

Response to Comments – Line and Load Interconnection Procedures

BPA Transmission Business Practice

Version 4
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Version 4

This document contains comments and BPA responses regarding Version 4 of the Line and Load Interconnection Procedures Business Practice posted for comment from June 9, 2026, to July 15, 2026.

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. Portland General Electric

Comments on BPA’s proposed version 4 of the Line and Load Interconnection Procedures business practice

PGE appreciates the opportunity to comment on BPA’s draft version 4 of the Line and Load Interconnection Procedures business practice. PGE recognizes BPA’s efforts to update the document to better reflect current operating conditions and study timelines. The following comments, in response to concepts presented on June 15, 2026, are intended to improve transparency, predictability, and efficiency while supporting timely development of transmission and load-serving infrastructure throughout the region:

1. Section A. LLIR

PGE appreciates BPA’s effort to provide clearer triggers for when an LLIR is required. To improve consistency and predictability, BPA should define the basis on which the proposed 20 MW threshold for new load at an existing Point of Delivery (POD) will be measured (e.g., coincident peak demand, requested firm service, nameplate capacity, or

another defined metric). BPA should also clarify whether grid-charging battery storage constitutes new load for purposes of applying this threshold.

BPA Response 1

BPA clarifies that Section A.1.a.iii of the Line and Load Interconnection Procedures (LLIP) Business Practice only applies to a Transmission Customer seeking to utilize Network Integration Transmission Service (NITS).

Section A.1.a.iii of the LLIP Business Practice requires a Transmission Customer to submit a Line and Load Interconnection Request (LLIR) when utilizing NITS to deliver to 20 MW or more of new peak load at an existing Point of Delivery (POD) on BPA's Transmission System. The need for an LLIR is triggered when the cumulative sum of the new peak load additions reaches 20 MW at any point during a 10-year period. Customers identify this information in Section 2.E (projected load) of the LLIR form.

In response to this and other comments requesting clarification, BPA has edited Section A.1.a.iii of the LLIP Business Practice as follows:

- iii. New peak load at an existing POD on BPA's Transmission System reaches 20 MW within a 10-year period. 20-MW or more of new load at an existing POD, identified by the
 - 1. Transmission Customer identifies this information in the 10-year "Projected Load" data field in Section 2.E of the Line and Load Interconnection Request form.

BPA further clarifies that energy storage facilities (including grid-charging battery storage) are evaluated under BPA's generator interconnection procedures (Attachment L, N, or R of BPA's Open Access Transmission Tariff).

PGE also requests clarification regarding how the proposed 20 MW threshold interacts with BPA's separate LaRC-based determination for load growth or load transfers that do not constitute New Network Load. To reduce uncertainty, BPA should include illustrative examples addressing ordinary load growth, discrete new customer loads, phased project expansions, grid-charging battery storage, and modifications to requested service at an existing POD.

BPA Response 2

BPA clarifies that Section A.1.a.v of the LLIP Business Practice requires that a Transmission Customer seeking to utilize NITS submit an LLIR when BPA determines that Load Growth or load transfers that do not fall under Sections A.1.a.i-iv need to be assessed.

When evaluating a customer's LaRC, BPA may determine that study of a POD is required to provide NITS for Load Growth or permanent transfers of load that do not otherwise trigger a requirement to submit an LLIR under Sections A.1.a.i-iv of the LLIP Business Practice. BPA will contact the customer if this occurs.

In response to this and other comments requesting clarification, BPA has added a sentence to the end of Section A.1.a.v as follows:

“BPA will notify the Transmission Customer that an LLIR is required at the conclusion of evaluating the LaRC.”

When developing forecasts, the NITS customer is encouraged to work with their assigned Transmission Account Executive, who will facilitate coordination with the appropriate Customer Service Engineer, to assist the NITS customer in identifying whether an LLIR will be needed.

For Point-to-Point (PTP) customers, BPA should clarify whether any increase in MW delivered to an existing POD requires a new LLIR, or only increases that necessitate physical modifications to the interconnection. PGE recommends adopting a materiality standard under which only changes that could reasonably affect interconnection facilities study assumptions, or other transmission customers would require a new LLIR.

BPA Response 3

BPA clarifies that customers intending to utilize Long-Term Firm Point-to-Point Transmission Service (PTP) that would result in any increase of energy delivered to an existing POD must submit an LLIR.

In response to this comment requesting clarification, BPA has edited Section A.2.a.iii of the LLIP Business Practice as follows:

“iii Any increases of MW of PTP to be delivered to an existing facility.”

BPA declines to adopt a standard that would only require an LLIR submission when changes are reasonably expected to affect interconnection facilities. Such a standard would fully rely on customers to determine when BPA’s Transmission System was affected or would require BPA to establish a separate assessment process. Under the LLIP Business Practice, upon receiving an LLIR, BPA determines whether facilities need to be modified to provide the requested service. If a proposed increase in the MWs of energy delivered at an existing POD does not require study or physical modifications, BPA will conclude processing the LLIR and notify the customer that no study is required.

2. Section E. Material Change Analysis Request

PGE requests that BPA establish a transparent process for situations in which a customer disagrees with BPA’s determination that a proposed change is material. Because a material change determination may require withdrawal of an existing LLIR and loss of queue position, customers should have an opportunity to review BPA’s preliminary determination, provide supporting information, and seek reconsideration before a final decision is made.

BPA Response 4

BPA declines to adopt a separate dispute process in the LLIP Business Practice for customers to challenge BPA’s determination that a proposed change to an LLIR is a material change. Customers retain the ability to exercise the dispute resolution provisions in Section 12 of BPA’s Open Access Transmission Tariff (OATT).

3. Section H. LLI FAS

PGE appreciates BPA's recognition that Facilities Studies vary significantly in scope and complexity. While the draft includes milestones for certain study activities, it should also provide planning-level target completion ranges for Facilities Studies based on study complexity. This information would improve customers' ability to plan commercial development, financing, permitting, and construction activities.

BPA Response 5

BPA declines to adopt target completion ranges for Line and Load Interconnection Facilities Studies based on study complexity into the LLIP Business Practice. Under Section H of the LLIP Business Practice, BPA provides each request an estimated completion date unique to the project's scope and complexity. BPA believes providing an estimate that is specific to the project will best support customers' ability to make informed development decisions.

4. Section I. Post-Study Agreements

PGE supports BPA's proposal to remove the requirement that corresponding PTP TSRs be submitted on the same day as the LLIR request.

PGE is concerned, however, that allowing up to six months to offer a post-study agreement following completion of the FAS could introduce significant uncertainty into project development schedules. BPA should either shorten this timeframe or provide a defined implementation schedule shortly after the FAS is completed that identifies anticipated agreement timing, customer funding requirements, major procurement milestones, and estimated energization dates.

BPA Response 6

BPA clarifies that Section I was added to the LLIP Business Practice to provide customers with better certainty on when to expect a post-study contract after the completion of an LLI FAS, where the previous version of the LLIP Business Practice was silent. Generally speaking, following the conclusion of the LLI FAS, it may take up to six months for BPA and the customer to finalize the terms of the post-study contract, establish cost and resource allocation, and execute any necessary agreements. Those conversations include identifying anticipated agreement timing, customer funding requirements, major procurement milestones, and estimated energization dates. BPA declines to adopt a requirement to provide a schedule for completing next steps following the completion of an LLI FAS at this time.

5. Timeline

Although BPA's LLIR business practice establishes procedures that are not expressly defined within BPA's Open Access Transmission Tariff (OATT), BPA's website states that "the interconnection of Lines and of Loads to the Federal Columbia River Transmission System (FCRTS) is governed by BPA's Open Access Transmission Tariff." As such, customers reasonably expect the LLIR process to remain generally consistent with the study timelines reflected in BPA's Small and Large Generator Interconnection Procedures (SGIP/LGIP) and the broader framework established by the FERC *pro forma*.

PGE appreciates BPA's efforts to establish study timelines that more accurately reflect current workloads and available resources, and recognizes that the timelines contained in Version 3 of the Line and Load Interconnection Procedures business practice were

frequently difficult to achieve. However, extending both the System Impact Study and Feasibility Study timelines to 180 days, while leaving the Facilities Study duration effectively unbounded, results in an overall interconnection process approaching three years (assuming 180-day FAS). Such timelines create significant uncertainty for utilities, customers, and developers seeking to support regional load growth, economic development, and resource adequacy. Extended study durations may also impair customers' ability to satisfy evolving load maturity requirements under the TC-27 process.

BPA Response 7

In updating the LLIP Business Practice, BPA clarified that the business practice outlines the process by which BPA studies PODs on BPA's Transmission System as required to provide PTP and NITS. BPA updated the tariff references in the LLIP Business Practice to identify BPA provides PTP and NITS under Parts I, II, and III of BPA's OATT. The Standard Large Generator Interconnection Procedures (LGIP), Attachment L of BPA's OATT, and the Standard Small Generator Interconnection Procedures (SGIP), Attachment N of BPA's OATT, do not apply to the LLIP Business Practice.

In the past few years, BPA has experienced an unprecedented volume of requests to interconnect new loads, representing larger and more complex interconnections, comparable with nationwide trends. However, the LLIP Business Practice had not been updated in several years. The updated timelines are reflective of the increased number, size, and complexity of LLIRs, and BPA's current ability to process them. BPA has proposed changes to the LLIP Business Practice to reflect current averages and help customers better understand current timelines.

BPA staff indicated that staffing constraints are a primary factor driving the proposed timeline extensions. Given the unprecedented pace of load growth across the Pacific Northwest, PGE requests additional transparency regarding the underlying causes of these constraints, BPA's plans to increase study capacity, and opportunities to improve study throughput over time.

BPA Response 8

Please see BPA Response 7.

BPA will continue to consider ways to improve the studies outlined in the LLIP Business Practice in the future in BPA's Rapid Access Products & Interconnection Delivery (RAPID) program. BPA encourages PGE and other customers interested in such topics to engage in workshops on RAPID, a topic within BPA's Grid Access Transformation (GAT) project: <https://www.bpa.gov/energy-and-services/transmission/grid-access-transformation-project>.

PGE also encourages BPA to evaluate additional options for reducing study timelines, including allowing customers to fund studies performed by mutually agreed-upon third-party consultants, subject to BPA oversight and final approval. Similar approaches have been adopted elsewhere in the industry to supplement utility resources while maintaining study quality and consistency.

PGE appreciates BPA's continued engagement with customers as these business practices evolve and looks forward to continued collaboration to improve the transparency, predictability, and efficiency of the LLIR process. Thank you for consideration of these comments.

BPA Response 9

Please see BPA Responses 7 and 8. BPA declines to adopt any changes to the LLIP Business Practice to allow third-party study at this time. Such a change is out of scope for this round of edits, which attempts to clarify current procedures. BPA will consider ways to improve the study processes outlined in the LLIP Business Practice in the future in the RAPID program.

BPA thanks PGE for commenting on the proposed edits to the LLIP Business Practice.

B. Umatilla Electric Cooperative

Re: BPA's Proposed Line and Load Interconnection Procedures Business Practice

Below are comments provided by the Umatilla Electric Cooperative ("UEC") in response to the Bonneville Power Administration's ("BPA") proposed Line and Load Interconnection Procedures Business Practice ("LLIP BP"), Version 4. Our understanding is that BPA's revisions were intended to provide additional procedural clarity regarding when and how BPA's customers submit Line and Load Interconnection Requests ("LLIR"). UEC shares this same goal, and we submit the following comments to meet that objective.

LLIR Submission Thresholds

We understand the intended goal of the proposed section A.1.a is to provide more clarity to Network Integration Transmission Service (NITS) Customers for when an LLIR submission is required. UEC agrees that most of sections A.1.a.i-iii provide clear and understandable thresholds for when an LLIR is necessary, and these sections are superior to BPA's current Line and Load Interconnection Procedures, which state that *'All NT Customers must submit a LLIR...when requesting a new or modified transmission system interconnection'* and are silent on any specific MW thresholds. That said, section A.1.a.iii is somewhat ambiguous where BPA proposes that *"20 MW or more of new load at an existing POD"* will require submittal of an LLIR. We request BPA clarify this provision, as it is unclear whether this will be triggered at any point at which a load at an existing POD exceeds 20 MW (i.e., a 14 MW load increases to 23 MW over the 10-year projected period), or instead whether the cumulative increase over the 10-year projected period exceeds 20 MW (i.e., a 35 MW load increases above 55 MW over the 10-year projected period). Our assumption of BPA's intent is the latter interpretation but would appreciate additional clarity to avoid confusion.

Unfortunately, the proposed section A.1.a.v eliminates any clarity provided by sections A.1.a.i-iii. Proposed section A.1.a.v states that *'any load growth or transfer included in a LARC submittal may be deemed to require an LLIR.'* This language could mean that *any* load growth—even less than 1 MW—can be deemed to require an LLIR at BPA's sole discretion and only once a LARC is submitted.

BPA Response 10

Please see BPA Response 1. BPA confirms UEC's understanding that Section A.1.a.iii applies when the cumulative increase of new peak load exceeds 20 MW in a 10-year period. Please see BPA Response 1 for the change BPA made to the LLIP Business Practice to better clarify the application of Section A.1.a.iii.

Please see BPA Response 2 for an explanation of Section A.1.a.v of the LLIP Business Practice and for the change BPA made to clarify the application.

Sections A.1.a.iv-v are further problematic from a timing and implementation perspective since they both rely on the LARC process to determine if an LLIR submittal is deemed necessary. BPA requires that LARC's are submitted once a year. In 2023 and 2024, it took 220 days on average for BPA to respond to UEC's LARC via a formal close out letter. Under this example, this means that if BPA identified a load requiring an LLIR via a LARC submittal, it may take up to 585 days after the load growth was identified by UEC. In the same vein, section A.1.a.iv states that an LLIR will be required for a "*New Network Load at an existing POD*", but BPA's current draft Network Integration Transmission Service Business Practice proposes to make New Network Load determinations for Non-Trended Load Growth only within the LARC process.

Therefore, UEC proposes that BPA retain sections A.1.a.i-iii as the thresholds for when a customer must submit a LLIR and remove sections A.1.a.iv-v.

BPA Response 11

BPA declines to remove Sections A.1.a.iv–v from the LLIP Business Practice. Please see BPA Response 2 for an explanation of Section A.1.a.v of the LLIP Business Practice and for the change BPA made to clarify the application of that section.

BPA acknowledges the timing concerns regarding the LaRC process and is actively working to streamline internal forecast evaluations.

Study Cost Responsibility

The proposed LLIP BP expands the potential situations where NITS customers must submit an LLIR but provides no further clarity on potential study costs. If BPA maintains the language under section A.1.a.v, there may also be situations where BPA requires an LLIR for any amount of load growth. This could lead to an uncapped cost exposure for BPA's Network Integration Transmission Customers in order to fulfill their LLIR obligations.

Thus, UEC proposes two additions to the proposed LLIR BP:

- Include the same cost provisions that BPA provides to its generation interconnection customers in the Small Generation Interconnection Business Practice—*"If BPA decides that the Interconnection Request requires a technical study, deposits for each study conducted under the SGIP will be the greater of \$5,000 or the good faith estimated study costs."*
- BPA include a provision stating that BPA will provide a detailed accounting of all study costs and return any unused study funds to the customer within 30 days of study completion or LLIR withdrawal by the customer.

BPA Response 12

BPA clarifies that although a NITS customer may need an LLIR in a variety of situations, NITS customers only bear responsibility for the cost of an LLI study for requests that are for New Network Load, or are considered "Exploratory" or "Preliminary" interconnections, as outlined

in Section A.3.ii of the LLIP Business Practice. A customer's cost exposure for study is equal to the actual costs of the study, established in Section A.3 of the LLIP Business Practice.

BPA declines to adopt a change in the LLIP Business Practice that would require a customer to pay the greater of a set amount or the good faith estimated cost of study. BPA thinks such a provision would provide little additional certainty around the deposit amount. BPA routinely provides customers with information on average study costs in the kickoff meeting to help the customer anticipate the deposit amount required for the initial study.

BPA declines to adopt a provision in the LLIP Business Practice to address accounting of study costs or the return of deposit funds at this time but may consider further clarifications in the future. Provisions outlining accounting actions are included in individual study agreements.

Materiality

The draft LLIR business practice includes materiality provisions in the event that a customer submits a modification to its original LLIR submittal. BPA proposes to require that a customer withdraw the existing LLIR and submit a new LLIR in the event that an LLIR modification is deemed to be material.

Proposed section E.3.b.i states that BPA will deem an LLIR to have a material change if the modification *'impacts the cost or timing of other LLIRs, including impacts to the schedule of energization of other LLIRs, or requires the LLIR at issue to be restudied'*. BPA's materiality determinations should not give deference to lowered queued requests, as it is standard industry practice that lowered queued requests are contingent upon higher queued requests. Thus, UEC requests that BPA delete section E.3.b.i in its entirety, and at a minimum, BPA's language should be modified to state that an LLIR modification will only be deemed to be material if the modification *increases* the cost or *delays* the timing of other LLIRs.

BPA Response 13

BPA declines to modify Section E.3.b.i of the LLIP Business Practice in response to UEC's comment. BPA does not understand it to be standard industry practice to allow senior-queued requests to make unilateral changes to the detriment of lower-queued requests or to the manageability of the study process. BPA finds it reasonable to establish a practice that prevents changes from causing cost-shifts or schedule disruptions on other requests.

UEC also proposes to remove *'including a change in voltage class'* in section 3.a.ii.b. A change in voltage class may not necessarily result in any material impacts when compared to the customer's original LLIR submittal, and therefore should not automatically result in a material change determination.

BPA Response 14

BPA declines to remove voltage class changes from the list of material changes in Section E.3.b.ii of the LLIP Business Practice. Changing the voltage class of an interconnection fundamentally alters the substation transformer configuration, protection schemes, short-circuit duty, and contingency analysis and physical station layout. Such a change requires a full engineering restudy and cannot be processed as a nonmaterial administrative modification.

Study Timelines

The current Line and Load Interconnection Procedures require BPA to complete System Impact Studies and Facilities Studies within sixty days, respectively. The proposed LLIP BP further states that BPA will ‘*endeavor to*’ complete these studies within 180 days. This means it will likely take more than a year for a customer to receive the requested study results after submitting an LLIR. At the BPA hosted business practice meeting on June 15, 2026, BPA staff that the sole reason for tripling each of the study timelines presented was staffing constraints and resource concerns.

UEC urges BPA to maintain consistency with other study timelines for Network Integration Transmission Customers outlined in its Open Access Transmission Tariff. For example, section 33.2 of BPA’s OATT states that ‘*Upon receipt of an executed System Impact Study Agreement, the Transmission Provider will use due diligence to complete the required System Impact Study within a sixty (60) day period*’ and provides the same timeline for System Facilities Studies. UEC sees no reason why an LLIR study would take longer or require more BPA staff time than a request for a modification to Network Integration Transmission Service under BPA’s OATT and do not believe staffing issues should be the a sole reason to deviate from the current 60-day timelines. Additionally, BPA’s attempt to ‘*endeavor to*’ complete the studies within a certain timeline is unacceptable. The business decisions and planning needs of UEC’s end-use members rely heavily on BPA’s ability to meet its study deadlines. Thus, UEC requests to remove any references to endeavoring to meeting study deadlines.

BPA Response 15

Please see BPA Responses 7 and 8 regarding the study timelines in the LLIP Business Practice.

In response to this comment BPA has edited Section E.3, F.3, G.5, H.2, and I.1 of the LLIP Business Practice to replace “endeavor” with “use due diligence.”

BPA remains committed to completing studies as expeditiously as possible using due diligence.

UEC also urges BPA to consider allowing the interconnection Feasibility, System Impact, and Facilities Studies to be completed by the interconnection customer itself or by a third-party engineering firm if BPA staffing resources are inadequate. This would assist in expediting study timeframes and allow customers to make efficient and timely business decisions to promote economic success of BPA and its customers.

BPA Response 16

Please see BPA Response 9.

BPA thanks UEC for commenting on revisions to the LLIP Business Practice.

C. Northwest Requirements Utilities

Re: Northwest Requirements Utilities Comments on Proposed Revisions to Line & Load Interconnection Procedures Business Practice

Northwest Requirements Utilities (“NRU”) appreciates the opportunity to provide these comments on BPA’s proposed revisions to its Line & Load Interconnection Procedures (“LLIP”) business practice. NRU represents the interests of nearly 60 Load-Following preference customers and one generation and transmission cooperative, all of whom depend on Network Integration Transmission Service (“NITS”) contracts with BPA for reliable load service. Given the regional economic value at stake through the timely interconnection of new loads, NRU and its members have a profound interest in the business practices and processes BPA uses to interconnect such loads. We therefore request BPA to consider these comments.

At the outset, BPA specified in the public meeting to review the business practice that a primary purpose in revising the LLIP business practice was to update and modernize the document and align it to BPA’s current practices. BPA last updated the current LLIP business practice in 2015, and since then there has been considerable advancement across the industry in the proliferation of large loads seeking more immediate interconnection. A modernization of the LLIP business practice is well overdue and appreciated, but as we note further below, aligning the business practice to BPA’s current processes is an insufficient stopping point. Additional enhancements to BPA’s load interconnection procedures remain critical given the considerable advancement in load interconnection policies across the nation.

We offer the following specific comments on BPA’s proposed business practice.

1. Section A – Line and Load Interconnection Request (LLIR)

a. Policy Applicability

At the business practice customer meeting, Bonneville staff noted that the LLIP business practice is intended to generally apply only to loads interconnecting to BPA’s transmission system. While a potential formality, we request that BPA carry this detail through section A.1 pertaining to Line & Load Interconnection Requests (“LLIRs”) for NITS Customers. Specifically, we request that BPA include the text “on BPA’s Transmission system” after “at an existing POD” in sections A.1.a.iii, A.1.a.iv, and A.1.a.v. Many of BPA’s NITS customers’ loads are interconnected solely within another utility’s transmission system and are served via transfer, and as such we believe it is important for BPA’s policies to be clear in their scope to minimize unintended confusion among the diverse set of NITS Customers. Bonneville includes this language already in sections A.1.a.i and A.1.a.ii, so we recommend including this language throughout for consistency.

BPA Response 17

BPA thanks NRU for this comment and updates Sections A.1.a.iii, .iv, and .v of the LLIP Business Practice to include “on BPA’s Transmission System,” as follows:

- iii. New peak load at an existing POD on BPA’s Transmission System reaches 20 MW within a 10-year period.
 - 1. Transmission Customer identifies this information in the 10-year “Projected Load” data field in Section 2.E of the Line and Load Interconnection Request form.
- iv. New Network Load at an existing POD on BPA’s Transmission System.
- v. Load Growth or load transfers that are not New Network Load at an existing POD on BPA’s Transmission System, if BPA determines a submission is required through the Load and Resource Consolidated Data Collection Tool (LaRC) evaluation process. BPA will notify the Transmission Customer that an LLIR at the conclusion of evaluating the LaRC.

b. Adoption of 20 MW LLIR Threshold

In section A.1.a.iii, BPA proposes that “20 MW or more of new load at an existing POD” will require submittal of an LLIR. We request Bonneville clarify this provision, as it is unclear whether this will be triggered at any point at which a load at an existing POD exceeds 20 MW (i.e., a 14 MW load increases to 23 MW over the 10-year projected period), or instead whether the cumulative increase over the 10-year projected period exceeds 20 MW (i.e., a 35 MW load increases above 55 MW over the 10-year projected period). Our assumption of BPA’s intent is the latter interpretation but would appreciate additional clarity to avoid confusion.

BPA Response 18

Please see BPA Response 1.

Further, we question the purpose of a 20-MW load increase threshold at an existing POD (proposed section A.1.a.iii) for triggering the submittal of an LLIR, alongside the proposal for BPA to require an LLIR submission for “load growth or load transfers that are not New Network Load at an existing POD if BPA determines a submission is required” in evaluating a NITS Customer’s load and resource forecast (proposed section A.1.a.v). If the purpose of the 20-MW threshold is to establish consistency and a level of advanced certainty of doing business with Bonneville, any such certainty is trampled over by BPA’s boundless ability to require an LLIR be submitted for any reason as part of evaluating a load and resource forecast. It is unclear when Bonneville would adhere to the 20-MW threshold when it can instead require a NITS Customer to submit an LLIR ostensibly for any reason. We urge BPA to clarify how the 20-MW threshold will coexist with what appears to be blanket discretion for BPA to require an LLIR be submitted, and request that BPA either adopt specific guardrails for BPA to “determine” the submission of an LLIR is required, or eliminate section A.1.a.v altogether.

BPA Response 19

Please see BPA Responses 2 and 10 for clarification on why BPA may require a LLIR for Load Growth and load transfers.

Finally, we agree with comments submitted by others noting the timing implications of BPA's determination that an LLIR is necessary. If BPA arrives at its determination through the load and resource forecast evaluation process, it should adopt more timely deadlines for making and noticing such determination. Because that evaluation period can take upwards of six months (plus a calendar year between ordinary forecasting cycles), a NITS Customer can face significant timing penalties by waiting for its eventual conclusion. We therefore request that BPA provide notice to a NITS Customer within 15 business days of receiving an updated load and resource forecast whether an LLIR will be required for any of the identified Points of Delivery. This is especially critical given BPA's TC-27 proposal to condition a NITS Customer's ability to be studied for transmission service on first achieving specific progress in the load interconnection process.

BPA Response 20

BPA declines to adopt a provision in the LLIP Business Practice requiring notice of the need for an LLIR within 15 Business Days of LaRC submittals. Evaluating complex load forecasts against regional power-flow models requires comprehensive engineering review that cannot be completed within 15 Business Days. Sections A.1.a.i through A.1.a.iv provide clear criteria to the NITS customer on when a LLIR is required for a majority of the situations that require an LLIR.

Please see BPA Responses 2 and 11.

c. Cost Responsibility

i. Section A.3.a.ii.2.a

NRU appreciates BPA's efforts to perpetuate its policy of not charging NITS Customers for interconnection study costs related to "trended" load growth, and to clarify situations that would require a NITS Customer to pay for the necessary interconnection studies. We understand certain situations may result in a NITS Customer paying for certain interconnection studies.

However, we request that Bonneville further clarify proposed section A.3.a.ii.2.a, which currently specifies "[a]n LLIR is considered 'Exploratory' when a utility customer is seeking an informational study." It is not clear how BPA defines "informational study", and one interpretation is that every interconnection study associated with every LLIR could be considered an "informational study". Ultimately, all interconnection studies will produce system impact or network upgrade information, and so it is not immediately clear what distinguishes an "Exploratory" LLIR from that which is not, and when a NITS Customer should identify the LLIR as such. Given the potential cost exposure associated with interconnection studies, we request that BPA provide further information regarding its definition for "informational" study, including when a NITS Customer should be reasonably expected to mark the "Exploratory" box of the Line and Load Interconnection Request form. Our assumption is that an "Exploratory" LLIR relates to a NITS Customer seeking a study for a prospective interconnection site located within the utility customer's service territory, but where no end use customer has been identified. To the extent this interpretation is correct, we request BPA include clarifying language in its proposed business practice to this effect.

BPA Response 21

In response to this comment, BPA has changed Sections A.3.a.ii.2.a and b to better clarify "Exploratory" and "Preliminary" as follows:

- a. An LLIR is considered "Exploratory" when a utility customer seeks an informational study for a prospective interconnection location within its service territory, but where no specific end-use customer or committed load has been identified. ~~is seeking an informational study.~~
- b. An LLIR is considered "Preliminary" when a utility customer and a specific end-user are in discussion but have not executed a binding service agreement. ~~is seeking study of a load that it has taken some action to develop, such as initiating discussions with an end user, but has not committed to developing.~~

In both cases, because the load is speculative and not firm, the NITS customer is responsible for actual study costs pursuant to Section A.3.a.ii.

ii. Section A.3.b.iii.1

In section A.3.b.iii.1, BPA notes that it will discuss with the NITS Customer the nature of the load needs driving the upgrade prior to a determination of the NITS Customer's advance funding obligation. Although this provision carries forward BPA's existing interconnection advance funding policy, it also leaves significant uncertainty as to the NITS Customer's ultimate advance funding obligation. And while BPA identifies "size of the load, load diversity, and the project cost estimate" as factors influencing that determination, it is not abundantly clear how these criteria relate to risk to BPA or its ratepayers. To the extent practicable we request that BPA provide additional detail regarding how the evaluation and determination of "level of risk" will be determined. For instance, will BPA consider other factors such as the level of commitment (contractual or financial) between the end use load and the NITS Customer? The progress of distribution upgrades that may be required to connect the load? Ultimately, we believe that the NITS Customer should be provided some degree of certainty regarding its potential advance funding obligation in the early stages of an LLIR submittal, and as the associated load matures over time.

BPA Response 22

BPA has not proposed changes to policies around advance funding or the *BPA Facility Ownership and Cost Assignment Guidelines (FOCA)* as part of the edits on the LLIP Business Practice. Such changes are out of scope for this round of edits, which attempts to clarify current procedures.

BPA will continue to consider ways to improve the procedures outlined in the LLIP Business Practice in the future in BPA's Rapid Access Products & Interconnection Delivery (RAPID) program. BPA encourages NRU and other customers interested in such topics to engage in workshops on RAPID, a topic within BPA's Grid Access Transformation (GAT) project: <https://www.bpa.gov/energy-and-services/transmission/grid-access-transformation-project>.

2. Proposed Section D – Queue Status

NRU appreciates BPA's commitment to update the "status" field in the interconnection request queue, as the LLIR proceeds through the interconnection process. We recommend, to the extent possible, that BPA provide additional clarity for certain status designations. Specifically, we respectfully request that instead of "STUDY" and "STUDY COMPLETED"

designations, Bonneville indicate which study is currently being performed, as well as which study has been completed. Given the numerous studies within BPA's interconnection processes, providing more refined status updates can help external stakeholders understand where in the process various interconnection requests are, as well as the expected general timeframe that Bonneville requires to complete its studies.

BPA Response 23

Changing the reporting fields for the interconnection request queue is out of scope for this round of edits to the LLIP Business Practice, which attempts to clarify current procedures. Changing information fields in the interconnect request queue would impact all interconnection reporting, not just LLIRs. BPA will consider ways to improve the transparency on the queue in the future.

3. Proposed Sections F, G, H, and I

For the Feasibility Study and System Impact Study stages (proposed sections F and G) of the interconnection process, BPA proposes to “endeavor” to complete these sequential studies each within 180 Calendar Days, a proposed tripling relative to the status quo. Accounting for the kickoff meeting, as well as contracting processes prior to and following the Feasibility Study, a BPA interconnection customer can be expected to wait nearly a year and a half from submitting an LLIR to receive the results of its System Impact Study. For the Facilities Study stage (proposed section H), Bonneville avoids including even a perfunctory timeframe that it may need to complete this study. Lastly, for post-study agreements (proposed section I), Bonneville again proposes to “endeavor” to offer such agreement within six months of the Facilities Study review meeting. These timelines are untenable.

Although we understand that the proposed timelines are meant to reflect the current state of BPA's resource constraints and study capabilities, with which we sympathize, they will halt legitimate regional economic growth and new load addition opportunities for BPA's NITS Customers. Concerns with these interconnection study timelines are compounded by the fact that BPA also proposes through the TC-27 proceeding to require advancement in the load interconnection process before a NITS Customer will be even permitted to be evaluated for transmission service. We therefore urge BPA to restore the currently effective timelines of 60 days each to complete interconnection studies, whether Feasibility, System Impact, or Facilities Studies. Doing so would more closely align with the timelines established in sections 19 and 32 of BPA's tariff for completing System Impact and Facilities Studies, as well as the preamble to the proposed business practice itself which lists sections I, II, and III of BPA's tariff as the policy reference.

BPA Response 24

Please see BPA Responses 7, 8, and 15.

To the extent that BPA cannot adhere to the current 60-day interconnection study timelines, then we encourage BPA to assess the following alternatives:

- Allow the interconnection Feasibility, System Impact, and Facilities Studies to be completed by the interconnection customer itself or a third-party engineering firm. BPA should no longer serve as the only source for completing these studies, when BPA's current capabilities require a potential tripling of their durations (or, in the case of Facilities Studies, contain no duration whatsoever). If executed efficiently and to BPA's required specifications, allowing others to complete certain interconnection studies could yield a higher number of completed

interconnection studies in a shorter overall timeframe than if BPA were responsible for completing them all. This not only would preserve Bonneville's resources but also allow loads to interconnect at a potentially faster pace – a mutually beneficial outcome for BPA and its customers.

- Evaluate the merits of batching or clustering multiple LLIRs within load interconnection studies, where feasible.

BPA Response 25

Please see BPA Response 9.

Evaluation of a clustered study approach for LLIRs is out of scope for this round of edits on the LLIP Business Practice, which attempts to clarify current procedures. BPA will consider ways to improve the study processes outlined in the LLIP Business Practice in the future through RAPID.

Conclusion

Although we acknowledge that a significant driver for the proposed revisions to the LLIP business practice is to modernize the language and align it to BPA's current procedures, BPA must seek to adopt more aggressive innovation, and quickly. BPA's proposal to triple the time to complete its interconnection studies is especially concerning in light of recent rulings by the Federal Energy Regulatory Commission ("FERC") on large load interconnections in Independent System Operator ("ISO") and Regional Transmission Organization ("RTO") territories. There, a focus is on accelerating study timelines; not protracting them.¹ We therefore recommend that BPA pursue efforts to adopt best practices for the interconnection of large loads that have proved successful in other regions.

¹We note that in the FERC Orders initiating show-cause proceedings for ISO/RTOs, the Commission noted "based upon the record, it appears reasonable that such study processes, culminating in a report to the Eligible Customer with the results of the studies, including any Direct Assignment Facilities and Network Upgrades necessary to accommodate the transmission service request as well as a non-binding good faith estimate of the cost and the time to construct such facilities, should take no more than 60-90 [sic] calendar days to complete."

For instance, we encourage BPA to evaluate accelerated or abbreviated interconnection study processes for loads that agree to provide demand flexibility in response to grid or local interconnection constraints. This approach for loads could mimic the approach for resources utilizing the Energy Resource Interconnection Service type in the generation interconnection process, which may result in fewer identified network upgrades and reduce the timeline for interconnection. Notably, interconnecting additional load onto the existing transmission system or with only modest upgrades could have a lowering effect on transmission rates. Similarly, BPA could evaluate streamlining interconnection study processes in instances where loads will be paired with dedicated generation, and consider rate incentives to encourage such behavior where it would result in fewer upgrades, fewer impacts to BPA's transmission system, and a shorter timeline for interconnection.

BPA Response 26

BPA appreciates NRU commenting to encourage BPA to consider these innovative concepts to shorten interconnection timelines and reduce upgrades needed for interconnection.

BPA will continue to consider ways to improve the procedures outlined in the LLIP Business Practice in the future in BPA's RAPID program. BPA encourages NRU and other customers interested in such topics to engage in workshops on RAPID.

We lastly encourage BPA to consider ways to plan on a more long-term, holistic basis for interconnection service, such as through its Proactive Planning initiative. Were BPA to include local interconnection areas within its long-term, proactive planning process, it could potentially identify load-area reinforcements in advance and lessen the overall burden associated with completing individual LLIR studies. We applaud BPA for taking steps to initiate long-term, proactive transmission planning – but this innovation should not be isolated to only the transmission network.

We appreciate the opportunity to provide these comments in response to the proposed revisions to the LLIP business practice. NRU members' economic viability is largely a function of Bonneville's success in efficiently completing its various transmission processes, and we look forward to working with BPA in identifying ways to enhance its effectiveness. Please reach out if you have any questions or would like to discuss anything contained in these comments.

BPA Response 27

BPA encourages NRU and other customers interested in such topics to engage in workshops on the Proactive Planning initiative, a topic within BPA's Grid Access Transformation (GAT) project:

<https://www.bpa.gov/energy-and-services/transmission/grid-access-transformation-project>.

BPA thanks NRU for commenting on the LLIP Business Practice.

D. Public Power Council

RE: PPC Comments on BPA's Proposed Line and Load Interconnection Procedure Business Practice Revisions

The Public Power Council (PPC)¹ appreciates the opportunity to provide feedback on BPA's proposed revisions to its Line and Load Interconnection Procedure Business Practice. PPC would like to express some overarching concerns with the proposed BP revisions in addition to specific concerns raised by our members and public power partners.

¹PPC is the umbrella trade association representing the interest of the Northwest's non-profit, public power utilities that have preference rights to the output of the federal system. PPC's members rely on BPA for wholesale power and transmission services to provide economic, reliable, and environmentally responsible power supply for the communities and businesses they serve at cost. PPC's members subscribe nearly the full firm output of the Federal Columbia River Power System (FCRPS) and a large portion of the capability of BPA's transmission system. The ability to access BPA's transmission system to deliver federal and non-federal generation to their communities is critical for PPC members.

As consumer owned utilities, PPC members are responsible for serving the electricity needs of their local communities. A large part of this role is facilitating economic development in those communities through providing affordable, reliable, and timely electricity service. BPA plays a large role in PPC members' ability to facilitate this economic development, which can provide a meaningful difference in the economic health and growth opportunities in communities across the Northwest.

To support this through its Line and Load Interconnection process, BPA should at a minimum provide: 1) timely completion of studies and construction of facilities to integrate new and growing loads onto its system, 2) clarity around when a line and load interconnection request is needed, and 3) transparent expectations for funding of line and load interconnection facilities.

PPC is concerned that the proposed revisions to the agency's Line and Load Interconnection Procedures do not achieve these minimum threshold objectives; instead, the edits prolong timelines and establish policies that introduce the opportunity for judgement calls and interpretations, which do not provide clarity for PPC member utilities or the end use consumers they serve.

PPC is concerned about the extension to developing SIS studies for line and load interconnection requests. Where most of the industry is looking to decrease study time, BPA's proposal triples the time allocated to conduct its study.

BPA Response 28

Please see BPA Responses 7, 8, and 15.

Performance of these studies should be included in BPA's execution enhancement efforts to identify potential solutions. One potential solution which should be explored is allowing third parties to develop studies that meet BPA's standards. This could allow customers to invest in additional resources on BPA's behalf in instances where the agency cannot meet existing study timelines.

BPA Response 29

Please see BPA Response 9.

While we understand BPA's staffing challenges, the agency needs to continue to be responsive to its customers. PPC supports additional staffing as needed to achieve this outcome. With other processes going through large reform efforts, BPA needs to ensure that line and load interconnection study efforts remain appropriately staffed.

Additionally, as raised in comments from other public power entities, there are several areas where greater clarity is needed, and we expect BPA to work with customers to ensure that clarity is achieved before finalizing its revised business practice.

We appreciate the opportunity to comment.

BPA Response 30

BPA remains committed to increasing internal engineering capacity, recruiting specialized technical staff, and streamlining study workflows. BPA appreciates PPC's support for resource enhancement.

BPA will continue to consider ways to improve the procedures outlined in the LLIP Business Practice in the future in BPA's Rapid Access Products & Interconnection Delivery (RAPID) program. BPA encourages PPC and other customers interested in such topics to engage in workshops on RAPID, a topic within BPA's Grid Access Transformation (GAT) project: <https://www.bpa.gov/energy-and-services/transmission/grid-access-transformation-project>.

BPA thanks PPC for commenting on the LLIP Business Practice.

E. NITS Customer Group

The NITS Customer Group¹ submit these comments in support of the comments of the Northwest Requirements Utilities ("NRU") and Umatilla Electric Cooperative ("UEC") regarding the Bonneville Power Administration's ("BPA") proposed revisions to its Line and Load Interconnection Procedures ("LLIP") Business Practice.

¹The NITS Customer Group is comprised of Benton PUD, Benton REA, Big Bend Electric Cooperative, City of Forest Grove, Clallam PUD, Clark Public Utilities, Columbia River PUD, Eugene Water & Electric Board, Klickitat PUD, Lewis PUD, Mason PUD #3, McMinnville Water & Light, Northern Wasco PUD, Snohomish PUD, Umatilla Electric Cooperative ("UEC"), Northwest Requirements Utilities ("NRU"), PNGC Power, and the Western Public Agencies Group. By joining these comments as members of the NITS Customer Group, NRU and UEC both underscore their own respective comments and express support for the other party's comments.

As the final leg of BPA's source to load transmission planning triumvirate, the LLIP Business Practice plays an underappreciated role in meeting the region's load growth and enabling economic development. An updated, modern LLIP Business Practice that both clearly identifies the respective Line Load Interconnection Request ("LLIR") responsibilities of BPA and its transmission customers and is diligently and expeditiously executed by all parties, and particularly by BPA, is essential to meet the increasing load demands being placed on BPA and its NITS customers in a timely manner.

For the above reasons, the NITS Customer Group join NRU and UEC in their call for additional clarity and firmer commitments by BPA in the updated LLIP Business Practice, including, without limitation, NRU's and UEC's recommendations that:

- Section A.1.a be revised to provide more clarity and certainty as to when an LLIR will or will not be required, and specifically that the overly broad and commercially challenging discretion in BPA under Section A.1.a.v to require an LLIR for any load growth identified in a NITS customer's LARC, regardless of how de minimis, be removed.²

²NRU LLIP Business Practice Comments, Sections 1.a, 1.b (July 15, 2026) ("NRU Comments"); UEC LLIP Business Practice Comments, pages 1-2 (July 15, 2026) ("UEC Comments").

BPA Response 31

Please see BPA Responses 2, 10 and 11.

- Section A.1.iii be revised to clarify how the proposed 20 MW load increase threshold at an existing point of delivery (“POD”) for the triggering of a LLIR will be measured and applied.³

³NRU Comments, Section 1.b; UEC Comments, pages 1-2.

BPA Response 32

Please see BPA Response 1.

- Section A.3.a.ii.2.a be clarified as to what constitutes an “Exploratory LLIR” and an “information study” for purposes of determining when a NITS customer will be expected to pay interconnection study costs.⁴

⁴NRU Comments, Section 1.c.i.

BPA Response 33

Please see BPA Response 21.

- Section A.3.a.ii and Section A.3.b.iii be modified to provide more certainty to NITS customers as to their funding obligations, respectively, for LLIR studies and transmission facilities.⁵

⁵UEC Comments, page 2; NRU Comments, Section C.ii.

BPA Response 34

Please see BPA Responses 12 and 22.

- Section G.5 be amended to reject BPA’s proposal to “endeavor” to complete System Impact Studies within 180 calendar days and instead (i) restore and maintain BPA’s commitment in the current Business Practice to use reasonable efforts to complete System Impact Studies within 60 days from its receipt of an executed System Impact Study Agreement and (ii) take such steps as are necessary to be able to meet this commitment.⁶ Adopting this recommendation will better align the proposed Business Practice with BPA’s obligation under its OATT to “use due diligence” to complete System Impact Studies within 60 days of its receipt of an executed System Impact Study Agreement.⁷ This is compared to BPA’s proposed Business Practice language, which triples the timeline and deemphasizes the level of effort required by BPA in its OATT.

⁶UEC Comments, pages 2-4; NRU Comments, Section 3.

⁷BPA OATT, §§ 19.3, 32.3.

BPA Response 35

Please see BPA Responses 7 and 15.

- Section H be strengthened by renewing BPA's pledge under Section G.3 of the current LLIP Business Practice to use reasonable efforts to complete Facility Studies within 60 calendar days of receipt of a customer's executed Facility Study Agreement.⁸ Like the recommendation above regarding System Impact Studies, adopting this recommendation will also better align the proposed Business Practice with BPA's obligation under its OATT to "use due diligence" to complete required Facilities Studies within 60 days of its receipt of an executed Facilities Study Agreement.⁹ BPA should take such steps as are necessary to ensure that it is using reasonable efforts and due diligence to meet this commitment.

⁸NRU Comments, Section 3.

⁹BPA OATT, §§ 19.4, 32.4

BPA Response 36

Please see BPA Responses 5 and 15.

- Section F.3 be revised to also include a commitment by BPA to use reasonable efforts to complete Feasibility Studies within 60 calendar days of its receipt of an executed Feasibility Study Agreement.¹⁰ Feasibility Studies are a helpful addition to the Business Practice. They are intended to be high-level and quick studies of the ability to serve the load, and BPA should be able to complete them well within 60 days.

¹⁰NRU Comments, Section 3.

BPA Response 37

Please see BPA Responses 7 and 15. Feasibility studies provide critical high-level engineering evaluations; establishing realistic 180-day completion windows ensures study accuracy under current queue volumes.

- Sections F, G, and H be amended to allow interconnection Feasibility, System Impact, and Facilities Studies to be completed by interconnection customers or third-party engineering firms approved by BPA.¹¹

¹¹NRU Comments, Section 3; UEC Comments, page 4.

BPA Response 38

Please see BPA Response 9.

In addition to the above support for the comments of NRU and UEC, the NITS Customer Group also recommends that:

- To improve consistency and provide customers with a reasonable opportunity to review and respond to requests, the Business Practice be revised to establish a standard customer response timeline of 15 business days for all customer actions. The only exception should be the Post Study Agreement response timeline, which is currently proposed as 30 business days and should remain unchanged.

We appreciate BPA's consideration of these comments in support of the comments of NRU and UEC regarding its LLIP Business Practice.

BPA Response 39

BPA thanks the NITS Customer Group for this comment and has changed all 15 Calendar Day timelines to 15 Business Days in Sections E.4, G.1, and H.1 of the LLIP Business Practice.

BPA thanks the NITS Customer Group for commenting on the LLIP Business Practice.

F. Clatskanie PUD

Clatskanie People's Utility District (PUD) offers the following comments in response to the Bonneville Power Administration's ("BPA") proposed revisions to its Line and Load Interconnection Procedures ("LLIP") Business Practice.

We additionally offer broad support for the comments offered by the NITS Customer Group, NRU, and UEC.

A) Line and Load Interconnection Request (LLIR)

- 1) Network Integration Transmission Service (NITS) Customers
 - a) Transmission Customers intending to utilize NITS must submit an LLIR for the following:
 - (i) A new Point of Delivery (POD) on BPA's Transmission System.

Commented [CR1]: Are the listed determinates intended to layer on top of the most recent LARC or do they stand alone?

BPA Response 40

Please see BPA Response 2.

Each criteria outlined in Section A.1.a.i-iv of the LLIP Business Practice is independent of the need for an LLIR identified in LaRC evaluation, outlined in Section A.1.a.v. BPA will notify a customer if a LaRC submittal triggers the need for a LLIR.

- (ii) Changes to an existing POD on BPA's Transmission System.

Commented [CR2]: "Changes" is an overly broad term. Does this include alterations to metering and telemetry?

BPA Response 41

BPA clarifies that "changes" in Section A.1.a.ii of the LLIP Business Practice refers to changes to the physical connection to BPA's Transmission System at the POD. For example, change from a line tap to a looped connection may require BPA to design or construct facilities, which BPA does through the LLIP. Changes to metering and telemetry do not require an LLIR.

- (iii) 20 MW or more of new load at an existing POD, identified by the Transmission Customer in the 10-year "Projected Load" data in Section 2.E of the Line and Load Interconnection Request form.

Commented [CR3]: The language creates a circular loop where the guidance on when to fill out the form requires the form already being filled out.

It is unknown how this will be measured and used in application. Will new load identified by BPA as part of BPA's forecasting efforts be excluded from the LLIR process?

Should load materialize or coincide beyond projected amounts (ie weather events), how will customer be impacted?

BPA Response 42

Please see BPA Response 1. In response to this comment, BPA has edited Section A.1.a.iii of the LLIP Business Practice as follows:

- iii. New peak load at an existing POD on BPA's Transmission System reaches 20 MW within a 10-year period. 20-MW or more of new load at an existing POD, identified by the
 - 1. Transmission Customer identifies this information in the 10-year "Projected Load" data field in Section 2.E of the Line and Load Interconnection Request form.

Please see BPA Response 2 regarding how forecasts interact with the LLIP. BPA clarifies that LLIR's are not meant to facilitate continuity events like weather.

- 2) Long-Term Firm Point-to-Point Transmission Service (PTP) Customers.
 - a) Transmission Customers intending to utilize Long-Term Firm Point-to-Point Transmission Service (PTP) must submit an LLIR for the following:
 - (i) A new POD on BPA's Transmission System.
 - (ii) Changes to an existing POD on BPA's Transmission System.
 - (iii) Increases of MW of PTP to be delivered to an existing POD.
- 3) Cost responsibility for study and transmission facilities.
 - a) Cost responsibility for study of an LLIR.
 - (i) Transmission Customers intending to utilize PTP related to an LLIR are responsible for the actual costs of BPA performing any required studies.
 - (ii) Transmission Customers intending to utilize NITS related to an LLIR are responsible for the actual costs of BPA performing any required studies when:
 - (1) An LLIR is required for New Network Load; or

Commented [CR4]: As written BPA can force an LLIR and the costs through the LARC process.

BPA Response 43

Please see BPA Response 12. BPA confirms Clatskanie PUD's understanding: Transmission Customers seeking to utilize NITS are responsible for the actual costs of a study under the LLIP for New Network Load.

- (2) An LLIR is not for a New Network Load but the Transmission Customer has identified the request as "Exploratory" or "Preliminary" in Section 2.A of the Line and Load Interconnection Request form.
 - (a) An LLIR is considered "Exploratory" when a utility customer is seeking an informational study.
 - (b) An LLIR is considered "Preliminary" when a utility customer is seeking study of a load that it has taken some action to develop, such as initiating discussions with an end user, but has not committed to developing.
- (iii) Transmission Customers intending to utilize NITS related to an LLIR are not responsible for the costs of study in instances not covered in Section A.3.a.ii above.

Commented [CR5]: The language as proposed is subjective.

BPA Response 44

Please see BPA Response 21.

C) Processing an LLIR

- 1) Within five (5) Business Days following receipt of an LLIR, BPA will acknowledge receipt of the Transmission Customer's email.
- 2) Within 15 Business Days following receipt of an LLIR, BPA will provide the Transmission Customer with notification of any deficiencies in the LLIR. BPA will describe any deficiencies in such notification.
 - a) The Transmission Customer will have 15 Business Days from BPA's notice of deficiencies to resolve the deficiencies and provide an updated LLIR to BPA.
 - b) If the Transmission Customer fails to resolve the deficiencies within 15 Business Days from BPA's notice, BPA will cease processing the LLIR and the Transmission Customer will need to restart the LLIR submission procedures for any additional consideration of an LLIR by BPA.

Commented [CR6]: Will BPA notify customer if no "deficiencies" are found?

Commented [CR7]: While not explicit; does this mean the original submission date is null and void?

BPA Response 45

BPA notices that Clatskanie PUD's comment document includes changes to the text of portions of the LLIP Business Practice without explicitly identifying those changes through formatting or any comments. BPA attempts to respond to all comments or proposed changes but may miss changes that are not identified in some manner. BPA has highlighted Clatskanie PUD's text additions in yellow to identify Clatskanie PUD's proposed changes.

BPA declines to adopt Clatskanie PUD's proposed edits to Section C of the LLIP Business Practice. BPA clarifies that when BPA notifies a customer of a deficient LLIR submission, the notice includes identification of the specific items that are deficient. BPA thinks this requirement is sufficiently captured in the proposed language. When resolution of such a deficiency requires an updated LLIR, the deficiency notice will provide that direction.

BPA confirms Clatskanie PUD's understanding that failure to cure deficiencies in an LLIR submission results in the BPA disregarding that initial submission date in establishing queue positions. Queue position of an LLIR is established based on the date of submission, as outlined in Section D.1 of the LLIP Business Practice. However, an LLIR is not assigned a queue position until validated. If a customer submits an LLIR but fails to resolve deficiencies in the submission, BPA will not establish a queue position for that request and the customer must submit a new LLIR for additional consideration.

- 3) BPA will schedule a kickoff meeting to occur between BPA and the Transmission Customer within 30 Calendar Days of receiving a completed LLIR.
 - a) During the kickoff meeting, BPA and the Transmission Customer will discuss which study steps are required.

Commented [CR8]: This could be interpreted as a meeting will "occur" within 30 days or it will be "scheduled" within 30 days to happen at a later date.

BPA Response 46

BPA clarifies that under Section C.3 of the LLIP Business Practice, BPA will undertake the action of scheduling the kickoff meeting within 30 Calendar Days of receiving a completed LLIR. The date of the meeting is dependent on the coincident availability of technical staff of the customer and BPA.

In response to this comment, BPA has edited Section C.3 of the LLIP Business Practice as follows:

3. ~~Within 30 Calendar Days of receiving a completed LLIR,~~ BPA will schedule a kickoff meeting between BPA and the Transmission Customer ~~within 30 Calendar Days of receiving a completed LLIR.~~
- 4) If upon conclusion of the kickoff meeting the proposed LLIR is found to be invalid or not technically feasible at the time of the request, BPA will withdraw the LLIR from the interconnection queue.

BPA Response 47

BPA will determine, in conversation with a customer, whether a proposed interconnection is feasible. Please see BPA Response 4, regarding the dispute resolution provisions in BPA's OATT.

E) Material Change Analysis Request

- 1) Any change to information pertinent to an LLIR, contained in the LLIR form, study reports, or meeting notes, requires BPA approval.
 - a) A change that BPA deems to be a material change may require the Transmission Customer to submit a new LLIR to proceed with the change.

BPA Response 48

BPA clarifies that Section E of the LLIP Business Practice establishes a process for a customer to propose a change to an LLIR and receive BPA confirmation on whether the change would be a material change that would result in a loss of current queue position. As outlined in Section E.4 of the LLIP Business Practice, the customer may decide whether to proceed with a material change by submitting a new LLIR or to proceed with the LLIR unchanged.

BPA notes that Clatskanie PUD has changed the text of Section E.1.a in its comment document from "requires" to "may require." BPA declines to adopt the proposed change. As described above, Section E intends to establish clear guidelines on the result of proceeding with a material change, which is loss of queue position and the need to submit a new LLIR.

- 2) To request a change to information in an existing LLIR, the Transmission Customer must email an amended Line and Load Interconnection Request form (BPA F 6420.25e) to interconnection@bpa.gov and include:
 - a) Enter "LLIR Change Request" and the queue number (L####) of the applicable request in the subject line of the email to facilitate processing.
 - b) The amended LLIR form must be completed and signed to be valid.
 - c) Section 4 of the LLIR form must include a detailed description of the proposed change to the interconnection and all information necessary to support BPA's evaluation of the proposed change.
 - (i) BPA may require the Transmission Customer to provide additional information if necessary to evaluate a proposed change.

Commented [CR9]: Who is the determining body? BPA, Customer, or both? What constitutes "not technically feasible". Is there a dispute mechanism if the parties are not in agreement?

Commented [CR10]: This language implies that any change to reports or study notes would require a new LLIR. Does the submission of a material change LLIR mean the original submission date is lost?

- 3) Within 30 Calendar Days of receipt of a request for change, BPA will assess the change request and notify Transmission Customer of whether the proposed change is:
- Nonmaterial; or
 - A material change.
 - A material change is a change that impacts the cost or timing of other LLIRs, including impacts to the schedule of energization of other LLIRs, or requires the LLIR at issue to be restudied.
 - The following are always deemed material changes:
 - Increases to the originally requested load.
 - Change of the POD, including a change in voltage class, after a single POD has been established in the study process.
 - Decreases in power factor.
- 4) Within 15 Calendar Days after BPA sends the determination of whether a change is nonmaterial or a material change, the Transmission Customer shall provide BPA notice via email to interconnection@bpa.gov to either rescind or proceed with the requested change.
- If such notice is not received within 15 Calendar Days after BPA's determination is sent, the request for the proposed change will be deemed rescinded.
 - If the change is deemed a material change, in order to proceed, the Transmission Customer must withdraw the existing LLIR and submit a new LLIR.

Commented [CR11]: The material change language creates barriers and disincentives to providing updated forecasts and facilities information.

Commented [CR12]: Is this applicable to increases and decreases in requested load? Should it be assumed that a change to the timing of the load is also a material change?

BPA Response 49

See BPA Response 13. BPA finds it reasonable to adopt the material change section in the LLIP Business Practice to prevent changes to requests from causing cost-shifts or schedule disruptions to other requests. BPA does not believe that the material change analysis section creates barriers or disincentives for accurate forecasts. It remains in customers' best interests to provide accurate forecasts and facility information. BPA notes that material change analysis applies only to changes to an LLIR that is in SIS or a later study phase. Customers should evaluate whether the interconnection they are seeking is ready to advance to SIS or not.

The items that are always deemed material changes are listed under Section E.3.b.ii of the LLIP Business Practice. Other changes, including decreases in load or energization date, are not always material changes and would be assessed under Section E.3.b.i for impacts on the cost or timing of other requests and the study process.

BPA declines to adopt Clatskanie PUD's proposal to change "endeavor to assess" to "assess." See BPA Response 15 for changes BPA made to Section E.3.

- F) Line and Load Interconnection Feasibility Study (LLI FES)
- Upon determining that conducting an LLI FES is necessary, BPA will provide the Transmission Customer the following within 30 Calendar Days of the kickoff meeting:
 - A notice of intent (NOI) to study at BPA's cost; or
 - An LLI FES Agreement and non-binding, good-faith estimate of the costs to complete the LLI FES.

- 2) Within 15 Business Days of receiving an LLI FES Agreement, the Transmission Customer must provide BPA:
 - a) An executed LLI FES Agreement and a deposit for the LLI FES equal to the estimated cost of study; or
 - b) A request for a Self-Study Agreement.
- 3) BPA will endeavor to complete the LLI FES within 180 Calendar Days of when BPA issues the NOI or receives the executed and funded LLI FES Agreement.
- 4) Upon completion of the LLI FES, BPA will provide the Transmission Customer with the LLI FES report.
 - a) Within 30 Calendar Days of providing the LLI FES report BPA will schedule an LLI FES review meeting.

Commented [CR13]: Propose to develop a self study agreement and include it by reference in the business practice. Self study conditions may best be further described in a stand alone section.

BPA Response 50

Please see BPA Response 9. BPA declines to adopt the proposed Self-Study section, or any provisions allowing for third-party study, into the LLIP Business Practice at this time.

BPA will continue to consider ways to improve the procedures outlined in the LLIP Business Practice in the future in BPA's Rapid Access Products & Interconnection Delivery (RAPID) program. BPA encourages Clatskanie PUD and other customers interested in such topics to engage in workshops on RAPID, a topic within BPA's Grid Access Transformation (GAT) project: <https://www.bpa.gov/energy-and-services/transmission/grid-access-transformation-project>.

For sections F, G, and H we propose reference to a new Self-Study section describing how customers and BPA will agree to such actions. Example language is provided below.

NEW SECTION – Self Study

XXX) Self-Study

- 1) Upon requesting a Self-Study Agreement, BPA will provide the Transmission Customer within 30 Calendar Days an agreement. Within the Agreement BPA will describe;
 - a) Parameters of the study, and
 - b) Time constraints for when the study will be completed and submitted to BPA, and
 - c) Description of how study results are to be formatted for submission to BPA.
- 2) Upon receiving Self-Study documentation, BPA will review the materials and notify the Transmission Customer accepting the report or of any study deficiencies needing to be resolved.
 - a) Customer will have 30 Calendar Days to resolve study deficiencies and resubmit the results to BPA.
- 3) Within 30 Calendar Days of accepting the self-study materials, BPA will schedule a review meeting.

Commented [CR14]: Draft language describing a self study process.

BPA Response 51

See BPA Response 50.

I) Post-Study Agreements

- 1) BPA will offer the Transmission Customer an agreement to design, procure, and build transmission facilities and equipment identified as necessary in the LLIR study process within 60 calendar days of the LLI FAS review meeting.
 - a. Agreement type, such as a Preliminary Engineering Agreement (PEA), Engineering and Procurement (E&P), or Construction/General Agreement, will be determined by scope of the interconnection and estimated schedule.
 - b. BPA will identify funding required with an agreement.
 - c. Any environmental or cultural compliance obligations will be outlined in the agreement. 2. No later than 30 Business Days after receipt of an agreement, the Transmission Customer must return the executed agreement and any required funding.
- 2) Upon Customer request, BPA within 60 calendar days will offer the Transmission Customer a Self-Design, Self-Procure, and/or Self-Build agreement.
 - a. Such agreements will be determined by scope of the interconnection and estimated schedule.
 - b. BPA will identify funding required with an agreement.
 - c. Within the agreements BPA will outline BPA's evaluation and approval process and timelines.
 - d. No later than 30 Business Days after receipt of an agreement, the Transmission Customer must return the executed agreement and any required funding.

Commented [CR15]: Proposed customer design, procure, build language.

BPA Response 52

Adoption of a customer build option is out of scope for this round of edits to the LLIP Business Practice, which attempts to clarify current procedures. BPA encourages customers interested in self-build to engage in workshops on Accelerate Expansion, a topic within BPA's Grid Access Transformation (GAT) project: <https://www.bpa.gov/energy-and-services/transmission/grid-access-transformation-project>.

BPA declines to adopt Clatskanie PUD's proposal to change "endeavor to offer" to "offer" and "within six (6) months" to "within 60 calendar days." See BPA Response 15 for changes BPA made to Section I.1.

We appreciate the opportunity to offer comments. Please reach out with any thoughts or questions

BPA Response 53

BPA thanks Clatskanie PUD for commenting on the LLIP Business Practice.

G. BPA Action

In Section A.1.a.v of the business practice, BPA identified that the word “growth” in the term “Load Growth,” a defined term in the BPA Acronyms and Glossary, was not capitalized. BPA has capitalized the word “growth” in the final version of the business practice.