

November 12, 2025

Submitted via techforum@bpa.gov

**Re: Northwest Requirements Utilities Comments in Response to BPA's October 28, 2025
TC-27 Pre-Proceeding Workshop**

Northwest Requirements Utilities ("NRU") appreciates the opportunity to provide these limited comments in response to BPA's October 28, 2025, TC-27 pre-proceeding workshop ("Workshop") where BPA provided education and described the issues underlying its Grid Access Transformation ("GAT") project reforms. NRU represents the interests of 58 Load-Following preference customers and one generation and transmission cooperative, all of whom depend on Network Integration Transmission Service ("NITS") contracts with BPA for reliable load service. NRU and its members have a vested interest in the particular tariff provisions, business practices, and processes that BPA uses to plan its transmission system in response to NITS customer load and resource forecasts.

Scope of TC-27

Overall, NRU supports BPA's proposed scope for its TC-27 proceeding, as outlined at the Workshop. BPA's proposal to include the Evaluation Criteria, Long-Term Firm Queue Management, and Interim Service topics within the TC-27 proceeding appears reasonable as these elements will very likely significantly affect the terms and conditions of its transmission products and services. Moreover, these topics are complex, will affect a wide cross section of transmission customers, and are sufficiently impactful to justify the additional time and regional engagement provided through the TC-27 proceeding. It is critical that a robust record be developed to support these proposals, given the durable nature of tariff reforms and the necessary time and burden to later modify them.

As such, and to ensure that the TC-27 proceeding can be as expeditious as possible, we encourage BPA to be open to holding any additional stakeholder engagements as necessary during the pre-proceeding period to build consensus before the commencement of *ex parte* communications. We specifically appreciate BPA's recent addition of a third day to its mid-December 2025 workshop and recognize this is a direct response to feedback from interested stakeholders on increased discussion on the GAT reforms.

Additionally, we generally support BPA's intent to exclude the NITS Forecasting topic from the TC-27 proceeding. As explained in the Workshop, BPA proposes to adopt an annual new large load threshold through revisions to relevant NITS business practices on a shorter timeline than that of the TC-27 tariff proceeding. Although we remain uncertain whether a bright-line value is an appropriate permanent solution, we agree with BPA that this should allow it to begin responding to and encumbering transmission capacity for a significant quantity of load and resource forecasts – i.e., a foundational tariff obligation to its NITS customers – in the near term. Additionally, and equally importantly, maintaining these policies in business practices will enable their timelier adjustment or, if necessary, elimination in the future more easily than if they are maintained in BPA's tariff. This is a critical aspect given the uncertainties remaining in the NITS Forecasting topic, as described below.

BPA noted that certain NITS Forecasting elements will neither be clarified through near-term revisions to business practices nor through the TC-27 proceeding. Specifically, BPA stated that both the treatment of forecasts that exceed the annual large load threshold as well as BPA's application of its "70% Probability" screen to new load forecasts will both be addressed within the Proactive Planning topic – a topic currently lacking a discrete implementation timeline and critical detail. As a result, it is appropriate and necessary to codify any near-term NITS Forecasting policies through relevant business practices while BPA develops and shares additional details on the holistic impact to NITS customers of load forecasts in excess of an annual large load threshold. Along this line, we are encouraged by and greatly support BPA's apparent intent to continue conducting stakeholder engagement for the Proactive Planning and Accelerate Expansion topics in parallel with the TC-27 proceeding, rather than deferring these to a later proceeding. BPA cannot delay developing these concepts given the significant and complementary role these elements will play in meeting NITS load and resource forecasts on a long-term basis.

NITS Forecasting

BPA acknowledged at the Workshop that certain aspects of BPA's annual large load staff leaning required additional discussion and analysis, such as whether any annual large load threshold would be applied on a per-Point of Delivery (POD) or instead a per-Facility basis, how it might affect forecasted new resources without a corresponding load increase, and how the policy would apply to Contracted-For/Committed-To loads. NRU agrees that these aspects require additional discussion.

BPA's presentation also solicited from customers other outstanding aspects that would be important to discuss. In this vein, an additional aspect not described by BPA but that also requires additional discussion is any impact of a large load threshold on NITS customers located outside of BPA's service territory (i.e., Transfer Service customers). This is a critical set of BPA transmission customers that may justify nuanced consideration of the new large load policies, particularly in the implementation of any such policies. To the extent that BPA determines load

growth above a specific threshold requires a modified planning process, it must ensure that such policies do not unnecessarily harm those NITS customers with loads outside of BPA's service territory and who may already face large load requirements imposed by their host utility, or who do not interconnect directly to a BPA POD.

Finally, NRU urges BPA to consider modifying its NITS Forecasting staff leaning from a threshold of 13 MW to a minimum of 20 MW. As BPA is undoubtedly aware, the Department of Energy's recent directive to the Federal Energy Regulatory Commission (FERC) to establish standardized load interconnection procedures proposed that such large load interconnection policies should apply only to loads greater than 20 MW. Additionally, a 20-MW threshold would align with the threshold contained in the definition of a large generator under FERC's Large Generator Interconnection Procedures, to which BPA already adheres.

Further, BPA previously presented in its July 2025 GAT deep dive workshop that its leaning was to require NITS customers to submit a Line & Load Interconnection Request for any addition of 20 MW or more at an existing POD. To the extent that BPA believes it must implement a MW threshold for large loads, NRU encourages it to at least align its planning thresholds across its various transmission services: Generator Interconnection, transmission network, and Line & Load Interconnection. Doing so would establish a consistent planning framework and prevent otherwise avoidable confusion.

General Comments

Like other commenters, we continue to request that BPA establish success metrics for the GAT Project. Given the regional significance and scope of agency resources committed to its execution, we believe that the region would benefit from transparency regarding how BPA intends to measure success and whether the implemented reforms are meeting its customers' and the region's expectations. Additionally, established and transparent metrics can help inform when a course correction may be necessary.

Finally, we urge BPA to heed the call to be disruptive and embrace innovation in identifying solutions to planning for its customers' transmission needs. The status quo and reliance on existing practices can no longer functionally serve the transmission needs of the Pacific Northwest or ensure BPA can meet its tariff obligations to plan for its NITS customers. We are encouraged by the information BPA has shared to-date, particularly around Proactive Planning and the nearer-term steps it intends to take to begin responding to certain NITS customer load and resource forecasts, and insist that BPA continue to lean in and develop out-of-the-box concepts and alternatives. To this effect, we request that BPA seriously evaluate broadening the scope of the GAT project beyond BPA's transmission network to also include interconnection services.

As example, we highlight the Portland-Area Reinforcement Study (PARS), a study that evaluated the long-term load growth potential of a collective group of BPA customers and hypothetical local area reinforcements to accommodate load growth over a 20-year period. NRU recommends that BPA's Proactive Planning study include similar load-area studies, culminating in a 20-year transmission plan sufficient to enable service all the way from the designated resources to the NITS customer loads. This accomplishment would both deliver a major cornerstone of long-term, reliable load service to BPA's NITS customers and facilitate significant regional economic growth.

We would similarly not oppose BPA including studies of generator interconnection areas within its Proactive Planning process given the long-term, forward-looking nature of such process. We note that Southwest Power Pool recently submitted to FERC a proposal to merge its Generator Interconnection study process within its transmission planning process, resulting in a single holistic transmission plan that eliminates siloed transmission planning – a principle that we recommend BPA evaluate and consider pursuing in the spirit of truly disruptive transmission planning.

Conclusion

We continue to appreciate BPA's focus on and engagement with the GAT Project. We understand that BPA's October pre-proceeding workshop was intended to be educational and provide a foundation for the problem or issue at hand. To this end, we believe BPA met its burden and adequately justified its intended tariff revision process. We look forward to future engagements and remain committed to working with BPA both within and outside of the TC-27 process, in order to ensure that the GAT Project will be successful in meeting its NITS customers' transmission needs. If you have any questions related to these comments, please don't hesitate to contact us.

Sincerely,

Chris Jones
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Northwest Requirements Utilities