

April 25, 2024, 2023

BONNEVILLE POWER ADMINISTRATION
905 NE 11TH AVENUE
PORTLAND OR 97232

Submitted via email: techforum@bpa.gov

Comments on BPA GI Reform Business Practice Changes

Seattle City Light (City Light) appreciates BPA's efforts to actively engage and be responsive to customers regarding the Generator Interconnection (GI) TC-25 Reform proceedings and the GI Reform business practice changes. City Light would like to offer the following comments for BPA's consideration.

Large Generator Interconnection Procedures Dispute Resolution Process Business Practice

City Light recommends that BPA consider that a single business practice regarding tariff disputes would be a more efficient, transparent, and equitable way to address the issue.

Generation Integration Services

City Light suggests BPA consider greater opportunities for requesters to perform design and installation of metering equipment that meets BPA's high standards. BPA could add language that allows this to occur "by mutual agreement" for projects that meet the requirements of section B.2.b. regardless of the resource size. Language requiring BPA approved commissioning testing could also be included.

Large Generator Interconnection Business Practice

City Light encourages BPA to continue to update their requirements for inverter-based resources to interconnect. The Technical Requirements for Interconnection to the BPA Transmission Grid STD-N-000001 could be revised and updated to reflect the most recent lessons learned and regulatory requirements prior to phase two of the transitional cluster study.

City Light thanks BPA for consideration of these comments.

Sincerely,

Michael Watkins
Strategic Advisor
Seattle City Light