



GAT Project Comments

Chris Stolz
VP, Transmission
Pine Gate Renewables

FTSR/TSR Data Validation Readiness Criteria

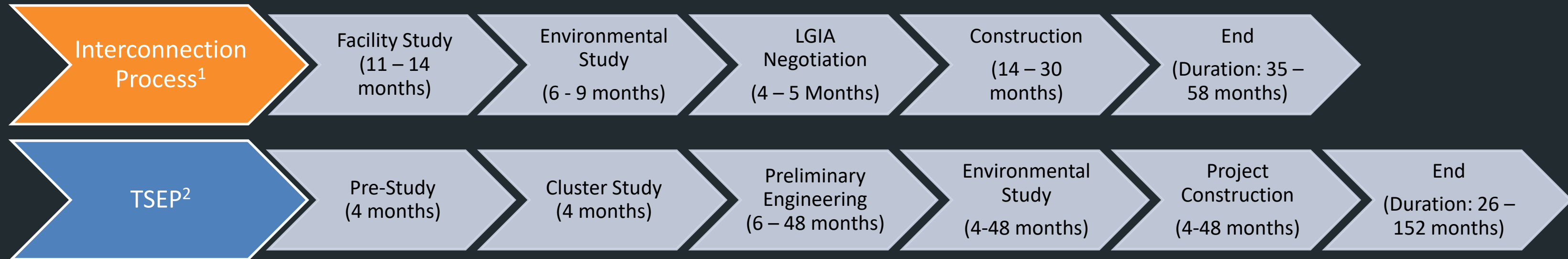
Interconnection Process Readiness Impacts

Interconnection customers at Phase 2 completion need to provide a readiness milestone, many of which will become more difficult to obtain without any material progress towards obtaining new transmission service

Readiness Requirement	Impacts by inability to request TSR prior to Phase 2 completion
Executed Term Sheet	Difficult to obtain PPA without transmission service arranged
Executed Contract for to LSE, Marketer, End Use Customer	Less customers available without TSRs to common settlement nodes
RFP Selection	RFPs often require or score project's transmission service arrangements
Purchase Order for Generating and/or Interconnection Facilities	COD and procurement timeline is questionable without insight into TSR start date
Documentation of Transmission Service Reservation	Unless purchasing/transferring existing service, will not be possible
Security in Lieu (20% of Network Upgrades)	Not impacted

All non-financial forms of readiness are impacted by varying degrees from project's inability to procure transmission service. BPA should consider the amount of financial security a project has provided to proceed at Phase 2 into consideration as they request transmission service

Interconnection & TSR timelines



The Interconnection and TSEP processes need to be synced with one another to ensure GI customers are not sitting with a stranded asset

Studies, Engineering, and Construction can only be shortened so much, putting further emphasis on the utilization of Conditional Firm Service/Interim Service.

¹Estimated Durations from Slide 17 from April 26/27, 2023 TC-25 Workshop ([link](#))

²Estimated Durations from TSEP Business Practice ([link](#))

Interim Service

Interim Service Requirements

Interim service is critical to BPA's success in transitioning from the TSEP process to a least regrets proactive planning methodology enabling existing and future transmission service requests

Separate Process	Annual/Seasonal Duration	No Deferrals	Queue Priority
<ul style="list-style-type: none">• Separate from future TSEP process• Projects with valid TSEP queue positions eligible	<ul style="list-style-type: none">• Studied annual for future interim service period (i.e. 2025 study for 2026 interim service year).• Optional Seasonal study for projects with identified limitations	<ul style="list-style-type: none">• Requests should only intend to enter study if confident to proceed in utilizing service for studied service year	<ul style="list-style-type: none">• Not TSEP priority, but as studied in interim service process• Ensures future offers of interim service respect previous offers

Sub Grid Constraints

In the 2023 TSEP, transmission constraints identified within various sub-grid areas limited awarding further conditional firm service (CFS)

- Nine sub-grid regions were identified in the 2023 TSEP as barrier to provide CFS

Interim solutions are needed to support enabling transmission capability in the operating horizon until BPA can progress proactive planning transmission portfolio

- Grid Enhancing Technologies, such as Dynamic Line Ratings

Recommendation

BPA led Technical Workshop to discuss complexity of reliably managing sub grid paths and continuing to work with customers to identify solutions



THANK YOU!