

FREQUENTLY ASKED QUESTIONS

**BONNEVILLE POWER ADMINISTRATION
GENERATOR INTERCONNECTION QUEUE REFORM PROPOSAL**

****DRAFT AND PREDECISIONAL****

SITE PERMIT MILESTONE	
Questions	Answers
1. What is the “Site Permit Milestone”?	It is a time by which a complete site permit must be received by BPA in order for the Request to retain its queue priority and proceed with the interconnection process.
2. Why is BPA adding a Site Permit Milestone to the Large Generation Interconnection Process (LGIP)?	The goal is to facilitate interconnection of projects in a manner that recognizes their preparedness and commercial viability. Implementing a Site Permit Milestone ensures the timely completion of the customer’s permitting process, so enabling BPA’s completion of the environmental review under the National Environmental Policy Act (“NEPA”) and other laws, which is required before making an offer of an interconnection agreement.
3. What triggers the start of the 24-month site permitting period?	The 24-month period starts 30 days after the Interconnection Customer receives an Environmental Study Agreement for signature from BPA. This approach is consistent with BPA’s tariff, which requires that the Interconnection Customer sign and return an Environmental Study Agreement to BPA within 30 days after receipt.
4. Can I start my permitting process before the start of the 24-month period?	Yes.
5. Why 24 months for the Site Permit Milestone?	Based on customer comments and benchmarking of other transmission providers’ generator interconnection request queue reforms, 24 months provides sufficient time for developers to conclude site permitting activities.
6. What constitutes a “site permit”?	Examples include a state-issued site certificate or a county conditional use permit that allow the developer to proceed with obtaining construction permits for the Interconnection Request. If the state or county does not require a site permit for the proposed Generating Facility, the



	Interconnection Customer will not be required to submit a site permit to BPA. All Interconnection Requests, however, are subject to BPA’s environmental review pursuant to an Environmental Study Agreement.
7. Do I need a site permit for the full MW amount of my Interconnection Request, including all phases of an Interconnection Request?	Yes. BPA is required to conduct an environmental review of the entire Interconnection Request.
8. Will every Interconnection Request ultimately require a Site Permit?	Not necessarily. We can foresee that, for instance, certain requests to increase existing generators may not require additional permitting; and some projects involving only minimal indoor work without any ground-breaking may not require either a permit or extensive environmental review. Nonetheless, BPA will always have to conduct some level of environmental review to ensure compliance with NEPA. See also Question No. 6.
9. When will I receive an Environmental Study Agreement from BPA?	BPA will tender an Environmental Study Agreement simultaneously with the Interconnection System Impact Study (“ISIS”) agreement, after the Feasibility Study results have been issued to the Interconnection Customer and reviewed.
10. What happens if my site permit is delayed for reasons beyond my control, causing me to miss the Site Permit Milestone (at the end of 24 months)?	The Interconnection Request will be placed in the Parking Lot and will lose its queue priority. The Parking Lot, however, provides the Interconnection Customer additional time to resolve its site permit issues without withdrawal (<i>i.e.</i> , termination) of the Interconnection Request.
11. Will BPA give me notice that my 24-month Site Permit Milestone is approaching?	Yes. BPA will provide written notice to the Interconnection Customer 30 days before the Interconnection Customer’s Site Permit Milestone. If BPA has not received the Interconnection Customer’s site permit before the Site Permit Milestone date, the Interconnection Request will be transferred to the Parking Lot.
12. When can I expect BPA to conclude its environmental review of my Interconnection Request?	BPA typically concludes its environmental review within 90 days of receiving the Interconnection Customer’s site permit; however, BPA retains discretion to determine the appropriate environmental review and documentation under NEPA and other applicable laws for each Interconnection Request.”

PARKING LOT	
13. What is the “Parking Lot”?	The “Parking Lot” is the status of an Interconnection Request that has not met the Site Permit Milestone.
14. When does an Interconnection Request enter the Parking Lot?	If the Interconnection Customer does not obtain and submit its site permit to BPA before the Site Permit Milestone (at the end of the 24 month period), the Interconnection Customer’s Interconnection Request will be placed in Parking Lot status.
15. Do I have to pay any fees or deposits to enter or to exit the Parking Lot?	No. However, additional deposits for restudies may be necessary upon reentry to the interconnection study process from the Parking Lot.
16. What happens to my Interconnection Request if it enters the Parking Lot?	Upon entering the Parking Lot, the Interconnection Request loses its queue priority.
17. Why do I lose my queue priority in the Parking Lot?	BPA needs certainty in the generator interconnection planning process. Interconnection Requests that are in the Parking Lot have not met the Site Permit Milestone and are not ready to move forward with the interconnection study process or to commit to a construction schedule. By removing the queue priority from Interconnection Requests that are in the Parking Lot, BPA can exclude those interconnection requests from its system planning studies and its work-plans. As a result, BPA will obtain greater certainty in system planning and greater efficiencies in its capital expenditures because it can focus its resources on evaluating only the interconnection requests that are most ready and able to move forward with the generator interconnection if BPA is able to offer an interconnection agreement.
18. What happens to my interconnection study deposits if I am transferred to the Parking Lot?	BPA will return the unspent balance of the Interconnection Request’s interconnection study deposits, less any costs incurred, unless the Interconnection Customer provides written notice to BPA requesting that BPA retain all study deposits while the Interconnection Request is in Parking Lot status.
19. How long can my Interconnection	Up to two years unless an exception applies. See

Request stay in the Parking Lot?	Question No. 28.
20. What happens to my Interconnection request if I do not have a site permit after two years?	The Interconnection Request will be deemed withdrawn from the Generator Interconnection Queue unless an exception applies. See Question No. 28. The Interconnection Customer may submit a new Interconnection Request at any time.
21. How can my Interconnection Request exit the Parking Lot?	An Interconnection Request may reenter the interconnection study process upon BPA's receipt of Site Permit within the two year period stated in Question No. 19 above. An Interconnection Request may also exit because of withdrawal of the request.
22. What happens if the state or country denies my site permit application?	Your Interconnection Request may remain in the Parking Lot until the two year period expires, unless an exception applies. See Question No. 28.
23. What will my Interconnection Request's queue priority be if I exit the Parking Lot and reenter the interconnection study process?	BPA will assign the Interconnection Request a new queue priority based on the date BPA receives your site permit. The Interconnection Request will be given queue priority behind any Interconnection Requests that have already been tendered ISIS and Environmental Study Agreements from BPA.
24. Why will my new queue priority be below any Interconnection Requests that have been tendered an ISIS and Environmental Study Agreement from BPA?	To prevent disruption of BPA's planning and ISIS study assumptions for Interconnection Requests that are already in the ISIS stage.
25. Will other Interconnection Customers know that my Interconnection Request was transferred to the Parking Lot?	Yes. All current queue priorities, Parking Lot status and date of reentry into the interconnection study process will be posted on OASIS. The identity of the developer will remain confidential unless disclosed pursuant to BPA's environmental review activities in accordance with NEPA and other environmental laws.
26. Is there any way to avoid the Parking Lot?	Yes. The Interconnection Customer must submit a valid site permit to BPA before the Site Permit Milestone (within the 24-month period).
27. What happens if the Site Permit is delayed through no fault of my own while my Interconnection Request is in the Parking Lot?	If the delay occurs while the Interconnection Request is in the Parking Lot, the Interconnection Request may remain in the Parking Lot beyond the Parking Lot term of two years if an exception applies. See Question No. 28.
28. Is it possible to receive an extension beyond two years to remain in the	Yes. BPA will grant an extension beyond two years to any Interconnection Request that is in the

Parking Lot?	Parking Lot and the Interconnection Customer’s site permit is delayed both because of reasons beyond the Interconnection Customer’s control and: (1) state, county, or court proceedings directly pertaining to the site permit, including any litigation, create the delay; or (2) BPA has not yet completed a transmission service build that is necessary to fulfill a TSR (not including interconnection related Network Upgrades or interconnection facilities).
29. Will BPA give me notice before my two year Parking Lot term expires?	Yes. BPA will provide written notice 30 days before the Interconnection Customer’s two year Parking Lot term expires.
PRO RATA COST ALLOCATION	
30. Which Interconnection Requests will be subject to pro rata cost allocation?	All Interconnection Requests interconnecting within a 5 year period that require the shared Network Upgrades to support their Interconnection Request will pay a pro rata share of the costs of those Network Upgrades, as determined by BPA.
31. How will BPA allocate costs of shared interconnection Network Upgrades?	Costs for interconnection Network Upgrades will be allocated on a pro rata basis among Interconnection Customers that require those Network Upgrades to support their Interconnection Request
32. What is the Pro Rata allocation of costs based off of?	The total MW size of the Interconnection Request will form the basis for prorating costs.
33. Is my request required to fund Network Upgrades that are not required for interconnection?	No, Any Network Upgrades that BPA determines are not required to support other Interconnection Requests at a common facility or Point of Interconnection will be advance funded by the Interconnection Customer that requires those Network Upgrades.
34. Will the funds for the Network Upgrades still be eligible for Network Credits?	Funds advanced for Network Upgrades will be eligible for transmission credits in accordance with BPA’s transmission credit business policy, as revised.
35. If my Interconnection Request requires the use of Network Upgrades that were already advanced funded and constructed pursuant to earlier	Yes. BPA will require later interconnection requests (within five years from the In-Service date of the first-interconnection request) to fund a pro rata share of the shared Network Upgrades costs

<p>Interconnection Requests, will I have to pay to utilize those Network Upgrades?</p>	<p>based on the total MW size of the Interconnection Request, as determined by BPA in the interconnection studies. Phased construction of a single Interconnection Request will not be allowed to reduce its pro rata cost allocation.</p>
<p>36. What about the Direct costs for interconnection?</p>	<p>Each Interconnection Customer will continue to be responsible for any direct costs for the interconnection, including costs associated with Interconnection Facilities.</p>
<p>SUSPENSION AND EXTENSIONS OF THE COMMERCIAL OPERATION DATE</p>	
<p>After I execute a Large Generator Interconnection Agreement (“LGIA”) will I be able to suspend BPA’s construction activities or extend the Commercial Operation Date listed in the LGIA?</p>	<p>Yes. An Interconnection Customer with an executed LGIA can suspend BPA’s construction activities for only 1 year or extend its Commercial Operation Date for one year.</p>