

Submitted to Tech Forum on May 15, 2023

PPC Comments on TC-25 Workshop (April 26-27, 2023)

The Public Power Council¹ (PPC) appreciates the opportunity to comment on BPA's TC-25 Pre-proceeding workshops. The information presented by BPA to date has been helpful, and PPC is generally supportive of BPA's efforts to improve management of its Generation Interconnection (GI) process. In particular, we have appreciated BPA's efforts to benchmark reforms undergone by other transmission service providers in order to inform its proposed approaches. As BPA nears the conclusion of its pre-proceeding process, PPC requests that BPA address the following in its remaining workshops.

Impacts of Reform on Transmission Customers as a Whole

As BPA develops proposals to reform its GI process it is necessary to understand how these reforms will impact those who are or will be looking to interconnect generation to BPA's system, which has been the focus of much of the workshop discussion. PPC would also like to understand the potential impacts to other transmission customers not currently seeking interconnection. In particular, PPC would like BPA to address staffing and rate impacts related to the proposed changes.

For instance, what, if any, impact these reforms will have on the distribution of existing transmission engineering staff. Will staff be pulled from other important initiatives, such as TSEP cluster studies or line and load interconnection studies, to ensure that BPA can implement these changes to its GI queue? Also, what, if any, rate impacts can be expected as a result of the proposed changes and BPA's expanding queue? Particularly, we would ask that BPA address the impact of increasing amounts of "pro forma OATT" LGIA transmission credits, which put upward pressure on BPA rates, in the near term as a result of the proposed changes? Are there any alternatives to LGIA credits or potential for increased revenues on BPA's system as the result of additional transmission system use that could offset some of this upward pressure?

¹ PPC, established in 1966, is an association that represents the vast majority of consumer-owned electric utilities across five states in the Pacific Northwest. PPC's mission is to preserve and enhance the benefits of the Federal Columbia River Power System operated by BPA for consumer-owned utilities. PPC's members pay roughly 70% of BPA's annual \$3.9M revenue requirement, in addition to owning their own generation and transmission facilities in the Northwest.

Generally, a more holistic summary of the impacts of BPA's proposal on all transmission customers, including responses to the specific examples above, would be helpful prior to the conclusion of this process.

Assurance That BPA Will Be Sufficiently Staffed to Execute Proposed Improvements

Adequate staffing to address study requests is a continued concern for PPC. We appreciate BPA seeking improvements to the management of its GI queue through the TC-25 process but are concerned that these improvements may not achieve their desired outcomes if the agency is not sufficiently staffed to execute the proposed changes. Changes such as moving to a cluster study approach may streamline the workload in some ways, but can also create the potential for additional strain on staff during certain times of the year. PPC would like to hear more from BPA on the staffing plan to execute its planned reform. The recent delay of BPA's transmission cluster study is a good example of the challenges that limited engineering and planning staff can create. To the extent that additional staffing is needed, BPA should identify that need and seek those additional FTEs as part of its Integrated Program Review process. PPC supports BPA being staffed sufficiently to deliver on its strategic plan, and notes that for transmission in particular, that may require additional investment compared to staffing levels today.

Readiness Requirements and Study Queue Priority

PPC would like to better understand how meeting the readiness requirements proposed for various stages impacts customers' queue priority. Including, what if any consideration is given for delays that BPA may introduce into the study process. In particular, we seek additional information on how BPA plans to "time stamp demonstrations of readiness" for the purposes of using this information as a tiebreaker in the case that a "scalable" project is identified, which would not necessarily enable all requests. It is unclear to PPC how this would be done, including what level of transparency there would be around the time stamping of projects in the queue (i.e., does only the project owner see that time stamp or is this information available to everyone). It also seems that there is the potential risk for some projects to be time stamped earlier or later based on actions taken by BPA staff, and we would like to understand what actions BPA would take under this proposal to minimize that risk.

Conclusion

PPC appreciates the opportunity to comment and looks forward to additional discussion leading up to the TC-25 proceeding.