

July 25th, 2024

BONNEVILLE POWER ADMINISTRATION  
905 NE 11<sup>TH</sup> AVENUE  
PORTLAND OR 97232

Submitted via email: [techforum@bpa.gov](mailto:techforum@bpa.gov)

### **Comments on July 10<sup>th</sup> NITS Workshop**

Seattle City Light (City Light) appreciates BPA's efforts to actively engage, facilitate workshops, and be responsive to customers regarding transmission needs. City Light would like to offer the following comments for BPA's consideration.

#### General Comments

In view of the broad expanse of customer expectations, City Light supports BPA extending the timeline for of the NITS Load and Resource Planning Workshop Series.

#### Problem Context

City Light agrees with BPA that it is not sustainable to treat significant load growth and organic load growth in the same manner for planning purposes or cost causation.

City Light suggests that providing NITS customers with an example of estimated costs involved for creating approximately 1000MW of transmission capacity on just one BPA path would be helpful context for customers.

City Light additionally suggest BPA consider providing NITS customers the context that being able to accommodate all significant load growth for NITS customers would be like embedding the costs of all the proposed projects from the 2019 through 2023 Cluster Study projects into only NITS rates. Providing the estimated NITS rate impact may be helpful context for customers. This would not need an exact accounting, an estimate showing the scale of difference is the suggestion.

#### Problem Statements

City Light recommends BPA differentiate between load growth scenarios to plan for local capacity and transmission capability. City Light suggests the following additional considerations:

- Interconnection Cost Threshold
- Network Upgrade Cost Threshold
- At Risk Stranded Asset Cost Impact on NITS Rates
- Bundling of long-term "Take or Pay" power contracts with interconnection agreements

City Light supports BPA establishing a criterion and limits for scenarios where load growth would be planned for solely through reliability studies that may result in a system reinforcement.

City Light recommends that transmission expansion needs be studied in a wholistic manner for both cost causation, least cost, and least regrets outcomes. This necessitates that known future NITS needs should be included in that wholistic process. City Light supports the participation of expanded NITS reserved capacity in the TSEP process.

City Light recommends BPA be open to exploration of possible interim measures to enable service for load growth with the caveat that those measures assure system reliability with BPA actively in control of curtailment mechanisms.

Draft Desired End State

City Light supports BPAs Draft Desired End State.

Draft Decision Criteria

City Light supports BPAs Draft Decision Criteria.

BPA Obligations

City Light thanks BPA for providing their legal analysis of NITS obligations.

Initial Industry Scan

City Light thanks BPA for its due diligence in collecting and presenting the information regarding threshold requirements for load across the industry. City Light encourages BPA to continue to scan and assess industry best practices regarding NITS service issues.

City Light thanks BPA for consideration of these comments.

Sincerely,

Michael Watkins  
Strategic Advisor  
Seattle City Light