

May 10, 2023

BONNEVILLE POWER ADMINISTRATION
905 NE 11TH AVENUE
PORTLAND OR 97232

Submitted via email: techforum@bpa.gov

Comments on TC-25 Generator Interconnection (GI) Queue Reform April 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 believe BPA has made good progress on reforming some aspects of Generator Interconnection. City Light would like to offer the following comments regarding the April 26-27 BPA GI Reform workshop topics.

Goal and Principles

City Light supports BPA's initial goals in implementing a First-Ready/First-Served cluster study process:

1. Increase the speed of interconnection queue processing.
2. Address queue backlogs and study delays.

City Light encourages BPA to take a step back to review the staff proposal and timeline from initial request until a requester receives a completed Facility Interconnection study in view of these goals and the following BPA TC-25 Tariff Principles:

- Prevent significant harm or provide significant benefit to BPA's mission or the region, including BPA's customers and stakeholders; or
- Align with industry best practice when the FERC pro forma tariff is lagging behind industry best practice, including instances of BPA setting the industry best practice.

City Light suggests that BPA may need additional resources to address interconnection reform in a manner consistent with these goals and principles. We encourage BPA to consider if more resources are needed across all transmission study/design processes and project management to serve customer needs. BPA should consider creatively addressing this need in the short term while planning additional FTE's and resources in the next Integrated Program Review process. As a BPA customer, City Light sees high value in BPA expanding its abilities and resources to efficiently address this growing long-term need.

First-Ready/First-Served Cluster Study Process

City Light agrees that there is value in identifying scalable plans where possible and using readiness "priority" to fit into expansion levels allowing projects to move forward and be completed.

City Light asks BPA to provide more details concerning the staff proposal to use “time stamps of demonstrated readiness requirements” as a tie breaker. City Light sees the risk of this “time stamp” process being an administrative burden and not appearing transparent or equitable. More details regarding how BPA intends to make this process transparent are needed for customers to adequately comment on this proposal.

Site Control

City Light supports the BPA staff proposal to require Site Control at the application to the Phase 1 of the Cluster Study process with no deposit in lieu of.

Commercial Readiness

City Light supports not requiring commercial readiness at the application to Phase 1 of the cluster study process. City Light additionally supports the BPA staff proposal to require Commercial Readiness or deposit in lieu of at entrance to Phase 2 cluster study.

Study Financials Cost Allocation

City Light suggests BPA reconsider the FERC approved method of allocating study costs assigning 50% of the costs on a pro rata MW cost and 50% of the costs allocated by the number of participants in the FR/FS Cluster Study. City Light believes having a “number of participants” cost component provides an incentive for entities to reduce the amount of redundant requests. It additionally provides a countervailing incentive against entities making multiple small requests representing a larger project to maximize their advantage in a proposed readiness priority queue.

Network Cost Allocation

City Light supports the BPA staff proposal to allocate Network costs based on those who use station equipment with transmission network costs allocated on proportionate capacity. City Light believes this aligns with cost causation and is consistent with industry norms.

Interconnection Information Access

City Light supports the BPA staff proposal to perform a phased cluster study approach and provide a publicly available interconnection capacity heat map. City Light suggests that a publicly available heat map showing the long-term available transfer capability of the AFC/ATC Less Pending Queued Request Inventory would additionally add value for customers and generation interconnection requesters.

Modeling Requirements

City Light supports the BPA staff proposal to remove Attachment A to Appendix 1 of BPA’s LGIP and provide specific model requirements in BPA’s Technical Requirements for Interconnection. City Light encourages BPA to prioritize developing the resources and abilities necessary to meet or exceed the recent NERC guidelines concerning inverter-based resources and EMT modeling. City Light supports BPA applying detailed EMT modeling and screening requirements in phase 2 of the proposed cluster study process.

Study Flexibility

City Light is encouraged by BPA's staff leaning to support the addition of co-located resource definition and the addition of the extra flexibility in the Material Modification evaluation procedures. City Light requests more details concerning both topics to allow for evaluation of the proposal.

Transition Process

City Light supports the BPA objectives for the transition process:

1. Advancing existing requests to connect generation in order to meet customer needs efficiently, and
2. Moving quickly to new reforms that could make the LGIP more efficient overall.

City Light recommends BPA consider both objectives in view of the planned Transitional Serial Facility Study Process. BPA staff has expressed that BPA can only support completing up to 15 total interconnection facility studies per year. With 40 requests currently waiting for a facility study and the likelihood of 5 or more entities completing a facility study agreement prior to the transition deadline, the appearance is that it will be 3 full years before the existing requests in this later stage of development are completed. City Light believes this is not reflective of the BPA Objectives for the transition process or the goals and principles of the GI Reform process.

City Light requests BPA consider creative options for more quickly addressing request at the facility study phase. City Light suggest BPA consider the following options:

1. Consider what resources BPA could acquire on a temporary basis to complete the Transitional Serial Facility Study Process in 1 year and to address those projects completing the Transitional Cluster Study Process within the following year.
2. Evaluate locations where facility interconnections can be consolidated to one facility.
3. Consider allowing design/build options in partnership with resource developers that meet or exceed BPA engineering standards for interconnection facilities.
4. Consider development internally or externally of a standard BPA interconnection modular substation design for 100MVA or less, 300MVA or less, and 500MVA or less for both 230kV and 500kV interconnection requests. This could apply to either generator interconnection or line/load interconnection requests.

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

Sincerely,

Michael Watkins
Strategic Advisor
Seattle City Light