



Northwest Requirements Utilities

March 30, 2023

Submitted via email to techforum@bpa.gov

Bonneville Power Administration

Comments on TC-25 Generator Interconnection (GI) Reform

Northwest Requirements Utilities (NRU) appreciates BPA's efforts to engage with customers on changes to BPA's Large Generator Interconnection Procedure (LGIP) through the TC-25 Tariff proceeding. NRU represents the interests of its 57 member utilities located in 7 states throughout the region, all of which are BPA Load Following and Network Transmission (NT) customers, and that together represent roughly 30% of BPA's total preference load.

NRU believes that exploring a "first ready, first served" approach to interconnection is reasonable, but encourage BPA to consider investments that have already been made by those currently in the queue and how those with completed studies will be treated under BPA's proposed approach.

Study Deposits

NRU agrees with the BPA staff proposal for a formulated tiered deposit, which should both ensure cost recovery and discourage speculative requests that are withdrawn later, exacerbating the current issues with queue management.

Network Cost Allocation

Regardless of which alternative is recommended, NRU would like to see a firm commitment from BPA to ensuring that cost allocation flows in accordance with the principle of cost causation. Further, NRU agrees with Seattle City Light's recommendation that BPA consider an additional step in their project review process, by considering proposed projects and upgrades from a system-wide perspective, ensuring that the most efficient and least-cost alternatives are included in consideration.

Sincerely,

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Northwest Requirement Utilities