

## **Iberdrola**

Subject: IRI Comments on proposed LGIP reform

Iberdrola Renewables appreciates the opportunity to comment on the Bonneville Power Administration's ("BPA's") proposal to reform its large generator interconnection process ("LGIP") and offers the following comments:

### **General Comments**

Iberdrola Renewables understands BPA's desire to take action to ensure the interconnection queue reflects an accurate view of generation that will move forward toward actual construction and interconnection to the BPA controlled grid, in order to properly plan for needed transmission upgrades. With the growth in renewable generation across the US over the past several years, many regions, including the Northwest, have seen a large influx of new generation interconnection requests entering the interconnection queues and thereby creating a backlog of queue requests seeking interconnection service. This backlog of new requests have led many Transmission Providers across the US to reform their interconnection processes, with the hope of reducing queue requests, simplifying study assumptions, and facilitating completion for those projects ready to proceed. Although queue reform may readily appear to provide benefits to many stakeholders, Iberdrola Renewables urges BPA to use caution before proceeding with an entirely new process. Iberdrola Renewables has found the current BPA interconnection process manageable, and while there may be areas where improvements can be made, the current process has resulted in many new projects proceeding toward construction and full operation.

Iberdrola Renewables understands that a large number of interconnection requests in queue may pose challenges for Transmission Providers making assumptions when studying interconnection requests in a serial process. However, a wholesale process change may result in a more rigorous process with higher barriers to entry, yet little success in actually allowing new generators to go forward and interconnect to the grid. It has been Iberdrola Renewables' observation that queue reform has not resulted in a dramatic net withdrawal of queue requests, as Transmission Providers may have hoped, nor have all the perceived "ready to build" projects always moved forward toward construction. In the case of CAISO and MISO processes, CAISO currently has approximately 70 GW of renewable generation in queue, and MISO has approximately 50 GW in queue. After a few years of queue reform, these two Transmission Providers are still managing very large interconnection queues and struggling with later queue studies and cost sharing. These regional processes may not be the best examples for BPA to model itself after, given the differences between the CAISO and MISO nodal markets and the BPA bi-lateral market where point-to-point transmission service remains key in moving generation to markets. There may be certain aspects of the CAISO and MISO processes which

merit consideration, but Iberdrola Renewables does not advocate BPA's wholesale adoption of either process.

Iberdrola Renewables encourages BPA to carefully consider the actual goals of queue reform before adopting new rules for interconnection, and discourages queue reform to simply aid in a clearing of the queue. BPA should consider whether it can propose specific changes to the existing LGIP process, as opposed to an entirely new process. BPA may want to consider proposing specific changes in the following areas:

- Elimination of the Feasibility Study
- Clustering of interconnection requests around large interconnection substations
- Increased financial commitments
- Revised cost allocation method around large common network upgrades
- Adoption of certain milestones in order to proceed toward an LGIA

In considering any queue reform, BPA has the opportunity to review queue reform across various regions and gain a better appreciation of what has worked and what has not. Iberdrola Renewables encourages BPA to continue discussions with its customers and stakeholders concerning queue reform and to carefully consider modification to the existing LGIP process, without wholesale changes. Finally, Iberdrola Renewables notes that any changes to the LGIP would need to be filed with FERC for approval in accordance with OATT section 9. Thank you for your consideration of these comments.