

May 10, 2023

Via Email: techforum@bpa.gov

Re: BrightNight Power comments to the Bonneville Power Administration's (BPA) TC-25 Pre-Proceeding Workshop on April 26-27, 2023

Hello,

Thanks to the BPA team for informing the participants on BPA's interconnection queue reform through multiple workshops and allowing the opportunity to provide comments.

BrightNight would like to submit the following comments on BPA's leanings on Queue Reform from the April 26 & 27th Workshop.

- BrightNight would like to provide the following comments on the forms of commercial readiness that are acceptable during the cluster process.
 - o BrightNight believes that non-financial forms should be included to demonstrate commercial readiness. In FERC NOPR and other FERC approved tariffs in the west, security deposits are in lieu of commercial readiness and not a form of commercial readiness itself. Different LSE's and other load entities reward projects with term sheets etc., which have been initially de-risked from the development and permitting side, even though there is some risk from the interconnection studies perspective. This can quickly be reduced from the Phase 1 studies, where the results could be used to further the commercial discussions with the Load counter parties. Not having non-financial form of commercial readiness would not provide much motivation for the interconnection customers to further the commercial scope of the project until later in the queue.
 - o Additionally, the cash deposits for commercial readiness should not be the sole milestones to enter the queue.
 - This is evident from the larger queues in PAC, Tri state etc. in the second cluster that the TO's opened. PSCo is one of the only TO in WECC which has the highest number of cluster cycles until date – 6. Once the TO has progressed through 4 clusters, they were seeing delays for the latest clusters, where the initial studies are delayed till 2025. This was due to larger queues and withdrawals in the initial cluster cycles. This led to another queue reform, second one in 4 years.
 - o Therefore, it is important to incentivize projects that have commercial success or are working towards it, we ask BPA include milestones below in-lieu:
 - Term-sheet/PPA
 - TSR confirmed or designation as Network Resource
- BrightNight would like to provide comments on the cost allocation methodology.
 - o From the discussion, BPA's assumption that only similar projects will be clustered could be short lived and with an influx of projects in any one cluster would end up creating too many micro clusters which would be impossible to study. With the extremely networked nature of the BPA and other TO's main grids and sub grids, it could be impossible to cluster projects in such a way that they have similar impacts on the network upgrades. One project in a cluster could trigger a big upgrade which would be allocated among the cluster, limiting the commercial viability of the entire cluster, projects that have done internal due diligence on sizing the project based on

network constraints would be penalized at the same rate as the project owners who were less informed on the sizing and the competition in the area.

- Quick fix to some of these might be incorporating of simple impact rules e.g.
 - If an upgrade is originating from the interconnecting bus the project will bear full responsibility for the upgrade, similar to rule MISO has.
- MISO has been one of the only cluster process that has been running relatively on time, they do still use DFAX criteria even with a 100GW+ queue, we would like to petition BPA to re-consider moving with the same criteria as MISO(<https://cdn.misoenergy.org/BPM%20015%20-%20Generation%20Interconnection49574.zip>)
- Additionally, if there are projects at the same POI with TSR confirmed or requesting NRIS, the constraints triggered could be different based on the path selected and the project impacts on these constraints could be very different as well.

Regards,
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