



March 19, 2025

*via email* ([techforum@bpa.gov](mailto:techforum@bpa.gov))

U.S. Department of Energy  
Bonneville Power Administration  
Transmission Services

**Re: Comments of Renewable Northwest on NITS Access to Transmission Capacity Alternatives**

Renewable Northwest (“RNW”) appreciates the opportunity to provide comments to Bonneville Power Administration (“Bonneville”) staff regarding the alternatives discussed at the informal workshop on March 7<sup>th</sup> to potentially increase Network Integration Transmission Service (“NITS”) customers’ access to transmission capacity (“Workshop”).<sup>1</sup> Bonneville is exploring various alternatives, including limiting PTP rollover rights for new service and reassess existing CFS offers more frequently.

RNW strongly urges Bonneville to refrain from moving forward with any alternatives that might minimize the value of its long-term transmission rights, including potentially limiting rollover rights for new Point-to-Point (“PTP”) contracts. At a minimum, Bonneville should weigh the detriment to PTP service against the benefit to NITS service before moving forward with this alternative.

---

<sup>1</sup> Additional details regarding the NITS Access to Transmission Capacity Initial Alternatives meeting, including the slide deck for Workshop (“Workshop Slide Deck”) is available at <https://www.bpa.gov/energy-and-services/transmission/nt-service/additional-resources>.

RNW members have extensive experience proposing projects in Bonneville's service territory, where long term PTP rights are crucial for project viability and deliverability. The currently proposed suite of projects in Bonneville's queues—both interconnection and transmission service requests—are the product of years of effort and investment. These projects have already been subjected to numerous study delays, each of which adds unanticipated cost and complexity to the proposed projects. Adding new limits or removing renewal rights to the PTP products would degrade the value and further erode the viability of the currently proposed projects. Although the precise impact is difficult to quantify, it would be severe and would threaten project viability for the very projects best positioned to meet the region's near-term clean energy and capacity needs. Since the limitation on PTP renewal rights is not expected to provide near-term relief or free up any capacity for NITS use, RNW urges Bonneville not to consider proceeding with this option.

RNW appreciates Bonneville's consideration of these comments and the recommendations contained herein and urges Bonneville to address the impacts the proposed NITS Alternatives might have on both NITS and PTP service before moving forward with the implementation of any alternative.

Regards,

**Mike Goetz**

Regulatory Affairs Director

[mike@renewablenw.org](mailto:mike@renewablenw.org)