



August 23, 2019

Via Email (techforum@bpa.gov)

U.S. Department of Energy
Bonneville Power Administration
Transmission Services

Re: Comments of Renewable Northwest on Draft Surplus Interconnection Service Business Practice, Version 1

Renewable Northwest thanks the Bonneville Power Administration (“BPA”) and its staff for working to develop a Surplus Interconnection Service Business Practice, consistent with BPA’s commitments under the TC-20 Settlement.¹ We also appreciate BPA’s efforts to seek stakeholder feedback in developing Version 1 of its Draft Surplus Interconnection Service Business Practice (the “Draft BP”). Below, we highlight areas of improvement to Version 1 of the Draft BP that we encourage BPA to consider.

I. The Draft BP needs greater detail on deposit amounts and the estimated timeline for processing surplus interconnection requests

Section D of the Draft BP requires Surplus Interconnection Customers to “submit deposits required during the processing of a Surplus Interconnection Request” in accordance with criteria outlined in the section. However, Section D does not specify the deposit amount that a Surplus Interconnection Customer must submit to BPA. Since the Draft BP does not include sufficient detail on the required deposit amount for interconnection customers to begin transacting, we encourage BPA to specify a deposit amount in Version 2 of the Draft BP.

Section E of the Draft BP, “Timelines and Study Process,” outlines the study process for Surplus Interconnection Service Requests. Section E also specifies that BPA “will use reasonable efforts to hold a meeting with the Surplus Interconnection Customer and the Original Interconnection

¹ TC-20 Administrator's Final Record of Decision, Appendix 1 at 18.

Customer after BPA has deemed the request for Surplus Interconnection Service complete.” While Section E goes on to list what studies may be performed, it does not include expected timelines for processing the Surplus Interconnection Service requests or for any individual studies. We encourage BPA to include an estimated timeline for processing Surplus Interconnection Service requests and any component studies in Version 2 of the Draft BP.

II. Additional opportunities for stakeholder comment would help in the development of a stronger Surplus Interconnection Service Business Practice.

Renewable Northwest again thanks BPA Staff for seeking stakeholder engagement, and encourages BPA to seek additional stakeholder feedback before finalizing the Surplus Interconnection Service Business Practice. While we acknowledge BPA’s time constraints, we encourage BPA to release Version 2 of the Draft BP for comment before finalizing the BP.

III. The TC-22 process should also address Surplus Interconnection Service

Renewable Northwest understands that time constraints associated with the process leading to the TC-20 Settlement factored into the settlement parties’ agreeing that BPA should implement the Order No. 845 Surplus Interconnection Service reform through a Business Practice. Ultimately, Surplus Interconnection Service language should be included in BPA’s Open Access Transmission Tariff (“OATT”). Hence, we encourage BPA to include in the list of TC-22 issues the need to add Surplus Interconnection Service language to BPA’s OATT.

Additionally, we expect that the Federal Energy Regulatory Commission (“FERC”) will have issued orders in response to public utilities’ compliance filings with Order 845 by the time TC-22 begins. While BPA is generally not subject to the public utilities requirements to adhere to FERC’s pro forma tariff, BPA has expressed a commitment to aligning with FERC’s pro forma tariff to the extent possible.² As a result, we expect that FERC’s response to FERC-jurisdictional entities’ Order 845 compliance filings may provide additional guidance to BPA going into the TC-22 process.

IV. Conclusion

Renewable Northwest is grateful for this opportunity for comment and looks forward to continue working with BPA on Order 845 reforms. We encourage BPA to add additional details on deposit requirements and process timelines to the Draft BP. We also encourage BPA to seek

² *Id.* at 1.

additional stakeholder comment before finalizing the Surplus Interconnection Service Business Practice, and suggest doing so through the release of Version 2 of the Draft BP for comment before finalizing the BP. Finally, we encourage BPA to add Surplus Interconnection Service language to its OATT as part of the TC-22 Process.

Sincerely,

/s/ Silvia Tanner

Silvia Tanner

Senior Counsel and Analyst

Renewable Northwest