*BPA-approved electrical proximity standard*”. Can BPA provide more specific information on this standard?
- Will flexibility related to PLAID projects be able to participate in organized markets?
- How will existing load facilities that would like to bring their own generation and/or demand response be treated?

The NLSL Group again thanks BPA and the GAT team for bringing these initiatives forward. Utilities and RTOs/ISOs have been implementing solutions to address these challenges, and we encourage BPA to move forward with solutions that

address the challenges of Speed to Power for large loads while protecting existing power and transmission customers for cost and reliability impacts. The NLSL Group hopes that BPA considers these comments and welcomes any comments or questions.

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