

The following comments are from Clark Public Utilities, Cowlitz PUD, Eugene Water and Electric Board, Mason PUD No. 3, Northwest Requirements Utilities, PNGC Power, and Western Public Agencies Group (collectively referred to as the “NT Customer Group”). We appreciate the efforts that the Bonneville Power Administration (“BPA”) has undertaken to implement the NT products and services that were agreed upon in BPA’s TC-20 Settlement Agreement via the draft NT Business Practice, Version 9 (“NT BP”) which is currently open for public comment. Our comments primarily address two points of emphasis—the proposed NT Dialogue process in sections B-D and the Seller’s Choice provisions in section F. We also have one proposed edit to Section F.7 regarding Behind The Meter Resources.

## **NT Dialogue**

We appreciate BPA’s effort to codify the NT Dialogue process in the NT BP. The NT Customer Group has urged BPA for several years to address its NT resource forecast process in some type of formal documentation. BPA has been administering ten-year resource forecast process via the NT Dialogue since 2016 and the process has worked well for some of BPA’s NT customers and at times has been challenging for other NT customers. The NT BP has appropriately addressed this resource forecast process, and we look forward to refining the forecast spreadsheet at future Network Operating Committee meetings.

On the other hand, it appears that BPA is attempting to force all load forecasting into the NT Dialogue without consideration to the larger agency-wide load forecasting process and related activities. This is problematic since the NT Dialogue was always intended to focus solely on non-federal resource forecasts and was never thought to include load forecasting. As a result, the inclusion of the load forecast process in the NT Dialogue section has resulted in the following:

- Section B introduces the concept of assigning all load forecasts a queue time. While the NT Customer Group acknowledges that, when taken together, Sections 29.2 and 31.2 of the OATT contemplate that designations of new Network Load will be assigned a queue time, we do not agree, and the OATT does not support, the implication made in the draft NT BP that NT load growth not associated with the designation of a new Network Load is subject to the same requirement. Instead, such load growth is subject to the requirements of Section 31.6, which requires NT customers to update their Network Load forecasts on an annual basis, and Section 28.2, which obligates BPA to include the Network Load of its NT customers in its Transmission System planning and to endeavor to construct and place into service sufficient transfer capability to deliver the Network Resources of NT customers to their Network Load .
- Sections B-D are written in a manner that leads customers to believe that the entire NT load forecasting process is encapsulated in the NT BP. This is not the case—both BPA and its NT customers undertake many more procedural steps and forecasting milestones. Thus, the NT BP may mislead customers into believing that they are fully meeting their load forecasting obligations with BPA if they follow sections B-D, which is not the case.
- There are several elements of the proposed treatment of load forecasts that are simply incorrect. For example, we do not believe that, in the event that BPA deems there is insufficient capacity to serve a submitted load forecast, the NT Customer should participate in BPA’s Transmission Service Request Study and Expansion Process. As discussed above, BPA’s OATT is very clear that it has the obligation to plan and, if necessary, expand its system to accommodate

NT load growth, and nowhere does the OATT imply that an NT customer must submit a TSR to enable service for load growth. We can only guess that this was not BPA's intent and this error is likely the result of an attempt to apply a resource forecast process to an NT customer's load growth.

Because of these issues, we believe that BPA should update sections B-D in the NT BP to only include the resource forecast procedures in the NT Dialogue and remove all instructions and processes associated with load forecasting. BPA and NT customers can then work collaboratively over the coming months to deliberately and thoughtfully address how to best include the load forecasting process. In addition, BPA should not introduce any reference to queue timing in the context of load forecasts until BPA has made clear how it intends to keep its obligations to NT Customers to provide firm transmission service under the OATT and Settlement Attachment 6.

### **Seller's Choice**

The NT Customer Group was pleased to see that BPA is working to implement the Seller's Choice option that was agreed to in the TC-20 Settlement. We also understand that implementation of Seller's Choice is challenging given that this concept is a significant change to how BPA currently treats NT customer's use of the market purchases at the Mid-C trading hub. Thus, we see BPA's current proposal for Seller's Choice as a step in the right direction, and we offer up the following additions to ensure the NT BP is aligned with the spirit and intent of the Seller's Choice provisions in the TC-20 Settlement Agreement:

- The proposal in the NT BP only applies the Seller's Choice option to the Northwest Market Hub. BPA should also apply Seller's Choice to all other Mid-C points beyond the Northwest Market Hub in order for NT customer to use firm transmission to deliver Seller's Choice market purchases to load. This would include: Northwest Market Hub, Mid-C Remote, Chelan County PUD, Grant County PUD, and Douglas County PUD.
- We understand that there may be software and automation limitations to applying Seller's Choice to all Mid-C points, and we would offer up that it may be easier for BPA to implement the ability for NT customers to submit TSRs from all of the Mid-C points that are then referenced back to a single Designated Network Resource on OASIS.

### **Behind the Meter Resources**

In Section F.7, we recommend that BPA provide references to the Small Generation Interconnection and Large Generation Interconnection procedures. Otherwise, NT customers who rely solely on the NT Business Practice may be unaware of the standards and requirements that must be met in order to integrate a resource into their service territory.

### **Conclusion**

Again, the NT Customer Group appreciates that the proposed NT BP attempts to capture several of the products and services that were committed to in the TC-20 Settlement Agreement. We believe the

intent of BPA's draft proposal is sound and that it will meet the intended outcomes that were agreed upon in the TC-20 process with the inclusion of the modifications that are outlined in these comments.