



*Commissioners*

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*Chief Executive Officer/  
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June 17, 2025

RE: Comments in Response to BPA's May 20, 2025 NITS Access to Transmission Capacity Alternatives Workshop

Clark Public Utilities appreciates the opportunity to provide comments on BPA's May 20, 2025 NITS Access to Transmission Capacity Workshop. BPA has clearly communicated that changes are needed to the NT Transmission planning practices to facilitate more timely access to firm transmission system capacity for forecast load and resource growth. While it is still unclear exactly how bifurcating NT load growth into trended and non-trended growth addresses these challenges, we do appreciate BPA's time and effort collaborating with stakeholders throughout this process. Clark Public Utilities has been involved with, and is generally supportive of, the NITS Customer Group comments regarding the engagement and procedural processes.

While it is understandable that the diverse NITS Customer Group may not have a definitive preference within the BPA's proposed alternatives, Clark Public Utilities would like to express our preference for "Alternative 1: New large load threshold per facility". Alternative 1 provides the simplest, clearest guidance with the least administrative burden. Aligning this threshold roughly with the New Large Single Load threshold from the Power Services side may be the correct magnitude. However, as was commented on during the June 5, 2025, NITS Focus Group meeting, it is paramount that both the selection of the alternative and the threshold values be a starting point in this process and not the definitive end result. In addition, the other considerations noted on Slide 8 of the May 20<sup>th</sup> presentation (timing, risk profile, and impacted transmission paths) should be evaluated for inclusion in determining the planning process requirements.

Clark Public Utilities sincerely thanks BPA's executives and staff for their high level of engagement on this critical issue. We look forward to continued collaboration as BPA works to improve transmission planning for the region.

Sincerely,

A handwritten signature in blue ink, appearing to read "Steve Andersen".

Steve Andersen  
Director of Energy Resources