

July 23, 2025

Via Email to techforum@bpa.gov

Bonneville Power Administration

Transmission Services

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.

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.

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.

Site Control V2

Clearway is largely supportive of the intent of BPA's proposed revisions to the Site Control Business Practices. There are several minor points of clarification or recommended edits that are necessary to ensure that site control is exclusive.

Under Section A.1c & Exhibit A, the proposed revisions require all parcels to be zoned appropriately or show active rezoning efforts that will not delay development. Other markets allow early-stage projects to initiate rezoning and demonstrate ongoing efforts. Clearway recommends that BPA clarify what qualifies as ongoing efforts to demonstrate active rezoning and allow for reasonable rezoning timelines, especially where delays are not expected to be material.

Within Section A.3c, the proposed revisions exclude Letters of Intent ("LOI"), Memorandum of Understanding ("MOU"), licenses, and purchase agreements as valid site control at queue entry. Most other markets allow these agreements as sufficient to demonstrate site control at queue entry and require additional evidence of site control at a later milestone. BPA should clarify that these conditional documents are allowed at application and require a different form of evidence to demonstrate site control by the Facilities Study stage.

Under Section A.4 & Exhibit A Section 3, the proposed revisions allow BPA to reject site documents that are not in the exact name of the Interconnection Customer. This requirement is out of line with other markets which allow documentation in an affiliate's name when accompanied by corporate structure certification. Clearway requests that BPA clarify that it will accept documentation from affiliated entities with appropriate attestations.

The proposed revisions at Section A.5 & Exhibit A Section 3.B.I require all option periods to be exercised and the term to cover the full operational period. Most markets accept options with unilateral extension rights or milestone triggers. BPA should clarify that it will accept valid options with clear extension terms or milestone-based triggers rather than requiring all options to be exercised.

Within Section A.6.b-c, & B.3, the proposed revisions require detailed mapping and acreage subtraction for unusable areas, such as roads, wetlands, and third-party Rights of Way. While Clearway understands the importance of demonstrating site exclusivity, this level of detail is a significantly increased burden at the application stage. Clearway recommends that this requirement be eliminated or paired down at the application phase, instead BPA should allow developers to demonstrate usable acreage later in the process when design and survey work are further along. For example, this evidence could be required by the Facilities Study Stage rather than at application.

Under Section A.7, D.1-D.3, the proposed revisions require both a PE-stamped layout and supplemental evidence to dispute site control acreage requirements. Clearway recommends that BPA accept either a stamped layout by a PE or supplemental design documentation; both should only be required unless there is a need to move to the formal acreage dispute process.

Commercial Readiness V2

Clearway generally supports the proposed revisions to the Commercial Readiness Business Practice, subject to a few reservations. The amendments provide greater clarity regarding the evidence required for commercial readiness milestone options, as well as the procedures for the submission and resubmission of commercial readiness demonstrations. These modifications appear consistent with the foundational “first-ready, first-served” reforms established in TC-25, which require projects to be sufficiently advanced in their development to qualify for participation in a cluster study.

Within Section A.2.a-e, the proposed revisions detail rigid documentation formats. While A.2.b allows for documentation of active negotiations, it requires this to be demonstrated through a formal attestation from the counterparty. This formal attestation may be impractical at early stages of bilateral negotiations or RFP shortlisting. Accordingly, Clearway recommends that BPA allow commercially reasonable documentation for all milestone types including term sheets, redacted LOIs, and non-binding agreements. Section A.2.b should be expanded to include LOIs, MOUs, shortlisting notices, or Interconnection Customer self-attestations with supporting materials where a counterparty signature is not yet available.

Under Section A.2.e, the proposed revisions exclude blanket agreements and master supply agreements unless tied to a site with specific equipment serial numbers and delivery addresses, even if there is a binding commitment. Clearway recommends that BPA accept binding orders under MSAs or blanks purchase orders when the Interconnection Customer can either 1) provide supplier acknowledgement or 2) self-certify with supporting documentation (this could include executed agreement language, internal procurement approvals, or allocation letters). Clearway also recommends that the proposed revisions allow for reasonable flexibility on site addresses and serial number requirements, especially during early procurement stages.

In Section A.2.e.ii, B.2, & D.2, the proposed revisions require purchasing customer names to match exactly, even for POs or escrow deposits. Clearway requests that BPA clarify they will accept documentation in the name of affiliated entities when accompanied by legal confirmation of control or ownership.

Section A.2.e.3.a contains a requirement for a 95% power factor sizing for transformers to validate commercial readiness, even during early development. This requirement is overly burdensome for projects in early development. Clearway recommends that the section should be amended to allow Interconnection Customers to submit transformer POs or procurement commitments that reflect current project design. BPA should accept sizing that is below the final MW during early development provided that the Interconnection Customer certifies that final equipment will meet BPA’s interconnection standards by COD.

In Section C.7-8, the proposed revisions permit validation of commercial readiness only once per window, and BPA will not accept late updates. If a customer has made a good-faith effort to submit the required documentation on time, there should be an opportunity to address deficiencies before withdrawal from the queue. Clearway suggests implementing a 5-business day cure period after BPA issues notice of any deficiency. This brief period would allow projects that have made timely and reasonable efforts to remain in the generator interconnection queue.

Large Generator Interconnection V13

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

Under Section I & M of the proposed revisions, changes to fuel type, nameplate capacity, or electrical characteristics are prohibited under the Technological Advancement path. It is unclear whether those types of changes would be possible or permissible through a Material Modification request. Clearway recommends that the revisions are amended to clarify that resource-type or fuel-type substitutions may be permissible when supported by updated models, and the change does not result in material impacts to the transmission system. BPA should provide a path, potentially through material modification analysis, to enable such changes to proceed without queue loss when impacts are non-material. Additionally, BPA should clarify that a Material Modification Analysis may be submitted at any point prior to construction and will be assessed based on technical impact or the request rather than process phase.

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