

From: [Worthington, Tony \(PacifiCorp\)](#)
To: [Tech Forum](#)
Subject: PAC Feedback: March 7 NITS customer workshop
Date: Wednesday, March 19, 2025 2:47:37 PM
Attachments: [image001.jpg](#)
[image002.jpg](#)



To: Techforum@bpa.gov

RE: Comments related to BPA's NITS March 7, 2025, workshop
March 19, 2025

PacifiCorp (PAC) appreciates BPA's efforts to actively engage, facilitate workshops, and be responsive to customer needs. On March 7, BPA hosted a workshop to discuss options under consideration for expanding transmission service for Network Integration Transmission Service (NITS) customers. BPA sought input on near and long-term options under consideration. PacifiCorp offers the following comments for consideration.

General Comments

PacifiCorp as both a transmission provider and transmission customer understands and appreciates the issues associated with supporting current and future transmission capacity requirements.

PacifiCorp supports an open access transmission system.

PacifiCorp understands the problem statements presented in the March 7, 2025, workshop. In that workshop BPA proposed five options under consideration in the near and long term to resolve issues with capacity until transmission planning reform is completed. It is unclear where the five options presented in that workshop originated although there is a reference by BPA to a document containing near and long-term solutions mentioned during a customer workshop on August 14, 2024.

PacifiCorp is concerned that some of the options identified show preference to NITS customers over other customers and therefore would be inconsistent with open transmission access.

Specific Comments

Near-term solution Option C

Limit renewal/rollover rights on new PTP service offers to accommodate NITS load growth and reassess existing CFS offers biannually as needed.

Limiting renewal / rollover rights for new PTP customers to accommodate NITS load growth, or any other customer load growth shows a preference to NITS or other customers over PTP customers. This type of recommendation is inconsistent with open transmission access.

Some other considerations include:

- Rollover rights on "new" PTP service should not be limited, especially if the customer has invested in network upgrades to be awarded those rights. These rights are critical to the economic viability of some projects.
- Once granted, rollover rights should not be change. The approved rights should be part of base-level requirements in BPA's transmission planning thereby negating the need to limit in the future.
- BPA needs to clarify who are NITS customers and whether the load growth is being support FCRPS or their own resources.

Reassessing existing Conditional Firm Service (CFS) offers biannually as needed. This recommendation looks to review existing service. If for the purposes of reassigning to other customers than this

recommendation is inconsistent with open transmission access.

- We understand from the workshop that the reassessment would be limited to the reassessment version of conditional firm and that this is not applicable to most of BPAs conditional firm service which is bridge conditional firm service. Regardless actions to remove service from one customer to provide to another should be reviewed to ensure that this achieves all statutory requirements.

Thank you again for the opportunity to provide comments.

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