



Energizing Life in Our Communities

June 18, 2025

Bonneville Power Administration
P.O. Box 3621
Portland, OR 97208-3621

Delivered via email: techforum@bpa.gov

Re: BPA's Proposed NITS Access to Transmission Capacity Planning Alternatives

Thank you for the opportunity to provide comments on the Bonneville Power Administration's (BPA) proposed Network Integration Transmission Service (NITS) planning threshold alternatives. As a future Network Transmission (NT) customer, Snohomish believes this discussion is of vital importance to our ability to plan and serve future loads on firm transmission service.

Snohomish expects to have mild to moderate load growth over time

Snohomish's most recent load forecasts anticipate that Snohomish will experience mild to moderate load growth over its thirty-year integrated resource planning horizon. This load growth is expected to be relatively smooth over time with few instances of large or sudden additions. Snohomish expects and plans to serve this load growth using a combination of behind-the-meter resources and resources brought to load using firm NT transmission.

Any BPA alternative establishing planning standards for firm capacity must fairly treat customers with relatively smooth load growth profiles

As NT customers continue to grow and request firm service, BPA will need to implement planning standards that fairly and equitably represent the reality of planning for and allocating firm service across BPA's transmission system. These planning standards must account for customers that have load growing at consistent rates and those whose load experiences spiky or sudden growth. Snohomish believes that BPA has the statutory obligation to adequately plan for all NT customers' load growth and Snohomish expects BPA's planning policies to reflect practices that accomplish this in an equitable fashion.

Snohomish is not initially opposed to the concept of a planning threshold

Each of BPA's alternatives features some kind of planning threshold that differentiates load growth patterns and how BPA expects to establish planning, either through system assessment or through its commercial assessment process. Snohomish is not opposed to such a threshold but cautions BPA that implementing such a policy will require significant consideration and fine-tuning. Where such a

threshold would apply is a critical component that will distinguish between equitable and inequitable outcomes and Snohomish asks that BPA carefully consider with customers where such a delineation is appropriate. Snohomish does not believe any current alternative properly captures the needed equity but is open to further discussions and analysis supporting BPA's alternatives or any customer-proposed alternatives.

Snohomish recognizes that planning for customers' load growth represents a challenge for BPA

With BPA's transmission system and firm capacity inventories becoming increasingly constrained, Snohomish recognizes the challenges that BPA is facing and we encourage BPA to continue this process to find a mutually acceptable solution. Customer input will be vital to help ensure that this significant shift in NT planning processes does not have unintended consequences and is implemented in an equitable fashion. Snohomish encourages BPA to continue conversations and discussions with customers on this issue; while BPA is endeavoring to align its various transmission initiatives and their respective timelines with this process, it is critical that this issue be solved correctly rather than quickly.

Conclusion

Snohomish looks forward to working collaboratively with BPA as this process progresses to find NITS planning alternatives that both meet customer needs and are workable for BPA. We appreciate the opportunity to provide feedback to BPA on this process. If you have any questions or thoughts regarding our comments, please do not hesitate to reach out.

Sincerely,



Ian Hunter
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