

Invenergy

Invenergy LLC appreciates the opportunity to participate in the stakeholder process for the BPA Generator Interconnection and Network Open Season Reforms. Please see our comments below:

COMMENTS ON GENERATOR INTERCONNECTION REFORM

1. Making site permitting or certification a Milestone requirement, to strengthen permitting timeline and performance obligations. Invenergy agrees that the submittal of site permit applications could be a milestone requirement. The timing of this milestone should be after the Facilities Study Agreement is executed at the earliest.
2. Creating a 'fast-track' process for projects that have no material impact on the system or other projects. Invenergy supports this proposed change. This will avoid long queue processing waiting times for projects that are ready to move forward, but do not affect any other projects or the system.
3. Possibly develop more stringent eligibility criteria for submittal of a GI request and for its feasibility review. Invenergy is of the opinion that this criteria should be more stringent but remain reasonable. For example, requiring higher deposits and site control is something that has been done in other regions and it helps to weed out speculative projects. However, requiring excessive amounts of technical data and detail at this stage of the project is something that is not needed and will add more uncertainty and will delay the process.
4. Remove the 3-year suspension provision from the LGIA. Invenergy is against removing the 3-year suspension provision from the LGIA. There are many uncertainties that a project will face during development (permitting issues, etc.). The 3-year suspension provision provides reasonable flexibility so that a Project can manage the development uncertainty.
5. Make changes to tariff and credit repayment policies to reduce rate impacts. Invenergy believes that BPA should continue to provide credits for Network Upgrades, especially for the larger substations and transmission lines at 230kV and up. This will assure that the system is developed in an optimal way with fewer facilities and better reliability.
6. Making a PTSA a milestone requirement for interconnection: Invenergy is against making a PTSA a milestone for interconnection. There are cases in which a project can sell its output to a third party that already has transmission service and that can buy the power at the project's bus.
7. Making a PPA a milestone requirement for interconnection: Invenergy is against making a PPA a milestone for interconnection. In many cases, an executed Interconnection Agreement is necessary to execute a PPA with an offtaker.
8. Substantial commitment to funding upgrades and interconnection facilities; and/or substantial upfront financing: Invenergy is against a requirement for upfront funding of upgrades and interconnection facilities. The process of developing a cash flow schedule

- that will support the different milestones in the LGIA is a better and more reasonable option
9. Transition of existing requests: any reform to the interconnection process should apply to future requests and not to existing requests, especially when these requests have already completed part or all of the studies.

COMMENTS ON NETWORK OPEN SEASON REFORM:

1. Deferrals of Transmission service: BPA should not change the deferral mechanism of transmission requests. This is necessary in order to deal with development uncertainty. This is similar to the 3-year suspension provision in the LGIA. They are both necessary.
2. Eliminate market hubs as viable POR/PODs for NOS requests: Invenergy is against this. In many cases, offtakers take the power at these hubs
3. BPA is considering alternative methods of funding NOS expansion projects (lease-financing where applicable, customer funding, revenue financing, etc.): Invenergy is against customer funding of large transmission projects. In other regions where new transmission is being built, these projects are not customer funded (MISO with the MVP projects, SPP with the priority projects, ERCOT with the CREZ Projects).

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