



# **Generation Interconnection (Attachment L and N)**

# 1. What is the *pro forma*?

**BPA's LGIP and SGIP and the FERC *pro forma*:** Attachments L and N to the tariff

- Based on FERC Orders 2003 and 2006
- Structure and content language of procedures *pro forma* (but many non-process deviations caused by statutory and jurisdictional factors)
- NEPA obligation causes a significant deviation from *pro forma*
- Multiple FERC Orders amend the *pro forma* without publishing a complete conformed text

# 3. What are we proposing?

- Deviations for statutory reasons (including many in current Tariff as well as new ones needed for new *pro forma* language being integrated)
- New *pro forma* language that hasn't been formally published (including Order 845)
- Best practice deviations derived from many jurisdictional utilities (MISO, CAISO, WAPA, Tri-State)

# Proposed ‘Best Practices’ Deviations

Intended outcome	Purpose	Language in:	Sections impacted	Overall summary	Best practices
<b>First ready/First build</b>	Encourages more rapid development of new generation and greater equity	LGIP, SGIP. Possible in IAs	Those discussing queue priority and cost allocation	Requires clear methodology and language to allow progress out of queue order with no discriminatory bias.	Found in Interconnection procedures of many FERC-jurisdictional utilities
<b>Pro rata cost sharing</b>	Eliminates funding roadblock for large capital interconnection facilities and upgrades	LGIP, SGIP. Possible in IAs	Those discussing queue priority and cost allocation	Uses MW generating capacity to spread major costs more equitably. Will include a ‘latecomer’ provision	Found in Interconnection procedures of many FERC-jurisdictional utilities
<b>Strengthen Milestones language in NEPA section</b>	Helps manage project progress towards construction preventing requests ‘sitting’ inactively.	Single sections in L and SGIP	Affects compliance with ‘tendering’ requirements for IAs	Addresses a procedural loophole created inadvertently by the existing BPA NEPA deviation and <i>pro forma</i> sections elsewhere.	

# Generation Interconnection (Attachment L and N) Tariff Proposal Summary

<p>1. What is the <i>pro forma</i>?</p>	<p>Attachments L and N to the Tariff which are based on FERC Orders 2003 and 2006</p>
<p>2. What did we hear?</p>	<p>TBD</p>
<p>3. What are we proposing?</p>	<ul style="list-style-type: none"> <li>• First ready/first build – Requires clear methodology and language to allow progress out of queue order with no discriminatory bias.</li> <li>• Pro rata cost sharing – Uses MW generating capacity to spread major costs more equitably. Will include a ‘latecomer’ provision</li> <li>• Milestone NEPA language – Addresses a procedural loophole created inadvertently by the existing BPA NEPA deviation and <i>pro forma</i> sections elsewhere.</li> </ul>
<p>4. If not proposing <i>pro forma</i>, then which TC-20 tariff principles apply?</p>	<p>Align with industry best practice when the FERC <i>pro forma</i> tariff is lagging behind industry best practice, including instances of BPA setting the industry best practice.</p>
<p>5. Why are we proposing this position?</p>	<p>TBD</p>
<p>6. What are the change impacts?</p>	<p>TBD</p>
<p>7. Is there a rate case impact?</p>	<p>TBD</p>

# GI TC-20 Workshop Timeline



Develop proposed tariff language

  
 June 26<sup>th</sup>  
 Customer Workshop  
 Scope of tariff changes presented at Customer Workshop

  
 July 23<sup>rd</sup>  
 Customer Workshop

  
 Aug 21<sup>st</sup>  
 Customer Workshop  
 LGIP, SGIP, LGIA & SGIA redlines posted changes presented

Customers provide feedback on tariff changes

  
 Sept 15<sup>th</sup>  
 LGIP, SGIP, LGIA & SGIA proposal posted