

# **ISSUE #12: GENERATOR INTERCONNECTION**

Step 1: Introduction and Education

Step 2: Description of the Issue

# Objective

- To educate and give background on the Generator Interconnection

# Background: FERC Order No. 845

- Order No. 845: Revised the pro forma LGIP and LGIA to improve certainty for interconnection customers and promote more informed interconnection decisions and enhance the interconnection process. In Order No. 845 (845), FERC adopted ten reforms:
  1. Interconnection Customer's Option to Build;
  2. Dispute Resolution;
  3. Identification and Definition of Contingent Facilities;
  4. Transparency Regarding Study Models and Assumptions;
  5. Definition of Generating Facility in the Pro Forma LGIP and LGIA;
  6. Interconnection Study Deadlines;
  7. Requesting Interconnection Service Below Generating Facility Capacity;
  8. Provisional Interconnection Service;
  9. Utilization of Surplus Interconnection Service; and
  10. Material Modification and Incorporation of Advanced Technologies.

# Background: TC20 Settlement Agreement

- Settlement: As part of the TC20 Settlement Agreement, Bonneville agreed to adopt tariff language to implement eight (8) of the reforms pursuant to 845 (see below):
  - Interconnection Customer's Option to Build;
  - Dispute Resolution
  - Identification and Definition of Contingent Facilities;
  - Transparency Regarding Study Models and Assumptions;
  - Definition of Generating Facility in the Pro Forma LGIP and LGIA;
  - Interconnection Study Deadlines;
  - Requesting Interconnection Service Below Generating Facility Capacity; and
  - Provisional Interconnection Service.
- Phased Approach: Bonneville also agreed to develop a business practice to take a phased approach to the implementation of two (2) of the 845 reforms (see below):
  - Utilization of Surplus Interconnection Service; and
  - Material Modification and Incorporation of Advanced Technologies.

# Background: FERC Order No. 845, 845-A, & TC22

- **Order No. 845-A:** On February 21, 2019, FERC issued an order on rehearing of 845—845-A. As part of the TC-22 Terms and Conditions Tariff Proceeding, Bonneville seeks to complete its phased approach of 845 and also adopt revisions made by 845-A. 845-A made substantive revisions to the highlighted reforms below:
  1. **Interconnection Customer's Option to Build;**
  2. Dispute Resolution;
  3. **Identification and Definition of Contingent Facilities;\***
  4. Transparency Regarding Study Models and Assumptions;
  5. Definition of Generating Facility in the Pro Forma LGIP and LGIA;
  6. **Interconnection Study Deadlines;**
  7. **Requesting Interconnection Service Below Generating Facility Capacity;**
  8. Provisional Interconnection Service;
  9. **Utilization of Surplus Interconnection Service;\*** and
  10. **Material Modification and Incorporation of Advanced Technologies.\***

*\*In an effort to complete its phased approach of implementing 845 (and now 845-A), Bonneville is proposing significant edits to Attachment L that are consistent with pro forma where possible.*

# TC22 Significant Revisions Reform #3

- Identification and Definition of Contingent Facilities:
  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.

# TC22 Significant Revisions Reform #9

- Utilization of Surplus Interconnection Service: 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.
  - Includes a new definition of Surplus Interconnection Service in the LGIP and LGIA
  - Provides an expedited interconnection process outside of the interconnection queue for Surplus Interconnection Service:
    - Must allow affiliates of the existing Interconnection Customer to use Surplus Interconnection Service for another interconnecting generating facility, and;
    - Must allow for the transfer of Surplus Interconnection Service that the existing Interconnection Customer or one of its affiliates does not intend to use.

# TC22 Significant Revisions Reform #9

## (continued)

- 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. .



# TC22 Significant Revisions Reform #10

- Material Modification and Incorporation of Advanced Technologies: Requires transmission providers to:
  1. Include in their pro forma LGIP a technological change procedure;
  2. Transmission providers must also assess, and if necessary, study whether proposed technological advancements can be incorporated into interconnection requests without triggering the material modification provisions of the pro forma LGIP;
  3. Transmission providers must, consistent with the guidance provided in the Final Rule, develop a definition of “Permissible Technological Advancement.” Such permissible technological advancements would, by definition, not constitute material modifications.

# TC20 & TC22

## Other Revisions to Attachments L & N

- TC20: Bonneville deleted from Attachments L and N tariff language that made reference to Bonneville filing its tariff with FERC.
- TC22:
  - Bonneville will continue its review of Attachments L and N to remove any remaining instances that may make reference to filing with FERC.
  - Bonneville will also review Attachments L and N to clean up tariff language and align with pro forma to the extent possible.

# TC22: Other Efforts

- Exploring repowering and replacements provisions for the TC-22 tariff.
  - Interconnection Customers' generating facilities are aging and some are finding it necessary to replace/update equipment.
  - Bonneville has an opportunity to create a streamlined process to facilitate these efforts.

# Next Steps

- Provide feedback by March 10, 2020 to [techforum@bpa.gov](mailto:techforum@bpa.gov) (with a copy to your Transmission Account Executive).
  - The next workshop is on April 28, 2020.
  - Steps 3 and 4
  - BPA will share draft tariff language at this workshop.