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Columbia River Public Utility District
Comments on BPA Load Area Reinforcement Studies (LARS)

Columbia River Public Utility District (CRPUD) provides electric service throughout Columbia County, Oregon, including the communities of Scappoose, St. Helens, Warren, Deer Island, Goble, and surrounding rural areas. As a BPA preference customer and Network Integration Transmission Service (NITS) customer, CRPUD relies upon BPA's transmission system to support the growing needs of our residential, commercial, industrial, and emerging large-load customers.

CRPUD appreciates BPA's efforts to develop the Load Area Reinforcement Studies (LARS) process and was pleased to participate in the Portland Area Reinforcement Study (PARS) pilot. The pilot demonstrated the value of early coordination, transparent planning discussions, and meaningful engagement between BPA and its customers. The collaborative nature of the process improved visibility into long-term system needs and provided participants with a better understanding of potential reinforcement requirements.

Importance of Service Territory-Based Planning

CRPUD believes the value of LARS extends beyond the development of a single 20-year load forecast. Effective transmission planning requires a comprehensive understanding of a customer's service territory, including economic development opportunities, land-use changes, industrial recruitment efforts, electrification trends, large-load inquiries, and other factors that may influence future system needs.

To better understand future demand, CRPUD engaged an independent consultant to evaluate multiple load-growth scenarios across our service territory. We then supplied this information to BPA as a starting point, which led to better engagement through the PARS process.

CRPUD believes LARS provides BPA and its customers with a unique opportunity to discuss these localized planning considerations and evaluate multiple future scenarios rather than relying exclusively on a single forecast outcome. This broader approach allows for a more complete understanding of regional growth potential and supports transmission investments that are resilient, adaptable, and responsive to changing conditions.

General Support for LARS

The primary benefit of LARS is its ability to facilitate holistic planning. By evaluating entire load areas over a long-term planning horizon, BPA can better identify transmission reinforcements that address both current and future needs. This planning approach helps ensure that transmission investments are coordinated, strategic, and aligned with long-term customer requirements.

CRPUD believes proactive planning through LARS will improve BPA's ability to prioritize maintenance and reinforcement projects in a manner that supports future system demands. Rather than implementing incremental upgrades driven solely by individual requests, LARS creates opportunities to evaluate comprehensive solutions that may provide greater long-term value for both BPA and its customers.

Value of LARS in Supporting LLIR Evaluations

CRPUD believes one of the most important benefits of LARS is the opportunity to inform future Line and Load Interconnection Request (LLIR) evaluations.

Traditional LLIR studies appropriately focus on addressing the impacts associated with a specific customer request. However, those studies are generally limited to the issue presented by the individual request. LARS provides BPA with the opportunity to understand cumulative load growth across an area and evaluate reinforcement options within a broader planning context.

As a result, BPA may be able to identify solutions that not only address the immediate needs associated with a specific LLIR but also accommodate reasonably foreseeable future growth throughout the study area. This can improve investment efficiency, reduce repetitive upgrades, and help ensure infrastructure investments remain valuable as customer needs evolve. It will also reduce the time BPA needs to study an area.

Support for Areas Currently Under Consideration

CRPUD believes BPA has identified reasonable initial areas for LARS implementation. The areas currently under consideration appear to reflect locations experiencing significant load growth, evolving reinforcement requirements, or identified transmission constraints.

CRPUD supports BPA's proposal to use these areas as the starting point for broader system-wide evaluations and encourages BPA to continue incorporating customer input when selecting future study areas.

Customer Engagement and Transparency

One of the strongest elements of both the PARS pilot and the proposed LARS framework is the emphasis on customer engagement. The pilot process demonstrated that direct discussions between BPA and participating customers result in better planning assumptions, more complete information, and improved confidence in study outcomes.

CRPUD encourages BPA to continue emphasizing robust customer participation throughout the planning process and to leverage customer-provided forecasts, studies, and local planning information whenever possible.

Study Cost Methodology for NITS Customers

CRPUD believes LARS study costs should be recovered through BPA's transmission rates for NITS customers rather than being assigned solely to individual participants or specific local study beneficiaries.

The benefits of LARS extend well beyond a single customer or project. The studies provide BPA with critical information that supports regional transmission planning, identifies mutually beneficial reinforcement opportunities, and enables better long-term investment decisions. Because these benefits accrue across the transmission network, the associated planning costs should similarly be treated as a network planning expense.

From CRPUD's perspective, a rate-based approach appropriately recognizes that all NITS customers benefit when BPA has access to better planning information and can make more informed, future-proof investment decisions.