



May 24, 2023

Via Email: Tech Forum

To: Bonneville Power Administration

From: PNGC Power

RE: PNGC Comments on TC-25 Generator Interconnection Reform

PNGC submits these comments regarding recent Generator Interconnection (GI) Reform workshops. Following up on our comments from May 12, 2023, and BPAs recent discussion on May 18, 2023. The conversation to date has been beneficial for us to better understand the issues facing BPA and customers.

First, we think a slight pause or extension of these workshop discussions in making any final decisions is warranted. We are still trying to ensure we think through the potential course of action and the ramifications that will result. Minimizing disruptions to the market is important to keep in the forefront of our minds here. Development of resources and transmission assets is important. We cannot change the rules of the game and sacrifice entity's ability to develop and procure the resources they need economically. Cost pressures are affecting us across the board. We cannot increase risk that result in further disruptions to a market that is already going through a costly transformation.

We understand one of the most pressing issues facing us all is staffing ability and time efficiency. A pause in the TSEP process to allow for a catch up in processing the other queues seems reasonable. It allows BPA to efficiently manage staff bandwidth and time on where it is most needed while they work through the challenging hiring process. As we work through and clear current GI and LLIR queues we will learn better how flows on the transmission system will look and further identify areas for upgrades. Certain areas have already been identified and work to upgrade them should be started as soon as possible. As new resources and loads get through their respective queues and within models we will better understand where further capacity upgrades are needed to manage constraints on what the system will be.

It would be helpful for BPA to host another discussion around the benefits of a pause as stated above. Along with input from BPA on any benefit in alternating GI and TSEP cluster study years.

We must not forget the investments entities have made today under the current OATT as we make changes to this process. We have heard that during these discussions and it resonates. Costs ultimately get passed down to LSEs. This is the base of our comments. Certainty allows for a more economic and efficient process to get the needed development on the resources, loads, and transmission front we need today.

We look forward to continued dialogue and engagement throughout this process.

PNGC Team