

# **Response to Comments – Large Generator Interconnection**

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## **BPA Transmission Business Practice**

Version 13

Posted 8/18/2025

## Response to Comments – Large Generator Interconnection

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### Version 13

This document contains comments and BPA responses regarding Version 13 of the Large Generator Interconnection Business Practice posted for comment from June 16 to July 23, 2025.

This is Bonneville’s final agency action in regard to this version of the business practice .

For more information on business practices out for comment, visit the BPA [Proposed Business Practices webpage](#).

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### A. Northwest & Intermountain Power Producers Coalition (NIPPC)

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The Northwest & Intermountain Power Producers Coalition submits the following comments in response to the BPA proposed changes to the following business practices:

- Transition Process version 2;
- Site Control version 2;
- Commercial Readiness version 2; and
- Large Generator Interconnection version 13

The Northwest & Intermountain Power Producers Coalition (“NIPPC”) is a membership-based advocacy group representing competitive electricity market participants in the Pacific Northwest and Intermountain region. NIPPC has a diverse membership including independent power producers and developers, electricity service suppliers, transmission companies, marketers, storage providers, and others. Most of NIPPC’s members are transmission customers of BPA and will be impacted by this business practice.

NIPPC does not object to the proposed changes to the business practices referenced above. NIPPC recognizes that the proposed changes represent lessons that BPA learned in

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implementing the readiness and site control requirements that BPA and customers agreed to in TC-25. The additional detail regarding the requirements for site control and commercial readiness will help customers by allowing them to collect and maintain necessary documentation in advance of deadlines set forth in the generator interconnection process. Standardizing the format that customers use to provide BPA with information will reduce the burden on BPA staff to confirm that customers have provided all the necessary information.

#### **BPA Response 1**

BPA appreciates NIPPC submitting comments in support of the changes to the large generator interconnection business practices. As NIPPC notes, BPA's proposed business practice edits intend to provide customers with greater clarity on what information must be provided and establish a standardized process for submitting information required in the reformed cluster study process that regional stakeholders and customers agreed to in the TC-25 Settlement Agreement. BPA believes these processes will allow requests to move more efficiently through the interconnection process.

## **B. NewSun Energy**

### **Subject: Comments on BPA Business Practices – Transition Process V2, Site Control V2, Commercial Readiness V2, and LGIA V13**

To the Bonneville Power Administration (BPA):

NewSun Energy appreciates the opportunity to provide comments on BPA's proposed updates to its interconnection business practices. While we support BPA's efforts to modernize and streamline the interconnection process, we believe it is essential to slow down the implementation of these changes to ensure they align with other ongoing processes and reforms currently underway at BPA including BPA's Grid Access Transformation Project (GAT), which has overlapping implications with the proposed business practices.

BPA's business practice updates must not undermine the intent or terms of the negotiated settlement with the region.<sup>1</sup> These practices embody the collaborative spirit and commitments made during that process. Any deviation risks damaging trust and creating inequities in the interconnection framework. The proposed changes also appear to raise the standard of compliance and the burden of documentation that Interconnection Customers must provide, which may adversely impact or disqualify Interconnection Requests that were previously validated by BPA.

<sup>1</sup> See TC-25 Settlement Agreement available at <https://www.bpa.gov/energy-and-services/rate-and-tariff-proceedings/tc-25-tariff-proceeding>.

#### **Timing Comments**

These business practice proposals should be considered at the same time as the GAT reforms so that overlapping implementation issues can be considered together, but in any event this process should be given no less than an additional 30 days for review. NewSun officially requests that the proposed business practice changes be delayed so that

Developers and Load Serving Entities can fully assess the proposed business practices and their impact on the region.

### **BPA Response 2**

BPA notes that BPA is not currently reforming its large generator interconnection processes but is implementing reforms adopted in January 2024, through the TC-25 Tariff Proceeding Administrator's Final Record of Decision. The large generator interconnection reforms that regional stakeholders agreed to in the TC-25 Settlement Agreement include a large shift from the pre-existing first-come, first-served model to a first-ready, first-served clustered model. To implement those reforms, BPA created new and edited existing business practices. The TC-25 Settlement Agreement and the resulting tariff determine the process and timeline for interconnection and create the need for business practice edits.

BPA believes the proposed business practice edits are largely procedural, relating to the manner, timing, and format that information required under the tariff is submitted. For example, BPA proposed the use of forms that allow for the standardized submission of information that the tariff requires a customer to provide. BPA does not believe the complexity or volume of modifications or stakeholder comments warrant additional comment at this time.

Finally, BPA notes that these changes relate to submissions that customers are required to provide in the next phase of the Transition Cluster Study. BPA finds it helpful to provide these edits to customers as soon as possible to allow customers more time to prepare for the upcoming information submissions.

Due to the scope of the changes to the large generator interconnection process that resulted from the TC-25 Settlement Agreement, BPA will continue to edit business practices as needed to implement the changes and to improve processes as BPA gains experience in administering the new process. BPA declines to delay these proposed business practice edits until the completion of reforms regarding other transmission services, which are irrelevant to BPA's obligation to implement the large generator interconnection reform.

The proposed changes to the interconnection business practices will unduly harm Interconnection Customers and power supply to the region in numerous ways outlined below:

- The changes in the business practices are likely to harm already validated queue positions by implementing drastic business practice changes with extraordinarily little time before the start of the second transition cluster validation period. At a minimum, BPA should provide an update on its expected timing for returning the Phase One Cluster Study Report, so that the region can understand the extent to which there is an urgency here.
- The business practice modifications drastically increase the volume of workload and documentation that is required to keep the interconnections valid with no precedent for why the additional models and supporting documentation are needed.
- The proposed changes lock in developers to a standard that is not feasible and could cause withdrawals late into the process causing uncertainty for the future power supply.
- The accelerated timeline of the proposed changes creates risk for serious and stable projects to be removed from the queue, further exacerbating the power supply needs for the region.

- The changes described also introduce a large amount of financing risk to developers and could make PPA negotiations and project financing impossible.
- The newly requested limits to the acceptable documentation severely limit the paths towards project completion and reduce the diversification of projects and the stability that provides to the interconnection process.
- In light of changes to the federal investment tax credit and the continued need for additional generation in the region, it is imperative to preserve the options that are in the queue and buildable within the next 10 years.

With the multitude of business practice changes, in multiple forums being proposed, we urge BPA to slow the processes down. We need to ensure alignment and unintended consequences are adequately discussed and understood before finalizing such impactful decisions. The diversity of business models, inter-relatability of processes, investments, and potential consequences needs further regional consideration before finalizing these business practices.

### **BPA Response 3**

BPA believes the proposed business practice edits are largely procedural, relating to the manner, timing, and format that information required under the tariff is submitted, and do not reflect a drastic change in approach. For example, BPA proposes adopting the use of forms that allow for the standardized submission of information that the tariff requires a customer to provide to have and maintain a valid Interconnection Request. BPA does not believe the complexity or volume of modifications or stakeholder comments warrant additional comment at this time.

NewSun has not discretely identified how the proposed changes harm customers with Interconnection Requests in the Transition Process or how these changes would cause late withdrawals, make project financing impossible, or limit the path to project completion. BPA believes providing more clarity to customers around the requirements for submitting information needed to proceed in the interconnection process will reduce uncertainty and the prevalence of deficient submissions, which require customers to take further action to correct. The clarifications will allow customers to more efficiently provide information and enable customers to make more informed decisions in proceeding in the interconnection process.

Regarding NewSun's request that these business practice changes be slowed down, BPA notes that these changes relate to customers' submissions in the next Customer Review Period of the Transition Cluster Study. BPA finds it helpful to provide these edits to customers as soon as possible to allow customers more time to prepare for upcoming information submissions. Delays in implementing these business practice changes will reduce the quality of customers' submissions, resulting in a need for more processing and work for both BPA and customers.

Regarding NewSun's request that these changes be aligned with changes to other transmission services in other forums, BPA reiterates that the TC-25 Settlement Agreement and the resulting tariff determine the process and timeline for interconnection and create the need for business practice edits. BPA declines to delay these proposed business practice edits until the completion of reforms regarding other transmission services, which are irrelevant to BPA's obligation to implement the large generator interconnection reform.

Please refer to BPA Response 2 in this Response to Comments – Large Generator Interconnection document.

### **Business Practice Comments**

We offer the following detailed comments to support a transparent, equitable, and inclusive interconnection process that accommodates a diverse range of project developers and load-serving entities (LSEs):

#### **LGIA Business Practice V13**

- BPA's ability to move the POI without customer input contradicts the reform intent. Customers should retain POI choice and bear associated costs. Otherwise, BPA must revise how TSRs meet CRC. This is an example of how we must consider the multiple reform processes currently underway together because they are aligned and have cross-impacts.

#### **BPA Response 4**

NewSun has not identified any provision in the Large Generator Interconnection Business Practice that it comments upon. BPA has not proposed any edits in the Large Generator Interconnection Business Practice relating to the Point of Interconnection for an Interconnection Request.

BPA reminds NewSun that regional stakeholders and customers agreed through the TC-25 Settlement Agreement that BPA will determine the Point of Interconnection for Interconnection Requests in the reformed cluster study process at its sole discretion pursuant to criteria outlined in the tariff. Refer to Section 2.h.iii. of Appendix 1 of the TC-25 Settlement Agreement. Section 6.4 of the LGIP captures that directive and reads: "Transmission Provider will determine the Point of Interconnection at its sole discretion to improve: the reliability benefits, costs and/or benefits of the interconnection for the Cluster Area. In the event that Transmission Provider determines that a requested Point of Interconnection is not feasible or may need to be relocated, Transmission Provider will make Reasonable Efforts to consult with the impacted Interconnection Customer, so long as these meetings will not delay the issuance of the Phase One Cluster Study Report."

BPA disagrees that its ability to determine the Point of Interconnection for an Interconnection Request contradicts the intent of the reform. Rather, adoption of NewSun's suggestion would contradict the TC-25 Settlement Agreement and the tariff adopted in the TC-25 Tariff Proceeding. NewSun's comment seems to attempt to reopen matters that were directly addressed in the formal tariff proceeding through the business practice process. BPA must implement the TC-25 Settlement Agreement and cannot consider this change.

In response to NewSun's comment regarding the interaction between the TSR Commercial Readiness Milestone Option and BPA's responsibility in setting the Point of Interconnection for an Interconnection Request, BPA notes that a customer may choose from multiple Commercial Readiness Milestone Options. The variety of options provide customers with flexibility in meeting those requirements and proceed through the interconnection process. During the Transition Process, if a customer relied on the TSR Commercial Readiness Milestone Option to establish a valid Transition Request but can no longer rely on the TSR at the redemonstration period due to the Point of Interconnection in the Phase One Cluster Study report and TSR not matching, the customer may shift to another Commercial Readiness Milestone Option in the Customer Review Period. After the Transition Period,

customers demonstrate Commercial Readiness after the issuance of the Phase One Cluster Study report, which will identify the Point of Interconnection for all requests.

Finally, BPA notes that BPA is not currently reforming its large generator interconnection processes. Any interaction between the TSR Commercial Readiness Milestone Option and BPA's responsibility in setting the Point of Interconnection for an Interconnection Request is unrelated to any reforms that BPA is currently undertaking on other services. Commercial Readiness Milestone Options and the method of determining the Point of Interconnection were directly addressed in the TC-25 Settlement Agreement and the tariff adopted in the TC-25 Tariff Proceeding. BPA declines to delay the implementation of the large generator interconnection reform through these business practice edits until the completion of efforts regarding other transmission services.

- Customers should have an automatic right to downsize without losing queue position if criteria are met.

### **BPA Response 5**

NewSun has not identified any provision in the Large Generator Interconnection Business Practice that it comments upon. BPA has not proposed any edits in the Large Generator Interconnection Business Practice relating to an Interconnection Customer's ability to downsize an Interconnection Request.

BPA notes that the tariff provides Interconnection Customers with the right to reduce the size of a project in an Interconnection Request at various points in the process without a request for Material Modification analysis. This feature of the interconnection process was agreed to in the TC-25 Settlement Agreement and is captured in the tariff adopted in the TC-25 Tariff Proceeding and in Section L of the Transition Process Business Practice.

BPA will continue to make future edits to its large generator interconnection business practices as needed as it completes the Transition Process and implements the large generator interconnection reforms.

### **Conclusion**

With the multitude of business practice changes, in multiple forums being proposed, we urge BPA to slow the processes down to align it with the GAT or at a minimum provide an additional 30 days for comments and hold enough workshops to discuss all these changes holistically. We need to ensure alignment and unintended consequences are adequately discussed and understood before finalizing such impactful decisions. The diversity of business models, inter-relatability of processes, investments, and potential consequences needs further regional consideration before finalizing these business practices.

We appreciate BPA's consideration of these comments and look forward to continued collaboration to ensure a fair and efficient interconnection process

### **BPA Response 6**

BPA notes that BPA is not currently reforming its large generator interconnection processes but is implementing reforms adopted in January 2024. The TC-25 Settlement Agreement and the resulting tariff determine the process and timeline for interconnection and create the need for business practice edits.



BPA believes the proposed business practice edits are largely procedural, relating to the manner, timing, and format that information required under the tariff is submitted. For example, BPA proposed the use of forms that allow for the standardized submission of information that the tariff requires a customer to provide. BPA does not believe the complexity or volume of modifications or stakeholder comments warrant additional comment at this time.

Finally, BPA notes that these changes relate to customers' submissions in the next Customer Review Period of the Transition Cluster Study. BPA finds it helpful to provide these edits to customers as soon as possible to allow customers more time to prepare for the upcoming information submissions. BPA declines to delay these proposed business practice edits until the completion of reforms regarding other transmission services, which are irrelevant to BPA's obligation to implement the large generator interconnection reform.

Please refer to BPA Responses 2 and 3 in this Response to Comments – Large Generator Interconnection document.

## C. Renewable Northwest

### **RE: Renewable Northwest Comments on Proposed Revisions to Generator Interconnection Business Practices**

Renewable Northwest ("RNW") appreciates the opportunity to comment on the Bonneville Power Administration's ("BPA") proposed revisions to the following Business Practices: Transition Process (version 2), Site Control (version 2), Commercial Readiness (version 2), and Large Generator Interconnection (version 13).

Renewable Northwest is a non-profit advocacy organization that works to decarbonize the region by accelerating the transition to renewable electricity. RNW has approximately 80 member organizations that include renewable energy developers and manufacturers, large purchasers of clean energy resources, consumer advocates, environmental groups, and other industry advisers. Many of RNW's members are current or prospective BPA transmission customers. RNW has been an active participant in BPA's generator interconnection reform efforts, including the TC-25 proceeding that adopted many of the reforms covered by the Business Practices at issue.

Below are some general comments applicable to all the proposed Business Practice revisions followed by comments on three individual Business Practices broken out by section as follows: Transition Process (Section II); Site Control (Section III); and Commercial Readiness (Section IV).

#### **I. General Comments**

RNW appreciates BPA's initiative in bringing forth these Business Practice revisions to facilitate successful implementation of improvements to BPA's generator interconnection process. RNW is broadly supportive of BPA's proposed Business Practice revisions, which we view as reasonable and practical changes aimed at improving the efficiency of the generator interconnection process for BPA and customers. The proposed revisions draw from BPA's experience implementing the reforms adopted in TC-25, reflecting targeted additional



process improvements. As BPA and its customers continue to gain experience with the generator interconnection reforms, it may be necessary to revisit certain aspects of the Business Practices. However, at this time, the revisions generally appear to be helpful in clarifying customer expectations and enabling more streamlined review by BPA staff.

#### **BPA Response 7**

BPA appreciates RNW submitting comments in support of BPA's proposed edits to the large generator interconnection business practices. As RNW notes, the edits and clarifications to the generator interconnection business practices intend to provide customers with clarity on how to meet the requirements that were agreed to in the TC-25 Settlement Agreement and adopted in the BPA's tariff. BPA believes these edits will support a more efficient process to verify that customers have met requirements to proceed in the interconnection process.

## **D. Clearway Energy Group**

### **RE: Clearway Comments on Proposed Revisions to Generator Interconnection Business Practices**

Clearway Energy Group ("Clearway") appreciates the opportunity to comment on the Bonneville Power Administration's ("BPA") proposed revisions to the following Business Practices: Transition Process (Version 2), Site Control (Version 2), Commercial Readiness (Version 2), and Large Generator Interconnection (Version 13).

Below are some brief general comments that are largely applicable to all four of the proposed Business Practice revisions. They are followed by specific comments or points of clarification on each of the proposed revisions to individual Business Practice sections.

#### **General Overview**

Clearway appreciates BPA's effort to bring forward these proposed revisions for stakeholder comments based on learnings following implementation of modifications to BPA's generator interconnection process. Overall Clearway is supportive of the direction BPA is heading in the proposed revisions, as they are largely practical changes that are intended to improve the efficiency of the generator interconnection queue for BPA staff and Interconnection Customers. While the revisions generally appear to be helpful in streamlining reviews for customers, Clearway recognizes some areas that could benefit from further clarification.

#### **Large Generator Interconnection V13**

Clearway is generally supportive of the proposed revisions to the Large Generator Interconnection Business Practices. There is one area where Clearway sees value in modification or clarification.

Under Section I & M of the proposed revisions, changes to fuel type, nameplate capacity, or electrical characteristics are prohibited under the Technological Advancement path. It is unclear whether those types of changes would be possible or permissible through a

Material Modification request. Clearway recommends that the revisions are amended to clarify that resource-type or fuel-type substitutions may be permissible when supported by updated models, and the change does not result in material impacts to the transmission system. BPA should provide a path, potentially through material modification analysis, to enable such changes to proceed without queue loss when impacts are non-material. Additionally, BPA should clarify that a Material Modification Analysis may be submitted at any point prior to construction and will be assessed based on technical impact or the request rather than process phase.

Thank you for the opportunity to comment on these proposed revisions.

### **BPA Response 8**

BPA appreciates Clearway submitting comments expressing general support for the proposed changes to the large generator interconnection business practices.

BPA did not propose any changes to the language in Section M of the Large Generator Interconnection Business Practice regarding a Request for Technological Advancement and considers changes to that section out of scope for this round of edits. BPA declines to make changes to Section I or Section M of the Large Generator Interconnection Business Practice in response to Clearway's comment as explained below.

In response to Clearway's suggestion that BPA provide customers with a path to making fuel type, nameplate capacity, or electrical characteristics changes when not material, BPA clarifies that the tariff and business practices already provide customers participating in a cluster study such a path in many circumstances. Certain changes to an Interconnection Request, such as reductions in nameplate and certain electrical characteristics, are permitted in Customer Review Periods without a request for Material Modification analysis. See Sections 4.4.1 and 4.4.2 of the LGIP and Section L.2.b. of the Transition Process Business Practice. Changes to information in the Interconnection Request, such as the fuel type of the project, require that a customer submit a request for Material Modification analysis. See Sections 4.4.3 of the LGIP and Section L.2.a. of the Transition Process Business Practice and Section I of the Large Generator Interconnection Business Practice. Changes that are found to not be Material Modifications are permitted without the withdrawal of the Interconnection Request.

BPA requires customers with Interconnection Requests in the Transition Cluster Study to submit a single request for Material Modification analysis in the first half of the Customer Review Period to ensure that modifications do not delay the study process. See Section L of the Transition Process Business Practice. BPA notes that if it were to accept requests for Material Modification analysis throughout the cluster study, the study would need to pause to allow for analysis of the change and incorporation of updated models and information when a change was made. Even if changes are technically justified or consistent with feasibility, there is no way to run the analysis without causing delay and harm to other Interconnection Customers in the cluster study, making such changes Material Modifications. BPA's proposal that customers bring requests for modification during the Customer Review Period when the study analysis is not ongoing ensures changes do not delay the process and that those changes are incorporated into information used in the next study phases in a timely manner.

BPA will continue to update the large generator interconnection business practices as it proceeds in implementing the reforms, including providing additional details on how

customers may submit requests for Material Modification analysis at various stages in the interconnection process.

## **E. NewSun Energy Transmission Co. and the Pacific Northwest Renewable Energy Interconnection & Transmission Customer Advocates**

### **RE: Comments on Proposed Changes to Transmission Business Practice on Large Generator Interconnection**

NewSun Energy Transmission Company LLC (“NewSun”), and the Pacific Northwest Renewable Interconnection & Transmission Customer Advocates (“PRITCA,” together the “Commenting Parties”) provide the following comments on the BPA’s proposed changes to its Transmission Business Practices on the Transition Process.

#### **About Us**

The Commenting Parties together represent more than 100 BPA Interconnection Customers. Collectively, the Commenting Parties comprise more than a quarter of the current BPA interconnection queue. The Commenting Parties are signatories to well over 100 study agreements, and have participated in hundreds of BPA scoping and study report meetings involving wind, solar, geothermal, battery storage and pumped storage projects ranging in size from 20 to 600 MW. The Commenting Parties also include BPA Transmission Customers with thousands of MW of confirmed long-term firm transmission rights on the BPA transmission system and many thousands of MW more of transmission requests for future long-term firm service. Collectively, the Commenting Parties have provided tens of millions of dollars to BPA over the past ten years for environmental studies, engineering and procurement of network upgrades, deposits for Large Generation Interconnection Agreements (“LGIAs”), and other study agreements. The Commenting Parties’ members have successfully developed hundreds of megawatts of generation that are provided to both public power and IOU loads.

#### **Comments**

- 1. 15 days is not enough time to determine whether to withdraw or proceed after BPA provides notice of whether it has accepted a modification request.*

BPA should not reduce the amount of time an Interconnection Customer has to decide whether to move forward on a modification from 30 days to 15 days. Two weeks to analyze such a decision is insufficient, particularly given the complexity of the financial and commercial considerations involved. Given that project modifications are typically tied to financing, coordination with multiple stakeholders—including lenders, investors, and legal teams—is likely to take longer than two weeks. An Interconnection Customer may also need time to evaluate risk or renegotiate terms with partners or suppliers. A shortened window could force underinformed decisions, potentially weakening the study process, and may disproportionately disadvantage smaller developers or those with more complex project structures. Maintaining a 30-day period ensures a more equitable and thoughtful decision-making process both for Interconnection Customers and BPA.

This new constraint on the modification procedures specified in Section 4.4 of BPA's OATT Attachment L amounts to a material modification of the OATT and therefore must be subject to the procedural requirements for modifying the OATT, and cannot be processed as a Business Practice, which offers minimal procedural protections. Our conclusion is supported by the "rule of reason," which requires that tariffs include practices that "affect rates and service significantly," "are realistically susceptible of specification," and "are not so generally understood in any contractual arrangement as to render recitation superfluous."<sup>1</sup> Halving the time available for an Interconnection Customer to consider the outcome of a material modification request easily meets these tests and therefore must be included in BPA's OATT.

<sup>1</sup> Cometa Energia, S.A. De C.V., 191 FERC ¶ 61,089 at P 19 (2025).

### **BPA Response 9**

BPA declines to make changes to the proposed edits on the Large Generator Interconnection Business Practice in response to NewSun and PRITCA's comment.

BPA notes that in submitting a request for Material Modification analysis, an Interconnection Customer is aware that proceeding with a change found to be a Material Modification will result in the withdrawal of the Interconnection Request. The customer should seriously consider whether a change to the project is needed prior to submitting the Material Modification analysis request. The Material Modification analysis process is not a mechanism for customers to explore a range of permissible changes to a project. If a change captured in a request for Material Modification analysis requires an Interconnection Customer to engage lenders, investors, or legal teams, for a period of more than fifteen (15) Calendar Days, the Interconnection Customer should coordinate those efforts in advance of submitting a Material Modification analysis request as necessary.

Through the TC-25 Settlement Agreement and the TC-25 Tariff Proceeding, regional stakeholders, customers, and BPA agreed to adopt a first-ready, first-served clustered interconnection process. Customers must achieve and maintain a certain level of readiness to enter and proceed in the interconnection process. The Material Modification analysis process provides a mechanism to make changes to a request when those changes do not harm other customers. BPA finds its proposed change to be reasonable in light of the reformed large generator interconnection process, by ensuring that changes to an individual project do not delay the interconnection process.

Finally, BPA disagrees that altering the time provided to a customer to pursue a change under the Material Modification analysis process affects terms and conditions outlined in BPA's tariff, requiring a tariff proceeding to allow alteration. Section 4.4.3 of the LGIP outlines when a request for Material Modification analysis is required and dictates the process that BPA uses to notify the customer of the outcome of the analysis. Excepting a timeline for evaluating a request to add Co-Located Resources, Section 4.4.3 of the LGIP does not establish a timeline for the process or grant the customer any right to a period of time to decide to proceed with a Material Modification. The details of how Material Modification analysis requests are made, including the timeline provided for the various steps, were established through business practice language and are appropriate topics for business practices.

In addition, BPA's current Phase I cluster study is not due to be completed until January 30, 2026, the first date on which the proposed Business Practice changes would

come into practical effect. BPA should therefore extend the comment deadline and hold additional workshops to ensure that its proposed changes will not upset settled investment expectations or otherwise create unintended consequences.

**BPA Response 10**

BPA notes that it is following Bonneville's Business Practice Process, adopted and agreed to in the TC-20 Settlement Agreement and TC-20 Tariff Proceeding. BPA proposed modifications to existing business practices and provided notice of those changes through a Tech Forum communication. BPA posted the proposed modifications on its website. BPA identified that the proposed modifications included material revisions, making them Category B changes, and, as such, BPA held a meeting to describe the changes to stakeholders and answered questions. BPA provided customers with twenty (20) Business Days following the meeting to comment. BPA is now responding to comments to explain and clarify the reasons for modifications and its decision on the final business practice language.

BPA believes the proposed business practice edits are largely procedural, relating to the manner, timing, and format that information required under the tariff is submitted, and do not reflect a drastic change in approach. For example, BPA proposes adopting the use of forms that allow for the standardized submission of information that the tariff requires a customer to provide to have and maintain a valid Interconnection Request. NewSun and PRITCA's comment does not identify how these changes will upset settled investment expectations or why they think these changes warrant additional time. BPA does not believe the complexity or volume of modifications or stakeholder comments warrant additional comment.

BPA notes that these changes relate to submissions that customers are required to provide in the next phase of the Transition Cluster Study. BPA finds it helpful to provide these edits to customers as soon as possible to allow customers more time to prepare for upcoming information submissions.

BPA declines to extend the comment deadline or to hold additional meetings on these business practice modifications.

**Conclusion**

We urge BPA to reject its proposal to cut the time period available to an Interconnection Customer to consider the results of a study of a material modification request from 30 to 15 days both because 15 days is unreasonable given the commercial context in which the decision to proceed must be made and because this change belongs in BPA's OATT, not in a Business Practice.

**BPA Response 11**

Please refer to BPA Response 9 in this Response to Comments – Large Generator Interconnection document.