

October 26, 2026

Northern Wasco County PUD (NWCPUD) respectfully submits these comments on Bonneville Power Administration's Rapid Access Products and Interconnection Delivery (RAPID) initiative, including the Speed to Power Request for Interim Non-Firm Transmission (SPRINT) and Paired Load and Integrated Dispatch (PLAID) proposals presented at BPA's October 19, 2026 workshop. With the load queue approximately four times BPA's system peak, NWCPUD supports urgent, innovative action that also protects existing customers and ratepayers.

Support for RAPID Objectives

RAPID, SPRINT, and PLAID could accelerate service, improve transmission use, enable co-located generation, and support economic growth. Costs caused by large-load growth should remain with the customers creating them.

Deliberate Design and Stakeholder Engagement

Because these proposals could affect BPA's tariff, rates, planning, and service obligations, BPA should allow meaningful review. It should identify expected customer and project types, eligibility, likely participants, implementation requirements, and issues to be decided through BP-27R, TC-27R, or other processes. "Slow is smooth, and smooth is fast": careful design can support faster, durable implementation.

First, Do No Harm

Accelerated service must not impair BPA's obligations to preference and current transmission customers. BPA should demonstrate that SPRINT will not reduce capacity relied upon for preference-customer loads and explain effects on existing rights, power-marketing obligations, planning, and future service.

Broad Regional Access

RAPID's expedited pathways could also benefit communities, businesses, and industries broadly, not only hyperscale data centers. Projects serving industrial, utility, municipal, port, manufacturing, agricultural-processing, transportation, and economic-development needs, including loads from 13 MW to 50 MW, can provide substantial regional value.

Transparent Selection and Open-Season Design

If requests exceed available capability, BPA should publish objective criteria before applications are submitted. Criteria should address ratepayer impacts, customer value, reliability, operational flexibility, long-term system and regional benefits, and final selections.

PLAID, Reliability, and Implementation

BPA should define PLAID's electrical-proximity and eligibility standards, clarify curtailment under N-0 and N-1 conditions and alignment with WRAP, and identify participant obligations and protections for existing planning and queue-management work.

Conclusion — NWCPUD supports BPA's creative response to extraordinary load growth. Concurrently transparent rules, broad access, meaningful engagement, and protection of existing obligations can enable timely service, reliability, resource development, and regional economic benefits.

Sincerely,
Humaira Falkenberg
Chief Energy Resource Officer

