

## **Cordelio Power's Comments on BP/TC-26 Workshop of August 27 and 28, 2024**

### **Generator Interconnection Withdrawal Penalties**

Cordelio submits the following comments in response to the BP/TC-26 August workshops. Cordelio appreciates this opportunity to share feedback.

### **Generator Interconnection Withdrawal Penalties**

#### ***Calculation of the Penalty Amount***

Cordelio supports Alternative 3, as laid out in slide 145 of the August 27/28 BP/TC-26 workshop. Cordelio believes beginning penalties after Phase One Study has commenced, but before any Phase One Re-studies have commenced will encourage developers to submit projects that have achieved an appropriate level of development.

#### ***Exemptions to the Penalty.***

Cordelio supports the following exemptions:

- The withdrawal does not have a material impact on the cost or timing of any Interconnection Requests in the same Cluster.
- The most recent Cluster Study or Cluster Re-Study Report identifies Network Upgrade costs assigned to the Interconnection Request that have increased by more than 25% compared to costs identified in the preceding Cluster Study Report or Cluster Re-Study Report.
- The Interconnection Facilities Study Report identifies Network Upgrade costs assigned to the Interconnection Request that have increased by more than 100% compared to costs identified in the preceding Cluster Study Report or Cluster Re-Study Report.

Cordelio believes this approach will protect developers from the harm created by dropouts while protecting Interconnection Customers from steep withdrawal penalties in circumstances where costs have increased significantly.

#### ***Funds Collected Through Withdrawal Penalties***

Cordelio also encourages BPA to use withdrawal penalties to help Interconnection Customers who have been harmed by withdrawals.