

BPA Responses to Comments from June 15, 2026 LARS Customer Call

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Columbia River PUD	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. - 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.	Thank you for the comment. We will take it into consideration for the next LARS cycle.
Columbia River PUD	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.	Thank you for the comment.
Columbia River PUD	Areas Currently Under Consideration 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.	Thank you for the comment.
Columbia River PUD	Customer Engagement and Transparency 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.	Thank you for the comment.
Columbia River PUD	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. - Because these benefits accrue across the transmission network, the associated planning costs should similarly be treated as a network planning expense.	Thank you for the comment.
NRU	Identification and Selection of LARS Locations Bonneville should take steps to formalize its approach to identifying and selecting candidate reinforcement areas.	Thank you for the comment. More information will be provided at the 8/5 Customer Meeting.
NRU	Scope of LARS - We recommend that Bonneville clarify the scope and its overarching intent with LARS, such as whether Bonneville expects to eventually include every network customer in a LARS or instead that LARS is intended to include only a subset of BPA's transmission customers based on localized load growth needs or specific reliability drivers only. - We also request Bonneville provide additional details around the structure of LARS.	Thank you for your comments and recommendations. Regarding scope and intent, LARS aims to work with and inform customers seeking to potentially expand local interconnection capacity in order to serve new loads in the selected area. LARS candidates are selected based on geographic load areas and reliability drivers rather than individual customers. However, any customer with load within a selected study area is fully included in the LARS process. While not every customer will be in a study area during a single

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	○ For example, we encourage BPA to outline anticipated timelines for completing a LARS, and what milestones would define commencement and conclusion, as well as the frequency for LARS. ○ Similarly, we recommend that Bonneville describe the connection between LARS and its other study processes, as well as how LARS participants would secure capacity from LARS reinforcements. ○ In other words, BPA should outline the necessary steps to operationalize the LARS planning results into local area transmission capacity, and how that capacity will be allocated (whether through the Line/Load Interconnection Process or otherwise).	cycle, the framework is designed to encompass any area of the system meeting the selection criteria over time. LARS focuses on local interconnection capacity only and does not consider long-term firm transmission availability. LARS is intended to complement, and not replace, existing BPA processes including the line and load interconnection process (LLIR), the Load and Resource Consolidated forecasting (LaRC) process, the Transmission Service Request (TSR) process, and BPA’s annual Reliability System Assessment. By evaluating local interconnection needs of customers in a single study rather than the individual LLIR process, LARS may provide opportunities to combine plans of service, garner agreement and support, share costs, and help prioritize human and financial capital to more efficiently expand the grid and meet the needs of the participating customers.
NRU	Cost Considerations ● As much as practical, we support Bonneville’s LARS adhering to cost causation and “beneficiary pays” principles. Costs of conducting LARS should generally be contained to those particular load serving entities participating in the study. ● Further, we encourage Bonneville to prioritize local areas where there is 100% support by the composite utilities, out of consideration of BPA’s limited resources. ● Where Bonneville identifies a prospective local area for a LARS, but not all composite utilities opt in to the study, we suggest that those local areas be de-prioritized in favor of other areas with full buy-in. ○ To the extent the no candidate LARS area achieves 100% support, then we suggest allocating the study costs only to those entities electing to participate. ○ If local area reinforcements are ultimately pursued, the capacity resulting from such reinforcements should generally be allocated only to those participants that paid for the LARS and agree to support the resulting upgrades.	Thank you for the comment.
NRU	Execution Feedback ● With a goal of executing one LARS per year, it is unclear how many total years it may take for Bonneville to sufficiently study all of the relevant local areas. We therefore suggest Bonneville consider potentially conducting multiple LARS in parallel, given the interest and value to BPA’s network customers and to BPA itself. ● In addition, and as we’ve stated in prior comments, we continue to encourage Bonneville – over the long term – to seek out ways to consolidate planning processes where it may make sense and may increase procedural efficiencies. ● Although we understand that this is not Bonneville’s intended approach with LARS, we do have ongoing concerns over execution risk of all of BPA’s various processes, and welcome innovative proposals to increase efficiencies in completing them. Whether merging the transmission and interconnection queues (accomplished by Southwest Power Pool), or merging the long-term network and local area planning studies, continued innovative approaches could ultimately yield significant benefits to BPA and its customers.	Thank you for the comment.
PGE	Perspectives on the five areas currently under consideration	Thank you for the comment.

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	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.	
PGE	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.	BPA Planning appreciates your feedback. To study the transmission system, BPA Transmission Planning has established 27 load service areas defined by electrical cutplanes, which are determined using geographic boundaries, topological identification, and network flow modeling. While we will consider your suggestions during our broader system assessment process, re-defining these cutplanes is outside the scope of the LARS process.
PGE	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. - 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.	Thank you for the comment. We will take it into consideration and will share it with the broader GAT team.
PGE	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.	Thank you for the comment.
Public Power Council	LARS process [BPA] 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. - Provide increased transparency on the staff time required to conduct the study, the assumptions used in the study, and the study results.	Thank you for the comment. BPA is actively examining its existing processes in order to find efficiency gains and looks forward to collaborating closely with customers and stakeholders in those efforts. We will take your comments into consideration in future LARS cycles.

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Public Power Council	LARS execution BPA staff should perform the work to the greatest extent possible instead of contracting the work out.	Thank you for the comment.
Public Power Council	LARS study funding - 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.	Thank you for the comment.
Public Power Council	Impacts to BPA planning processes - 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 comment.
Seattle City Light	General Comments - The stated purpose of LARS—to proactively address localized reinforcement needs—should be implemented for all customers, not a small subset over an 18–24-month period. - If LARS recovers BPA staff costs, the approach should still ensure that other customers are not burdened with higher third-party costs due to internal resource reallocation. - Regarding staffing, City Light asks BPA to reconsider the perception created by significant transmission-staff expansion while serving a limited set of customers. Such expansion is appropriate only if benefits accrue broadly. City Light’s support for future Integrated Resource Plans and budgets will be contingent on demonstrable proportional service to our ratepayers. - City Light also requests greater transparency linking BPA’s GERP 1.0/2.0 project maps to actual resourcing and schedule performance. The current picture suggests a primary focus on the Portland area. Please publish resource allocation details (staffing, budget, timeline, and milestone status) by project and geography.	Thank you for the comments. We will take them into consideration and share the request regarding GERP with the appropriate staff.
Seattle City Light	Principles To anchor proactive planning in customer service, City Light recommends BPA adopt the following principles:	Thank you for the comment. We will take it into consideration for the next LARS cycle.

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	• Improve evaluation of customer-provided localized forecasts across BPA service areas and interconnected systems. • Engage customers earlier and more consistently throughout the planning process. • Initiate collaborative discussions with customers to understand localized load-growth trends. • Increase transparency around potential future system reinforcement needs. • Provide customers with clearer, longer-range planning insights. • Enhance visibility into potential mutually beneficial expansion projects that span multiple customers.	
Seattle City Light	LARS Area Evaluation • City Light requests BPA explain the criteria used to exclude the Puget Sound area from LARS. ○ BPA indicated that non-selected areas either lack substantial congestion, have a robust 10-year plan, or show no challenges in LLIRs or SGI/LGIs. Which of these applies to Seattle and the greater Puget Sound region? Please provide supporting data.	Thank you for the comment. We look forward to discussing the selection at the 8/5/2026 LARS meeting. As presented during the June 15, 2026 LARS workshop, BPA evaluated its entire system and identified five areas as candidates for the first LARS process. The identification of five areas and the necessity to choose a single area for the first study did not exclude other areas from future consideration. If the factors listed in SCL’s comment (lack of substantial congestion, a robust 10–year plan, or no challenges in LLIRs or SGI/LGIs) were construed as means to exclude areas from consideration, that was not intended. We encourage review of BPA’s 10-Year Plan and System Assessment Summary report. If specific issues or congestion are identified in areas that lack adequate mitigation plans, or that would benefit significantly from the deep engagement process LARS offers, we welcome specific feedback. We will thoroughly consider this input before finalizing our selection for the next LARS study area.
Seattle City Light	Additional Localized Load Areas • City Light believes the stated purpose of the LARS initiative should be applied to BPA’s entire customer area instead of a select few.	Thank you for this comment. To clarify, the LARS methodology was systematically applied across BPA’s entire service territory. BPA evaluated all 27 distinct load areas within our footprint during the initial screening phase. While the Seattle/Tacoma load area was fully evaluated as a candidate alongside the others, it did not rank within the top five priority areas based for this specific cycle. Future LARS cycles will re-evaluate all service areas to address shifting load growth and reliability needs across the entire footprint. While not every customer will be in a study area during a single cycle, the framework is designed to encompass any area of the system through the selection process. LARS is seeking to aid customers in making decisions to enable growth, but BPA is not currently able to apply it to all load areas simultaneously. BPA is actively examining its existing processes in order to find efficiency gains and looks forward to collaborating closely with customers and stakeholders in those efforts. We will take your comments into consideration in future LARS cycles.
Seattle City Light	Localized Load-Growth Trends and Planning If BPA consistently includes ≥100 kV facilities in its transmission planning processes—and harmonizes requirements across load forecasts, interconnection requests, and transmission service requests— localized load growth can be addressed within existing	Thank you for the comment. BPA includes ≥100 kV facilities in its transmission planning processes and coordinates requirements across load forecasts, interconnection requests, and transmission service requests but is actively examining its existing processes for potential efficiency gains. One aspect of LARS is an intent to bridge the gap between planning processes

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	processes. BPA’s recent GI improvements (site control, commercial viability, deposits) are helpful; applying similar requirements to Line & Load requests would further reduce uncertainty and improve planning discipline. City Light also emphasizes that BPA’s mission to facilitate economic growth in the Northwest does not imply that all customers should subsidize localized capacity expansions benefiting a few. Customers seeking greater available capacity—on the BPA main grid or in localized areas—should fund the associated development.	developed for typical forecasts and new demands driven by the proliferation of large point loads in order to proactively enable economic load growth. While LARS does identify major reinforcements that significantly expand local capacity and address what are expected to be the more significant reliability impacts, it does not conduct a complete reliability analysis. The load evaluated in LARS must go through standard BPA processes, including the LLIR process and transmission service request studies, to have a complete plan of service identified. LARS is intended to complement, and not replace, existing BPA processes.
Seattle City Light	Perspectives on Customer Study Costs • Deposits: Require participating entities to provide deposits of 125% of estimated study cost for their area. • Accounting & True-Up: Provide a detailed cost accounting at completion and true-up actuals against deposits. • Residual Application: Allow any residual funds to be applied to the entity’s ongoing Line & Load Interconnection costs.	Thank you for the comment.