



June 18, 2025

Mr. John Hairston
Bonneville Power Administration
Administrator/Chief Executive Officer
Via email: techforum@bpa.gov

Re: Comments Concerning May 20, 2025, BPA NITS Access to Transmission Capacity Workshop

Thank you for the opportunity to provide the Bonneville Power Administration (BPA) with the following comments. The Pacific Northwest Generating Cooperative (PNGC Power) comments are intended to help further inform and shape BPA's Network Integration Transmission Service (NITS) capacity planning process. PNGC Power believes it is imperative that BPA move expediently to develop solutions that will ensure reliable, cost-effective load service over the long term for all NITS customers. BPA's transmission system faces many challenges ahead, and we expect that changes will be disruptive and difficult decisions will need to be made. We encourage BPA to explore all options while keeping laser focused on its load service obligation to its preference customers. The purpose of PNGC Power's comments are twofold: to reinforce our support for the broader comments submitted by the larger NT Customer group on June 18, 2025, and to provide BPA with additional substantive points that are important to the PNGC Power membership.

PNGC Power was deeply disappointed by the options presented on May 20, 2025. BPA's proposed approach is to bifurcate the identified transmission planning initiatives (Planning for NITS Load & Resource Forecast, NITS Offer Types, and NITS Load Forecast 70% Rule) associated with NITS by shifting two of the three initiatives to the Transmission Planning Reform Process¹. The shifting of the Offer Types and the 70% Rule to the Transmission Planning Reform (TPR) is done without explanation in writing of how this decision was made, why it is necessary and what the benefits would be of bifurcating these issues. These issues are very intertwined and PNGC Power believes that it is not possible to evaluate these issues in separate forums and achieve a successful solution that is beneficial to BPA or its customers.

This concern was demonstrated during the workshop when BPA staff repeatedly responded to issues outside the narrow scope of their preferred discussion to refer parties to the Transmission Reform Process. Transmission planning is a critical element of the process that results in the

¹ See page 6 of the NITS Access to Transmission Capacity presentation dated May 20, 2025.

development, deployment and energization of system elements required to meet the needs of BPA's preference customers who purchase NITS. Planning changes cannot be implemented in isolation from the wider reform process without increasing the risk to current and future load service by BPA's preference customers. PNGC Power respectfully reminds BPA that it bears the statutory obligation to plan for and meet the transmission needs of all preference customers, an obligation BPA appears unable to meet at this time.

In terms of the substance of BPA staff's proposal, PNGC Power finds little that is worth preserving. The proposal appears to simply segregate loads primarily based upon their size and adds more process for larger loads without any commitment to more expeditious planning or commitments to improve the processes that are required to develop and energize additional system elements to meet its NITS customers' needs, as articulated each year in our Load and Resource Consolidated Data Collection Tool submissions (LaRC). Instead, PNGC Power encourages BPA planning staff to consider instead the following questions as drivers of our next discussion.

1. *What process leads to the fastest deployment of the bulk electric system elements required to meet NITS customers' load forecasts?*

This requires NITS planning reform to occur as part of the wider transmission reform process and not in isolation. Adding layers of additional process will not achieve the shared goal of reliable load service and certainly is not the "disruptive" approach the BPA Administrator has encouraged all of us to embrace, as cited repeatedly during the workshop.

2. *Why is it appropriate for BPA to devalue the accuracy of NITS customers' load forecasts?*

The "70% rule", which is not to be found in statute, formal BPA Policy, BPA's OATT, or transmission business practices appears to be a source of uncertainty rather than efficiency. It is not unreasonable to ask BPA staff to reciprocate the trust we place in the agency to provide transmission service by trusting the load forecasts submitted by customers each year and acting expeditiously upon them.

3. *Why is it appropriate for BPA to discriminate among the retail loads of its NITS customers?*

PNGC Power is extremely concerned about bifurcation concepts (i.e., "trended" and "non-trended") that prioritize service based on BPA's categorization of the retail members/customers its preference customers serve in turn. As stated in BPA's own Open Access Transmission Tariff - requests for transmission service come with an obligation to pay; thereby negating the oft-cited and rarely experienced "stranded cost" of transmission and thoroughly undermining the proposed penalty structure² for "gaming" load forecasting.

² See page 12 of the NITS Access to Transmission Capacity presentation dated May 20, 2025 and Section 32 of the BPA OATT (Additional Study Procedures For Network Integration Transmission Service Requests).

4. *What are the appropriate metrics for the work required for BPA to meet all NITS requests for service?*

“Time to energization” of required system elements is one concrete example. Another would be whether BPA can grant all NITS transmission service requests at the time the request is made, based upon the forecasts submitted annually in the LaRC and in the Line and Load Interconnection Request (LLIR) processes.

Substantively, PNGC Power believes there are a range of possible NITS planning changes under the umbrella of evaluating “disruptive” changes can improve the planning process and achieve a faster “time to energization” than what was proposed at the May 20th workshop. For example, MISO and PJM are both taking advantage of AI-driven tools to accelerate their planning processes. See - <https://pearlstreettechnologies.com/miso-collaboration/> or <https://blog.google/inside-google/infrastructure/electric-grid-ai/> . In this way, what is currently seen by BPA planning staff as a challenge (data center loads) could instead be an opportunity to improve their work by an order of magnitude.

Another possible approach, if the “trended and non-trended” methodology is adopted, BPA could grant all trended load growth conditional firm or firm service *as submitted in NITS customers’ LaRCs*, without a 30% discount applied to the forecasts, as this would lessen many NITS customer concerns that today’s uncertainty and lack of meaningful dialogue has created.

Given current and near-term probable staffing constraints placed upon the Agency, BPA is almost certainly going to need to become “comfortably uncomfortable” with new approaches to meeting our shared goals. Whether it is on the construction side where NITS customers may be able to design, build, and energize system elements faster or more cost-effectively than BPA can today (and could transfer the system elements to BPA after energization), or joint use of BPA right-of-way and future facilities to achieve timely load service to all NITS preference customers, BPA and its NITS customers need to find a new path forward - together.

Similarly, PNGC is concerned that BPA staff working on NITS matters may not be considering the regional or geographic aspect of the adjacent Transmission Service Providers, and whether there are more efficient and timely solutions that do not solely depend upon BPA. It is our understanding that the Western Power Pool’s WestTec initiative is driving towards regional solutions, but do not believe there is this level of granular engagement between that process and the problem of BPA’s inability to meet the needs of NITS customers going forward.

Procedurally, given the long delay between workshops, absence of the acknowledgement of previous customer proposals or the incorporation of customer comments, and the lack of meaningful reform represented by BPA Staff’s proposal shared on May 20th, the proposed timeline which would conclude this process in less than 60 days³ is simply unacceptable. It is neither fair nor equitable for BPA to force customers into a contracted timeline that provides no meaningful opportunity to be heard, let alone develop a consensus proposal that both BPA and its NITS customers can support. Such a hurried process introduces additional concerns that the

³ See page 5 of the NITS Access to Transmission Capacity presentation dated May 20, 2025.

conflicts between the work product developed in different forums will create roadblocks and further complicate transmission planning and future load service under NITS.

PNGC Power appreciates Bonneville's collaborative approach to meeting the transmission service needs of its customers on a long-term, sustainable basis. It is recognized that there are no simple or easy solutions and that difficult decisions will need to be made. BPA's obligation is to proactively plan, maintain and build a transmission system that will ensure reliable, long-term, firm service to its preference customers and the load growth customer's forecast. PNGC Power looks forward to continuing to work with the agency and its staff to resolve the current set of challenges together.

Sincerely,

/s/ Laura Dombrowsky
Manager of Power and Transmission Contracts
PNGC Power