



January 23, 2026

Umatilla Electric Cooperative
750 W. Elm Ave.
PO Box 1148
Hermiston, OR 97838
Phone: (541) 567-6414

Re: BPA TC-27 Large Load Facility Proposal

Umatilla Electric Cooperative (“UEC”) is encouraged that the Bonneville Power Administration (“BPA”) is proposing initiatives that intend to address the unique requirements of expedited service for large loads and resources. UEC shares BPA’s goal of interconnecting large loads in an efficient manner while ensuring the traditional loads that BPA’s customers serve (e.g., residential, commercial, irrigation, small industrial) are not exposed to the cost burden associated with large load interconnection. UEC believes that the interconnection of new resources and large loads are beneficial to the region through increased transmission revenues, expedited resource development, and regional economic growth especially in the more rural areas of the Pacific Northwest. That said, we are concerned that BPA’s proposed concepts will be implemented prior to adequately understanding their requirements and implications.

SPRINT

UEC appreciates BPA’s attempt to look under every stone to identify existing capacity that can be utilized. BPA currently has a robust line and loads Interconnection queue with substantial megawatt volumes in the early and latter stages of BPA’s study processes, and BPA and its customers currently have a significant number of large loads in their workplans to interconnect over the next 3-5 years. BPA has also interconnected and energized a significant amount of large data center loads for multiple customers over the past decade. Thus, UEC has concerns that SPRINT may distract both BPA staff and the region from the ongoing interconnection work that is underway for planned and committed projects. Instead, BPA should focus on (1) improving the efficiency of its current interconnection process both in terms of study and construction timeliness, and (2) conducting bilateral discussions between BPA and customers who have the ability to serve new large loads to define the parameters of the SPRINT agreements, e.g., defining “highest-value” proposals, and tolerance for frequency and duration of service interruptions.

Additionally, the ‘path to firm’ under SPRINT is unclear. SPRINT, in its most basic sense, is intended to expedite load interconnection but requires that customers rely on non-firm Point-to-Point transmission until such time that firm transmission is made available. The problem is, BPA’s current interconnection process is decoupled from the commercial transmission process and generation interconnection processes and SPRINT does not address this issue. Rather, it relies on a yet-to-be defined transmission open season concept.



As an alternative, SPRINT could bind these disparate processes together in lieu of a transmission open season. For example, there are situations where the customer already has existing firm transmission rights that can be paired with a SPRINT driven interconnection. In these cases, the customer should be able to apply those firm transmission rights in lieu of mandatory non-firm Point-to-Point transmission or a forthcoming transmission open season.

UEC also has concerns regarding how the expanded use of non-firm Point-to-Point transmission will impact existing services already used for regional loads (e.g., network Secondary Service), as well as the anticipated award of Conditional Firm services anticipated with implementation of the BPA's TC-27 process.

PLAID

BPA's intended goal under PLAID has merit, but the initial proposal needs refinement. Importantly, the proposal recognizes the value and efficiencies gained by pairing resources and loads. Also, we support the idea that NT customers should be able to serve discrete portions of their system loads with PTP service. However as proposed, PLAID provides too many conditions and barriers to efficiently expedite load or generation interconnection. BPA states that PLAID requests 'are offered an interim interconnection on PTP non-firm, while [the customer pursues] a path to firm'. It is unclear how PLAID will actually speed up load or resource interconnection, especially where a customer already has firm transmission rights or may use network Secondary Service as defined in the OATT.

UEC proposes that PLAID be reenvisioned as a product to free up transmission capacity, and thus avoid transmission builds, rather than a path to firm. Under this approach, a customer would identify a resource and load (either new or existing) that satisfy BPA's electrical proximity standard (i.e., not negatively impact the BPA network) and where the resource is adequately sized to serve the load on a reliable basis. The customer and BPA would enter into a curtailment agreement to balance load and resource output, i.e., in the event resource output is less than load, then the customer or BPA would curtail the load or resupply; and, in the event that the resource output is greater than load, then it would be the customer's responsibility to reduce output or secure the necessary transmission service to deliver the surplus to a third party. This regime would ; free up transmission capacity otherwise planned to serve the load included in PLAID; would allow new large loads to utilize capacity freed up by this proposal; and would potentially remove the need to firm the path.

Transmission Open Season

BPA's transmission open season concept needs more time for customer input. UEC recommends that BPA focus first on SPRINT and PLAID and define these contractual parameters prior to proceeding with the proposed transmission open season concept and the subsequent OATT modifications needed to support it.

Here are some fundamental issues that need to be resolved:

- The implementation of the TC-27 proposal which utilizes Conditional Firm service (NT and PTP) for already existing requests.



- One aspect of this proposal that needs further explanation is why the SPRINT and PLAID projects will be required to participate in the open season auction for firm transmission capacity after having invested in the system to become viable and purchasing long-term non-firm PTP service.
- It is unclear as to whether the transmission open season concept is intended to be used for securing service to large loads for transfer capability that is available on its system, after GERP 1.0 and 2.0, and the HOT projects are energized, or if the transmission open season approach is intended to be a wholesale replacement of the Transmission Service Request process.
- There is a need for understanding how the various transmission services will be treated in terms of transmission rights in organized markets.

Conclusion

We appreciate BPA's focus on serving large loads and its stated goal of expediting the interconnection of large loads. We look forward to continued deliberations among BPA and its customers to fine tune the RAPID proposals in a way that ultimately leads to BPA's stated goal of expediting large load interconnection.

At a minimum, we suggest maintaining a list of issues to be resolved so implementation may be accelerated while simultaneously refining concept elements and details. Clearly, participation in the conceptual proposals which are significant in size, financial impact, and commitment require a high level of understanding and confidence in both the processes and outcomes. To this end, we recommend allowing sufficient time to develop the proposals with customers outside of *ex parte* restrictions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Blake Weathers", is positioned above the printed name.

Blake Weathers
Vice President, Power Supply