



Umatilla Electric Cooperative
750 W. Elm Ave.
PO Box 1148
Hermiston, OR 97838
Phone: (541) 567-6414

March 19, 2025

Re: NITS Access to Non-Firm and Conditional Firm Transmission Capacity

Umatilla Electric Cooperative ("UEC") is a load serving entity located in eastern Oregon. UEC is an electric cooperative made up of residential, commercial, irrigation, and industrial loads, and is owned by the members it serves. UEC holds both an NT Transmission Service Agreement and Regional Dialogue Power Sales Agreement with the Bonneville Power Administration ("BPA").

UEC generally supports the alternatives that were presented BPA's NITS Access to Transmission Capacity Initial Alternatives Meeting, which was held on March 7, 2025. That said, the proposed alternatives should not be viewed as a replacement to BPA's Open Access Transmission Tariff and Network Integration Transmission Agreement obligations to plan and construct its system to meet the load growth of its NITS customers. Rather, BPA's proposed alternatives should be considered complimentary and not a replacement to BPA's tariff and contractual obligations.

UEC supports BPA's proposal to offer its Network Non-Firm ("6-NN") product without capacity checks on an earlier timeframe. UEC strongly encourages BPA to expand the 6-NN Monthly reservation window to 365 days before delivery with no ATC check. UEC also supports the expansion of BPA's Conditional Firm product to NITS load service. Thus, we encourage BPA to conduct a mini-TC process as soon as practicable and include a proposed mini-TC timeline to customers at the next NITS related workshop.

Thank you,

A handwritten signature in blue ink, appearing to read "Blake Weathers", is written over a faint, light blue circular stamp.

Blake Weathers
Vice President of Power Supply