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**Comments on BPA's 6/15/2026 Load Area Reinforcement Studies (LARS) Overview Customer Meeting**

PGE appreciates the opportunity to comment on BPA's plans to conduct targeted Load Area Reinforcement Studies (LARS). PGE recognizes the significant effort BPA is investing in ensuring load service to areas experiencing significant load growth and/or congestion. PGE is supportive of identifying solutions to ensure load service to meet customer needs. These comments are intended to provide BPA staff with feedback on the concepts presented thus far and responses to the specific questions BPA posed to stakeholders during the June 15, 2026 meeting:

**1. Perspectives on the five areas currently under consideration**

PGE supports prioritizing a LARS evaluation of the Salem/Albany and Central Oregon areas., given that multiple planned projects that both BPA and PGE are developing (i.e., North of Marion and Warm Springs Power Pathway) impact this area and are expected to bring significant new capacity for load growth.

**2. Whether there are additional localized load areas BPA should consider**

PGE recommends either: a) expanding the Tri-Cities area to include Central Washington and Southeastern Washington; or b) adding a unique Central/Southeastern Washington area.

**3. Customer perspectives on localized load growth trends and future planning considerations**

PGE recommends BPA focus on areas experiencing either long-term planning congestion and/or real-time flow congestion, focus on areas forecasting/requesting large load integration, and consider the potential benefits of co-located generation and/or batteries. While it is important to consider flexibility options - such as RAS - solutions should include both flexibility considerations and firm conditions that may require the expansion of the transmission system - optionality is key.



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PGE also recommends the results of these studies be made public.

Finally, PGE encourages BPA to integrate LARS findings into its broader transmission Grid Access Transformation Proactive Planning and future state commercial study processes. Local reinforcement studies should help inform longer-term regional transmission planning rather than function as a separate planning effort.

#### **4. Perspectives on customer study costs**

PGE supports spreading costs to the Network since funders of these LARS studies will not receive direct benefits and will be required to submit Line and Load Interconnection requests and fund related studies and upgrades.