

TC22 Proposal: Except from Attachment L to Bonneville’s Tariff: 845, 845-A
Pre-Decisional. For Discussion Purposes Only.

NOTE: Effective October 1, 2019, the Bonneville Power Administration (Bonneville) revised its Open Access Transmission Tariff (Tariff) and associated Business Practices to adopt the Federal Energy Regulatory Commission’s (FERC) reforms pursuant to Order No. 845 (845)¹.

On February 21, 2019, FERC issued an order on rehearing of 845—No. 845-A (845-A). Bonneville seeks to adopt 845-A² as part of the TC-22 Terms and Conditions Tariff Proceeding.

The Legend below is for reference only. It indicates whether Bonneville’s 845, 845-A tariff language and deviations to FERC *pro forma* are a part of Bonneville’s current tariff (TC20 Attachment L) or is newly proposed for TC22 (TC22 Attachment L).³

Bold Black/Black	<i>Pro forma</i> tariff language that already exists in the TC20 Attachment L
Red Strikethrough Red Bold	Deletions and additions to <i>pro forma</i> that already exists in the TC20 Attachment L
<u>Black/Black Underline</u>	<i>Pro forma</i> tariff language newly proposed in the TC22 Attachment L
Red Strikethrough Underline <u>Red Bold Underline</u>	Deletions and additions to <i>pro forma</i> newly proposed in the TC22 Attachment L
Green Highlight	Populated placeholders for tariff language that already exist in the TC20 Attachment L.
Green Highlight Underline⁴	Populated placeholders for tariff language newly proposed for the TC22 Attachment L.
Yellow Highlight	This language is for reference only; it provides a summary of each 845, 845-A reform.

¹ Reform of Generator Interconnection Procedures and Agreements, Order No. 845, 163 FERC ¶ 61,043 (2018) (Final Rule).

² Order No. 845, order on reh’g, Order No. 845-A, 166 FERC ¶ 61,137 (2019).

³ Revisions that only resulted in re-numbering of sections/articles or changes to title headings are not reflected in this document. All 845-All proposals include corrections made by FERC’s errata notices.

⁴ Some placeholders populated for TC22 is modeled after PGE and Pacificorp’s Tariff Language.

Reform #1: Interconnection Customer's Option to Build

845: Removed the limitation that Interconnection Customers⁵ may only exercise the option to build a Transmission Provider's Interconnection Facilities and Stand Alone Network Upgrades in instances where the Transmission Provider cannot meet the dates proposed by the Interconnection Customer.

845-A: (1) Allows Transmission Providers to recoup oversight costs when Interconnection Customers exercises its option to build. (2) Clarified that the option to build applies to all public utility Transmission Providers but does not apply to Stand Alone Network Upgrades on Affected Systems, (3) Transmission Provider must explain why it does not consider a specific Network Upgrade to be a Stand Alone Network Upgrade.

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LGIP: Section 1. Stand Alone Network Upgrades:

Stand Alone Network Upgrades shall mean Network Upgrades that are not part of an Affected System that ~~an~~ Interconnection Customer may construct without affecting day-to-day operations of the Transmission System during their construction. Both ~~the~~ Transmission Provider and ~~the~~ Interconnection Customer must agree as to what constitutes Stand Alone Network Upgrades and identify them in Appendix A to the Standard Large Generator Interconnection Agreement. If ~~the~~ Transmission Provider and Interconnection Customer disagree about whether a particular Network Upgrade is a Stand Alone Network Upgrade, ~~the~~ Transmission Provider must provide ~~the~~ Interconnection Customer a written technical explanation outlining why ~~the~~ Transmission Provider does not consider the Network Upgrade to be a Stand Alone Network Upgrade within 15 days of its determination.

LGIA: Article 1. Stand Alone Network Upgrades, Article 5.2 General Conditions Applicable to Option to Build (5.2.12):

Stand Alone Network Upgrades shall mean Network Upgrades that are not part of an Affected System that ~~an~~ Interconnection Customer may construct without affecting day-to-day operations of the Transmission System during their construction. Both ~~the~~ Transmission Provider and ~~the~~ Interconnection Customer must agree as to what constitutes Stand Alone Network Upgrades and identify them in Appendix A to the Standard Large Generator Interconnection Agreement. If ~~the~~ Transmission Provider and Interconnection Customer disagree about whether a particular Network Upgrade is a Stand Alone Network Upgrade, ~~the~~ Transmission Provider must provide ~~the~~ Interconnection Customer a written technical explanation outlining why ~~the~~ Transmission Provider does not consider the Network Upgrade to be a Stand Alone Network Upgrade within 15 days of its determination.

5.1 Options. Unless otherwise mutually agreed to between the Parties, Interconnection Customer shall select the In-Service Date, Initial Synchronization Date, and Commercial

⁵ Terms with initial capitalization have the meanings indicated in Bonneville's LGIP.
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Operation Date; and either the Standard Option or Alternate Option set forth below, and such dates and selected option shall be set forth in Appendix B, Milestones. At the same time, Interconnection Customer shall indicate whether it elects to exercise the Option to Build set forth in Article 5.1.3 below. If the dates designated by Interconnection Customer are not acceptable to Transmission Provider, Transmission Provider shall so notify Interconnection Customer within thirty (30) Calendar Days. Upon receipt of the notification that Interconnection Customer's designated dates are not acceptable to Transmission Provider, ~~the~~ Interconnection Customer shall notify Transmission Provider within thirty (30) Calendar Days whether it elects to exercise the Option to Build if it has not already elected to exercise the Option to Build.⁶

5.1.3 Option to Build. Interconnection Customer shall have the option to assume responsibility for the design, procurement and construction of Transmission Provider's Interconnection Facilities and Stand Alone Network Upgrades on the dates specified in Article 5.1.2. Transmission Provider and Interconnection Customer must agree as to what constitutes Stand Alone Network Upgrades and identify such Stand Alone Network Upgrades in Appendix A. Except for Stand Alone Network Upgrades, Interconnection Customer shall have no right to construct Network Upgrades under this option.

5.1.4 Negotiated Option. If the dates designated by Interconnection Customer are not acceptable to Transmission Provider, the Parties shall in good faith attempt to negotiate terms and conditions (including revision of the specified dates and liquidated damages, the provision of incentives, or the procurement and construction of all facilities other than Transmission Provider's Interconnection Facilities and Stand Alone Network Upgrades if ~~the~~ Interconnection Customer elects to exercise the Option to Build under Article 5.1.3). If the Parties are unable to reach agreement on such terms and conditions, then pursuant to Article 5.1.1 (Standard Option), Transmission Provider shall assume responsibility for the design, procurement and construction of all facilities other than Transmission Provider's Interconnection Facilities and Stand Alone Network Upgrades if ~~the~~ Interconnection Customer elects to exercise the Option to Build.

5.2 General Conditions Applicable to Option to Build. If Interconnection Customer assumes responsibility for the design, procurement and construction of Transmission Provider's Interconnection Facilities and Stand Alone Network Upgrades,

5.2.12 If Interconnection Customer exercises the Option to Build pursuant to Article 5.1.3, Interconnection Customer shall pay Transmission Provider the agreed upon amount of [PLACEHOLDER] for Transmission Provider to execute the responsibilities enumerated to Transmission Provider under Article 5.2. Transmission Provider shall invoice Interconnection Customer for this total amount to be divided on a monthly basis pursuant to Article 12.

⁶ 845-A did not make changes to Sections 5.1, 5.1.3, 5.1.4, these sections are included for reference only.

Reform #2: Non-Binding Dispute Resolution

845: Established interconnection dispute resolution procedures that allow a disputing party to unilaterally seek non-binding dispute resolution.

845-A: No entity requested clarification or rehearing regarding this reform.

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LGIP: Section 13.5.5 Non-Binding Dispute Resolution Procedures:

~~13.5.5 Non-binding dispute resolution procedures.~~

13.5.5 Non-Binding Dispute Resolution Procedures.

If a Party has submitted a Notice of Dispute pursuant to ~~section~~ **Section** 13.5.1, and the Parties are unable to resolve the claim or dispute through unassisted or assisted negotiations within the thirty (30) Calendar Days provided in that ~~section~~ **Section**, and the Parties cannot reach mutual agreement to pursue the ~~section~~ **Section** 13.5 arbitration process, a Party may request that Transmission Provider engage in Non-binding Dispute Resolution pursuant to this ~~section~~ **Section** by providing written notice to Transmission Provider ("Request for Non-binding Dispute Resolution"). Conversely, either Party may file a Request for Non-binding Dispute Resolution pursuant to this ~~section~~ **Section** without first seeking mutual agreement to pursue the ~~section~~ **Section** 13.5 arbitration process. The process in ~~section~~ **Section** 13.5.5 shall serve as an alternative to, and not a replacement of, the ~~section~~ **Section** 13.5 arbitration process. Pursuant to this process, a Transmission Provider must ~~within 30 days of receipt of the~~ **promptly, after receipt of the** Request for Non-binding Dispute Resolution appoint a neutral decision-maker that is an independent subcontractor that shall not have any current or past substantial business or financial relationships with either Party. Unless otherwise agreed by the Parties, the decision-maker shall render a decision within sixty (60) Calendar Days of appointment and shall notify the Parties in writing of such decision and reasons therefore. This decision-maker shall be authorized only to interpret and apply the provisions of the LGIP and LGIA, ~~and except for those related to NEPA and other environmental laws.~~ **In addition, this decision maker** shall have no power to modify or change any provision of the LGIP and LGIA in any manner. The result reached in this process is not binding, but, unless otherwise agreed, the Parties may cite the record and decision in the non-binding dispute resolution process in future dispute resolution processes, including in a ~~section~~ **Section** 13.5 arbitration, ~~or in a Federal Power Act section 206 complaint.~~ Each Party shall be responsible for its own costs incurred during the process and the cost of the decision-maker shall be divided equally among each Party to the dispute.

Reform #3: Identification of Contingent Facilities

845: (1) Requires Transmission Providers to publish a method for identifying Contingent Facilities and provide a list of potential Contingent Facilities to Interconnection Customers at the close of the System Impact Study phase; (2) Transmission Providers must provide, upon Interconnection Customer's request, the estimated Network Upgrade costs and estimated in-service completion date associated with each identified Contingent Facility if Transmission Provider determines that this information is readily available and not commercially sensitive.

845-A: FERC denied rehearing for this reform.

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LGIP: Section 1. Contingent Facilities. Section 3.8 Identification of Contingent Facilities (3.8.1 through 3.8.5):

Contingent Facilities shall mean those unbuilt Interconnection Facilities and Network Upgrades upon which the Interconnection Request's costs, timing, and study findings are dependent, and if delayed or not built, could cause a need for ~~Re-Studies~~ re-studies of the Interconnection Request or a reassessment of the Interconnection Facilities and/or Network Upgrades and/or costs and timing.

3.8 Identification of Contingent Facilities.⁷

~~Transmission Provider shall post in this sSection a method for identifying the Contingent Facilities to be provided to Interconnection Customer at the conclusion of the System Impact Study and included in Interconnection Customer's Large Generator Interconnection Agreement LGIA. The method shall be sufficiently transparent to determine why a specific Contingent Facility was identified and how it relates to the Interconnection Request. Transmission Provider shall also provide, upon request of the Interconnection Customer, the estimated Interconnection Facility and/or Network Upgrade costs and estimated in-service completion time of each identified Contingent Facility when this information is readily available and not commercially sensitive.~~

3.8.1 In General. Transmission Provider's method for identifying the Contingent Facilities to be provided to Interconnection Customer at the conclusion of the System Impact Study and included in Interconnection Customer's LGIA is set forth below. The method permits the parties to determine why a specific Contingent Facility was identified and how it relates to the Interconnection Request.

3.8.2 Baseline Assumptions. Transmission Provider uses a technical screening process to identify Contingent Facilities, which includes starting with the

⁷ Bonneville modled its Contingent Facilities language on Pacificorp's language.

baseline assumption that the following are in service: (i) Generating Facilities that are directly interconnected to the Transmission System; (ii) Generating Facilities that are interconnected to Affected Systems and may have an impact on the Interconnection Request; (iii) Generating Facilities that have a pending higher queued Interconnection Request to interconnect to the Transmission System and their associated Interconnection Facilities and Network Upgrade requirements; (iv) Generating Facilities that have no Queue Position, but have executed an interconnection agreement; (v) Pending and granted requests for transmission service and their associated facilities or upgrade requirements to the extent they have an impact on the Interconnection Request; and (vi) Transmission Provider's transmission expansion plan components, or the transmission expansion plan components of third-party transmission providers, to the extent they have an impact on the Interconnection Request.

3.8.3 Technical Screening Process. The technical screening process for identifying Contingent Facilities is comprised of the following steps:

- (1) **Identify Potential Contingent Facilities.** Transmission Provider will review all applicable Interconnection Study results for higher queued Interconnection Requests to identify any unbuilt Interconnection Facilities and/or Network Upgrades as potential Contingent Facilities to be evaluated pursuant to Steps 2-5 below.
- (2) **Remove a Potential Contingent Facility and Perform Applicable Contingency Analyses.** The Transmission Provider will take a potential Contingent Facility out of service in its study model and: (a) perform steady state, short circuit, voltage stability, and/or transient stability analyses to determine if the Transmission System demonstrates acceptable pre- and post-contingency system performance, in accordance with current Transmission Provider, WECC, NERC, or Reliability Coordinator criteria or standards; and (b) document the resulting Transmission System performance deficiencies following the analysis in Step 2(a).
- (3) **Add the Proposed Generating Facility into Model and Rerun Contingency Analyses.** Transmission Provider will add the proposed Generating Facility into the model after taking the potential Contingent Facility out of service as provided in Step 2 above, and: (a) perform the same analysis for the added proposed Generating Facility as the analysis outlined in Step 2(a) for the removed potential Contingent Facility; and (b) document the resulting Transmission System performance deficiencies following the analysis in Step 3(a).
- (4) **Apply Threshold and Categorize.** If the Transmission System performance deficiencies observed in Step 3(b) are: (a) exacerbated by

one percent (1%) or greater than the Transmission System performance deficiencies initially observed in Step 2(b), then the potential Contingent Facility that is individually evaluated in Step 2 will be deemed a Contingent Facility; or (b) exacerbated by less than one percent (1%) than the Transmission System performance deficiencies initially observed in Step 2(b) so long as the impact allows all equipment to remain below equipment rating, then the potential Contingent Facility that is individually evaluated in Step 2 will not be deemed a Contingent Facility.

(5) Repeat for Each Identified Potential Contingent Facility.

Transmission Provider will repeat Steps 2-4 for each potential Contingent Facility identified in Step 1.

(6) Per Se Contingent Facilities. Notwithstanding Steps 1-5, an

Interconnection Facility or Network Upgrade of a higher-queued Interconnection Request shall automatically be deemed a Contingent Facility if such Interconnection Facility or Network Upgrade would be necessary for the proper functioning of the proposed Generating Facility as System Protection Facilities, (as defined in Appendix 6 to Attachment L of Transmission Provider's LGIA, which is in Attachment 6OATF).

3.8.4 The Interconnection System Impact Study report will list Contingent Facilities in an appendix, which will include: (a) a description of each Contingent Facility; and (b) the Interconnection Request, transmission service request or planned project for which the Contingent Facility was initially required. This list of Contingent Facilities is subject to updates if a System Impact Study is Re-Studied pursuant to Section 7.6.

3.8.5 If requested by the Interconnection Customer, and if readily available and not commercially sensitive, Transmission Provider will also provide an estimate of the costs of and the in-service date for each Contingent Facility, which may be subject to later updates if a Contingent Facility's estimated costs and in-service dates change.

LGIA: (1) Article 1. Contingent Facilities, (2) Appendix A #4 Contingent Facilities:

Contingent Facilities shall mean those unbuilt Interconnection Facilities and Network Upgrades upon which the Interconnection Request's costs, timing, and study findings are dependent, and if delayed or not built, could cause a need for re-studies of the Interconnection Request or a reassessment of the Interconnection Facilities and/or Network Upgrades and/or costs and timing.⁸

⁸ 845, 845-A established this defined term in the LGIP but this new term was not included in the pro forma LGIA. However, references to Contingent Facilities are made in the LGIA. Therefore, Bonneville is proposing this deviation as superior to pro forma.

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Appendix A to LGIA

Interconnection Facilities, Network Upgrades and Distribution Upgrades

#4 Contingent Facilities:

DRAFT

Reform #4: Transparency Regarding Study Models and Assumptions

845: Requires Transmission Providers to maintain network models and underlying assumptions on either an Open Access Same-Time Information System (OASIS) site or a password-protected website.

845-A: No substantive edits were made.

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LGIP: Section 2.3 Base Case Data:

2.3 Base Case Data.

Transmission Provider shall maintain base power flow, short circuit and stability databases, including all underlying assumptions, and contingency list on either its OASIS site or a password-protected website, subject to confidentiality provisions in LGIP Section 13.1. In addition, Transmission Provider shall maintain network models and underlying assumptions on either its OASIS site or a password-protected website. Such network models and underlying assumptions should reasonably represent those used during the most recent interconnection study and be representative of current system conditions. If Transmission Provider posts this information on a password-protected website, a link to the information must be provided on Transmission Provider's OASIS site. Transmission Provider is permitted to require that Interconnection Customers, OASIS site users and password-protected website users sign a confidentiality agreement before the release of commercially sensitive information or Critical Energy Infrastructure Information in the Base Case data. **Transmission Provider reserves the right to withhold Critical Energy Infrastructure Information if the disclosure of such information would waive protections against public disclosure pursuant to 16 U.S.C. § 824o-1 as may be amended or replaced from time to time, or violate reliability standards prohibiting disclosure adopted pursuant to 16 U.S.C. § 824o as may be amended or replaced from time to time.** Such databases and lists, hereinafter referred to as Base Cases, shall include all (1) generation projects and (2) transmission projects, including merchant transmission projects that are proposed for the Transmission System for which a transmission expansion plan has been submitted and approved by the applicable authority.

Reform #5: Definition of Generating Facility in the LGIP and LGIA

845: Revised the definition of "Generating Facility" to include electric storage resources and to allow electric storage resources to interconnect pursuant to large generator interconnection processes.

845-A: No substantive edits were made.

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LGIP: Section 1. Generating Facility:

Generating Facility shall mean Interconnection Customer's device for the production and/or storage for later injection of electricity identified in the Interconnection Request, but shall not include ~~the~~ Interconnection Customer's Interconnection Facilities.

LGIA: Article 1. Generating Facility:

Generating Facility shall mean Interconnection Customer's device for the production and/or storage for later injection of electricity identified in the Interconnection Request, but shall not include ~~the~~ Interconnection Customer's Interconnection Facilities

Reform #6: Interconnection Study Deadlines

845: Requires Transmission Provider to post Interconnection Study metrics to increase the transparency of Interconnection Study completion timeframes. Additionally, if study deadlines are exceeded for more than 25 percent of any study type for two consecutive quarters Transmission Provider must make available informational reports for four calendar quarters. If during this period, Transmission Provider exceeds more than 25 percent of study deadlines for any study type for two consecutive quarters, the reporting requirement would be retriggered for another four consecutive quarters, from the date of the last consecutive quarter to exceed the 25 percent threshold.

845-A: (1) Extends the commencement of the retention and posting requirements, the reporting requirement shall commence in the first calendar quarter of 2020. (2) Changed Interconnection Service Requests to Interconnection Requests.

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LGIP: Section 3.5 OASIS Posting (3.5.1 through 3.5.4).

3.5. OASIS Posting.

3.5.1

Transmission Provider will maintain on its OASIS a list of all Interconnection Requests. The list will identify, for each Interconnection Request: (i) the maximum summer and winter megawatt electrical output; (ii) the location by county and state; (iii) the station or transmission line or lines where the interconnection will be made; (iv) the projected In-Service Date; (v) the status of the Interconnection Request, including Queue Position; (vi) the type of Interconnection Service being requested; and (vii) the availability of any studies related to the Interconnection Request; (viii) the date of the Interconnection Request; (ix) the type of Generating Facility to be constructed (combined cycle, base load or combustion turbine and fuel type); and (x) for Interconnection Requests that have not resulted in a completed interconnection, an explanation as to why it was not completed. Except in the case of an Affiliate, the list will not disclose the identity of Interconnection Customer until Interconnection Customer executes an LGIA or requests that Transmission Provider file an unexecuted LGIA with FERC. Before holding a Scoping Meeting with its Affiliate, Transmission Provider shall post on OASIS an advance notice of its intent to do so. Transmission Provider shall post to its OASIS site any deviations from the study timelines set forth herein. Interconnection Study reports and Optional Interconnection Study reports shall be posted to Transmission Provider's OASIS site subsequent to the meeting between Interconnection Customer and Transmission Provider to discuss the applicable study results. Transmission Provider shall also post any known deviations in the Large Generating Facility's In- Service Date.

3.5.2 Requirement to Post Interconnection Study Metrics.

Transmission Provider will maintain on its OASIS or its website summary

statistics related to processing Interconnection Studies pursuant to Interconnection Requests, updated quarterly. If Transmission Provider posts this information on its website, a link to the information must be provided on Transmission Provider's OASIS site. For each calendar quarter, Transmission Providers must calculate and post the information detailed in sections 3.5.2.1 through 3.5.2.4.

3.5.2.1 Interconnection Feasibility Studies Processing Time.

- (A) Number of Interconnection Requests that had Interconnection Feasibility Studies completed within Transmission Provider's coordinated region during the reporting quarter,
- (B) Number of Interconnection Requests that had Interconnection Feasibility Studies completed within Transmission Provider's coordinated region during the reporting quarter that were completed more than **forty-five (45) Calendar Days** after receipt by Transmission Provider of the Interconnection Customer's executed Interconnection Feasibility Study Agreement,
- (C) At the end of the reporting quarter, the number of active valid Interconnection Requests with ongoing incomplete Interconnection Feasibility Studies where such Interconnection Requests had executed Interconnection Feasibility Study Agreements received by Transmission Provider more than **forty-five (45) Calendar Days** before the reporting quarter end,
- (D) Mean time (in days), Interconnection Feasibility Studies completed within Transmission Provider's coordinated region during the reporting quarter, from the date when Transmission Provider received the executed Interconnection Feasibility Study Agreement to the date when Transmission Provider provided the completed Interconnection Feasibility Study to the Interconnection Customer,
- (E) Percentage of Interconnection Feasibility Studies exceeding **forty-five (45) Calendar Days** to complete this reporting quarter, calculated as the sum of 3.5.2.1(B) plus 3.5.2.1(C) divided by the sum of 3.5.2.1(A) plus 3.5.2.1(C).

3.5.2.2 Interconnection System Impact Studies Processing Time.

- (A) Number of Interconnection Requests that had Interconnection System Impact Studies completed within Transmission Provider's coordinated region during the reporting quarter,
- (B) Number of Interconnection Requests that had Interconnection System Impact Studies completed within Transmission Provider's

coordinated region during the reporting quarter that were completed more than **ninety (90) Calendar Days** after receipt by Transmission Provider of the Interconnection Customer's executed Interconnection System Impact Study Agreement,

(C) At the end of the reporting quarter, the number of active valid Interconnection Requests with ongoing incomplete System Impact Studies where such Interconnection Requests had executed Interconnection System Impact Study Agreements received by Transmission Provider more than **ninety (90) Calendar Days** before the reporting quarter end,

(D) Mean time (in days), Interconnection System Impact Studies completed within Transmission Provider's coordinated region during the reporting quarter, from the date when Transmission Provider received the executed Interconnection System Impact Study Agreement to the date when Transmission Provider provided the completed Interconnection System Impact Study to the Interconnection Customer,

(E) Percentage of Interconnection System Impact Studies exceeding ninety **(90) Calendar Days** to complete this reporting quarter, calculated as the sum of 3.5.2.2(B) plus 3.5.2.2(C) divided by the sum of 3.5.2.2(A) plus 3.5.2.2(C)).

3.5.2.3 Interconnection Facilities Studies Processing Time.

(A) Number of Interconnection Requests that had Interconnection Facilities Studies that are completed within Transmission Provider's coordinated region during the reporting quarter,

(B) Number of Interconnection Requests that had Interconnection Facilities Studies that are completed within Transmission Provider's coordinated region during the reporting quarter that were completed more than **ninety (90) Calendar Days, if Interconnection Customer requested no more than a +/- 20 percent cost estimate contained in the report; or one hundred eighty (180) Calendar Days, if Interconnection Customer requests a +/-10 percent cost estimate⁹** after receipt by Transmission Provider of the Interconnection Customer's executed Interconnection Facilities Study Agreement,

(C) At the end of the reporting quarter, the number of active valid Interconnection Service requests with ongoing incomplete Interconnection Facilities Studies where such Interconnection Requests had executed Interconnection Facilities Studies Agreement received by Transmission Provider more than **ninety (90) Calendar Days, if**

⁹ Revised language in section B and C to indicate both 90 Calendar Days and 180 Calendar Days.

Interconnection Customer requested no more than a +/- 20 percent cost estimate contained in the report; or one hundred eighty (180) Calendar Days, if Interconnection Customer requests a +/-10 percent cost estimate before the reporting quarter end,

- (D) Mean time (in days), for Interconnection Facilities Studies completed within Transmission Provider's coordinated region during the reporting quarter, calculated from the date when Transmission Provider received the executed Interconnection Facilities Study Agreement to the date when Transmission Provider provided the completed Interconnection Facilities Study to the Interconnection Customer,
- (E) Percentage of delayed Interconnection Facilities Studies this reporting quarter, calculated as the sum of 3.5.2.3(B) plus 3.5.2.3(C) divided by the sum of 3.5.2.3(A) plus 3.5.2.3(C).

3.5.2.4 Interconnection Service Requests Withdrawn from Interconnection Queue.

- (A) Number of Interconnection Requests withdrawn from Transmission Provider's interconnection queue during the reporting quarter,
- (B) Number of Interconnection Requests withdrawn from Transmission Provider's interconnection queue during the reporting quarter before completion of any interconnection studies or execution of any interconnection study agreements,
- (C) Number of Interconnection Requests withdrawn from Transmission Provider's interconnection queue during the reporting quarter before completion of an Interconnection System Impact Study,
- (D) Number of Interconnection Requests withdrawn from Transmission Provider's interconnection queue during the reporting quarter before completion of an Interconnection Facilities Study,
- (E) Number of Interconnection Requests withdrawn from Transmission Provider's interconnection queue after execution of a generator interconnection agreement ~~or Interconnection Customer requests the filing of an unexecuted, new interconnection agreement,~~
- (F) Mean time (in days), for all withdrawn Interconnection Requests, from the date when the request was determined to be valid to when Transmission Provider received the request to withdraw from the queue.

- 3.5.3 Transmission Provider is required to post on OASIS or its website the measures in paragraph 3.5.2.1(A) through paragraph 3.5.2.4(F) for each calendar quarter within 30 days of the end of the calendar quarter. Transmission Provider will keep the quarterly measures posted on OASIS or

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its website for three calendar years with the first required reporting year to be **in the first quarter of 2017 2020.** If Transmission Provider retains this information on its website, a link to the information must be provided on Transmission Provider's OASIS site.

3.5.4 In the event that any of the values calculated in paragraphs 3.5.2.1(E), 3.5.2.2(E) or 3.5.2.3(E) exceeds 25 percent for two consecutive calendar quarters, Transmission Provider will have to comply with the measures below for the next four consecutive calendar quarters and must continue reporting this information until Transmission Provider reports four consecutive calendar quarters without the values calculated in 3.5.2.1(E), 3.5.2.2 (E) or 3.5.2.3(E) exceeding 25 percent for two consecutive calendar quarters:

(i) Transmission Provider ~~must submit~~ shall post on OASIS or its website a report ~~to the Commission~~ describing the reason for each study or group of clustered studies pursuant to an Interconnection Request that exceeded its deadline (i.e., 45, 90 or 180 days) for completion (excluding any allowance for Reasonable Efforts). Transmission Provider must describe the reasons for each study delay and any steps taken to remedy these specific issues and, if applicable, prevent such delays in the future. The report must be filed at the Commission posted within 45 days of the end of the calendar quarter.

(ii) Transmission Provider shall aggregate the total number of employee-hours and third party consultant hours expended towards interconnection studies within its coordinated region that quarter and post on OASIS or its website. If Transmission Provider posts this information on its website, a link to the information must be provided on Transmission Provider's OASIS site. This information is to be posted within 30 days of the end of the calendar quarter.

Reform #7: Requesting Interconnection Service Below Generating Facility Capacity

845: (1) Allows Interconnection Customers to request Interconnection Service that is lower than full Generating Facility Capacity; (2) Recognizes the need for proper control technologies and flexibility for Transmission Providers to propose penalties to ensure that the Generating Facility does not inject energy above the requested level of service; (3) Interconnection Customers may either request Interconnection Service below Generating Facility Capacity in their Interconnection Requests, or reduce their levels of requested Interconnection Service by up to 60 percent and 15 percent, respectively, at two subsequent points in the interconnection process: (a) prior to returning an executed system impact study agreement; and (b) prior to returning an executed facilities study agreement.

845-A: (1) Revised the last sentence of 3.1 to remove language indicating financial penalties for exceeding the limitations for Interconnection Service established in the interconnection agreements; (2) Added language to indicate if Transmission Provider determines that additional Network Upgrades are necessary, then Transmission Provider must (a) specify which additional Network Upgrade costs are based on which studies; and (b) provide a detailed explanation of why the additional upgrades are necessary.

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LGIP: Section 3.1 (Other Sections are included for reference only).

3.1 General.

An Interconnection Customer shall submit to Transmission Provider an Interconnection Request in the form of Appendix 1 to this LGIP and a refundable deposit of \$10,000. Transmission Provider shall apply the deposit toward the cost of an Interconnection Feasibility Study. Interconnection Customer shall submit a separate Interconnection Request for each site and may submit multiple Interconnection Requests for a single site. Interconnection Customer must submit a deposit with each Interconnection Request even when more than one request is submitted for a single site. An Interconnection Request to evaluate one site at two different voltage levels shall be treated as two Interconnection Requests.

At Interconnection Customer's option, Transmission Provider and Interconnection Customer will identify alternative Point(s) of Interconnection and configurations at the Scoping Meeting to evaluate in this process and attempt to eliminate alternatives in a reasonable fashion given resources and information available. Interconnection Customer will select the definitive Point(s) of Interconnection to be studied no later than the execution of the Interconnection Feasibility Study Agreement.

Transmission Provider shall have a process in place to consider requests for Interconnection Service below the Generating Facility Capacity. These requests for Interconnection Service shall be studied at the level of Interconnection Service requested for purposes of Interconnection Facilities, Network Upgrades, and associated costs, but may be subject to other studies at the full Generating Facility Capacity to ensure safety and reliability of the system, with the study costs borne by

~~the~~ Interconnection Customer. If after the additional studies are complete, Transmission Provider determines that additional Network Upgrades are necessary, then Transmission Provider must: (1) specify which additional Network Upgrade costs are based on which studies; and (2) provide a detailed explanation of why the additional Network Upgrades are necessary. Any Interconnection Facility and/or Network Upgrade costs required for safety and reliability also would be borne by the Interconnection Customer. Interconnection Customers may be subject to additional control technologies as well as testing and validation of those technologies consistent with Article 6 of the LGIA. The necessary control technologies and protection systems shall be established in Appendix C of that executed, ~~or requested to be filed unexecuted,~~ LGIA.

4.4.1 Prior to the return of the executed Interconnection System Impact Study Agreement to Transmission Provider, modifications permitted under this Section shall include specifically: (a) a decrease of up to 60 percent of electrical output (MW) of the proposed project, through either (1) a decrease in plant size or (2) a decrease in Interconnection Service level (consistent with the process described in Section 3.1) accomplished by applying Transmission Provider-approved injection-limiting equipment; (b) modifying the technical parameters associated with the Large Generating Facility technology or the Large Generating Facility step-up transformer impedance characteristics; and (c) modifying the interconnection configuration. For plant increases, the incremental increase in plant output will go to the end of the queue for the purposes of cost allocation and study analysis.¹⁰

4.4.2 Prior to the return of the executed Interconnection ~~Facilityies~~ Study Agreement to the Transmission Provider, the modifications permitted under this Section shall include specifically: (a) additional 15 percent decrease of electrical output of the proposed project through either (1) a decrease in plant size (MW) or (2) a decrease in Interconnection Service level (consistent with the process described in Section 3.1) accomplished by applying Transmission Provider-approved injection-limiting equipment; (b) Large Generating Facility technical parameters associated with modifications to Large Generating Facility technology and transformer impedances; provided, however, the incremental costs associated with those modifications are the responsibility of the requesting Interconnection Customer; and (c) a Permissible Technological Advancement for the Large Generating Facility after the submission of the Interconnection Request. Section 4.4.4 specifies a separate technological change procedure including the requisite information and process that will be followed to assess whether ~~the~~ Interconnection Customer's proposed technological advancement under Section 4.4.2(c) is a Material Modification. Section 1 contains a definition of Permissible Technological Advancement.

¹⁰ 845-A did not make changes to Sections 4.4.1, and 4.4.2 for this reform, but they are included here for reference only.

6.3 Interconnection Feasibility Study Procedures.

Transmission Provider shall utilize existing studies to the extent practicable when it performs the study. Transmission Provider shall use Reasonable Efforts to complete the Interconnection Feasibility Study no later than forty-five (45) Calendar Days after Transmission Provider receives the fully executed Interconnection Feasibility Study Agreement. At the request of Interconnection Customer or at any time Transmission Provider determines that it will not meet the required time frame for completing the Interconnection Feasibility Study, Transmission Provider shall notify Interconnection Customer as to the schedule status of the Interconnection Feasibility Study. If Transmission Provider is unable to complete the Interconnection Feasibility Study within that time period, it shall notify Interconnection Customer and provide an estimated completion date with an explanation of the reasons why additional time is required. Upon request, Transmission Provider shall provide Interconnection Customer supporting documentation, ~~workpapers~~ ~~work papers~~ and relevant power flow, short circuit and stability databases for the Interconnection Feasibility Study, subject to confidentiality arrangements consistent with Section 13.1.

Transmission Provider shall study the Interconnection Request at the level of service requested by the Interconnection Customer, unless otherwise required to study the full Generating Facility Capacity due to safety or reliability concerns.

7.3. Scope of Interconnection System Impact Study.

The Interconnection System Impact Study shall evaluate the impact of the proposed interconnection on the reliability of the Transmission System. The Interconnection System Impact Study will consider the Base Case as well as all generating facilities (and with respect to (iii) below, any identified Network Upgrades associated with such higher queued interconnection) that, on the date the Interconnection System Impact Study is commenced: (i) are directly interconnected to the Transmission System; (ii) are interconnected to Affected Systems and may have an impact on the Interconnection Request; (iii) have a pending higher queued Interconnection Request to interconnect to the Transmission System; and (iv) have no Queue Position but have executed an LGIA ~~or requested that an unexecuted LGIA be filed with FERC.~~

The Interconnection System Impact Study will consist of a short circuit analysis, a stability analysis, and a power flow analysis. The Interconnection System Impact Study will state the assumptions upon which it is based; state the results of the analyses; and provide the requirements or potential impediments to providing the requested ~~interconnection service~~ **Interconnection Service**, including a preliminary indication of the cost and length of time that would be necessary to correct any problems identified in those analyses and implement the interconnection. For purposes of determining necessary Interconnection Facilities and Network Upgrades, the System Impact Study shall consider the level of Interconnection Service requested by the Interconnection Customer, unless otherwise required to study the full Generating Facility Capacity due to safety or reliability concerns. The Interconnection System Impact Study will provide a list of facilities that are required as a result of the Interconnection Request and a non-binding good faith

TC22 Proposal: Except from Attachment L to Bonneville's Tariff: 845, 845-A
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estimate of cost responsibility and a non-binding good faith estimated time to construct.

APPENDIX 1 to LGIP INTERCONNECTION REQUEST FOR A LARGE GENERATING FACILITY

5. Interconnection Customer provides the following information:

- h. Requested capacity (in MW) of Interconnection Service (if lower than the Generating Facility Capacity).

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Reform #8: Provisional Interconnection Service

845: Interconnection Customers may request Provisional Interconnection Service subject to Transmission Provider's determination of frequency for updating Provisional Interconnection Studies.

845-A: No Substantive edits were made.

TC22 Tariff Language Proposal

LGIP: Section 1. Definitions:

Provisional Interconnection Service shall mean Interconnection Service provided by Transmission Provider associated with interconnecting ~~the~~ Interconnection Customer's Generating Facility to Transmission Provider's Transmission System and enabling that Transmission System to receive electric energy and capacity from the Generating Facility at the Point of Interconnection, pursuant to the terms of the Provisional Large Generator Interconnection Agreement and, if applicable, the Tariff.

Provisional Large Generator Interconnection Agreement shall mean the interconnection agreement for Provisional Interconnection Service established between Transmission Provider and/or the Transmission Owner and ~~the~~ Interconnection Customer. This agreement shall take the form of the Large Generator Interconnection Agreement, modified for provisional purposes.

LGIA: Article 1. Definitions:

Provisional Interconnection Service shall mean Interconnection Service provided by Transmission Provider associated with interconnecting ~~the~~ Interconnection Customer's Generating Facility to Transmission Provider's Transmission System and enabling that Transmission System to receive electric energy and capacity from the Generating Facility at the Point of Interconnection, pursuant to the terms of the Provisional Large Generator Interconnection Agreement and, if applicable, the Tariff.

Provisional Large Generator Interconnection Agreement shall mean the interconnection agreement for Provisional Interconnection Service established between Transmission Provider and/or the Transmission Owner and ~~the~~ Interconnection Customer. This agreement shall take the form of the Large Generator Interconnection Agreement, modified for provisional purposes.

5.9.2 Provisional Interconnection Service. Upon the request of Interconnection Customer, and prior to completion of requisite Interconnection Facilities, Network Upgrades, Distribution Upgrades, or System Protection Facilities **and after completion of the NEPA process and a decision to approve the project** Transmission Provider may execute a Provisional Large Generator Interconnection Agreement ~~or Interconnection Customer may request the filing of an unexecuted Provisional Large Generator Interconnection Agreement with the Interconnection Customer for limited Interconnection Service at the discretion of Transmission Provider based upon an evaluation that will consider the results of available studies.~~ Transmission Provider shall determine, through available studies or additional studies as necessary, whether stability, short circuit, thermal, and/or voltage issues

would arise if Interconnection Customer interconnects without modifications to the Generating Facility or Transmission ~~System-Provider's~~ system.¹¹ Transmission Provider shall determine whether any Interconnection Facilities, Network Upgrades, Distribution Upgrades, or System Protection Facilities that are necessary to meet the requirements of NERC, or any applicable Regional Entity for the interconnection of a new, modified and/or expanded Generating Facility are in place prior to the commencement of Interconnection Service from the Generating Facility. Where available studies indicate that such, Interconnection Facilities, Network Upgrades, Distribution Upgrades, and/or System Protection Facilities that are required for the interconnection of a new, modified and/or expanded Generating Facility are not currently in place, Transmission Provider will perform a study, at the Interconnection Customer's expense, to confirm the facilities that are required for Provisional Interconnection Service. The maximum permissible output of the Generating Facility in the Provisional Large Generator Interconnection Agreement shall be studied and updated **an annual basis** and at the Interconnection Customer's expense. Interconnection Customer assumes all risk and liabilities with respect to changes between the Provisional Large Generator Interconnection Agreement and the Large Generator Interconnection Agreement, including changes in output limits and Interconnection Facilities, Network Upgrades, Distribution Upgrades, and/or System Protection Facilities cost responsibilities.

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¹¹ By definition, Provisional Interconnection Service concerns the Transmission Provider's Transmission System, so this deviation is superior to *pro forma*.

Reform #9: Utilization of Surplus Interconnection Service

845: Surplus Interconnection Service enables an existing Interconnection Customer whose Generating Facility is already interconnected, one of its affiliates, or a non-affiliate to utilize the unused portion of an existing Interconnection Customer's Interconnection Service within specific parameters. The tariff includes a new definition of Surplus Interconnection Service in the LGIP and LGIA, and provides an expedited interconnection process outside of the interconnection queue for Surplus Interconnection Service. That expedited process must allow affiliates of the existing Interconnection Customer to use Surplus Interconnection Service for another interconnecting generating facility and allow for the transfer of Surplus Interconnection Service that the existing Interconnection Customer or one of its affiliates does not intend to use. The Transmission Provider must perform reactive power, short circuit/fault duty, and stability analyses studies as well as steady-state (thermal/voltage) analyses as necessary to ensure evaluation of all required reliability conditions to provide Surplus Interconnection Service and ensure the reliable use of Surplus Interconnection Service. Surplus interconnection service cannot be granted if doing so would require new network upgrades. The original interconnection customer must be able to stipulate the amount of surplus interconnection service that is available, designate when that service is available, and describe any other conditions under which Surplus Interconnection Service at the Point of Interconnection may be used.

845-A: No substantive edits were made.

TC22 Tariff Language Proposal

LGIP: Section 1. Definitions: Surplus Interconnection Customer, Surplus Interconnection Service, Surplus Interconnection Service Request, and Surplus Scoping Meeting, Section 3.3 Utilization of Surplus Interconnection Service and the following subsections:

- 3.3.1 No Applicability to Transmission Service
- 3.3.2 Surplus Interconnection Service Requests
- 3.3.3 Initiating a Surplus Interconnection Service Request;
- 3.3.4 Acknowledgement of the Surplus Interconnection Service Request;
- 3.3.5 Surplus Interconnection Service Queue;
- 3.3.6 Deficiencies in the Surplus Interconnection Service Request;
- 3.3.7 Surplus Interconnection Service Scoping Meeting;
- 3.3.8 Environmental Study Agreement;
- 3.3.9 Withdrawal of Surplus Interconnection Service Request;
- 3.3.10 Surplus Interconnection Service System Impact Study Agreement;
(3.3.10.1-3.3.10.3);
- 3.3.11 Surplus Interconnection Service Facilities Study Agreement;
(3.3.11.1-3.3.11.4); and
- 3.3.12 Surplus Interconnection Service Agreement

Surplus Interconnection Customer shall mean an entity that proposes to utilize or transfer Surplus Interconnection Service in accordance with Section 3.3 of these procedures.

Surplus Interconnection Service shall mean any unneeded portion of Interconnection Service established in a Large Generator Interconnection Agreement, such that if Surplus Interconnection Service is utilized, the total amount of Interconnection Service at the Point of

Interconnection would remain the same.

Surplus Interconnection Service Request shall mean a Surplus Interconnection Customer's request, in accordance with Section 3.3. of the LGIP, to utilize or transfer Surplus Interconnection Service at an existing Point of Interconnection.

Surplus Scoping Meeting shall mean the meeting between representatives of the Surplus Interconnection Customer and Transmission Provider conducted for the purpose of discussing the Surplus Interconnection Service Request and exchanging information.

3.3 Utilization of Surplus Interconnection Service¹²

Transmission Provider must provide a process that allows an existing Interconnection Customer (Interconnection Customer whose Generating Facility is already interconnected to Transmission Provider's Transmission System) to utilize or transfer Surplus Interconnection Service at an existing Point of Interconnection. The ~~original~~ existing Interconnection Customer or one of its affiliates shall have priority to utilize Surplus Interconnection Service. If the existing Interconnection Customer or one of its affiliates does not exercise its priority, then that service may be made available to other potential Surplus Interconnection Customers that are not affiliated with the existing Interconnection Customer.

3.3.1 No Applicability to Transmission Service

Nothing in this Section shall constitute a request for transmission service or confer upon a Surplus Interconnection Customer any right to receive transmission service.

3.3.2 Surplus Interconnection Service Requests

A Surplus Interconnection Service request may be made by the existing Interconnection Customer whose Generating Facility is already interconnected¹³ or one of its affiliates. Surplus Interconnection Service requests also may be made by a ~~non-affiliate~~ other Interconnection Customer. Transmission Provider shall provide a process for Surplus Interconnection Service. Studies for Surplus Interconnection Service shall consist of reactive power, short circuit/fault duty, stability analyses, and any other appropriate studies. Steady-state (thermal/voltage) analyses may be performed as necessary to ensure that all required reliability conditions are studied. If the Surplus Interconnection Service was not studied under off-peak conditions, off-peak steady state analyses shall be performed to the required level necessary to demonstrate reliable operation of the Surplus Interconnection Service. If the original System Impact Study is not available

¹² Sections 2 through 13 of the LGIP states that it applies to an Interconnection Request pertaining to a Large Generating Facility. Interconnection Request is a defined term. Therefore, it is necessary to create stand alone procedures for Surplus Interconnection Service Requests.

¹³ This language is not needed because "Existing Interconnection Customer" is indicated in Section 3.3.

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for the Surplus Interconnection Service, both off-peak and peak analysis may need to be performed for the existing Generating Facility associated with the request for Surplus Interconnection Service. The reactive power, short circuit/fault duty, stability, and steady-state analyses for Surplus Interconnection Service will identify any additional Interconnection Facilities and/or Network Upgrades necessary.

3.3.3 Initiating a Surplus Interconnection Service Request

Surplus Interconnection Customer identified in 3.3.2 must first submit, in writing to Transmission Provider, a Surplus Request. A valid request will consist of the following:

- a) a cover letter stating: (i) the identity of Surplus Interconnection Customer; (ii) the existing Point of Interconnection that Surplus Interconnection Customer proposes to use for Surplus Interconnection Service, (iii) the identity of the existing Interconnection Customer, (iv) if Surplus Interconnection Customer is any entity other than the existing Interconnection Customer, Surplus Interconnection Customer's affiliation, if any, to the existing Interconnection Customer; (v) the amount of Surplus Interconnection Service Surplus Interconnection Customer seeks to use, and (vi) the expected In-Service Date of the Surplus Interconnection generating facility;
- b) (i) a deposit of \$10,000, (ii) demonstration of Site Control or a posting of an additional deposit of \$10,000. Such deposits shall be applied toward any Surplus Interconnection Studies pursuant to the Surplus Interconnection Service Request. If Surplus Interconnection Customer demonstrates Site Control within the cure period specified in Section 3.3.6 after submitting its Surplus Interconnection Service Request, the additional deposit shall be refundable; otherwise, all such deposit(s), additional and initial, become non-refundable;
- c) Modeling data (in a format acceptable to Transmission Provider) and project one line diagram for the Surplus Interconnection Service Request.
- d) A letter of intent, signed by the existing Interconnection Customer, indicating: (i) the existing Interconnection Customer's intent to allow a specified portion of its Interconnection Service to be used by Surplus Interconnection Customer; (ii) the specified amount of Surplus Interconnection Service that the existing Interconnection Customer is making available; (iii) the date when the Surplus Interconnection Service will be available; (iv) the conditions under which such Surplus Interconnection Service may be used; and (v) the letter must also include a statement that the existing

Interconnection Customer is waiving its priority right, on behalf of itself and any affiliate to utilize the Surplus Interconnection Service, only if Surplus Interconnection Customer is any entity other than the existing Interconnection Customer or an affiliate of the existing Interconnection Customer.

3.3.4 Acknowledgement of the Surplus Interconnection Service Request

Transmission Provider shall acknowledge receipt of the Surplus Interconnection Service Request within five (5) Business Days of receipt of the request and attach a copy of the received Surplus Interconnection Service Request to the acknowledgement.

3.3.5 Surplus Interconnection Service Queue

Following Transmission Provider's receipt of a completed Surplus Interconnection Service Request, Transmission Provider will process such requests on an expedited basis and separately from other requests pending in its interconnection queue. To do so, however, Surplus Interconnection Customer shall timely provide, to Transmission Provider, such other information as the Transmission Provider may reasonably request.

3.3.6 Deficiencies in the Surplus Interconnection Service Request

If Surplus Interconnection Customer fails to provide a completed Surplus Interconnection request to Transmission Provider, Transmission Provider will notify Surplus Interconnection Customer of the deficiencies and Surplus Interconnection Customer will have 15 Business Days, from the date on the Notice, to cure any deficiencies. Failure to timely cure all deficiencies will result in a deemed withdrawal of the Surplus Interconnection Service Request.

3.3.7 Surplus Interconnection Service Scoping Meeting

Within ten (10) Business Days after Transmission Provider receives a valid Surplus Interconnection Service Request, Transmission Provider shall establish a Surplus Scoping Meeting date. The date must be agreeable to Surplus Interconnection Customer and, if applicable, the existing Interconnection Customer. The date shall be no later than thirty (30) Calendar Days from receipt of the valid Surplus Interconnection Service Request, unless otherwise mutually agreed upon by the Surplus Interconnection Customer or the existing Interconnection Customer, if applicable.

The purpose of the Surplus Scoping Meeting shall be to discuss the Surplus Interconnection Service that the existing Interconnection Customer is making available at such Point of Interconnection, and to exchange information including any studies and transmission data that would reasonably be expected to impact such interconnection. Surplus Scoping Meeting attendees will bring to the meeting any studies that may have been

performed for the existing Interconnection Customer, any existing LGIA, and such technical data, including, but not limited to: (i) general facility loadings, (ii) general instability issues, (iii) general short circuit issues, (iv) general voltage issues, and (v) general reliability issues as may be reasonably required to accomplish the purpose of the meeting. Meeting attendees will also bring to the meeting personnel and other resources as may be reasonably required to accomplish the purpose of the meeting in the time allocated for it. On the basis of the meeting, Surplus Interconnection Customer shall provide to Transmission Provider its preferred plan of service for its use of Surplus Interconnection Service.

3.3.8 Environmental Study Agreement

As soon as practicable, Transmission Provider shall tender to Surplus Interconnection Customer an environmental study agreement authorizing Transmission Provider, at Surplus Interconnection Customer's expense, to perform environmental review of the proposed surplus interconnection, including review under the National Environmental Policy Act (NEPA), and setting forth Surplus Interconnection Customer's responsibilities in connection with such environmental review. Surplus Interconnection Customer shall execute and return the environmental study agreement within 30 Calendar Days of receipt or its Surplus Interconnection Service Request shall be deemed withdrawn and the unexpended amount of its deposit, if any, shall be returned.

3.3.9 Withdrawal of the Surplus Interconnection Service Request

Surplus Interconnection Customer may withdraw its Surplus Interconnection Service Request at any time by written notice of such withdrawal to Transmission Provider. In addition, if Surplus Interconnection Customer fails to adhere to all applicable requirements of this LGIP, except as provided in Section 13.5 (Disputes), Transmission Provider shall deem the Surplus Interconnection Service Request to be withdrawn and shall provide written notice to Surplus Interconnection Customer of the deemed withdrawal and an explanation of the reasons for such deemed withdrawal. Upon receipt of such written notice, Surplus Interconnection Customer shall have fifteen (15) Business Days in which to either respond with information or actions that cure the deficiency or to notify Transmission Provider of its intent to pursue Dispute Resolution.

Withdrawal shall result in the loss of Surplus Interconnection Customer's Queue Position. If Surplus Interconnection Customer disputes the withdrawal and loss of its Queue Position, then during Dispute Resolution, Surplus Interconnection Customer's Surplus Interconnection Service Request is eliminated from the queue until such time that the outcome of Dispute Resolution would restore its Queue Position. A Surplus Interconnection Customer that withdraws or is deemed to have withdrawn its Surplus Interconnection Request shall pay to Transmission Provider all costs that Transmission Provider prudently incurs with respect to that

Surplus Interconnection Request prior to Transmission Provider's receipt of notice described above. Surplus Interconnection Customer must pay all monies due to Transmission Provider before it is allowed to obtain any Surplus Interconnection Study data or results.

Transmission Provider shall (i) update the OASIS Surplus Interconnection Queue Position posting and (ii) refund to Surplus Interconnection Customer any portion of Surplus Interconnection Customer's deposit or study payments that exceeds the costs that Transmission Provider has incurred, including interest calculated in accordance with section 35.19a(a)(2) of FERC's regulations. In the event of such withdrawal, Transmission Provider, subject to the confidentiality provisions of Section 13.1, shall provide, at Surplus Interconnection Customer's request, all information that Transmission Provider developed for any completed study conducted up to the date of withdrawal of the Surplus Interconnection Request.

3.3.10 Surplus Interconnection Service System Impact Study Agreement

Unless otherwise agreed, following the Surplus Scoping Meeting and provided the existing Interconnection Customer's System Impact Study is available, Transmission Provider will determine if the existing System Impact Study is sufficient to evaluate the request for Surplus Interconnection Service. If the existing System Impact Study is not available, or available but insufficient to enable Transmission Provider to evaluate the Surplus Interconnection Request, then, Surplus Interconnection Customer will be provided a Surplus Interconnection Service System Impact Study (Surplus System Impact Study) Agreement similar in form to that of Appendix 3 of this LGIP) obligating Surplus Interconnection Customer to pay the actual costs of the Surplus System Impact Study.

3.3.10.1 Surplus Interconnection Customer shall execute the Surplus System Impact Study Agreement and deliver the executed Surplus System Impact Study Agreement to Transmission Provider no later than thirty (30) Calendar Days after its receipt along with demonstration of Site Control, and a \$50,000 deposit. If Surplus Interconnection Customer does not provide all such technical data when it delivers the Surplus System Impact Study Agreement, Transmission Provider shall notify Surplus Interconnection Customer of the deficiency within five (5) Business Days of the receipt of the executed Surplus System Impact Study Agreement and Surplus Interconnection Customer shall cure the deficiency within ten (10) Business Days of receipt of the notice, provided, however, such deficiency does not include failure to deliver the executed Surplus System Impact Study Agreement or deposit.

3.3.10.2 Upon receipt of the executed Surplus System Impact Study Agreement and deposit, Transmission Provider shall initiate the

Surplus System Impact Study. The Surplus System Impact Study shall consist of reactive power, short circuit/fault duty, stability analyses, harmonic analysis, and any other studies deemed appropriate by Transmission Provider. As an example, Steady-state (thermal/voltage) analyses may be performed as necessary to ensure that all required reliability conditions are studied. Transmission Provider shall utilize existing studies to the extent practicable in performing the Surplus System Impact Study. The resulting Surplus System Impact Study report will identify any additional Interconnection Facilities and findings that would affect eligibility for Surplus Interconnection Service (i.e. the need for Network Upgrades). Transmission Provider shall use Reasonable Efforts to complete the Surplus System Impact Study and issue the report within ninety (90) Calendar Days after the receipt of the Surplus Interconnection System Impact Study Agreement, all modeling data, and required study deposit. At the request of Surplus Interconnection Customer or at any time the Transmission Provider determines that it will not complete the Surplus System Impact Study report within the ninety (90) Calendar Days, the Transmission Provider shall notify Surplus Interconnection Customer and provide an estimated completion date and an explanation of the reasons why additional time is required.

3.3.10.3 Within ten (10) Business Days of providing a Surplus System Impact Study report to Surplus Interconnection Customer, the Transmission Provider, existing Interconnection Customer and Surplus Interconnection Customer shall meet to discuss the results of the Surplus System Impact Study. Alternatively, Surplus Interconnection Customer may waive this meeting.

3.3.11 Surplus Interconnection Service Facilities Study Agreement

3.3.11.1 If any Surplus Interconnection Service Facilities and/or control technologies are identified as necessary in the Surplus System Impact Study report for the utilization of the Surplus Interconnection Service, simultaneously with the delivery of the Surplus System Impact Study report to Surplus Interconnection Customer, Transmission Provider shall provide to Surplus Interconnection Customer a Surplus Interconnection Service Facilities (Surplus Facilities) Study Agreement (similar in form to that of Appendix 4 to this LGIP). The Surplus Facilities Study Agreement shall provide that Surplus Interconnection Customer shall compensate Transmission Provider for the actual cost of the Surplus Facilities Study.

3.3.11.2 Surplus Interconnection Customer shall execute the Surplus

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Facilities Study Agreement and deliver the executed Surplus Facilities Study Agreement to Transmission Provider within thirty (30) Calendar Days after its receipt, together with an additional \$50,000 deposit to be used in preparation of the Surplus Facilities Study and report.

3.3.11.3 Transmission Provider shall utilize existing studies to the extent practicable in performing the Surplus Facilities Study. Transmission Provider shall use Reasonable Efforts to complete the Surplus Facilities Study and issue the report within one hundred eighty (180) Calendar Days after the receipt of the Surplus Facilities Study Agreement and required study deposit, with a +/- 120 percent cost estimate contained in the Surplus Facilities Study report. If the Transmission Provider is unable to complete the Surplus Facilities Study within the time required, it shall notify Surplus Interconnection Customer and provide an estimated completion date and an explanation of the reasons why additional time is required.

3.3.11.4 Within ten (10) Business Days of providing a Surplus Facilities Study to Surplus Interconnection Customer, the Transmission Provider, existing Interconnection Customer and Surplus Interconnection Customer shall meet to discuss the results of the Surplus Facilities Study. Alternatively, Surplus Interconnection Customer may waive this meeting.

3.3.12 Surplus Interconnection Service Agreement

Within fifteen (15) Business Days after the date on which Transmission Provider completes a record of decision under NEPA or other appropriate NEPA document, or the parties have completed the negotiation process, whichever is later, Transmission Provider will decide whether to Offer a final Surplus Interconnection Service Agreement to Surplus Interconnection Customer.

If the Transmission Provider decides to offer the Surplus Interconnection Customer an executable Surplus Interconnection Agreement, Transmission Provider will also tender an amended and restate LGIA to the existing Interconnection Customer.

Both the Surplus Interconnection Customer and the existing Interconnection Customer shall have 30 Business Days or another mutually agreeable timeframe to sign and return the Surplus interconnection agreement and the amended and restated LGIA respectively. If the Surplus Interconnection Customer or the existing Interconnection Customer does not sign their respective agreements, the Surplus Interconnection Request shall be deemed withdrawn.

After the Surplus interconnection agreement and the amended and restated agreements are signed by the Parties, the Surplus Interconnection Service shall proceed under the provisions of the Surplus Interconnection Agreement.

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LGIA: Section 1. Surplus Interconnection Customer, Surplus Interconnection Service, Surplus Interconnection Service Request, and Surplus Scoping Meeting:

Surplus Interconnection Customer shall mean an entity that proposes to utilize or transfer Surplus Interconnection Service in accordance with Section 3.3 of the LGIP.

Surplus Interconnection Service shall mean any unneeded portion of Interconnection Service established in a Large Generator Interconnection Agreement, such that if Surplus Interconnection Service is utilized, the total amount of Interconnection Service at the Point of Interconnection would remain the same.

Surplus Interconnection Service Request shall mean a Surplus Interconnection Customer's request, in accordance with Section 3.3 of the LGIP, to utilize or transfer Surplus Interconnection Service at an existing Point of Interconnection.

Surplus Scoping Meeting shall mean the meeting between representatives of the Surplus Interconnection Customer and Transmission Provider conducted for the purpose of discussing the Surplus Interconnection Service Request and exchanging information.

Reform #10: Material Modification and Incorporation of Advanced Technologies

TC22 Tariff Language Proposal

LGIP: Section 1. Permissible Technological Advancement, Section 4.4.3, 4.4.4, 4.4. and adds a new Section 4.4.6 Technological Change Procedure to include a process for technological changes.

Permissible Technological Advancement shall mean any new, upgraded, updated, or modified technological advancement proposed by an Interconnection Customer for incorporation in the design, construction, or operation of generation facilities that will not change the electrical characteristics of the Interconnection Request and will not require extensive studies to determine whether such a proposed change constitutes a Material Modification, ~~as that term is defined in this LGIP~~. Such permissible changes may include advancements to turbines, inverters, plant supervisory controls, or other technological advancements to equipment that will provide cost efficiency and/or electrical performance benefits, or, may affect a generating facility's ability to provide ancillary services. However, such Permissible Technological Advancements do not include any additions to or change in the generation technology or fuel type. For all Permissible Technological Advancements, Interconnection Customer must demonstrate that the proposed incorporation of the technological advancement would result in electrical performance that is equal to or better than the electrical performance expected with the technology originally proposed with the Interconnection Customer's Interconnection Request.

- 4.4.1** Prior to the return of the executed Interconnection System Impact Study Agreement to Transmission Provider, modifications permitted under this Section shall include specifically: (a) a decrease of up to 60 percent of electrical output (MW) of the proposed project, through either (1) a decrease in plant size or (2) a decrease in Interconnection Service level (consistent with the process described in Section 3.1) accomplished by applying Transmission Provider-approved injection-limiting equipment; (b) modifying the technical parameters associated with the Large Generating Facility technology or the Large Generating Facility step-up transformer impedance characteristics; and (c) modifying the interconnection configuration. For plant increases, the incremental increase in plant output will go to the end of the queue for the purposes of cost allocation and study analysis.¹⁴
- 4.4.2** Prior to the return of the executed Interconnection Facilities Study Agreement to the Transmission Provider, the modifications permitted under this Section shall include specifically: (a) additional 15 percent decrease of electrical output of the proposed project through either (1) a decrease in plant size (MW) or (2) a decrease in Interconnection

¹⁴ 845-A did not make changes to Sections 4.4.2 for this reform, it is included here for reference only.

Service level (consistent with the process described in Section 3.1) accomplished by applying Transmission Provider-approved injection-limiting equipment; (b) Large Generating Facility technical parameters associated with modifications to Large Generating Facility technology and transformer impedances; provided, however, the incremental costs associated with those modifications are the responsibility of the requesting Interconnection Customer; and (c) a Permissible Technological Advancement for the Large Generating Facility after the submission of the Interconnection Request. Section 4.4.4 specifies a separate technological change procedure including the requisite information and process that will be followed to assess whether the Interconnection Customer's proposed technological advancement under Section 4.4.2(c) is a Material Modification. Section 1 contains a definition of Permissible Technological Advancement.

4.4.3 Technological Change Procedure

At any time prior to the return of the executed Interconnection Facility Study Agreement to Transmission Provider, Interconnection Customer may request a modification under this Section 4.4.6, for incorporation of a technological advancement into its generating facility. To timely perfect that request, Interconnection Customer shall submit the following to Transmission Provider:

(1) A written technological advancement request, specifying the change in technology Interconnection Customer seeks to incorporate into its Interconnection Request;

(2) A \$10,000 deposit;

(3) Any analysis Interconnection Customer has that demonstrates how incorporation of the proposed technological advancement would (i) result in electrical performance that is equal to or better than the electrical performance expected prior to the technological change, and (ii) not cause any reliability concerns; and,

(4) To the extent applicable, updated modeling data in PowerWorld or GE PSLF format, or in such other format as Transmission Provider may agree to accept.

Once the technological advancement request, deposit, and additional data are received by Transmission Provider, Transmission Provider is to evaluate whether the technological

advancement is a Material Modification or whether further study is necessary to complete the analysis of whether the technological advancement is a Material Modification. If Transmission Provider determines that the proposed technological advancement is permissible, then no study will be necessary, the proposed advancement will not be considered a Material Modification, and the Interconnection Customer's deposit will be refunded.

Should further studies be required, Transmission Provider's studies may include steady-state, reactive power, short circuit/fault duty, stability analyses, and any other appropriate studies that Transmission Provider deems necessary to determine whether the technological advancement results in electrical performance that is equal to or better than the electrical performance expected prior to the technology change, and whether such technological advancement causes any reliability concerns. In addition, Transmission Provider's studies may include any additional environmental studies that Transmission Provider deems necessary to comply with NEPA and other environmental laws. The Transmission Provider shall use Reasonable Efforts to complete the assessment within thirty (30) days after Transmission Provider receives a perfected request for incorporation of the technological advancement that includes the deposit and the data outlined above. At the conclusion of the study, Transmission Provider is to provide an accounting of its costs to the Interconnection Customer and either refund any overage or invoice the Interconnection Customer for any shortage of costs that exceed the deposit amount.

If the Transmission Provider's assessment determines that the change is a Permissible Technological Advancement, the Transmission Provider shall notify the Interconnection Customer and the Permissible Technological Advancement shall be incorporated without the loss of Interconnection Customer's queue position. If, however, the Transmission Provider cannot accommodate the proposed technological advancement without triggering the Material Modification provision of this LGIP, the Transmission Provider is to tender a report with the results of the steady-state analyses, reactive power capabilities, short circuit/fault duty impacts, stability analyses, and any other studies that were completed, including an explanation of why the technological advancement is deemed a Material Modification. Once notified, the Interconnection Customer may choose whether to abandon the proposed modification or proceed and lose its queue position.