

March 19, 2025

**Via email:**

[techforum@bpa.gov](mailto:techforum@bpa.gov)

U.S. Department of Energy  
Bonneville Power Administration  
Transmission Services

**Re: Comments of Puget Sound Energy, Inc. Regarding NITS Access to  
Transmission Capacity Initial Alternatives**

Puget Sound Energy, Inc. (“PSE”) submits the following comments on the BPA March 7, 2025 presentation on NITS Access to Transmission Capacity Initial Alternatives.<sup>1</sup>

BPA has requested comments by March 19, 2025. However, it is unclear what the scope of proposed changes to existing and future point-to-point services include and how BPA would implement the proposed changes. Therefore, —

- (i) BPA should clarify and elaborate if the existing approach to bridge conditional firm and long-term firm point-to-point service offerings is fundamentally changing to lessen or remove certainty of perpetual transmission service offerings via renewed service.
- (ii) BPA should confirm that the proposed changes do not apply to existing transmission service agreements for bridge conditional or long-term firm point-to-point service, nor subsequent transmission service agreements executed for the renewal of the existing transmission service.
- (iii) BPA should confirm that any renewal limitations associated with any new original transmission service will be explicitly noted in the associated transmission service agreement. In the absence of a reference to any renewal limitation, PSE assumes that the existing transmission service offering can be renewed into perpetuity.

PSE appreciates BPA’s review of these comments. By return e-mail, please confirm BPA’s receipt of these comments.

cc: Adelle Harris, [alharris@bpa.gov](mailto:alharris@bpa.gov)

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<sup>1</sup> Available at [https://www.bpa.gov/-/media/Aep/transmission/nt-service/NITS-Offer-Options-Presentation-3\\_7\\_25.pdf](https://www.bpa.gov/-/media/Aep/transmission/nt-service/NITS-Offer-Options-Presentation-3_7_25.pdf) (“March 7 Presentation”).