Columbia River PUD Comments on NITS Workshop

From: Branden Staehely
Sent: Thursday, April 4, 2024 8:41 AM
To: Tech Forum <techforum@bpa.gov>
Subject: [EXTERNAL] Planning for NITS Loads & resources workshop 3/20/24

Please see CRPUD questions and comments below regarding the workshop held on 3/20/24

- What is BPA's process for evaluating the Possible New & Growing Loads tab within the LaRC?
- When does BPA decide to encumber LTF capacity available to meet forecasted growing loads (what are the criteria)?
    - For 70% or more likely?
    - For under 70% likely?
    - For federal resources?
    - For non-federal resources?
- If BPA deems that capacity is available for an NT forecasted load and resource, what mechanism does BPA use encumber the capacity to be sure it is still there when a customer is ready to use it?
    - Is there a difference between a forecasted federal and non-federal resource in this process?
    - Is there a difference between under and over 70% likely load?
- Is there a distinction when evaluating forecasted LTF capacity needed for a new load versus a returning load at an existing POD?
    - If it is different, how does Transmission make that determination?
    - What is considered a returning load vs. a new load?
    - Does BPA hold out capacity for a forecasted returning load?
        - If not why not?
        - If so, what is the mechanism for encumbering that LTF capacity, an FTSR, or other means?
        - Does it make a difference if the likelihood is under or over 70%?

- Does BPA generally encumber available LTF capacity for forecasted loads less than 70% likely?
    - Note: CRPUD is concerned that by the time a load is 70% likely, the transmission service will be needed imminently, e.g., within a year or two. This timeline seems incompatible with the need to go through a TSEP cycle and allow for transmission builds that could take 10-20 years if capacity is not available.
- Does BPA draw a distinction between federal and nonfederal resources when evaluating whether to encumber LTF capacity for forecasted resources?
- When is BPA statutorily required to hold out capacity on the transmission system to satisfy BPA contractual obligation to provide sufficient capacity for the transmission of federal power?
    - What is the trigger -- the contractual commitment, or the forecast?
    - Does the statutory obligation apply to Tier 1, Tier 2, and NR power purchases?
    - Does this provision hold BPA accountable for forecasted loads including New and Possible loads?

- What is the definition of a network flow gate?
- What is the definition of a 1:1 path?
- Can you tell us about any differences between evaluating and encumbering LTF capacity for 1-1 paths vs. across network flow gates?
    - Do these different kinds of paths impact an NT customer's ability to access LTF capacity?

- Please walk us through some example scenarios where there are competing NT LTF load and resources forecasts and Point-to-Point (PTP) TSRs and how it would work out in various scenarios when LTF capacity is limited/constrained:
    - Federal resource forecasts for NT
    - Federal TSRs for PTP
    - Non-federal resource forecasts for NT
    - Non-federal resources for PTP TSRs
    - Existing PODs for non-fed resources
    - New PODs for non-fed resources
    - Existing PODs for federal resources
    - New PODs for federal resources

Comment:

- We support loads added in the Possible New & Growing Loads tab to be studied to see what limitation might exist.
- Additional consideration when accepting increases in forecast:
    - Changes in local land use. An example: A city bringing in 250 acers of industrial land into their urban growth boundary.
- CRPUD cannot commit beyond 69% for a new load until there is confirmation that we have both transmission capacity and power available.

Thank you,

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