

June 18, 2025

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Comments Concerning May 20<sup>th</sup> NITS Access to Transmission Capacity  
Alternative Meeting

◆  
**Board of  
Directors**

Joe Liebelt  
Craig Melton  
Debbie Reed  
Neal Sheppard  
Garratt Tayler

**General Manager**  
Michael J. Sykes

◆  
CRPUD greatly appreciates BPA's efforts in conducting the NITS initiatives and the three alternatives presented May 20th. While we value this effort, an alternative should genuinely address the root cause of the dilemma the region faces today. In our opinion, this alternative should be a highly collaborative effort that truly builds for the future. BPA is currently running a pilot program called PARS, which CRPUD sees as a potential model. Currently, the PARS initiative examines local reinforcements; it can be expanded to consider the broader Bulk Electric System. A highly collaborative effort, such as PARS, ensures that customers submit a reasonable forecast, allowing BPA to make an informed determination rather than working in a silo without all the necessary details.

In our opinion, without an approach like PARS, BPA will never meet the five-year timeline you are striving to achieve. A line, as described in the three alternatives, in our view, bases load growth on historical trends and does not meet BPA's planning obligation of planning for reasonably forecasted loads, which is future-looking. Additionally, it creates a scenario where utilities lose potential economic opportunities that will be developed outside our region. Utilities will then focus on loads that can grow within those parameters to the point where BPA ultimately cannot catch up. While the approach mentioned above may require more staff time and be more expensive, it will ensure customer needs are met as long as we continue to engage with BPA.

Thank you,

*Branden Staehely*

Branden Staehely  
Engineering Manager/ Assistant General Manager