



Figure 2: Import Available Transfer Capability (ATC in MW)

Yearly Firm ATC by Year (as of 2/23/2023)		
Path 8	<i>BPA Import</i>	Yearly Firm ATC
	2023	0
	2024	31
	2025	47
	<i>AVAT Import</i>	
	2023	196
	2024	162
	2025	162
	<i>BRDY Import</i>	
Path 18	2023	59
	2024	59
	2025	0
	<i>Jeff Import</i>	
	2023	72
	2024	72
Path 80	2025	72
	<i>YTP/Crossover Import</i>	
	2023	0
	2024	0
	2025	0

Even when there is available capacity on a path, NorthWestern has to compete with other transmission customers/users. The operation of NorthWestern's transmission system is subject to regulation by FERC in accordance with NorthWestern's FERC-jurisdictional Open Access Transmission Tariff ("OATT"). As a result, NorthWestern is required to provide transmission service to several types of customers on a first come first serve basis, which means that there is competition for ATC among many potential users of the transmission system. NorthWestern's transmission system serves four types of customers – retail, network, interconnection, and point to point ("PTP"). In addition to NorthWestern's retail customers, our FERC customers include electric cooperatives, federal marketing agencies (e.g. BPA and WAPA), and "choice" customers, who are all customers that do not receive their electric supply service from NorthWestern. This means that there are many non-NorthWestern entities within the NorthWestern BAA that are competing for available transmission, constraining transmission of power at critical peak times when customers need that power the most. Critically, this transmission competition is becoming much greater as in-state generation shuts down. As noted above, transmission capacity is awarded on a first-come, first-served basis. Of critical importance is that NorthWestern's own "native" load does not receive any preference over other eligible customers. In addition, there are rules governing what is a valid transmission service request or network service designation. For example, long-term network transmission service designation requests must be tied to legitimate network resources with valid contracts for service in place. Figure 3 displays the current firm transmission imports that are reserved on a long-term basis by parties. Many of these reservations are not for service to NorthWestern's customers. This transmission capacity