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Subject: TransAlta Comments on Initial Alternatives for NITS Access to Transmission Capacity

Matt:

TransAlta Energy Marketing (U.S.) Inc. ("**TEMUS**") appreciates the opportunity to comment on the initial alternatives that BPA presented on March 7, 2025 for providing transmission capacity to Network Integration Transmission Service ("**NITS**") customers. We agree that insufficient capacity on the existing transmission system is a serious problem when it prevents BPA from awarding any Point-to-Point ("**PTP**") or NITS long-term firm transmission service requests. However, TEMUS is very concerned with the options currently under consideration and we request that BPA abandon two:

1. **Offer long-term firm capacity to NITS customers without commercial study.**

TEMUS contends that this solution is unworkable for two reasons. First, it seems to suggest that NITS service be considered unlimited, which conflicts directly with BPA's reliability function. Recall from TC-20 proceedings that BPA could not continue awarding unlimited hourly firm service due to concerns about reliability. TEMUS suggests that the same concerns should prevent this option from being considered further, particularly because of the longer term involved.

Second, TEMUS is very concerned that this option would bypass the current Transmission Planning Reform project, which has halted evaluation of other transmission services requests for an indefinite period. Clearly it would be inequitable to proceed with one class of transmission requests while pausing the rest.

2. Limit renewal/rollover rights on new PTP service

TEMUS echoes customer concerns voiced during the March 7 meeting about limiting renewal rights on new long-term PTP service. That would radically and negatively alter the product and make it unfeasible for PTP customers who purchase long-term PTP in support of new generation. Further, it is unclear how this option would help solve the problem in the near- or longer-term.

TEMUS looks forward to further customer engagement on near-term solutions that are equitable for all users of BPA's transmission system and we hope this issue helps to accelerate the best *long-term* solution, transmission expansion.

TRANSALTA ENERGY MARKETING (U.S.) INC.

STEVE LINCOLN
Manager, Transmission