

NIPPC Comments on BPA Proposed Business Practices

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.

Site Control Version 2

NIPPC supports the clarifications to the Site Control requirements in Section A. NIPPC understands that these changes reflect lessons that BPA learned in processing customers' proof of site control submitted for the Phase One Transition Cluster Study. These clarifications will assist customers in ensuring that they have assembled all the documentation they need to demonstrate site control as they enter an interconnection cluster study.

During the negotiations towards the eventual settlement of TC-25, BPA staff consistently stressed the need for customers to demonstrate "exclusive" site control. Many of the proposed changes are consistent with this settlement principle and provide important clarifications to customers regarding BPA's expectation that site control is "exclusive". This clarity will in turn allow customers to collect, organize and maintain all the documentation of site control that they will need to submit to BPA well in advance of a deadline in the process.

NIPPC does not object to the more detailed requirements for the Google Earth Site Plan Map. NIPPC recognizes that the proposed requirements are reasonable and will speed processing by BPA staff.

NIPPC also does not object to the greater detail regarding requirements for projects that do not meet the standard site size requirements. These proposed changes will assist customers who do not meet the site size requirements to ensure that the substitute documentation they provide BPA clearly establishes that their project(s) can be developed on their site.

Commercial Readiness version 2

NIPPC supports the proposed changes to the Commercial Readiness Business Practice. In particular, NIPPC supports the greater detail associated with specific Commercial Readiness Milestone Options. During TC-25, BPA and customers negotiated tariff provisions to move towards a “first-ready, first-served” model for interconnection requests. Under this new paradigm, only customers whose projects were sufficiently “ready” would be eligible to enter an interconnection cluster study. Instead of simply adopting the commercial readiness milestone options that FERC adopted for the pro forma OATT, however, BPA and its customers agree to additional readiness criteria – in some cases these additional milestone options were more flexible than the FERC pro forma. NIPPC recognizes that these proposed changes to the Commercial Readiness Milestone Options likely represent experience that BPA gained in processing documentation that customers submitted to support their entry into the Phase One Transition Cluster for interconnection studies. NIPPC supports BPA’s proposed changes as they will ensure that customers who rely on a specific milestone option (such as a site-specific purchase order) are demonstrating commercial readiness to a certainty on par with the other milestone options.

NIPPC also agrees with the proposal to adopt standardized formats for customers to use to demonstrate commercial readiness. Use of standardized forms will not pose any undue burdens on customers and should ease the burden on BPA staff to confirm customer compliance.

NIPPC agrees that customers who fail to demonstrate commercial readiness within the applicable timelines or fail to meet all the applicable standards should be removed from the queue. Customers who still have questions about their documentation (even after reviewing the more detailed requirements proposed in these business practices), should present those questions to BPA during the customer review period. NIPPC recognizes that customers who fail to timely provide BPA with complete and accurate documentation of commercial readiness increase the burden on staff and delay the study process for all customers.