

May 1, 2025

Comments Submitted by Columbia River PUD:

CRPUD greatly appreciates the steps that BPA is taking to reform transmission planning. We are grateful that BPA aims to create a process that will take a request and grant service in less than 5 to 6 years.

CRPUD recognizes that overcoming the hurdles to achieve this will not be easy. We believe that BPA has the tools to meet this goal. On slide 6, you mentioned proactive planning. This is the number one criterion that should be further developed to ensure execution, and we believe BPA has a solid starting process. Efforts like the Portland Area Reinforcement Study (PARS) are key to success. BPA should conduct this type of study, which is highly collaborative with stakeholders, and then integrate it into the project once a construction need is identified, whether through an Attachment K, LLIR, TSEP, or another BPA study. This will ensure BPA builds sufficiently, instead of merely meeting today's needs without considering tomorrow's requirements.

One item that may help BPA achieve success is incorporating a 20 to 30-year forecast.

BPA should rely on the LaRC from NITS customers, but reduce the 70% likelihood of a load materializing and focus more on efforts like PARS to future-proof construction and meet the 5 to 6-year goal. BPA should avoid relying primarily on trended load growth, as past trends do not always predict the future. In CRPUD's opinion, focusing on a trended pattern causes current growth areas to continue and limits areas that already lack sufficient capacity to grow because capacity does not exist, and the build time is too long, with industry not willing to wait.

We are truly excited about BPA's plan to implement a proactive planning model that will look to identify no-regrets projects based on anticipated demand and resource-rich areas. CRPUD hopes that resource-rich areas would be considered areas with significant industrial land holdings that have experienced tremendous development interest but have been passed over due to limited transmission capacity.

Thank you,

Branden Staehely

Columbia River PUD