

BPA,

As you may be aware, Savion is developing a significant portfolio of large load + generation facilities in the BPA footprint. Per BPA's GAT presentation on 8/19, BPA staff requested feedback from developers regarding the questions posed on slide 35 pertaining to the Rapid Access Products & Interconnection Delivery (RAPID) proposal. Please see Savion's response below:

Interconnection Needs: Where do today's LLI processes slow you down?

[Savion] BPA's construct is unlike most RTOs, ISOs and TPs. BPA is also not FERC jurisdictional, which seemingly results in lengthy stakeholder forums where BPA seeks to satisfy all participants for the sake of avoiding court challenges. We certainly appreciate BPA's dilemma, but we find BPA's stakeholder process to be much slower than virtually anywhere we have worked.

BPA's market construct is also challenging for developers. BPA has historically built and operated both generation and transmission assets across much of the Pacific Northwest. However, BPA does not sell the bulk of its generation output to direct retail load. Instead, BPA's power production is sold to Preference Customers. We understand that the Preference Customers apprise BPA of their load growth expectations, and BPA then builds more G&T infrastructure to meet the growing demand. This feedback loop is not conducive to quick, large load additions. Further, this puts developers in the uncommon position of working through a 3rd party (i.e., the Preference Customer) to gain "access" to BPA's G&T infrastructure. This "sleeving" situation is far from ideal and results in layers of administrative red tape that we would not normally see elsewhere.

Co-location: Appetite in this temporary interconnection service to fast track and non-firm service?

[Savion] Though we could potentially accept temporary non-firm transmission service, depending on the track to firm transmission service, it is unlikely that we would have interest in temporary interconnection service.

Product Design: Which fast-track paths – co-location, BTM, dispatchable – fit your projects?

[Savion] We are interested in all three. Our primary goal is to build large load facilities combined with flexible generation assets that are very responsive and dispatchable into the BPA footprint. It is possible that we could live with back-up generation resources that never run synchronous with the grid, but it is our preference to bring fast response generation assets that can be both beneficial to the grid (e.g., fast frequency response, VAR support, highly dispatchable) and supportive of 99.999% reliability to the large load.

If interested, we are happy to further discuss these matters, and our experiences pursuing comparable facility developments in other Transmission Provider footprints across the US.

Sincerely,

Derek Sunderman | SVP Transmission

M: 785.766.7613 | Savion, LLC

