

Elcon – Generation Interconnection Reform Comments

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BPA has requested comments on potential changes to its Generation Interconnection process. The following comments are being provided for consideration by BPA and stakeholders.

- 1) BPA should keep both a SGIP and LGIP process. Melding them together would place undue burden on small projects, and potential extra cost for the interconnection process. The proposed fast-track process may or may not mitigate this issue.
- 2) Site Control requirements need to be strengthened. BPA could require site control as a condition for all applications, possibly eliminating some speculative requests.
- 3) The cluster study approach for electro-geographically related requests appears to be a good idea. BPA however, would need to establish some type of Open Season or time period for GI submittals.
- 4) BPA presently does cluster studies for areas such as Diamond Butte, Stanfield, and Longhorn and the process as far as the technical studies appears to be successful.
- 5) The proposed idea for a parking lot for GI requests that are on hold or do not meet proposed milestones is a good alternative. At present GI requests can remain in the queue indefinitely depending on permitting and NEPA. This can be both a benefit for developers and not a benefit depending on where you are at in the queue.
- 6) Developing Milestones and timeframes for completion of these milestones need to be flexible for the various types of project sizes, permitting processes, and project SEPA processes. Perhaps a milestone for start of permitting process within X months of completion of the Interconnection Facility Study would be appropriate to remain in the active queue.
- 7) Using a Power Purchase Agreement as a milestone is not feasible. For an interconnection project to get a PPA, normally, the project must have a permitted project that has an LGIA and a long term firm transmission service agreement.
- 8) BPA should move towards a Pro-Rata cost sharing formula sharing interconnection costs and facilities where multiple parties connect to the BPA system. There should be a late comers provision, so parties interconnecting to a substation at a later date share in the costs of the existing facilities. Original parties should be reimbursed a share of their costs. Also, by pro-rata sharing of costs transmission credit use can be shared allowing for faster use of credits.
- 9) Parties that reduce their Interconnection demand level due to restrictions that only allow a portion to be interconnected due to other parties ahead of them in the queue using up the capacity,

should have priority to that capacity if a party ahead of them releases capacity. At present the surrender that right.

- 10) BPA should continue to provide transmission credits for designated network facilities. BPA's present method of determining Network and Direct Assignment facilities should be retained. The present policy provides for the best one utility method of developing major system substations. For example BPA presently considers the addition of 500/230-kV 1300 MVA transformer has a Network facility. If BPA were to re-designate that as a direct assignment facility, most likely, each party would put in their own transformer, and there would be a number of additional facilities added or duplicated.

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