SCOUT CLEAN ENERGY
A Brookfield Renewable Company

Comments for Customer Workshop: TC-25 Tariff Proceeding

APRIL, 2023

Introduction

- Founded in 2016

- Portfolio numbers
  - Wind 3099 MW
  - Solar 4345 MW
  - Battery Energy Storage (BESS) 201 MW

- Active Scout Projects in BPA
  - 9 queue positions, 1480 MW
  - Solar, Wind, BESS
    - Almost Half the positions are for additional capacity

- Brookfield Ownership
  - Brookfield Renewable purchased Scout in 2022

Agenda

- Readiness Requirements
  - Study Deposits
  - Site Control
  - Commercial Readiness / Security Deposits
- Transition Plan
- Additional Items
  - Technical Requirements
  - Study Flexibility
  - Access to Interconnection Information

Study Deposits

- Scout supports Alternative #2: Tiered deposit, with cap, collected once
  - BPA shall apply the initial study deposit toward the costs of the system impact study, system impact re-study, and facilities study
  - BPA should not request additional fund for preliminary engineering and scoping for the plan of service unless the initial study deposit funds have been exhausted

Site Control

- Scout supports a modified version of Alternative #1:
  - Tiered approach
    - By System Impact Study (Cluster Study): 50% site exclusivity of the generating facility
    - By Facilities Study: 90% site control, + 50% site control of gen-tie
    - By LGIA Execution: 100% site control of the generating facility and gen-tie line
  - Interconnection Customer should be allowed to submit a deposit in lieu of Site Control, if regulatory limitations prohibit Interconnection Customer from obtaining Site Control

Readiness Requirements

- Scout supports Alternative #2: Tiered/Linear Readiness Deposit only

- Scout has not found that commercial readiness requirements, i.e., executed term sheet, shortlisted in an RFP process, are an achievable requirements to demonstrate commercial readiness prior to receiving interconnection costs

- Customer provides commercial readiness deposits which might become at-risk depending on when a project elect to withdraw and its impact on the remaining study projects

Transitional Plan

- Scout does not support either proposed Alternatives

- Scout puts forward the following proposal for consideration
  - Late-stage projects that have an executed Facilities Study agreement should be giving the opportunity to continue under the existing construct given the following:

    - Projects with no costs toward system upgrades (excluding interconnection facilities)

    - Project with costs toward system upgrades (excluding interconnection facilities) who are willing to fully securitized those upgrades based on their system impact study results

Transitional Plan

- All other Projects with an active queue position should be included in the Transitional Cluster process
  - BPA should determine if the Transitional Cluster process should be a single transitional cluster study, or more than one transitional cluster study
  - BPA should provide an estimated timeline for the Transitional Plan and the New Process
  - Readiness requirements should include a security deposit and demonstration of Site Control
  - Readiness requirements should not include commercial readiness demonstration

Additional Items

- Technical Requirements
  - BPA should consider when EMT models should be required
    - Detailed models required in some markets greatly lengthening study time and study cost

- Study Flexibility
  - Suggest allowing interconnection applications' injection capacity be NMC, not GIC
    - Facilities can be managed by modern Plant Controllers should be allowed to define capacity as net metered capacity (NMC)
    - Group Installed Capacity ("GIC") is not the most modern and efficient way to define injection capacity
  - Support co-located Facilities
    - Better cost, transmission utilization, site suitability and grid resilience characteristics

Additional Items

- Interconnection Information Access
  - Scout supports a combination of Alternatives 1, 2, and 3
    - Pre application scoping meeting
    - Develop tools to provide useful system information to inform customers on BPA's system capabilities before selecting a POI and/or submitting a Project, i.e., GI queue dashboard, POI Map, ATC Heat Map
    - Perform a multi-phase cluster study approach to account for unavoidable re-studies


Thank You! – Any Questions?