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Submitted via email: [techforum@bpa.gov](mailto:techforum@bpa.gov)

### **Comments on TC-25 Generator Interconnection (GI) Queue Reform March Workshop**

Seattle City Light (City Light) appreciates BPA's efforts to engage with customers on impactful changes to BPA Large Generator Interconnection Procedure (LGIP) through its TC-25 GI Tariff Reform proceeding. City Light understands the monumental task for BPA staff to address the large number of generator interconnection requests. We applaud BPA's willingness to add an additional June customer workshop. City Light would like to offer the following comments regarding the March 15-16 BPA GI Reform workshop topics.

#### First-Ready/First-Served (FR/FS) Cluster Study Process

City Light agrees with the BPA view that there is a need to change from a serial study method to a FR/FS cluster study process to address the BPA generator interconnection queue.

City Light recommends BPA pursue Alternative #3: FR/FS with FERC approved Tariff filings. This will allow BPA to select the best, FERC approved processes to incorporate with necessary BPA deviations from the FERC NOPR. Additionally City Light suggests that BPA consider a FR/FS cluster study process that has three distinct phases with each phase having its own deposit and milestone requirements. This would allow BPA to complete initial feasibility phase cluster studies in a shorter time frame than the current process.

City Light suggests BPA consider offering phase 1 feasibility cluster studies on cycle that has a two-week submission request window with a 45-day feasibility study completion. This would provide value to BPA customers by providing requesters with an initial assessment of feasibility and costs. This information would facilitate the requester's ability to meet milestones and deposit requirements of later phases of the process.

#### Readiness Requirements – Study Deposits

City Light encourages BPA to view Study Deposits as a mechanism of cost causation where the deposit covers the cost of addressing requests in full and timely manner. Intentionally making study deposits large as to discourage the number of requests only increases the cost of acquiring new carbon free resources for BPA customers.

City Light recommends BPA pursue Alternative #3: Linear deposits with a cap with a lower per MW amount of \$500 for the feasibility phase study deposit. For an 80MW generator interconnection requests, this would mean a total feasibility study deposit of \$70,000. City Light

recommends BPA use the proposed \$1000 per MW amount for the System Impact and Facilities Study phases.

#### Readiness Requirements – Site Control

City Light agrees with BPA that requests that are withdrawn that lead to multiple studies and delays do cause uncertainty and increase costs for customers. City Light recommends BPA continue to allow requestors to submit an initial deposit in lieu of Site Control at the Systems Impact study phase using a deposit amount methodology that is one-half of the FERC pro forma amounts. This option provides flexibility for requestors and reduced uncertainty for BPA.

#### Readiness Requirements – Commercial Readiness

City Light recommends BPA require a demonstration of Commercial Readiness or deposit at the System Impact and Facility Study phases of a cluster process.

City Light additionally recommends that BPA pursue Alternative #3: Tiered/Linear Readiness Deposit and other Commercial Readiness demonstrations with the following changes. City Light suggests that requiring Commercial Readiness at the Feasibility Study phase will have an unnecessary chilling effect on the resource development of non-federal resources that will be vital to meeting regional resource adequacy in the long term. BPA should not require Commercial Readiness at the Feasibility Study phase.

City Light further suggests that BPA reconsider the deposit methodology for Commercial Readiness in the System Impact and Facility Study phase of the cluster view of the actual financial risk to BPA and customers. Specifically, subjecting requestors to a higher deposit for a Re-study that is not caused by their actions appears unnecessary. City Light requests more stakeholder discussions concerning the need for, the amount of, and the refundability of a Commercial Readiness deposit prior to BPA presenting a staff leaning on this topic.

#### Study Financials

City Light supports BPA's intent to recover all costs associated with a FR/FS Cluster Study from requestors.

City Light recommends BPA pursue Alternative #2 which assigns 50% of cost on a pro rata MW cost and 50% of the costs allocated by the number of participants in the FR/FS Cluster Study. This option retains some proportionality to project size and impact while ensuring projects share in the added financial burden for complexity of multiple participants.

#### Network Costs Allocation

City Light supports BPA's intent to recover all costs associated with network upgrades identified in FR/FS Cluster Study.

City Light recommends BPA pursue Alternative #3 Allocating Network upgrade build costs by different factors depending on the build. City Light believes this is the best method for BPA to

fully identify and address the network upgrade costs specifically associated with generator interconnection.

#### Shared Network Upgrades

City Light supports BPA's intent to address the issue of additional interconnection capacity from a previous cluster process.

City Light recommends BPA pursue Alternative #2 using a 20% threshold distribution to determine whether a later request benefits sufficiently enough from an upgrade that has an in-service date within the past 5 years. City Light additionally supports the concept that the amount of contribution will correlate to the level of use by the contributing interconnection customer.

#### Transition Process

City Light supports the BPA objective advancing existing requests to connect generation to meet customer needs efficiently and responsively. City Light additionally supports the transition process moving quickly to not delay new requests.

City Light recommends BPA is particularly responsive to customer comments regarding the Transition Process. City Light suggests that BPA adopt Alternative #2 FR/FS Hybrid Transitional Process adjusted for customer concerns. This option provides the ability for stakeholders to have the most input on the Transition Process.

#### Technical Study Requirements – Interconnection Information

City Light suggests that BPA reconsider the objective of replacing the existing Feasibility Study with publicly posted information. This option is unlikely to meet the needs of requesting customers or improve the quality of requests.

City Light recommends BPA adopt Alternative #3 to perform a multi-phased cluster study approach, with the first phase of the cluster study providing analysis similar to the existing Feasibility Study. City Light additionally recommends that the phase 1 Cluster Feasibility Study be a cycle that has a two-week submission request window with a 45-day feasibility study completion. Requesting customers would receive value by receiving initial feasibility and cost information in a shorter time frame than is currently being provided. BPA would have value in an efficient process that let requesting customers self-identify their ability to meet the requirements of a phase 2 Cluster System Impact Study.

#### Technical Study Requirements – Affected Systems Study Process

City Light supports BPA having a standardized Affected Systems Study Process.

City Light recommends BPA adopt Alternative #1 to accept proposed FERC NOPR language. City Light suggests that this option provides the most value to customers.

#### Technical Study Requirements – Modeling Requirements

City Light supports the BPA objective that all interconnection customers provide models needed for accurate interconnection studies, including models for non-synchronous generating facilities.

City Light recommends BPA adopt Alternative #2 to update the Attachment A to Appendix 1 of the LGIP. This option provides BPA the option to continually update BPA's Technical Requirements without the need to update the Tariff.

Study Flexibility

City Light suggests BPA consider allowing the flexibility of customers to add additional capacity to an interconnection request with as long as all requirements and deposits are met. City Light recommends providing this flexibility would warrant a re-study fee coving all costs associated with the re-study.

City Light appreciates the ability to provide these comments, as well as BPA's continuing efforts and consideration.

Sincerely,

Michael Watkins  
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Seattle City Light