



July 23, 2025

Via Email to techforum@bpa.gov
Bonneville Power Administration
Transmission Services

**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.

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.

III. Site Control, V2

RNW also supports BPA's proposed changes to the Site Control Business Practice. These changes include clarity on (1) the need for customers to demonstrate and maintain exclusive site control; (2) the requisite documentation evidencing site control; and (3) customer responsibilities and required documentation in the event that a project does not meet site size requirements. Again, these revisions appear to draw from BPA's experience to date in implementing TC-25 reforms and incorporate reasonable, pragmatic changes that clearly articulate requirements to streamline the process for BPA and customers.

With respect to the proposed changes to Section A on site control requirements, several of these changes are aligned with a core principle emphasized by BPA staff during the TC-25 settlement process that site control be exclusive. Together with the Site Control Demonstration Form, these changes set forth a clear list of required documentation and expectations.

The proposed changes in Section B on Site Control Submittal are generally geared toward facilitating timely review of required documentation by BPA staff. These changes include providing Site Plan maps in colors and sizes that enable key portions to be easily decipherable and ensuring clear labeling of parcels, generating facilities, and unusable portions of a site. In addition, BPA clarifies that if there is any material change to previously provided evidence of site control, customers must submit updated documentation. RNW finds all these changes to be reasonable, common-sense additions to the Site Control Business Practice.

IV. Commercial Readiness, V2

RNW generally supports the proposed revisions to the Commercial Readiness Business Practice, with limited caveats. The proposed changes clarify the evidence requirements for commercial readiness milestone options and the requirements for submittal and resubmittal of commercial readiness demonstrations. These changes appear in line with the foundational “first-ready, first-served” reforms adopted in TC-25, in which projects must demonstrate they are far enough along in the process to be eligible to participate in a cluster study. As with the other Business Practice revisions, the proposed changes appear to draw from BPA’s experience to date in implementing the TC-25 reforms.

While RNW is mostly comfortable with the proposed revisions, we have some concerns with the wording of Section C.8. RNW agrees with BPA that customers who do not meet commercial readiness requirements within the timelines set forth by BPA should not be eligible to remain in the queue. However, the wording of Section C.8 appears to suggest a potentially harsher result than may be intended. Provided that the customer has made a good-faith effort to submit required documentation in a timely manner (including by working to resolve questions before the deadline), the customer should have a narrow opportunity to cure the failure to demonstrate commercial readiness before being deemed withdrawn from the queue. In order to minimize any delays, RNW suggests that such an opportunity to cure any deficiencies be limited to 5 business days following notice by BPA of such deficiencies.

Thank you for the opportunity to comment.

Regards,

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