

Response to Comments – Transition Process

BPA Transmission Business Practice

Version 2
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Response to Comments – Transition Process

Version 2

This document contains comments and BPA responses regarding Version 2 of the Transition Process 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)

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 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.

Comments on specific business practices are attached.

Comments on Transition Process version 2.

NIPPC supports the clarification that BPA will not hold individual study review meetings during the Customer Engagement window. While NIPPC members have found similar meetings valuable in the past, NIPPC recognizes the burden that individual customer meetings pose on BPA staff time. Given the number of interconnection requests in the transition cluster, the limited duration of the customer engagement window, and other demands on BPA staff, NIPPC appreciates that BPA cannot commit to provide all customers with an individual study review meeting. Rather than scheduling a limited number of individual meetings with a small subset of customers, BPA staff should focus on responding to specific questions that customers submit (in writing) as they review their study results.

NIPPC also supports the clarifications regarding the information and models that customers must provide BPA to advance to Phase 2 of the Transition Cluster. NIPPC recognizes the value to BPA in requesting the information in the Customer Review Period Redemonstration form; receiving the necessary information in a consistent format should facilitate processing and validation by BPA. NIPPC also agrees that the more detailed description of the modeling requirements and formats will allow customers the ability to provide models in a format useful to BPA at the beginning of the process and substantially reduce the instances where customers must provide BPA with information after the normal deadline.

NIPPC does not object to the greater clarification of the process and timeline to request a Material Modification. NIPPC also supports the proposal to include more detail in the business practice regarding the changes customers are allowed to make during the Customer Review Period without having to pursue a Material Modification to their request. Likewise, NIPPC supports adoption of the proposed Phase One Cluster Study Customer Review Period Modifications form (the "Modifications Form"). The Modifications Form will assist customers as they consider their options in making changes to their project that are consistent with the flexibility that BPA and customers agreed to in TC-25. By collecting the information from customers in a consistent format, BPA should be able to process customer requests for modifications more efficiently.

NIPPC does not object to the proposal to establish a deadline of 45 days from the start of the customer review period for to submit Material Modification requests or modify their interconnection request as allowed under the terms of the TC-25 Settlement Agreement. The proposed deadline provides a reasonable opportunity for customers to review their study results and consider changes to their transmission request. Any desire customers have for more time to consider changes must be balanced against the need for BPA staff to consider and implement customer's changes to the size of their project without delaying the start of the subsequent study phase. NIPPC agrees that a 45 day window appropriately balances these competing concerns.

Finally, NIPPC supports the adoption of the Transition Cluster Study Phase One Cluster Study Customer Review Period Redemonstration form (the “Redemonstration Form”). The Redemonstration Form provides customers with a check list that details all the information they must provide to BPA at this stage. By collecting this information from customers in a consistent format, BPA will be able to process the large volume more efficiently.

BPA Response 1

BPA appreciates NIPPC submitting comments in support of the changes to the Transition Process Business Practice. As NIPPC notes, BPA’s proposed business practice edits intend to provide customers with greater clarity on what information must be included in demonstrations during the Customer Review Period and provide a standardized process for modifications that aligns with the reformed cluster study process established under the TC-25 Settlement Agreement. BPA believes these processes will allow requests to move more efficiently through the interconnection process by ensuring permitted changes to requests are made in manner that does not delay the study for all requests participating.

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.¹ 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.

¹ 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 – Transition Process 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):

Transition Process V2

- **Section H.3.c.i** – BPA's email-only communication policy may hinder efficiency. We recommend allowing optional customer meetings or calls during the Customer Review Period to facilitate understanding and expedite revalidation.

BPA Response 4

BPA clarifies that it does not have an email-only communication policy during the Phase One Cluster Study Customer Review Period. As outlined in Section 6.6(b) of the LGIP and Section H.3.c. of the Transition Process Business Practice, BPA will hold an in-person, open meeting to discuss the results of the Phase One Cluster Study report. BPA will discuss the project requirements, costs, and take questions that customers may have. Section H.3.c.i. of the Transition Process Business Practice clarifies that BPA will not provide individual meetings in the Customer Review Period to ensure customers understand what to expect during that period. In shifting from a serial to clustered study process, BPA intends to ensure communications on topics that impact multiple customers are made to all customers in a Cluster.

BPA declines to make changes to the Transition Process Business Practice in response to NewSun's comment.

Please refer to BPA Response 16 in this Response to Comments – Transition Process document.

- **Section H.3.d** – ASPEN, Dynamic, and EMT models should be due at signing of Phase Two agreements rather than at the same time as the Phase One Cluster Study Redemonstration form. If projects are invalidated or withdrawn, then there is no need to supply BPA with the models so the redemonstration and validation process should proceed first.

BPA Response 5

BPA has not proposed any changes to Section H.3.d of the Transition Process Business Practice and declines to make changes to the Transition Process Business Practice in response to NewSun's comment.

BPA notes that the requirement that models are due during the Customer Review Period is established in Section 6.6.2 of the LGIP, which requires customers to provide models no later than the completion of the first Customer Review Period following the Phase One Cluster Study. Upon submitting an Interconnection Request, in the Generation Model and Performance Attestation for a Modeling Facility Attachment A to Appendix 1 Interconnection Request of the LGIP, customers attest to understanding the modeling requirements and attest to providing those models during the first Customer Review Period. NewSun's comment seems to attempt to use the business practice process to reopen matters that were directly

addressed in the formal tariff proceeding. BPA must implement the TC-25 Settlement Agreement and cannot consider this change.

Customers have the entire ninety (90) Calendar Day Customer Review Period to decide whether to proceed in the study process. Interconnection Customers may choose to withdraw prior to submitting models and thus avoid any unnecessary demonstration.

- **Section H.3.d.v** – As it has been historically, ASPEN models should not be required at this phase.

BPA Response 6

ASPEN models are full-sequence impedance models, a form of dynamic model, used in completing the short circuit analysis undertaken in the Phase Two Cluster Study. Refer to Section 7.3 of the LGIP. In the Generation Model and Performance Attestation for a Modeling Facility, Attachment A to Appendix 1 Interconnection Request of the LGIP, provided with an Interconnection Request, customers attest to providing dynamic models during the first Customer Review Period. BPA's proposed edit to Section H.3.d.v of the Transition Process Business Practice intends to clarify the modeling requirements further. Requiring ASPEN models aligns with NERC's ongoing requirements to increase the performance standards for Generator Interconnections.

BPA declines to change Section H.3.d.v. of the Transition Process Business Practice in response to NewSun's comment.

- **Section H.3.d.vii** – The proposed language suggests that BPA unilaterally determines the Point of Interconnection (POI) in the Phase One Cluster Study report without consultation with the impacted Interconnection Customer and even if the requested POI is feasible. This approach contradicts the express intent of the TC-25 settlement, which stated that "[i]n the event that Bonneville determines that a requested [POI] is not feasible or may need to be relocated, Bonneville 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."² Customers should retain their requested POI (with cost responsibility) so long as it is feasible or have the option to accept a new cluster POI if the POI is not feasible and BPA has made reasonable efforts to consult with the impacted Interconnection Customer. A change in a POI materially affects the ability of associated transmission service requests (TSRs) to represent valid commercial readiness criteria (CRC) (see **Transition Process V2, Exhibit A, Section 3.A.b** – noting that if the Point of Receipt of the TSR does not match the POI as identified in the most recently issued study report) and diminishes the value of transmission investments.

² TC-25 Settlement Agreement at Appendix 1, p. 3.

BPA Response 7

BPA notes that the proposed edit on Section H.3.d.vii. is a small change in the pre-existing language to clarify that the Point of Interconnection in the single-line diagrams must align with the Phase One Cluster Study report.

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 proposed business practice language contradicts the intent of the TC-25 Settlement Agreement. 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 use the business practice process to reopen matters that were directly addressed in the formal tariff proceeding. 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.

- **Section L.2.b.3** – Clarify how plant size reductions affect interconnection size and whether this impacts the ability to file separate requests or share facilities.

BPA Response 8

BPA declines to make any edits to the Transition Process Business Practice in response to NewSun’s comment. The proposed edits to Section L.2.b.3 of the Transition Process Business Practice directly clarify how a plant size reduction may affect interconnection size. A customer may not request Interconnection Service in MW larger than the plant size of the Large Generating Facility. Reductions in plant size below the originally requested service level must be made with a corresponding reduction in service level.

- **Exhibit A, Section 3.a** – Clarify if there are any issues with the current term sheet format or required information.

BPA Response 9

BPA proposed the adoption of the Transition Cluster Study Phase One Cluster Study Customer Review Period Redemonstration form, Exhibit A of the Transition Process Business Practice, to clarify the information that must be demonstrated for each Commercial Readiness Milestone Option and to standardize the format of submitting that information. BPA has clarified the information and format for the executed term sheet Commercial Readiness Milestone Option and declines to propose additional changes at this time.

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 10

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 – Transition Process 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 11

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.

II. Transition Process, V2

RNW generally supports BPA's proposed changes to the Transition Process Business Practice. These changes include clarity on information that must be provided to advance through the Transition Cluster Study process or to make changes to a Transition Request. BPA's incorporation of the Phase 1 Cluster Study Customer Review Period Redemonstration Form and Phase 1 Cluster Study Customer Review Period Modifications Form are useful additions to help streamline information gathering and review. All of these changes appear geared at ensuring information is provided to BPA in a clear and consistent manner. This clarity benefits both BPA and customers by facilitating more efficient processing and validation of information with less need for follow-up.

RNW is cautiously supportive of two additional changes—the elimination of the individual study review meetings during the Customer Engagement Window and the establishment of a 45-day deadline for submission of Material Modification Requests. In both

cases, BPA has appropriately balanced competing viewpoints given time and resource constraints.

With respect to the individual study review meetings, RNW members have found these types of meetings valuable in the past; however, our members also recognize the competing demands for BPA staff's time and the significant amount of preparation that goes into these meetings. On balance, RNW agrees with BPA that eliminating this option would free up precious BPA staff time to focus on other higher-value endeavors to keep the Transition process moving forward in a timely manner.

RNW also weighed—and ultimately supports—the proposed 45-day timeline for submitting Material Modification requests or other allowable changes referenced in Section L of the Business Practice. While some customers may wish for more time to evaluate any potential changes, 45 days is a reasonable amount of time to review study results and propose any necessary changes. A longer review window could put added strain on BPA staff and potentially delay the start of the next study phase, to the detriment of BPA and other customers. Once again, BPA's proposed language strikes the proper balance.

BPA Response 12

BPA appreciates RNW submitting comments in support of the edits to the Transition Process Business Practice. As RNW notes, the changes to the Transition Process Business Practice intend to provide customers with greater clarity on what information must be included in demonstrations during the Customer Review Period. BPA believes the standardized process for demonstrating information will allow for more efficient review.

Regarding the requirement that modifications be submitted in the first half of the Customer Review Period, BPA agrees with RNW's comment that this approach should help prevent delays to the start of the next phase of the study. BPA believes these changes balance the need to allow customers to make changes to requests while ensuring a single customer's actions do not delay the entire Cluster from moving forward.

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.

Transition Process V2

Clearway generally supports BPA's proposed revisions to the Transition Process Business Practice. Clearway has found significant value from the individual study review meetings during Customer Engagement Windows, though Clearway is not opposed to removing individual meetings to enable BPA's resources to remain focused on moving the transition process forward.

Regarding the Material Modification requests and other allowable changes, Clearway seeks clarification on several points. First, on fuel-type change restrictions in Section L.2.b.ii.1, the redline appears to prohibit all changes in fuel type. BPA should clarify that fuel-type changes are allowed when there is no material impact on interconnection characteristics. Other markets, including CAISO, MISO, and PJM, allow for fuel-type changes if there is no material impact to the system. Preserving this flexibility will not burden the generator interconnection process as the requirement that the fuel type change cannot have a material impact on interconnection characteristics is a strict standard for an Interconnection Customer to meet. Additionally, the same section appears to only allow changes in OEM/model if the fuel type remains unchanged. BPA should clarify that an Interconnection Customer can substitute technologies when the change is supported by updated models and causes no material system impact.

BPA Response 13

BPA appreciates Clearway submitting comments expressing general support for BPA's proposed revisions to the large generator interconnection business practices and will address Clearway's request for clarification below.

BPA declines to make changes to Section L2.b.ii.1. of the Transition Process Business Practice in response to Clearway's comment because a separate section addresses the method for making fuel changes. BPA clarifies that Section L.2.b.ii.1 of the Transition Process Business Practice identifies permissible changes to technical parameters of Large Generating Facility that do not require a request for Material Modification analysis during the Customer Review Period following the issuance of the Phase One Cluster Study report. Changes to fuel type are a change to information provided in the Interconnection Request that requires a request for Material Modification analysis, as outlined in Section L.2.a. of the Transition Process Business Practice. Please refer to Section 4.4 of the LGIP and Section I of the Large Generator Interconnection Business Practice.

BPA clarifies here, in response to Clearway's request, that if a request for Material Modification analysis results in a finding that a fuel type change would not be a Material Modification, the customer may make that change during the Customer Review Period. The customer would be required to provide models reflecting that fuel change.

On Section L.2.b.iii.2, the redlines indicate that gen-tie line changes may be impermissible if they affect the plan of service, even if POI does not change. This practice is generally allowed in other markets as long as the electrical characteristics and POI are preserved. BPA should clarify that gen-tie route changes are non-material if POI and electrical performance are unchanged.

BPA Response 14

BPA declines to make changes to Section L2.b.iii.2. of the Transition Process Business Practice in response to Clearway's comment because BPA believes that section conveys the information Clearway seeks clarification on. Section L.2.b.iii.2 of the Transition Process Business Practice intends to clarify that changes that impact a plan of service or the POI may be impermissible. As Clearway notes, if a gen-tie line change does not change the electrical performance, the change would likely be permissible. However, if the gen-tie line changes technical parameters significantly, the electrical performance would need to be re-studied, resulting in delays to the whole Cluster, and would thus be likely to be deemed impermissible.

Lastly, regarding the 45-day deadline for submission of Material Modification Requests, the rigid modification timing window creates a potentially problematic timeframe for adjustments. While BPA may be concerned that modification requests could delay the start of the next study phase, clarification is necessary. Other markets allow for reasonable updates throughout the review process, with requirements that those updates are supported by proper technical documentation. Additionally, some modifications may require iterative updates to remain feasible. Fuel change, technology type, and gen-tie parameter changes that could be impermissible under the proposed revisions are often necessary beyond the 45-day window, they should be allowed if they are technically justified and do not materially harm the system. For example, if a gen-tie parameter must be changed to maintain feasibility of the resource on the 46th or 50th day, and all required technical documentation that accompanies the modification request suggests that it will not harm the system, it should not be barred due to the 45-day deadline for MMRs. Accordingly, BPA should clarify that modifications can be made beyond the 45-day window where the modification is technically justified, consistent with feasibility, and where the modification would not cause detriment to Staff or other Interconnection Customers.

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

BPA Response 15

BPA declines to change the Transition Process Business Practice in response to Clearway's comment. BPA's clarification that customers are limited to a single request for Material Modification analysis in the first half of the Customer Review Period is to ensure that customers do not submit requests for exploratory changes that would require repetitious review that would delay the start of the next phase of the study.

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.

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 the Transition Process

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

NewSun and PRITCA (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 scooping and study report meetings involving wind, solar, geothermal, battery storage and pumped storage projects ranging in size from 20 to 600 MW. PRITCA also includes 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 (“LGIAAs”), 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. BPA should not foreclose an individual study review option.

BPA proposes to amend Section H(3)(c) of the Business Practice by expressly stating that BPA will not offer individual study review meetings during the Customer Review Period. BPA should shape its Business Practices by outlining processes available to customers, not by limiting the actions BPA itself will take.

BPA should retain individual study review meetings to address questions customers may have about individual study results. In the experience of Commenting Parties, BPA studies may be very difficult to parse, even for trained engineers with deep experience in transmission expansion. Individual study review meetings therefore serve an important function in assisting Interconnection Customers to understand the study results, and to identify potential errors in the study, which helps avoid even longer delays later in the

process. At a minimum, BPA should not foreclose the possibility of holding such meetings altogether. Keeping this option available is beneficial both to BPA and its Interconnection Customers because these meetings provide a forum for deeper discussion, clarification, and problem-solving than may be possible in broader group settings. Making it policy to ban such meetings is unnecessary and could limit BPA's ability to address unique issues and maintain the viability of the cluster study process.

Conclusion

The Commenting Parties urge BPA to revisit and reject its proposal to modify its Transition Process Business Practice by eliminating individual study review meetings. We believe these meetings serve an important function and BPA therefore should keep such meetings available rather than eliminating them outright.

BPA Response 16

BPA declines to adopt changes to the Transition Process Business Practice in response to PRITCA's comment. BPA's proposed language intends to clarify that BPA will not provide individual meetings in the ninety (90) Calendar Day Customer Review Period to help customers understand what to expect during that period. As outlined in Section 6.6(b) of the LGIP and Section H.3.c. of the Transition Process Business Practice, BPA will hold an in-person, open meeting to discuss the results of the Phase One Cluster Study report. BPA will discuss the project requirements, costs, and take questions that customers may have. BPA believes that holding individual study review meetings would hinder efficiency and be inconsistent with the clustered study approach. In shifting from a serial to clustered study process, BPA intends to ensure communications on topics that impact multiple customers are made to all customers in a Cluster.

Please refer to BPA Response 4 in this Response to Comments – Transition Process document.

F. Bonneville Power Administration – Correction

Bonneville identified the need to modify the Exhibit A form as described below:

BPA Actions

BPA made the following changes between the Redline document and the finalized version of the Transition Process Business Practice.

Section C.a of the Transition Cluster Study Phase One Cluster Study Customer Review Period Redemonstration form, Exhibit A of the Transition Process Business Practice, will be updated as identified below. BPA makes this correction to ensure that the Transition Cluster Study Phase One Cluster Study Customer Review Period Redemonstration form identifies all the appropriate modeling requirements and matches the language appearing at Section H.3.d of the Transition Process Business Practice that outlines those requirements.

Section C.a of the Transition Cluster Study Phase One Cluster Study Customer Review Period Redemonstration form, Exhibit A of the Transition Process Business Practice, in the Redline document read:

C. Model Submissions (Section 6.6.2 of the LGIP):

- a. Interconnection Customer submitted the following items:
 - i. validated detailed powerflow and dynamic models representing the Generating Facility, Collector System, and any associated High Voltage equipment in PowerWorld (.pwb, .aux) or GE PSLF (.epc, .sav, .dyd) file formats;
 - ii. validated plant-specific Electromagnetic Transient (EMT) models that include OEM control and protection settings in a file format readable by PSCAD, and EMT model validation report; and
 - iii. single-line diagrams of the Generating Facility's connection to the POI identified in the Phase 1 Transition Cluster Study report.

Section C.a of the Transition Cluster Study Phase One Cluster Study Customer Review Period Redemonstration form, Exhibit A of the Transition Process Business Practice, in the finalized Transition Business Practice (additions bolded):

C. Model Submissions (Section 6.6.2 of the LGIP):

- a. Interconnection Customer submitted the following items:
 - i. validated detailed **positive-sequence** powerflow and dynamic models representing the Generating Facility, Collector System, and any associated High Voltage equipment in PowerWorld (.pwb, .aux) or GE PSLF (.epc, .sav, .dyd) file formats;
 - ii. **validated full-sequence impedance models (short circuit) in ASPEN Oneliner (.olr) file formats;**
 - iii. validated plant-specific Electromagnetic Transient (EMT) models that include OEM control and protection settings in a file format readable by PSCAD, and EMT model validation report; and
 - iv. single-line diagrams of the Generating Facility's connection to the POI identified in the Phase 1 Transition Cluster Study report.