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March 19, 2025

John Hairston
Administrator
Bonneville Power Administration

Submitted electronically via techforum@bpa.gov

RE: NITS Access to Transmission Capacity

Dear Administrator Hairston:

Mason PUD 3 appreciates this opportunity to comment on its access to transmission capacity and specifically the meeting held by BPA on this issue on March 7, 2025. Mason PUD 3 is a non-profit, locally governed utility at the base of the Olympic Peninsula that provides electric service to approximately 35,000 customers. As a preference customer, Mason 3 has a priority right to purchase wholesale power from BPA at cost. Doing so supports its mission to connect its community with safe, reliable, economical, and sustainable services, 24/7.

It is imperative transmission service is properly planned for, and the right solutions are implemented. Mason PUD 3 works closely with the NITS customer group and strongly supports its public comment. Given the importance of this issue, we would like to emphasize one key point.

Every year BPA customers submit to BPA its load and resource information for the next ten-year period. It is incumbent on BPA to use the information to determine how much capacity is available after NITS capacity needs are met in short- and long-term planning. Specifically, BPA is obligated to plan and construct its transmission system based on the submitted forecasts to facilitate delivery of network resources to network loads, and to reserve additional capacity for forecast network load growth. It is troubling to learn BPA is not able to award many long-term firm transmission service requests due to insufficient capacity. It is understood there is a unique situation today with the significant increase in new large loads however, putting this aside, it is my understanding BPA would still be in this predicament. The new large loads are just amplifying the issue.

As BPA looks to the future and considers reformative actions to take it needs to keep this fundamental issue and learned lesson in mind.

Thank you for consideration of these comments. Mason PUD 3 looks forward to continuing to work with BPA on this important issue.

Sincerely,

Michele Patterson

Michele Patterson
Power Manager

cc: Troy Simpson, BPA Transmission Account Executive