June 26, 2026

Bonneville Power Administration
Transmission Services
Submitted via Tech Forum techforum@bpa.gov

Re: Comments Supporting Selection of the Tri-Cities Area for BPA's Next Load Area Reinforcement Study

Bonneville Power Administration:

Benton PUD, Benton REA, Big Bend Electric Cooperative, City of Richland, Columbia REA and Franklin PUD (Tri-Cities Utilities) submit these comments in response to BPA's request for customer feedback regarding the next planning area to be studied through BPA's Load Area Reinforcement Study (LARS) process. We recognize that BPA has identified five important candidate areas: Central Oregon, Eugene, Salem/Albany, Southeast Idaho, and Tri-Cities. For context, BPA's 2025 Transmission Plan describes the Tri-Cities area needs in Section 8.5.2 (pages 66-68).[1]

Tri-Cities presents a particularly strong and publicly supportable case for being selected for the next LARS planning area because it combines long-standing transmission constraints, load growth, active and pending reinforcement needs, multiple interdependent public-power utilities, significant line and load interconnection activity, generation interconnection activity, community resilience concerns, and a long record of customer coordination with BPA. BPA's own LARS material identifies Tri-Cities as an area with rapid load growth and known transmission congestion in both operating and planning horizons.[2] The area's needs are not limited to one customer, one delivery point, one substation, one line, or one project. They are area-wide and multi-customer in nature. A coordinated 20-year study is therefore the right planning tool.

The Tri-Cities Utilities respectfully urge BPA to select the Tri-Cities area as the next LARS planning area and to consider these additional factors:

1. **The need for an area-based planning effort in Tri-Cities is long-standing.** In 2019, BPA hosted a coordination meeting in Pasco, WA to address customer and BPA concerns about current and long-term operational constraints and reliability issues associated with BPA's

[1] BPA 2025 Transmission Plan, available at: https://www.bpa.gov/-/media/Aep/transmission/attachment-k/2025-BPA-Transmission-Plan_Final.pdf
[2] BPA Load Area Reinforcement Studies (LARS) Overview Customer Meeting – June 15, 2026, available at: https://www.bpa.gov/-/media/Aep/transmission/transmission-business-model/20260615---LARS-Customer-Meeting.pdf

Tri-Cities area transmission system. Following that meeting, the Tri-Cities Utilities sent the attached letter strongly supporting BPA's efforts and emphasized the need for additional transmission operational flexibility, while also expressing concern about the proposed project timelines. Since then, BPA and the utilities have continued to work through individual projects, interconnection requests, and planning discussions, but the broader area need has not gone away. In fact, the need for a coordinated long-term planning framework has become more important, despite the progress that has been made.

2. **Importantly, the Tri-Cities case is not simply a large-load issue.** The area's transmission planning needs predate the current wave of data center and other large-load interest. At the same time, new load requests are now compounding long-standing constraints and accelerating the need for a coordinated 20-year plan. Some utilities in the Tri-Cities area are seeing data-center-type or other large-load inquiries.[3] Others are seeing industrial growth, agricultural and irrigation load growth, municipal development, public-facility needs, or resilience concerns. Planned community growth also demonstrates the scale of ordinary load growth in the area. For example, the Lewis and Clark Ranch area in West Richland includes more than 7,000 acres within city limits that are planned to transition from agricultural use to urban use over time.[4] These pressures differ by utility, but they interact across the same BPA transmission area. BPA's public planning record shows that Tri-Cities is not just an emerging concern or a speculative future growth area. It is already an active BPA planning area where a 20-year LARS process would add immediate value.

3. **BPA's South of Tri-Cities Reinforcement Project website[5] and the attached section of BPA's Final Environmental Assessment (EA) further describe why Tri-Cities should be selected.** These public materials show that BPA already recognizes the Tri-Cities area as a constrained and growing load area requiring coordinated reinforcement. Within the attached EA excerpt of Section 1.0 – Purpose of and Need for Action (pages 1-4), BPA explains in detail that the Tri-Cities load area has experienced summer peak conditions that strain the existing transmission system; that a single transmission line outage can cause operating limits to be exceeded; that limited capacity makes planned outages difficult; and that limited outage windows can delay or defer maintenance. BPA also notes that local customers had collectively requested more than 400 MW of line and load interconnections in the Tri-Cities load area that could not be accommodated without

[3] Tri-City Herald, "What to know about 4 major data center proposals for Tri-Cities area," May 12, 2026, available at: https://www.tri-cityherald.com/news/business/article315662521.html
[4] City of West Richland, "Lewis and Clark Ranch Subarea Plan & Planned Action EIS," available at: https://www.westrichland.org/299/Lewis-Clark-Ranch---2025
[5] BPA South of Tri-Cities Reinforcement Project website at: https://www.bpa.gov/learn-and-participate/public-involvement-decisions/project-reviews/south-of-tri-cities

reinforcing the transmission system. In addition, BPA explains that large load growth south of the Tri-Cities, including data center demand in the Boardman and Umatilla areas, is increasing strain on the transmission system and contributing to heavy north-south congestion through the Tri-Cities load area. These are precisely the kinds of conditions that justify a comprehensive, long-range load area study.

4. **Tri-Cities is also a strong candidate because the area illustrates why BPA's planning approach should continue evolving** from reactive, project-by-project analysis toward proactive area planning. Much of the area's local load-serving network depends on 115-kV facilities that are now being asked to support existing load service, future growth, maintenance flexibility, and multiple interconnection requests. Recent planning discussions and interconnection activity reinforce the need to evaluate whether currently planned reinforcements, by themselves, provide the long-term area capability the Tri-Cities needs. Utility interconnection requests should not be viewed only as isolated customer projects. They demonstrate cumulative load-service, reliability, and planning pressures across a shared BPA transmission network. A LARS study would provide value by evaluating these overlapping needs together given that the Tri-Cities transmission system functions as an interconnected load-serving area. Decisions made for one request or facility can affect the feasibility, timing, cost, and reliability of service for other utilities and communities. A coordinated LARS study would allow BPA and customers to evaluate localized growth, sensitivities, reinforcement concepts, and sequencing in a way that supports BPA's broader Grid Access Transformation and proactive planning objectives.

5. **The Tri-Cities need also extends beyond aggregate MW growth.** Several communities in the area face resilience and operational-flexibility issues that are difficult to resolve through individual interconnection requests. Prosser, Benton City, Connell, northern Franklin County, and agricultural and irrigation loads all illustrate the importance of evaluating load service, outage flexibility, wildfire exposure, public facilities, and community resilience together. For example, Benton County's Natural Hazard Mitigation Plan[6] identifies that Prosser is being served by a single main power transmission line and calls for an alternate source of primary transmission to shorten recovery after a line failure. Similar concerns have been raised in southern Benton County and northern Franklin County regarding radial service, agricultural growth, irrigation pumping, and critical public facilities.

[6] Benton County's Natural Hazard Mitigation Plan (PDF Page 261), available at: https://www.bces.wa.gov/home/showpublisheddocument/13299/637913343449600000

6. **Tri-Cities has a distinctive public-service and economic profile.** The area includes major agricultural loads, food processing, irrigation infrastructure, ports and industrial development, municipal growth, public facilities, healthcare facilities, federal facilities, research and technology-related loads, and large-load inquiries. The region's transmission needs therefore affect more than individual utility load forecasts. They affect public safety, economic development, water and irrigation service, food supply chains, critical community facilities, and the ability of public-power utilities to serve existing and future customers reliably.

7. **The Tri-Cities utilities are prepared to participate constructively in a Tri-Cities LARS.** We can provide BPA with localized load information, utility planning assumptions, customer-development information where appropriate, operational concerns, community and economic-development context, and utility-specific knowledge of the area. We also support a collaborative process that gives BPA and customers a shared understanding of study assumptions, constraints, potential reinforcement options, sequencing, and tradeoffs. Some Tri-Cities Utilities have demonstrated experience with transmission line construction that could support BPA's initiatives related to allowing customer builds to accelerate system expansion.

8. **We understand that LARS is not a project approval process** and that selection of Tri-Cities would not predetermine the outcome of any future reinforcement project, interconnection request, or transmission service request. Furthermore, we understand that study participants should expect to incur some cost responsibility, and we are open to further discussion on an appropriate cost allocation methodology. Our request is that BPA select the Tri-Cities area for the next LARS because the area presents a clear and compelling need for the type of long-range, customer-engaged, geographically comprehensive planning that LARS is designed to provide.

9. **Selecting Tri-Cities would be reasonable, transparent, and publicly defensible.** BPA's own public materials and publicly available interconnection information already identify rapid load growth, known congestion, overload risk, outage-planning challenges, deferred-maintenance concerns, active reinforcement work, and significant line, load, and generation interconnection demand in the area. The Tri-Cities Utilities have a long history of coordinating with BPA and with each other on these issues. A Tri-Cities LARS would therefore not be starting from scratch; it would build on years of documented planning work and convert that work into a coordinated 20-year framework.

For these reasons, the Tri-Cities Utilities respectfully request that BPA select the Tri-Cities area as the next Load Area Reinforcement Study planning area.

We appreciate BPA's consideration and look forward to working with BPA and other customers through the LARS process.

Sincerely,

Signed by:
Rick Dunn
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Rick Dunn, General Manager
Benton PUD

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Clint Whitney
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Clint Whitney, Energy Services Director
City of Richland

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Ryan Redmond
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John Francisco, General Manager/CEO
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Victor Fuentes, General Manager/CEO
Franklin PUD

Attachments

1. Tri-Cities Utilities 2019 Letter to BPA – Tri-Cities Area Transmission 2019-07-16
2. Excerpt from BPA South of Tri-Cities Reinforcement Project - Final Environmental Assessment 2026-03 - Section 1.0 – Purpose of and Need for Action (pages 1-4), https://www.bpa.gov/-/media/Aep/efw/nepa/active/south-of-tri-cities/SOTC-Final-EA-508-new.pdf

July 16, 2019

Jeff Cook
Vice President - Planning and Asset Management
Bonneville Power Administration
PO Box 491
Vancouver, WA. 98666-0491

RE: BPA Tri-Cities Area Transmission Planning and Operations

Dear Jeff:

We are writing on behalf of Tri-Cities area utilities to express our thanks for the work BPA transmission planning is doing to help address current and long-term operational constraints and reliability issues associated with BPA's Tri-Cities area transmission system. The recent collaborative meeting held on May 23rd in Pasco by BPA's transmission planning and operations staff was very informative and eye opening for area utilities.

It is encouraging to see the BPA transmission planning team working closely with your operations team to propose projects for the Tri-Cities area that will allow the operational flexibility needed during summer months to provide needed maintenance windows and to mitigate the risk of contingency caused outages.

Due to the area's robust growth, the lack of transmission operational flexibility has become acute and needs to be addressed. We want to express our strong support for the transmission improvement projects identified by BPA during the May 23rd meeting which would add flexibility to the system.

While we appreciate BPA's efforts to identify and resolve existing system constraints, we are concerned about the 2024 timeline for tapping one of the existing 500-kv lines sourced from Ashe Substation near the Columbia Generating Station. The Tri-Cities area is expected to see continued load growth over the next five years, which may place added stress on the flexibility of the transmission system. We would ask that this proposed project timeline, along with the timelines of other projects, be reviewed – and shortened if possible – to reduce the likelihood of events that may lead to local contingency plans being implemented.

We look forward to continuing to work cooperatively with BPA's transmission planning and operations organizations to help ensure both near and long-term electric reliability for our customers in the Tri-Cities area.

Sincerely,

Chad Bartram
General Manager, Benton PUD

Scott Rhees
General Manager, Franklin PUD

Clint Whitney
Energy Services Director, City of Richland

Mike Bradshaw
General Manager/Executive Vice President, Benton REA

Scott Peters
CEO, Columbia REA Cooperative

Yvette Armstrong
General Manager/CEO, Big Bend Electric

cc: Eric Carter, BPA
Jennifer Miller, BPA

1.0 Purpose of and Need for Action

1.1 Introduction

Bonneville Power Administration (BPA) is proposing the South of Tri-Cities Reinforcement Project to build a new 500/115-kilovolt (kV) substation and 115-kV transmission line in Benton County, Washington (Project or Proposed Action). The proposed substation near County Well Road would tie into an existing 500-kV transmission line and convert the voltage to 115-kV for local transmission along the new approximately 18-mile-long transmission line to the existing Badger Canyon Substation in Richland, Washington. Up to 0.8 mile of the proposed 115-kV transmission line would cross land managed by the U.S. Bureau of Land Management (BLM)-Spokane Border Field Office (BLM-Spokane). Badger Canyon Substation would be reconfigured and upgraded to incorporate the new transmission line. Fiber optic cable would be added to the new transmission line, as well as along other existing transmission lines in the area, to improve operational communication and control.

BPA prepared this Environmental Assessment (EA) to assess the potential impacts of the Project on the environment pursuant to the National Environmental Policy Act (NEPA).[1] This EA will be used to determine if the Project would cause effects of a magnitude that would warrant preparing an Environmental Impact Statement (EIS), or whether it would be appropriate to prepare a Finding of No Significant Impact (FONSI). This section of the EA describes the need for action that the Project addresses, identifies the purposes (i.e., goals) of the Project, and summarizes the public scoping process that was conducted for the EA.

1.2 Background

1.2.1 BPA Transmission System

BPA is a nonprofit federal power marketing administration that owns, operates and maintains more than 15,000 circuit miles of high-voltage transmission lines in the Pacific Northwest. The transmission lines move most of the Northwest's high-voltage power from facilities that generate power to customers throughout BPA's service territory. BPA sells transmission services to accommodate customer requests to transmit power across BPA's transmission system. BPA's transmission customers, typically utilities, independent power producers and power marketers, use these services to deliver power over BPA's transmission lines to their buyers. Users of power include public utility districts, municipalities, and investor-owned utilities which, in turn, use their own facilities to provide electricity to homes, businesses, industries, and farms.

BPA has a statutory obligation to ensure it has sufficient capability to serve its customers through a safe and reliable transmission system. The Federal Columbia River Transmission System Act directs BPA to construct improvements, additions and replacements to its transmission system that the BPA Administrator determines are necessary to provide service to BPA's customers, maintain electrical stability and reliability and integrate and transmit power (16 United States Code [U.S.C.] Section [§] 838b[b-d]).

[1] BPA is aware that the Council on Environmental Quality (CEQ), on February 25, 2025, issued an interim final rule to remove its NEPA implementing regulations at 40 C.F.R. Parts 1500–1508. Based on CEQ guidance, and to promote completion of its NEPA review in a timely manner and without delay, in this EA BPA is voluntarily relying on the CEQ regulations, in addition to DOE's own regulations implementing NEPA at 10 C.F.R. Part 1021, to meet its obligations under NEPA, 42 U.S.C. §§ 4321 *et seq*.

BPA plans its transmission system to serve expected loads and load growth for at least the next 10 years based on forecasts. BPA plans its system in accordance with the National Electric Reliability Corporation (NERC) Planning Standards and the Western Electricity Coordinating Council Regional Criterion to maintain system reliability.

Operating a reliable transmission system is one of BPA's fundamental objectives. Customers depend on consistent, quality electric service and maintaining that service requires a robust system that can respond to common outage-causing events. BPA follows mandatory Reliability Standards, developed by NERC and approved by the Federal Energy Regulatory Commission (FERC). To meet NERC standards, BPA planning performs annual system assessments and develops corrective action plans to expand the system as necessary. BPA Operations also continuously monitors **loads**[2] and voltages, evaluates the transmission system's performance and develops operating plans that respond to reliability risks.

1.2.2 Tri-Cities Area Reliability and Load Growth

BPA divides its service territory into **load areas** for planning purposes. Load areas are regions whose loads are served by a common set of substations and transmission lines. The Tri-Cities load area in Washington includes the population centers of Richland, Kennewick and Pasco, as well as the rest of Benton and Franklin counties and neighboring Grant and Walla Walla counties. Three substations (McNary, Sacajawea, and Midway) serve as the main transmission sources to the Tri-Cities load area, connecting the load area to the larger grid.

Planned transmission line outages are periodically needed for routine maintenance activities. Transmission line outages can also occur as a result of unplanned events, such as equipment failure, a public safety power shutoff during wildfire season, lightning strikes, or a transmission pole struck by a vehicle. Peak demand for electricity in the Tri-Cities load area occurs during the summer months. The seasonally high demand is driven by irrigation needs, agricultural refrigeration, air conditioning and industrial uses. When loads surpass 1,100 megawatts (MW) in the Tri-Cities load area, the capacity of the existing transmission system is strained. Under these conditions, a single transmission line outage can cause system operating limits to be exceeded, which increases the risk of unplanned line or substation outages that could lead to a loss of power to the area. The existing limited capacity of the transmission system in the Tri-Cities area during times of maximum power usage makes planning line outages for maintenance or upgrades difficult and limits the flexibility of BPA's transmission system operators to manage unplanned outages without risking power interruptions such as **load shedding.** Load shedding is a last resort for BPA, but if system operating limits are exceeded, this kind of power interruption may be required to prevent potential overloads and voltage violations on the grid.

The limited flexibility during peak loads in the Tri Cities load area is due to the area's limited number of energy sources (i.e., McNary, Sacajawea, and Midway substations and the Ice Harbor Lock and Dam on the Snake River) and limited transmission pathways into and through the area. The operating plans developed to meet NERC Reliability Standards are, therefore, particularly complex for the Tri-Cities area and require engineers to perform special real-time studies and analysis to keep the system functioning smoothly. Even with these efforts, capacity remains an issue, and if system operating limits are exceeded during a transmission line outage, a second transmission line outage would likely lead to required load shedding if other emergency operational measures are not implemented.

Loads in the Tri-Cities load area have surpassed 1,100 MW on hot days every summer for the past 10 years. In July 2017, a combination of high electricity use and equipment failures during a heat wave

[2] Acronyms and words in **bold** are defined in Appendix C.

nearly triggered a load shedding event. Other similar experiences occurred in the summer of 2016 and 2017. These events, and the likelihood of their reoccurrence, led BPA to put procedures in place to reduce the risk of load shedding during periods of peak demand. These procedures include barring planned transmission line outages during the summer.

Due to these procedures, construction projects in the Tri-Cities load area that require transmission line outages cannot occur during peak load conditions. Winter weather and operational requirements for Endangered Species Act (ESA)-listed fish species on the lower Snake River (including Ice Harbor Lock and Dam) in the late summer, fall and early winter further limit when planned transmission line outages can be scheduled. Because transmission line outage windows are so limited, some maintenance of the transmission system in the Tri-Cities load area has been deferred, increasing the risk of equipment failures.

While procedures developed in 2017 have been successful in avoiding the need for load shedding in the Tri-Cities load area, the situation remains tenuous. Every summer there are high temperature days when loads reach the threshold that puts the system at risk of exceeding system operating limits. Any unplanned outage from the loss of a major piece of equipment that occurs under these high-load conditions puts the area under threat of required load shedding. BPA expects the Tri-Cities load area to reach this load threshold with increasing frequency due to continued load growth within the next 10 years, putting long-term system reliability at risk.

Population and load growth in the Tri-Cities load area is also contributing to more demand on the transmission system. The population in the U.S. Census-defined Kennewick-Richland Metro Area, which includes Benton and Franklin counties, grew 23.2 percent between 2010 and 2022 (U.S. Census Bureau 2023). The region's economy, which is anchored in research and development, technology, manufacturing, agriculture, retail and healthcare, is also growing. Between 2001 and 2021, the total metro Gross Domestic Product (GDP) in Benton and Franklin counties combined increased by 63.3 percent (TRIDEC 2023). Between 2018 and 2021, the net growth rate of businesses in Benton and Franklin counties ranged between 2 and 4.3 percent (TRIDEC 2023).

Local utilities report seeing large load growth potential in the future, and substantial population growth is projected for Benton, Franklin, Grant and Walla Walla counties over the next 20 years (Washington Office of Financial Management 2022). Local utility customers served by BPA's transmission system in the Tri-Cities load area include Benton Public Utility District (PUD), Benton Rural Electric Association (REA), Big Bend Electric Cooperative, City of Richland, Columbia REA, Franklin PUD and South Columbia Basin Irrigation District. BPA expects load growth from these customers to increase by at least 1.5 percent annually.

Some of these local customers have requests pending before BPA to accommodate line and load interconnections in the Tri-Cities load area. Line and load interconnections are typically for new load service or to allow customers to build or shift the delivery of service to different points on their system. As of August 2024, local customers have requested, collectively, more than 400 MW of line and load interconnections that BPA cannot accommodate without reinforcing the transmission system in the Tri-Cities load area.

Large load growth south of the Tri-Cities load area from data center demands in the Boardman and Umatilla areas is also increasing the strain on the system. North-south transmission lines from Midway substations to McNary Substation through the Tri-Cities load area are heavily congested. A new source of energy serving the Tri-Cities load area from BPA's main grid, such as the proposed Project, would help offset the north-south flow congestion.

In addition, requests to integrate new clean energy power generation sources (i.e., new variable resources, such as wind and solar) into BPA's transmission system are contributing to anticipated capacity issues in the Tri-Cities load area. These requests are recorded in BPA's Interconnection Request Queue and are addressed in accordance with BPA's Open Access Transmission Tariff (OATT) (BPA 2023; BPA 2021). BPA's OATT defines the terms and conditions of the transmission and interconnection services it offers. The OATT is generally consistent with the FERC pro forma open access tariff. Under BPA's tariff, BPA offers transmission services to all eligible customers on a first-come, first-served basis, subject to a determination that there is sufficient available transfer capability on BPA's transmission system and that the customer can meet BPA's technical requirements for integration. Customers requesting interconnections pay for any system upgrades necessary to incorporate the power into BPA's transmission system. BPA's decisions regarding transmission interconnection requests are subject to individual environmental review under NEPA and other applicable laws.

BPA works with eligible customers to conduct studies that assess the feasibility of interconnection and how potential additions to the transmission system would affect safety and reliability. These studies identify the interconnection requirements, including any system upgrades, that would be needed to accommodate specific requests.

1.3 BPA's Purpose and Need for Action

The Federal Columbia River Transmission System Act directs BPA to construct improvements, additions, and replacements to its transmission system that are necessary to maintain electrical stability and reliability as well as provide service to BPA's customers (16 U.S.C. § 838b[b–d]). BPA needs to increase the long-term electrical capacity of its transmission system in the Tri-Cities load area to respond to reliability concerns and anticipated increased demand for electricity over a 10-year planning horizon. Construction of the Project would provide an additional source of transmission capacity to serve the Tri-Cities area and help meet the increased electrical capacity needs and reinforce the transmission system in the Tri-Cities load area.

In meeting the need for action, BPA seeks to achieve the following purposes:

- Ensure transmission system public safety and reliability standards set by the National Electric Safety Code and NERC are met.
- Continue to meet BPA's contractual and statutory obligations to supply safe, reliable power to serve its customers.
- Demonstrate cost effectiveness.
- Minimize impacts to the natural and human environment.

1.4 BLM's Purpose and Need for Action

The purpose and need for BLM's action is established by the agency's responsibility under Section 501(a)(4) of the Federal Land Policy and Management Act of 1976, as amended (43 U.S.C. 1761), which provides authority for the Secretary of the Interior, in their discretion, to grant rights-of-way on lands under its jurisdiction according to regulations at 43 CFR 2802.10. The BLM-Spokane District would need to respond to an application from BPA requesting a right-of-way (ROW) grant for the portion of the new 115-kV transmission line and access roads that would cross BLM-managed land. The grant would allow BPA to build, operate and maintain the proposed transmission line and access roads.

The BLM Land Use Plan that applies to this portion of the Proposed Action is the Spokane Resource Management Plan, as amended (BLM 1987, BLM 1992). One of the General Management Objectives