

March 19, 2025

BONNEVILLE POWER ADMINISTRATION
PO BOX 14428
PORTLAND OR 97293-4428

Submitted via BPA's Tech Forum (techforum@bpa.gov)

Comments Concerning March 7th, 2025, NITS Access to Transmission Capacity Alternatives Meeting

General Comments

Seattle City Light (City Light) recommends Bonneville Power Administration (BPA) honor the principles of Transmission Open Access and provide equal access to both Point-to-Point (PTP) and Network Integrated Transmission Service (NITS) customers. This should apply to new long-term requests and in the near-term horizon.

City Light believes that BPA offering PTP transmission that can be reduced or limited at renewal is neither Pro Forma nor meets the standard of reciprocal OATT service.

City Light suggests BPA considers the negative impact on transmission expansion and economic costs of offering inferior transmission products that are not Pro Forma.

City Light recommends BPA reconsider these alternatives from the perspective of both Western Resource Adequacy Program (WRAP) participation and Markets + participation.

Problem

City Light is painfully aware that BPA is currently unable to award/encumber long-term firm transmission service for many Point-to-Point (PTP) requests and Network Integration Transmission Service (NITS) requests/forecasts due to insufficient capacity on the existing transmission system. City Light encourages BPA to accelerate the Evolving Grid 1.0 and 2.0 projects as part of a collection of actions that benefit all BPA customers.

City Light recommends BPA be transparent with NITS customers regarding the availability of any CFS on any of BPA paths and flowgates.

City Light suggests BPA work with all customers transparently to address this problem. Solutions that only benefit one customer group while discriminating against other customer groups are divisive and not conducive to cooperatively addressing the region's transmission needs.

Options – Potential Near-Term Solutions

City Light believes Offering long-term firm capacity to NITS customers without commercial study is problematic from several perspectives. It grants long-term firm capacity in a method that is not available to all transmission customers. It places all BPA transmission customers at risk for both future costly curtailment and reliability impacts. It places BPA in regulatory and legal jeopardy.

City Light believes limiting renewal/rollover rights on new PTP service offers to accommodate NITS load growth and limiting existing CFS offers biannually as needed devalues BPA PTP transmission for both existing and new PTP rights on the BPA system. It puts PTP investments, resource development, and regional economic development at risk. This uncertainty increases costs for BPA and all customers.

City Light request BPA consider working with all transmission customers to provide NITS customers with access to 6-NN service in the same time frame, conditions, and requirements of PTP non-firm service. This would be equitable to all customer groups while maintaining incentives for all customers to support BPA's Evolving Grid projects and Transmission Planning Reform.

City Light opposes BPA limiting renewal rights on new PTP requests and reassess CFS offers to accommodate NITS customer load growth of any type. This is not a solution to the actual problem of BPA adequately planning to serve customer load while holding customers responsible for providing accurate ten-year load forecasts.

Options - Potential longer-term solutions

City Light recommends renewed evaluation of pro forma NITS elements such as planning redispatch, automatic devices, and NITS on OASIS. These elements require NITS service request to be studied for transmission expansion projects that provide duplicate capacity from declared resources and a minimum of one other BPA market hub location. The costs of building out this expanded flexible transmission capacity should be paid for by NITS customers under cost causation principles. The case could additionally be made that flexible capacity on the BPA transmission system is a benefit to all customers.

Seattle City Light thanks BPA for accepting and considering these comments concerning the February 11th, 2025, NITS Access to Transmission Capacity Alternatives Meeting.

Michael Watkins
Strategic Advisor
Seattle City Light

cc: Melanie Jackson, Bonneville Power Administration