



To: Techforum@bpa.gov

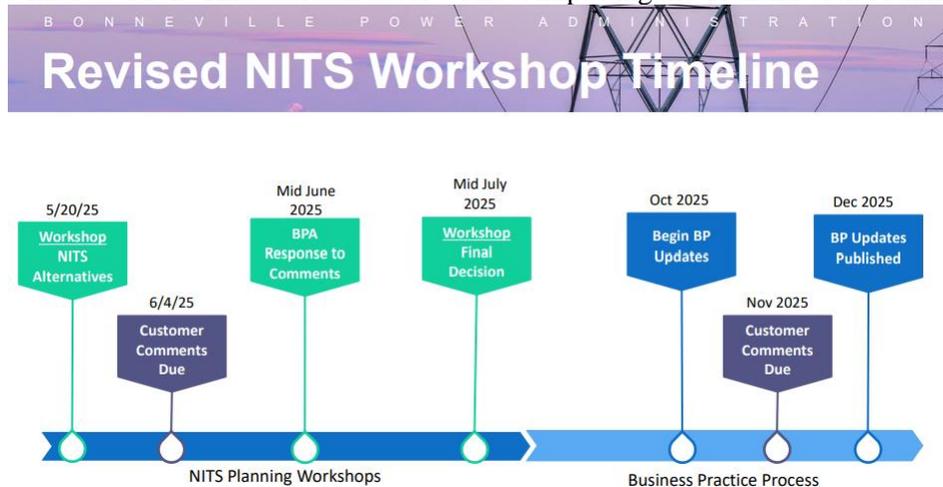
June 11, 2025

PGE Comments concerning BPA's NITS Access to Transmission Capacity workshop held May 20, 2025.

Portland General Electric (PGE) appreciates Bonneville's engagement in discussing future load growth options regarding NITS customers in an open and transparent customer forum. Thank you for the opportunity to provide comments.

Schedule:

PGE requests BPA reconsider the current NITS workshop timeline as it appears too aggressive if the NITS reform is to be a collaborative public process. If customer comments are due on June 18, BPA will probably not respond to customer comments until early July. I would adjust the schedule so that after BPA responds to customer comments, there is another workshop in mid-July, before there is a final decision and final workshop. This additional workshop will allow customers and BPA to hear arguments on both sides and discuss leanings prior to a final decision. This could all occur without impacting the Transmission Planning reform schedule.



NITS Alternatives:

It's not clear how the 3-alternative discussed on May 20 will get any closer to solving the problem of having enough Transmission capacity to serve both NT and PTP non-discriminatorily.

1. All the load growth data is already required by customers. These three proposals just put more work on BPA's side to slice and dice how they deal with the load forecasts, specifically with big chunky load growth.
2. PGE supports BPA's current policy of planning for NITS loads that meet the 70% viability rule. In addition, we support BPA's effort to try and distinguish between true load growth versus large, new load growth.
3. To solve the NT and PTP transmission Capacity issue, BPA needs to build more Transmission quickly. As a load serving utility, BPA is responsibility to providing sufficient Transmission to meet customer needs.



PGE supports BPA's effort to delineate new large network load growth from native load growth

1. There was a lot of discussion among NT customers at the May 20 meeting, concerned that they can't serve their new large load growth, and they don't want it to go through the Transmission expansion process.
 - a. As a PTP customers waiting in BPA's 68 GW Transmission Queue for new service for years, we understand the concern others have about going through this process. However, PTP customers also have load service obligations that we are nervous about meeting due to the current timeline it takes to process requests in the queue.
 - b. BPA holds 75% of the Transmission in the region, they have an obligation to reliably operate and, when necessary, upgrade the system to integrate new resources and serve the load of all of BPA's customers. We need to discuss the actual planning reform vs queue management.
2. If a NT customer must go through the Commercial study, if their load growth is less than the 70% viability threshold, their fall back is 6NN service and going through the Transmission expansion process.
 - a. This is a sufficient option for NT customers as it treats both PTP and NT customers consistently.
3. BPA's strategy for serving customers load growth should be equitable.

Cost Causation:

1. On May 20, there was discussion regarding NITS customers who must go through the Commercial Study/Transmission expansion process if their load doesn't meet the 70% threshold.
 - a. If both Forecasted Transmission Service Reservations (FTSRs) and PTP requests are being studied in a Commercial Study, PGE recommends that FTSRs should also have to pay the \$10k per request TSR deposit. Requiring NITS customers to pay the TSR deposit would be consistent with the pro forma tariff requirements.
 - b. BPA recently increased the TSR request fee from \$2k to \$10k with justification that the studies are becoming increasingly complicated. PGE requests BPA to apply consistency for all parties participating in the Commercial Study. Why is one group bearing the burden of a study that benefits all.
2. BPA requires cluster study participants to cover all cluster study costs and requires customers to provide funds in advance for its share of the estimated study costs on a MW-share basis. Participants are also required to share the costs of any required plans of service, and they are required to fund costs of Direct Assignment Facilities, per the TSEP BP. In addition, participants pay for preliminary engineering, environmental review, must provide BPA with financial security to support the construction associated with the plan of service.
 - a. What studies are you performing for FTSRs? How are you recovering those study costs?
 - b. Please outline how cost allocation for NITS and PTP customers will be consistent in the Commercial study process.
3. NITS customers will rebuke any alternative that requires them to use the Transmission expansion process due to cost causation and having to pay for upgrades to the system beyond their NT rate. PGE supports BPA's recognition that the magnitude of the customer load size should dictate the study process they follow, and it should be consistent with PTP commercial study costs/process.

Alternatives:

1. PGE supports alternative 3: The Larger of Percentage or MW Threshold for the following reasons:



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- a. The 5MW annual threshold is large enough to allow for local economic growth.
 - b. This is based upon a 10-year average, so it allows for dips and peaks in annual load changes.
 - c. The administrative implementation would not be too labor intensive with limited staff.
2. PGE would also like to see a discussion/outline on how you are planning for the resources associated with these new loads.
 3. Please provide a definition of a single facility and/or per facility. If the definition is like that used in Provider of Choice, please share that in your proposal.
 4. Please also publish the definition of the 70% viability rule.

PGE thanks BPA for the opportunity to provide comments and looks forward to future dialogue.

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