



May 10, 2023

## **Gallatin Power Partners, LLC Comments on the Proposed Generator Interconnection Queue Reforms Presented at the TC-25 April Workshops**

Submitted via email to [techforum@bpa.gov](mailto:techforum@bpa.gov)

Gallatin Power Partners, LLC (“Gallatin”) appreciates the opportunity to engage with Bonneville Power Administration (“BPA”) and submit comments concerning the TC-25 Tariff Proceeding Workshops held on April 26, 2023 and April 27, 2023.

Gallatin values BPA’s objective of “advancing existing requests to connect generation in order to meet customer needs efficiently and responsively” with the proposed Transition Process. With this objective, BPA is recognizing the time and monetary investments that have already been expended by those currently in the interconnection queue in addition to BPA employees’ time and resources used on completed studies and studies in process.

Gallatin believes that the Transition Process as currently proposed would disadvantage projects currently in the System Impact Study phase. BPA is proposing that only *Late-Stage* requests, defined as “an Interconnection Customer that has executed a Facilities Study Agreement,” be offered the opportunity to either elect the Transition Serial Facility Study Process or opt into the Transition Cluster Study Process. Historically, BPA has had project study timelines that have significantly exceeded its tariff, which resulted in queue positions being subject to an uncertain timeline and the inability to estimate interconnection and total project costs. The definition of *Late-Stage* as currently defined unfairly penalizes queue positions subject to study timeline delays that are out of their control. Because of these significant study delays Gallatin proposes that BPA revise the *Late-Stage* definition to include interconnection customers that executed their System Impact Study Agreements and had their study initiated by January 2023. Including projects in the System Impact Study phase would eliminate wasting the



resources and time BPA has already expended on these requests, which under the effective tariff timeline would be well underway or past the Facility Study phase.

Gallatin also disagrees with the proposed commercial readiness demonstration requirement of entering the Transition Serial Facility Study Process or the Transition Cluster Study Process. Throughout the workshops and comment periods of this proceeding, multiple stakeholders have stated that the requirement is inconsistent and disconnected from industry accepted project developmental and contracting timelines and practices. A project cannot enter into a binding term sheet or long-term sales contract without firm interconnection cost estimates from BPA.

Gallatin would also like to request that BPA clarify the proposed effective date for these proposed reforms and the “cut-off” date for projects to be eligible for the Transition Process.

Gallatin appreciates BPA’s consideration of these comments and the recommendations contained herein. Please do not hesitate to reach out if we can be of any assistances in this process.

Respectfully Submitted,

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