

Site Control

BPA Transmission Business Practice

Version 1

6/30/2024

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This business practice describes the Site Control requirement for Standard Large Generator Interconnection Procedures (LGIP).

BPA Policy Reference

- [Open Access Transmission Tariff \(OATT\)](#): Attachment L

For more information, visit the [BPA Transmission Business Practices webpage](#) or submit questions to techforum@bpa.gov.

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A. Site Control Requirements

1. Interconnection Customer must submit documentation evidencing Site Control consistent with the definition of Site Control set forth in Section 1 of the LGIP.
 - a. Documents submitted to evidence Site Control may be provided in whole, excerpted, or with redactions. By providing a redacted or excerpted document, an Interconnection Customer represents that the excluded sections of the document do not prevent the document from evidencing Site Control. Documents submitted to evidence Site Control may take the form of one of the following:
 - i. Lease agreement.
 - ii. Lease agreement with the Bureau of Ocean Energy Management (BOEM) to pursue development of an offshore wind Generating Facility.
 - iii. Deed or Title.

- iv. Option to lease or purchase.
 - v. Easement.
 - vi. Right of Way.
 - vii. Co-location agreement must be provided for Co-Located Resources.
 - viii. Other documentation consistent with the definition of Site Control set forth in Section 1 of the LGIP.
- b. The following are examples of documents that will not establish evidence of Site Control:
- i. Active negotiations for a lease.
 - ii. Memorandum of Understanding.
 - iii. Documentation solely evidencing an intent to purchase or lease (letter of intent).
 - iv. Request to a public land entity for Site Control.
2. Documentation evidencing Site Control should include Interconnection Customer's name as identified on the corresponding Interconnection Request. Otherwise, Interconnection Customer must demonstrate to BPA's satisfaction the relationship between the entity whose name is included on the document evidencing Site Control and Interconnection Customer.
3. When using an option to lease or purchase as documentation evidencing Site Control, ~~the term must extend through the latest Commercial Operation Date (COD) or Interconnection Customer must have the right to extend the term of the option through the project's latest COD.~~ the rights secured if the option is exercised must extend over the term of expected operation of the Generating Facility.
4. Documentation evidencing Site Control will be found to demonstrate a site of sufficient size for the Generating Facility's resource type if the documentation establishes the site meets the following acreage requirements unless acreage dispute requirements are met (see Section D):
- a. Battery Sites: 0.1 acres per MW.
 - b. Solar Generation Sites: 4 acres per MW.
 - c. Wind Generation Sites: 30 acres per MW.
 - d. Synchronous Generation Sites (Steam, Gas, etc.): 10 acres per facility.
 - e. Pumped Storage Sites: 10 acres per facility.
 - f. Hybrid (not co-located): The sum of required acreage for each fuel type.
 - i. Hybrid (not co-located) Acreage Calculation Example:
 150 MW Hybrid facility: 100 MW Solar + 50 MW Battery
 100 MW Solar * 4 acres/MW Solar + 50 MW Battery * 0.1 acres/MW Battery = 505-405 acres
 - g. Hybrid (co-located): The largest of Interconnection Customer's calculated requirements based on fuel type.
 - i. Hybrid (co-located) Acreage Calculation Example:

150 MW Hybrid facility: 100 MW Solar + 50 MW Battery

100 MW Solar * 4 acres/MW Solar OR 50 MW * 0.1 acres/MW
Battery = 400 acres

B. Site Control Submittal

1. Interconnection Customer must submit documentation evidencing Site Control as outlined in Section A and the evidentiary documents outlined in Section B.3 in the following instances:
 - a. When initiating an Interconnection Request under Section 3.4.1 of the LGIP, Interconnection Customer must submit documentation with its Interconnection Request.
 - b. If there is any material change in the previously provided demonstration documentation of Site Control, Interconnection Customer must notify BPA.
 - c. To continue to the Phase Two Cluster Study, Interconnection Customer must submit documentation during the Phase One Cluster Study Customer Review Period and the Customer Review Period after any Phase One Cluster Re-Study, as outlined in Section 6.6.3 of the LGIP.
 - d. To continue to the Facilities Study, Interconnection Customer must submit documentation during the Phase Two Cluster Study Customer Review Period and the Customer Review Period after any Phase Two Cluster Re-Study, as outlined in Section 7.5.3 of the LGIP.
2. Interconnection Customer must submit all documents required via email to GI_ClusterStudies@bpa.gov in Portable Document Format (PDF), unless another format is specified.
3. In addition to documents evidencing Site Control as outlined in Section A, Interconnection Customer must also submit the following:
 - a. Site Plan Map in PDF that identifies the following:
 - i. Project boundary.
 - ii. Boundaries of parcels and/or leasehold interests.
 - iii. Location of Interconnection Customer's Interconnection Facilities.
 - iv. Location of coordinates in Interconnection Request within the boundaries of the parcel.
 - v. Optional: proposed tie-line to requested Point of Interconnection.
 - b. Map files (a Google Earth Site Plan Map) in .kmz format that identify the following:
 - i. Project boundary.
 - ii. Boundaries of parcels and/or leasehold interests.
 - iii. Location of Interconnection Customer's Interconnection Facilities.

- iv. Location of coordinates in Interconnection Request within the boundaries of the parcel.
- v. Optional: proposed tie-line to requested Point of Interconnection.
- c. If submitting Site Control evidence for more than one parcel, provide a Site Control summary spreadsheet identifying the following for each parcel:
 - i. File Name of Site Control document.
 - ii. Tax ID.
 - iii. Acreage.

C. Site Control Review

- ~~1. BPA will review evidence of Site Control at initial application, and at the re-demonstrations during any Customer Review Period following any Phase One Cluster Study and Phase Two Cluster Study.~~
 - ~~a. BPA will review any change to documentation evidencing Site Control as shared by Interconnection Customer.~~
- ~~2. If estimated COD changes, Site Control must be valid through the updated COD.~~
- ~~3. Timing of re-demonstration of Site Control will not affect Queue Position.~~
- 1. BPA will determine if an Interconnection Customer has demonstrated Site Control by reviewing the documentation evidencing Site Control as outlined in Section A and the evidentiary documents outlined in Section B.3 of this business practice at initial application, as outlined in Section 3.4.1 of the LGIP.
- 2. BPA will determine if an Interconnection Customer has re-demonstrated Site Control by reviewing the documentation evidencing Site Control as outlined in Section A and the evidentiary documents outlined in Section B.3 of this business practice during any Customer Review Period following any Phase One Cluster Study or Phase Two Cluster Study, as outlined in Section 6.6.3 and 7.5.3 of the LGIP.
- 3. BPA will review any material change to documentation evidencing Site Control as outlined in Section A and the evidentiary documents outlined in Section B.3 of this business practice as shared by Interconnection Customer under Section B.1.b of this business practice.

D. Insufficient Land – Acreage Dispute

- 1. In the event of a disagreement between BPA and Interconnection Customer over the Site Control acreage requirement, BPA may accept a site plan drawing that depicts the proposed generation arrangement and specifies the Maximum Facility Output. This drawing must be stamped by a Professional Engineer who is licensed in the state where the Large Generating Facility will be located.
 - a. In addition, the following information must be included with the site plan drawing:
 - i. Design specifics from a manufacturer showing equipment footprints.
 - ii. Layout of facility showing equipment locations, spacing, and site setbacks.

- iii. Calculation showing proposed acre/MW.
2. If BPA ultimately determines the acreage requirements have not been met, Interconnection Customer may follow the dispute resolution process detailed in Section 13.5 of the LGIP and the [Large Generator Interconnection Procedures Dispute Resolution Business Practice](#).

E. Transfer of Site Control

1. Site Control can only be transferred as part of an Interconnection Request transfer.
2. In order to transfer Site Control, a memo on the letterhead of Interconnection Customer that owns the Interconnection Request shall be submitted via email to GI_ClusterStudies@bpa.gov which must include the following:
 - a. Signature of a company official for the current owner of the Interconnection Request.
 - b. Effective date of transfer.
 - c. Queue number of project being transferred.

F. Site Control for Surplus Interconnection Service Requests or Generating Facility Replacements

1. Consistent with Section 3.3 of the LGIP and the [Large Generator Interconnection Business Practice](#), Site Control for Surplus Interconnection Service Requests must be demonstrated at application and re-demonstrated with execution of Surplus System Impact Study Agreement.
 - a. Attestation from an officer of the original generating owner company may be submitted for Site Control via email to Interconnection@bpa.gov for the site of the existing facility.
2. If more parcels of land are required to support Generating Facilities contemplated in a Surplus Interconnection Service Request or Generating Facility Replacement Request, the Interconnection Customer making that request must submit documentation evidencing Site Control for the new parcels meeting the requirements.

G. Site Control Changes

1. Interconnection Customer is required to inform BPA via email to GI_ClusterStudies@bpa.gov if there is any **material** change in the **previously provided documentation demonstration of Site Control if associated with the definition of Site Control in Section 1 of the LGIP and the requirements in this business practice**.
2. Consistent with Section 3.4.1 of the LGIP, if there is a material change in the demonstration of Site Control, Interconnection Customer must continue to demonstrate fulfillment of the Site Control requirements.