NT CUSTOMER GROUP COMMENTS IN RESPONSE TO BPA'S APRIL 21, 2025 TRANSMISSION PLANNING REFORM WORKSHOP

Submitted: May 2, 2025 via techforum@bpa.gov

The NT Customer Group[1] appreciates this opportunity to submit comments in response to BPA's April 21, 2025 workshop to discuss its Transmission Planning Reform efforts. We deeply appreciate BPA taking the time and effort to discuss its conceptual proposals with its stakeholders and customers, as well as the proposed customer engagement schedule that is expected to occur over the next few months as outlined by its roadmap. These are critical issues to ensuring reliable, cost-effective load service over the long term, and we are committed to working closely with BPA as this process moves forward. Our comments are below and follow the general order as BPA described them in the workshop.

We generally support the objectives set forth by BPA leadership for BPA staff and the region to consider "disruptive" changes to BPA's processes to better meet the needs of its transmission customers, including the vision of providing service within 5-6 years of a request being submitted. We encourage creative and unique proposals, provided that BPA maintains as a primary focus its statutory obligations to its preference customers, including those taking Network Integration Transmission Service (NITS). To that end, we support the concept that BPA shared regarding its "proactive" planning model. Specifically, we very much support BPA prioritizing load forecasts and load service as the foundation of its long-term transmission studies, as opposed to transmission requests serving as the centerpiece. The transmission infrastructure necessary to ensure reliable, long-term load service should be informed by BPA's queue—not driven by it. While we expect additional details regarding the proactive planning approach, we generally support BPA's proposal to use a long-term (at least 20 years) study horizon. This will help ensure that BPA will avoid being short of transmission capacity as its customers' loads grow into the future. Further, we encourage BPA to evaluate transmission solutions resulting from its proactive planning process in an open and transparent manner, given the impacts of such transmission solutions on the rates of all of BPA's transmission customers.

We are also cautiously interested in further exploring BPA's concept of "on-demand" transmission service. As we understand it, based on BPA's oral description during the April 21st workshop, this concept will guarantee firm encumbrances for "trended" NT load growth without requiring those customers to participate in any transmission upgrades. However, much more detail and discussion is required regarding how BPA proposes to define and apply the "trended" and "non-trended" NT load growth concepts, particularly in circumstances where an individual NT customer provides its total forecasted load growth (inclusive of both the supposed "trended" and "un-trended" components) early and often in its annual load forecast submittals to BPA.

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[1] The NT Customer Group includes Benton Rural Electric Cooperative, Big Bend Electric Cooperative, City of Forest Grove, Clark Public Utilities, Clatskanie PUD, Columbia River PUD, Eugene Water & Electric Board, Lewis County PUD, Mason PUD #3, Umatilla Electric Cooperative, Northwest Requirements Utilities, PNGC Power, and Western Public Agencies Group.

Our understanding of BPA's obligations is that it must plan to serve on a firm basis all such load growth reasonably forecasted by its NT customers, not just select components of it.

Another component of its "on-demand" transmission service, BPA plans to offer transmission service (most likely some form of non-firm transmission service) in response to all new transmission requests where BPA lacks firm transfer capability, until such time as BPA completes the necessary transmission solution(s) to provide firm capacity. Although we await further details, we appreciate BPA's commitment to expanding the levels of transmission service that it may be willing to offer in circumstances where it lacks long-term firm capability. For instance, more expansive access to 6NN service would help BPA and Load Responsible Entities meet the transmission component of the WRAP forward showing requirements. However, we reiterate concerns that 6NN service is not comparable in value to PTP conditional firm transmission in the SPP Markets+ context, since congestion rents are allocated to PTP conditional firm service, but not allocated for 6NN transmission used by NT customers.

Additionally, we note that the value of BPA's on-demand transmission service will likely correlate to the total amount of such service accepted by customers – the higher the customer acceptance, the higher the likelihood that such customers will face curtailments of their service during periods of congestion. This will heighten the interest and importance of BPA succeeding in its capital project execution to install facilities that increase available transfer capability. Moreover, PTP conditional firm service is automatically afforded access to any short-term firm ATC prior to it being released to the market for other uses, including for 6NN service. As a result, the NT Customer Group believes that 6NN service is not adequately comparable in value to PTP conditional firm service. We request BPA explore opportunities to mitigate this disparity as part of clarifying its "on-demand" service proposal. In general, we also support BPA's proposal to require transmission customers to identify both the resource and load to be served as a requirement to accessing the queue and "on-demand" transmission service.

Lastly, we very much appreciate BPA's attention to project execution. In order to deliver on its vision of building to serve new requests within 5-6 years, BPA and the region must explore every possible opportunity to construct new facilities. We applaud BPA for considering a wide range of options beyond the status quo, including the potential to permit its customers to build necessary facilities and fully leveraging its secondary capacity model. To be clear, this is an incredibly ambitious goal to have – and we remain committed to supporting any and all efforts to enable efficient infrastructure development, while acknowledging BPA's obligations regarding its reliability and compliance standards.

In summary, we are generally supportive of BPA's conceptual proposals as we are able to understand them, with limited exception to the reliance on 6NN service as a stopgap where BPA lacks firm transmission capability. We look forward to future workshops and additional clarity from BPA on how it plans to address NT load service under this future planning and service model.