

August 26, 2019

Via Email (techforum@bpa.gov)

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

Re: Comments of Avangrid Renewables, LLC on the Proposed Surplus Interconnection Service Business Practice

Avangrid Renewables, LLC, (“Avangrid”) hereby submits comments on the Bonneville Power Administration (“BPA”) proposed Surplus Interconnection Service Business Practice (the “Proposed BP”).¹ As BPA has indicated, the Proposed BP—along with two separate revised business practices—are needed to implement certain reforms from Federal Energy Regulatory Commission (“FERC”) Order No. 845, as agreed upon in the TC-20 Settlement Agreement.² The Proposed BP could take effect as early as October 1, 2019, but does not address the new service requirements with enough detail to allow interconnection customers to begin transacting. While Avangrid appreciates that the Proposed BP may merely be a first incremental step towards implementing the new Surplus Interconnection Service, we respectfully request BPA establish a process to fully implement the new service in a timely fashion. Several key areas that Avangrid would like to see further detail on are addressed below.

1. Additional Stakeholder Involvement is Needed

Avangrid appreciates BPA’s willingness to move forward with the new service, but believes stakeholder participation and/or workshops will be needed for BPA to provide a workable business practice. BPA demonstrated a willingness throughout the TC-20 settlement to introduce Surplus Interconnection Service with a collaborative approach that involved its customers. BPA also expressed a desire to review other utilities’ Order No. 845 compliance filings, which were due on May 22, 2019, to fast-track its own implementation. Now that the agency has realized its commitment to offer Surplus Interconnection Service, the agency should establish a procedural schedule to thoroughly vet its proposal with stakeholders and host at least one workshop prepared to discuss its findings from other utilities’ implementations.

¹ BPA Transmission Business Practice, Surplus Interconnection Service, Draft Version 1 (Oct. 1, 2019) available at <https://www.bpa.gov/transmission/Doing%20Business/bp/Pages/Comments-and-Responses.aspx>.

² Tech Forum Notice (July 23, 2019) (“As part of the TC-20 Settlement Agreement, Bonneville agreed to develop a Business Practice taking a phased approach to implementation of FERC Order No. 845 reform Utilization of Surplus Interconnection Service.”).

BPA has several options for any such additional process. First, Section 4.5.1 of the agency's new Business Practice Process states that "[i]f circumstances warrant, Bonneville will schedule additional discussions of such Proposed Business Practices at subsequent meeting(s) or conference calls." Avangrid maintains that the current circumstances warrant additional discussions. Second, because the Surplus Interconnection Service implementation was part of the TC-20 Settlement Agreement, the agency could use the ongoing TC-20 Update meetings to refine its Surplus Interconnection Service proposal. The TC-20 process could solicit additional collaboration or an opportunity to sound board ideas. Finally, any future tariff revisions will need to be addressed in the TC-22 proceeding. Avangrid suggests fully fleshing out Surplus Interconnection Service before TC-22 begins, as there are already several issues set aside for that process. While Avangrid believes that all three of these venues may ultimately be needed to implement Surplus Interconnection Service, we encourage BPA to lay out a clear procedural process early.

2. Key Areas That Warrant Additional Consideration

Avangrid suggests the agency begin with at least three key sections from the Proposed BP. Critically, more procedural clarity is needed with respect to the time frames and costs for BPA's study processes. Additionally, it is not yet clear what a study agreement will look like overall or how it will relate to other interconnection processes. We pose the following issues to direct efficient, meaningful conversation.

First on timing, Section E states, "BPA will use reasonable efforts to hold a meeting with the Surplus Interconnection Customer and the Original Interconnection customer after BPA has deemed the request for Surplus Interconnection complete."³ This section goes on to lay out different studies that "may" be needed.⁴ Because Section E does not provide any specific notification or timing requirements, it is not clear how customers will know that BPA has deemed the request complete or decided whether any of the additional studies are necessary. Avangrid requests BPA commit to specific deadlines and timeframes for each step in its process.

Turning to costs, pursuant to Section D, "[t]he Surplus Interconnection Customer shall submit deposits required during the processing of a Surplus Interconnection Request in accordance with the electronic funds transfer criteria described below."⁵ This section sets out the process by which deposits and refunds will be submitted, but does not provide any specific cost information. We respectfully ask that BPA clarify what the agency expects the deposit amount for Surplus Interconnection Service will be.

Finally, the Proposed BP does not adequately explain how BPA anticipates the Surplus Interconnection Service Agreement will work with the Large Generator Interconnection

³ The Proposed BP at Section E.1.

⁴ *Id.* at Section E.2 ("[s]tudies for Surplus Interconnection Service may consist of:..."), E.3 ("[s]teady-state (thermal/voltage_ analysis may be performed"), E.4 (off-peak steady state analysis may be performed") and E.5 ("both off-peak and peak analysis may need to be performed").

⁵ *Id.* at Section D.1.

Agreement. For example, the Proposed BP does not address whether there will be cross defaults between the two agreements. The Proposed BP also does not address what will happen when the original Generating Facility shuts down. And overall, it is not clear what a Surplus Interconnection Agreement will look like. It is imperative that both existing customers, and potential surplus customers, know how BPA will address these issues before parties can evaluate whether the new service provides value or is a workable option.

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Avangrid appreciates the opportunity to submit these comments and looks forward to working with BPA on the Order No. 845 reforms, including Surplus Interconnection Service. By return e-mail, please confirm BPA's receipt of these comments.