

March 30, 2023
Bonneville Power Administration
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Submitted via email: techforum@bpa.gov

Wpd comments on BPA TC-25 (queue reform) in response to information provided during March 15 & 16 Workshops.

Wpd looks forward to working with BPA as it considers reasonable and effective queue reform and appreciates having an opportunity to participate and comment.

- While wpd has found BPA's implementation of the "traditional" interconnection process to be more efficient than many other ISO/RTOs across the country, we recognize that with ever increasing renewable energy demand, the current interconnection process is not sustainable.
- Wpd acknowledges that the current process of submitting an interconnection request in order to assess the cost associated with the proposed MW injection, and subsequent studies based on a grid that hypothetically contains these MW injections, leads to a broken system of continual re-studies as developers withdrawal for various reasons.
- Wpd asks BPA to provide updated presentations five (5) days prior to Workshops so that customers may be prepared. This will require more time between Customer led Workshops and BPA led Workshops in order for BPA to incorporate customer feedback, where able.
- Readiness Milestones should more closely align with reasonable project development timelines than what we are seeing in other ISO/RTOs that have undergone queue reform. As an example, it is unreasonable to expect a developer to meet a Readiness Milestone of having a power sale agreement in place prior to having advanced interconnection studies or an executed LGIA. It is unreasonable to expect a developer to have all required land, water, and air permits for the Facility in advance of submitting an interconnection request.
- Wpd supports an Informational Interconnection Study that is separate from the Interconnection Study Process, with an aim to give developers enough information to decide to enter the interconnection study process without substantially incurring financial burdens or causing re-studies by having estimated costs ahead of time. Alternately, or additionally, BPA could provide increased informational support for preliminary injection studies provided by transmission engineering firms contracted by the developer.

- Wpd asks BPA to strongly consider the implications of substantially higher deposits and, potentially, high withdrawal penalties. These create a financial risk that is too high for small, to mid-sized, developers seeking only to understand necessary costs associated with proposed development. This can lead to increased consolidation and thus reduced competition in the industry. This risk cost may eventually be borne by the rate payer.
- Wpd supports study results that indicate estimated interconnection costs at multiple MW injection amounts, with allowances for MW reductions at each Decision Point (study stage), with the goal of eliminating incentive for developers to submit multiple interconnection requests.
- Wpd supports changes to the tariff to increase flexibility for co-locating multiple generation technologies behind the POI. As an example, allowances for the developer to adjust the MW contributions from wind/solar/battery to meet market demand, if the total injection amount is at/under the studied level - without triggering a Material Modification.
- Wpd supports changes to the tariff to allow increases to Generating Facility Capacity (nameplate capacity) as long as the total injection amount is at/under the studied level.
- With increased study deposit amounts, wpd supports increased transparency of their use. Periodic reporting of amounts used during the study process should come along side this increased financial burden.
- Wpd suggests that BPA take a forward thinking look at “hot zones” of likely development (both in load and generation) in order to consider socializing additional upgrades to facilitate future growth above and beyond those required to facilitate those MWs in the queue.
- Wpd supports a transition process that allows existing interconnection applicants to a lenient opt-in process toward the new system or to be Grandfathered and continue to be processed under current rules.

Sincerely,



Micah Engum

