

June 2, 2023

BONNEVILLE POWER ADMINISTRATION
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PORTLAND OR 97232

Submitted via email: techforum@bpa.gov

Comments on May 25th GI Reform TC-25 Workshop

Seattle City Light (City Light) appreciates BPA's efforts actively engage and be responsive to comments regarding BPA Generator Interconnection (GI) reform. City Light would like to offer the following comments regarding the May 25th GI Reform TC-25 workshop.

General Process Comments

City Light requests BPA provide time for a more in-depth discussion of how BPA's proposal will impact staff workload, including how BPA is ensuring that it will not impact other related processes. City Light additionally requests BPA consider the value of additional customer engagement to increase the amount of understanding and alignment prior to the posting of the DRAFT TC-25 Tariff.

City Light suggests that the need to apply additional resources to the GI Reform process is immediate and urgent. We propose that BPA should exercise budgetary discretion on this urgent need prior to the next Integrated Program Review (IPR). City Light believes this is a critical component of the GI Reform implementation being a successful process. This would add great value to BPA customers' ability to manage load growth and carbon requirements in a least cost way.

Commercial Readiness Requirements

City Light supports the updated BPA Commercial Readiness Requirements proposed and believes BPA has provided adequate in-lieu-of deposit options for the phase II and phase III/FAS stages of the process. City Light suggests that BPA consider resource developer feedback regarding the time necessary to secure deposit funds and credit instruments within the deposit time requirements. And City Light recommends BPA work with public power entities to ensure that the readiness requirements fit within their planning processes so that projects serving public power needs are not disadvantaged for not going through an IRP.

Scalable Plans (Sub-clusters) Clarification

City Light appreciates BPA giving an example and details on implementing scalable plans with a readiness queue of cluster participants. City Light suggests BPA consider how to be transparent applying the planned readiness time stamp. Without the clear ability to consistently implement time stamping across all customers, BPA may need to retain the current queueing order for the purposes of defining scalable plans.

Interests on Deposits

City Light thanks BPA for being aware of the impacts of cost shifts between transmission customer groups. City Light requests BPA explore the possibility of establishing an escrow account that would directly accrue interests for those customers making deposits.

Study Financials

City Light applauds BPA being responsive to customer comments to allocate 50% of the study costs on the number participating and the remaining 50% of the study costs based on a per MW basis.

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