

Submitted to techforum@bpa.gov on June 26, 2026

RE: PPC Comments on BPA's Local Area Reinforcement Study (LARS) Process

The Public Power Council (PPC)¹ applauds BPA for exploring new ways to engage customers to plan its transmission system and seeking approaches that can more efficiently and strategically address current and future needs in local areas on the system. Continued evolution of BPA's work with the Portland Area Reinforcement Study, such as the proposed Local Area Reinforcement Study (LARS) process, is a step forward in responding to its customers' needs. This type of approach, including looking collectively at the load and resource needs of multiple customers, should be applied broadly across BPA's system to better plan for customer needs.

The agency should work with customers to develop the LARS process in a sustainable and inclusive manner. Among key areas that need to be addressed to achieve this objective:

- Adopt clear criteria that will determine how BPA prioritizes what area on the system to study.
- Create of a timeline that establishes how BPA plans to expand this study approach to all areas of its system.
- Develop a policy for how the agency will approach a study in local areas where a customer in that area selects not to participate in the study that will still allow others to receive informed results from LARS.
- Establish clear expectations for how LARS study results will inform future interconnection and transmission planning studies with an objective of making future studies more efficient through the use of LARS information.

¹ PPC is the umbrella trade association representing the interest of the Northwest's non-profit, public power utilities that have preference rights to the output of the federal system. PPC's members rely on BPA for wholesale power and transmission services to provide economic, reliable, and environmentally responsible power supply for the communities and businesses they serve at cost. PPC's members subscribe nearly the full firm output of the Federal Columbia River Power System (FCRPS) and a large portion of the capability of BPA's transmission system. The ability to access BPA's transmission system to deliver federal and non-federal generation to their communities is critical for PPC members.

- Provide increased transparency on the staff time required to conduct the study, the assumptions used in the study, and the study results.

Given the importance of LARS studies, BPA staff should perform the work to the greatest extent possible instead of contracting the work out. This should also help ensure that work products resulting from LARS studies are usable as inputs into future interconnection and transmission studies to reduce the need for duplicative work.

Regarding LARS study funding, those customers that benefit from the study should be funding the study work. More discussion would be helpful on how to allocate costs among customers within a specific local area. Additionally, a policy should be developed on how to approach situations where an entity might opt out of participation in a study, but where study results could potentially be informative to that entity.

PPC is supportive of the LARS concept in general, but more information is needed on how this highly engaged approach to planning can be applied broadly to BPA's customers for it to significantly improve the agency's planning processes. Additionally, information is needed on how information from LARS flows into other BPA study processes. BPA should continue to evaluate how to make these processes compatible to create additional efficiencies.

Lastly, use of the LARS process is not a replacement for developing a more holistic planning approach across BPA's system (including different uses of the system such as generation integration and load service). PPC encourages BPA to continue to explore how it can reduce siloed planning processes to streamline its planning approach and produce strategic plans of service to meet the region's needs in a timely manner.

Thank you for the opportunity to comment,

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