

## RNP Members

3Degrees  
American Wind Energy Assoc.  
Blattner Energy  
Bonneville Environmental  
Foundation  
BP Wind Energy  
Calpine  
Center for Energy Efficiency &  
Renewable Technologies  
CH2M Hill  
Christenson Electric  
Citizens' Utility Board  
Climate Solutions  
Clipper Windpower  
Columbia Gorge  
Community College  
Community Renewable  
Energy Association  
E.ON Climate & Renewables  
EDP Renewables  
Element Power  
Environment Oregon  
Environment Washington  
enXco, Inc.  
Eurus Energy America  
EverPower  
FirstWind  
Gaelectric  
Gamesa Energy USA  
GE Energy  
Geothermal  
Resources Council  
GL Garrad Hassan  
Green Mountain Energy  
Iberdrola Renewables  
Jones Stevedoring  
Kapla Law PLLC  
Lane Powell PC  
MAP  
Montana Environmental  
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Natural Capital Partners  
Natural Resources  
Defense Council  
NaturEner  
NextEra Energy Resources  
Northwest Environmental  
Business Council  
NW Energy Coalition  
Oregon Solar Energy  
Industries Association  
OSPIRG  
Port of Vancouver, USA  
Portland Energy  
Conservation, Inc.  
REC Silicon  
RES America Developments  
Ridgeline Energy  
Solar Oregon  
SolarCity  
Stoel Rives, LLP  
SunPower Corporation  
Suzlon Wind Energy Corporation  
SWCA Environmental Consultants  
Tonkon Torp LLP  
Vestas Americas  
Warm Springs Power &  
Water Enterprises  
Washington  
Environmental Council  
WashPIRG  
Western Resource Advocates



Renewable  
Northwest  
Project

**Date:** July 18<sup>th</sup>, 2012  
**To:** BPA Tech Forum  
**RE:** BPA LGIP Reform Request for Comments

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RNP appreciates the opportunity to comment on BPA's draft proposals for altering the Large Generator Interconnection Process (LGIP). Our members are cautiously supportive of BPA's effort to improve the LGIP and look forward to working with BPA on these issues and being a part of the solution. While we recognize that improvements could be made to the LGIP, we also believe that given all the other policy issues before BPA currently, our members could continue to function under the current LGIP policy just as well.

BPA is proposing to revise the Suspension Provision to one year or less. RNP's members believe that the Suspension Provision is an extremely important provision of the pro forma OATT that provides developers the necessary flexibility to align the timing of their project's transmission and market components. RNP suggest that BPA first explore and gain experience with the "site permit milestone" and "parking lot" concepts discussed below before altering the Suspension Provision of the OATT.

BPA is proposing to add a "site permitting milestone" to the LGIP process, allowing 18 months from the execution of the environmental study agreement for a customer to obtain a permit from the relevant jurisdiction. While RNP is supportive of the concept of a site permit milestone, we believe that the 18-month timeline is too fast. RNP would prefer a timeline of two years, beginning after the System Impact Report is issued.

If customers cannot obtain a site permit within the 18-months (or two years), BPA is proposing a one-year "parking lot" where customer requests may sit in limbo, losing queue priority over request further down in the queue that are moving through the LGIP faster. BPA is proposing that after the one-year parking lot, if customers have still not obtained a site permit the customer will be removed from the queue and would have to start the LGIP over in order to pursue the project further, unless the delay is due to a regulatory issue. RNP supports the concept of a one-year parking lot but wish to stress the critical importance of the "regulatory delay" provision. That provision must be included in any final LGIP reform process. We also believe that delays in a customer's ability to obtain transmission rights due to decisions made by BPA in BPA's Network Open Season (NOS) process should also be deemed "regulatory delay."

BPA is also proposing to alter the policies governing the responsibility, amount, and timing of payments for shared network facilities. BPA is proposing a pro-rata cost sharing of new network facilities and a five-year “late-comer” provision that would require pro-rata (as opposed to incremental cost) payments to first movers.

RNP supports these proposals in general, but we feel that a transition policy needs to be clearly articulated for any project that has completed the Facility Study (FAS) process. The status quo should be retained for any projects that have already completed the FAS and for any potential shared facilities that have already been built. There should be no retroactive application of the pro-rata late-comer provision.

If BPA moves forward with the latecomer provision, BPA should clarify that the latecomer will get transmission credits for the share of the cost of the network upgrade that they are required to pay.

Finally, RNP also believes it is also important to give customers the option to modify the capacity amount of their interconnection request up the execution of the LGIA as the project design may have been scaled back through the siting process.

Thank you for the opportunity to comment,

Cameron Yourkowski  
Senior Policy Manager