



June 2, 2023

Gallatin Power Partners, LLC Comments on the Proposed Generator Interconnection Queue Reforms Presented at the TC-25 May Workshop

Submitted via email to techforum@bpa.gov

Gallatin Power Partners, LLC (“Gallatin”) appreciates the opportunity to engage with Bonneville Power Administration (“BPA”) and submit comments concerning the TC-25 Tariff Proceeding Workshop held on May 25, 2023.

Gallatin appreciates BPA clarifying its proposed transition dates. Gallatin recommends tying the Transition Close Date to the proposed effective date of the tariff, which would be the date of the Final Record of Decision, currently estimated to be April 2024. Gallatin reiterates that the Transition Process, as presently proposed, would disadvantage projects currently in the System Impact Study Phase as described in the Gallatin comments submitted May 10, 2023. By tying the Transition Close Date to the Final Record of Decision, BPA will have additional time to complete the System Impact Studies currently in process, avoiding wasting BPA employees’ time and monetary investments already expended on projects that would be in the Facilities Study Phase had current tariff timelines been achieved. Gallatin also recommends offering projects with little to no network upgrades the ability to participate in the Transition Process to help expedite projects through the queue, which is favorable to both BPA and the projects.

BPA should reconsider the proposed commercial readiness demonstration requirement for entering the Transition Process as it needs to be more consistent and connected with industry accepted project development and contracting timelines and practices. In addition, the proposed Transition Close Date, which is potentially very near term, creates a potentially unachievable timeline for many late-stage projects forcing them to be withdrawn from the interconnection queue and harshly penalized due to a new and previously unknown requirement.



Gallatin appreciates BPA's consideration of these comments and the recommendations contained herein. Please do not hesitate to reach out if we can be of any assistances in this process.

Respectfully Submitted,

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