

Reform for Large Generator Interconnection Queue Frequently Asked Questions Updated February 2024

On Jan. 26 2024, BPA issued the [Administrator's Final Record of Decision](#) in the TC-25 Tariff Proceeding, which adopts reforms to the large generator interconnection procedures (LGIP) in BPA's open access transmission tariff as agreed to in the [TC-25 Settlement Agreement](#). This document answers basic questions about BPA's reforms and the process for adopting them.

BPA will update this document as additional questions come up or new information becomes available.

1. Why did BPA revise its large generator interconnection procedures?

The reforms are intended to help BPA more efficiently process the Large Generator Interconnection queue. The volume of interconnection requests has increased dramatically over the past five years, leading to study delays and backlogs. Study delays are further exacerbated by withdrawals from the queue, which trigger additional restudies and delays in processing requests further down in the queue. BPA is proposing reforms to help more efficiently allocate resources to manage the study process, address the backlog of requests and mitigate study delays.

Additional information is available on the [TC-25 Tariff Proceeding page](#).

2. What tariff revisions were adopted in the TC-25 Tariff Proceeding?

BPA revised the LGIP in Attachment L to its tariff to establish a two-phase first-ready, first served cluster study process. BPA also added a new attachment, Attachment R, to the tariff that establishes a process for transitioning from the current LGIP to the new procedures. Additional commitments to implement business practices and conduct workshops on specific topics were included in the TC-25 Settlement Agreement.

BPA's revised tariff, incorporating revisions to the LGIP and the new Attachment R, and the TC-25 Settlement Agreement are available on the [TC-25 Tariff Proceeding page](#).

3. What is the effective date of the new tariff revisions?

The effective date is June 30, 2024. The current tariff provisions will remain in effect through June 29, 2024.

4. How will BPA transition large generator interconnection requests that are currently in BPA's queue from the current tariff to the new procedures?

BPA's Transition Process (in the new Attachment R) applies to any valid large generator interconnection request submitted prior to 15 calendar days after publication of the Federal Register Notice for the TC-25 Tariff Proceeding ("Transition Close Date"). This Transition Close Date was Nov. 22, 2023. Only interconnection requests submitted to BPA's queue by the Transition Close Date are eligible to apply to enter the Transition Process beginning on June 30, 2024.

Under this Transition Process, customers may apply for interconnection requests to continue to be processed in the current serial study process or to be included in a Transition Cluster Study. As part of the application to the Transition Process, customers will have to meet the requirements specified in the proposed tariff, including requirements for site control and commercial readiness.



See [Attachment R](#) in BPA's Open Access Transmission Tariff for more details about the Transition Process.

5. When can a customer submit an application to include an interconnection request in the Transition Process?

If the interconnection request is both submitted into BPA's queue by Nov. 22, 2023, and is still valid as of June 30, 2024, a customer can apply to include an interconnection request in the Transition Process beginning on June 30, 2024.

From June 30, 2024 to Sept. 28, 2024, BPA will open a Transition Request Window for customers to submit applications for the Transition Process.

6. If a customer's interconnection request has completed all the Interconnection studies by June 30, 2024, does that request have to participate in the Transition Process?

If by June 30, 2024, all Interconnection studies (Feasibility, System Impact, Facility) have been completed, the interconnection request may bypass the Transition Process and continue to later stages in the interconnection process (Environmental Study Agreement, Engineering & Procurement, and Large Generator Interconnection Agreement).

Based on our current understanding of the queue and average study timelines, any interconnection request that has not already executed a Facilities Study Agreement (FAS) with BPA will be highly unlikely to complete a Facilities Study by June 30, 2024.

7. What if a customer receives notice of a study delay and the estimated date for completion of the study is after June 30, 2024?

If the estimated completion date is delayed beyond June 30, 2024, that means we will not complete it under the current LGIP, effective until June 29, 2024, and the customer will need to assess and make decisions on the eligibility of the interconnection request to be processed in the Transition Process.

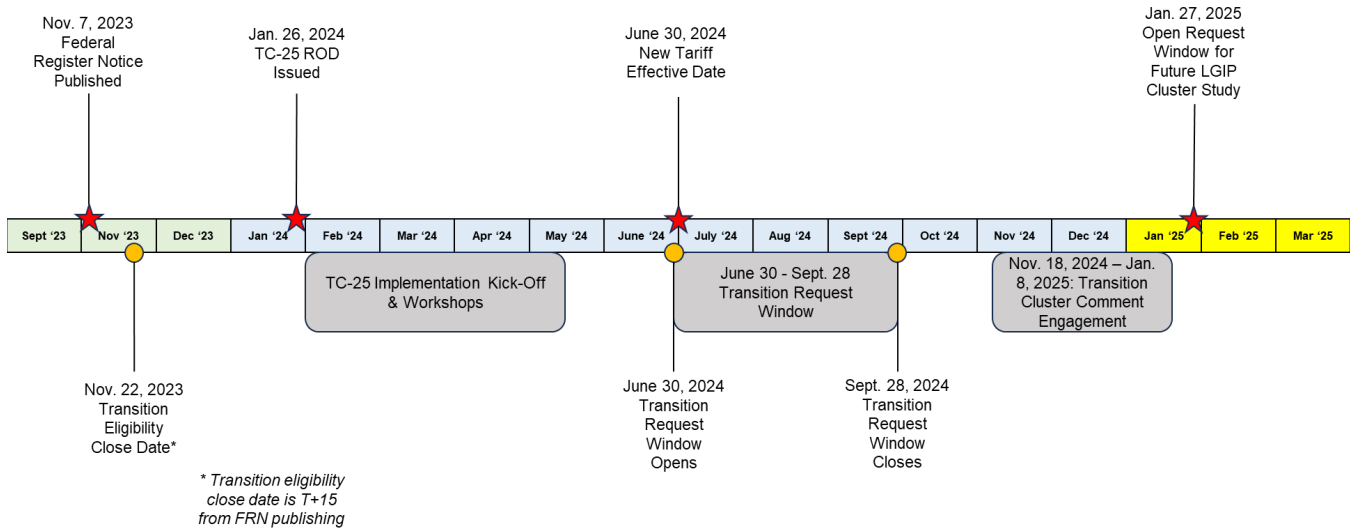
BPA continues to use our existing process for issuing delay notices. We are giving the best estimated dates based on our current resource availability and our understanding of the interconnection queue at that time.

8. What will happen to an interconnection request submitted after Nov. 22, 2023 (Transition Close Date)?

Due to current workload and backlog of interconnection requests, any interconnection request received after the Transition Close Date is highly unlikely to make meaningful progress in the current interconnection process before the tariff revisions take effect on June 30, 2024. Under the revised tariff, an interconnection request submitted after the Transition Close Date is invalid and will be withdrawn from the queue after June 30, 2024. Because new interconnection requests submitted after the Transition Close Date are unlikely to make meaningfully progress under either BPA's current tariff before June 30, 2024 and will be withdrawn after June 30, 2024, BPA urges customers not to submit new interconnection requests after that date. Responding to and processing any such requests will be a low priority for BPA staff. Under the revised tariff, customers will have the opportunity to submit new interconnection requests during the next cluster study request window, which BPA anticipates opening in January 2025.

9. When will BPA discuss implementation of the new tariff?

BPA will host a customer meeting on Feb. 9 to provide an update on generator interconnection queue reforms. At the meeting, BPA will share a schedule for customer engagement, including development of business practices and other related implementation efforts. Those materials are available on BPA's [Generator Interconnection Queue Reform page](#).



Archived Questions

1. What is the process and schedule for the TC-25 Tariff Proceeding?

In TC-25 Tariff Proceeding, BPA staff will formally propose that BPA's Administrator adopt the TC-25 Settlement Agreement and the tariff revisions. The TC-25 near-term schedule is posted on BPA's [TC-25 Tariff Proceeding page](#).

Key dates include:

Federal Register Notice initiating the TC-25 Tariff Proceeding	Nov. 7, 2023
BPA files Initial Proposal	Nov. 14, 2023
Hearing Officer's Recommended Decision	Dec. 15, 2023
Final Record of Decision	Jan. 26, 2024
Effective date of TC-25 tariff	June 30, 2024

Once the Federal Register Notice for the TC-25 Tariff Proceeding is published (Nov. 7), the procedural rules for the proceeding will prohibit all BPA employees and contractors from discussing issues related to the proposed tariff revisions outside of the official record for the proceeding or without providing public notice. This prohibition on "ex parte communications" will last until the Administrator makes the final decision in the proceeding on Jan. 26, 2024.

During this time, BPA will not be able to discuss the proposed tariff or impacts of the proposed tariff reforms on customer requests. BPA understands customers may have questions about the proposed reforms during this time but asks that you remain patient. BPA will have more information to share once the TC-25 Tariff Proceeding is over.