Umatilla Electric Cooperative
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June 17, 2025

Re: NITS Access to Transmission Capacity

Umatilla Electric Cooperative ("UEC") is a load serving entity located in eastern Oregon. UEC is an electric cooperative made up of residential, commercial, irrigation, and industrial loads, and is owned by the members it serves. UEC is a preference customer of the Bonneville Power Administration ("BPA") with a Network Integration Transmission ("NT") Service Agreement and Regional Dialogue Power Sales Agreement.

On May 20, BPA presented a conceptual proposal for different treatment of NT customers depending on the characteristics of the NT customer's load growth. BPA proposed different planning treatment based on a new dichotomy of "trended" and "non-trended" NT loads. BPA stated that it intends to define "trended" and "non-trended" load thresholds prior to continuing its ongoing Transmission Planning Reform process.

BPA stated that it would continue to meet its NT planning and load service obligation for "trended" load growth via its current system assessment process, and the costs associated with "trended" load growth would be socialized and embedded in the NT rate. Any "non-trended" load growth, however, would be processed and studied through BPA's commercial planning process ("TSEP") to determine the necessary transmission reinforcements to serve these larger NT loads.

At the May 20 workshop, BPA asserted that it is unable to meet its NT load service obligations in all instances. BPA then presented the following problem statement—"*how should BPA differentiate forecast treatment based on different load growth scenarios to plan for local capacity and transmission capability?*" This problem is predicated on the unsupported conclusion that distinguishing between different load growth rates is the singular cause behind BPA's inability to meet its entire NT load service obligation. BPA has provided no evidence nor has it articulated how different load growth scenarios are incompatible with its current NT planning process. For example, BPA's first alternative proposes that any forecasted loads greater than 13 MW during any year at a single facility must participate in TSEP. BPA has not provided any information to customers that demonstrates whether loads greater than 13 MW contribute to

its inability to adequately plan and reinforce its transmission system, or how loads above 13 MW are incompatible with its existing transmission planning process.

UEC assesses BPA's proposed alternatives through a straightforward lens—how do the proposed alternatives improve BPA's NT planning process? BPA has failed to show how the proposed alternatives expedite BPA's ability to plan for and reinforce its transmission system to serve NT load growth. More importantly, BPA provides no assurances that the alternatives will achieve the BPA Administrator's stated goal of constructing transmission reinforcements within 5-6 years. The proposed alternatives do not provide any more certainty or clarity regarding how NT load growth will be planned for and served. UEC must conclude that the proposed thresholds are simply arbitrary, do not improve BPA's ability to plan for and serve NT load growth, and the proposal to move these loads into TSEP will only slow BPA's ability to serve NT load growth and create additional uncertainty for NT customers (i.e., reoccurring TSEP pauses and delays).

BPA's proposed alternatives will also result in two negative and discriminatory outcomes that are ignored by BPA's problem statement. First, the alternatives allow BPA to decouple a portion of NT loads from its current NT load service obligation and apply the TSEP study and cost allocation principles to larger NT loads. This will also allow BPA to more easily allocate the costs for network reinforcements directly to some NT customers, but not others based on an arbitrary threshold. Second, the proposed alternatives will relieve BPA of its NT planning obligation within its system assessment process for a significant portion of NT loads, but not others. This will effectively treat certain NT customers the same as BPA treats its Point-to-Point customers in the assessment and planning for transmission service requests.

UEC proposes that BPA abandon further consideration of the proposed alternatives presented on May 20 and instead focus on alternatives that improve BPA's ability to plan for all NT load growth. To that end, UEC proposes the following for consideration:

1. **Identify improvements and efficiencies on the 'front end' of BPA's NT Planning process.**
    a. Better align the timing of an NT customer's 10-year load and resource ("LARC") forecasts with BPA's system assessment processes.
    b. Implement efficiencies to expedite BPA's NT planning and system assessment processes to more readily identify NT load growth on a more timely basis, including more timely close-out letters.
    c. Increase coordination and information sharing between BPA and customers in the identification of service needs of large loads in the LARC process.

2. **Articulate BPA's procedures and obligations for large loads that cannot be served in a timely manner.**
    a. Codify the procedures for how NT customers can serve loads that BPA cannot timely study and reinforce its system for firm load service. This could include the following:

i. Unlimited use of Network Non-Firm ("6-NN")
ii. Implement an NT Conditional Firm product
iii. Encourage the use of Behind-the-Meter Resources to reduce impact on BPA's transmission system
iv. Develop demand response programs specific to large NT loads

b. Identify and codify construction options that may be used in lieu of BPA transmission reinforcements, specifically consideration of customer-built projects.

Finally, any proposed alternative must continue to honor the existing firm encumbrances that have already been documented in NT customers' NT LARC closeout letters and 10-year load and resource forecasts. UEC views this as a fundamental and immutable baseline. Any changes to how BPA plans for NT customer load and resource forecasts must be implemented *only on a prospective basis*, and with an effective date to be determined.

Thank you,

Blake Weathers
Vice President of Power Supply