

Reform for Large Generator Interconnection Queue

Frequently Asked Questions

(Updated June 2024)

On Jan. 26 2024, BPA issued the [Administrator's Final Record of Decision](#) in the TC-25 Tariff Proceeding, which adopts reforms to the large generator interconnection procedures (LGIP) in BPA's open access transmission tariff as agreed to in the [TC-25 Settlement Agreement](#). This document answers basic questions about BPA's reforms and the process for adopting them.

BPA will update this document as additional questions come up or new information becomes available.

Transition Process

Please also refer to BPA's Frequently Asked Questions from February 2024, provided further below in this document, for more information about the Transition Process.

1. When will BPA open the Transition Request Window?

As outlined in the LGIP, the Transition Request Window opens on June 30, 2024, and closes on September 28, 2024. Customers apply to have eligible Interconnection Requests studied in the Transition Process by submitting a Transition Request during the Transition Request Window.

2. What payments do Interconnection Customers need to make with the Transition Request?

Transition Projects do not need to pay an application fee to enter the Transition Process. An Interconnection Customer must provide evidence of Commercial Readiness at application, which may be established with use of a Commercial Readiness Deposit, as specified in Section 2.1.2.g of Attachment R.

However, an Interconnection Customer will need to pay study deposits to proceed through the process. For example, before entering the Transition Cluster Study an Interconnection Customer will need to pay the study deposit after receiving the Phase One Cluster Study Agreement as specified in Section 6.1.1 of the LGIP.

3. What models are required to be submitted with a Transition Request (Appendix 1 to Attachment R)?

An Interconnection Customer electing to be studied in the Transition Cluster Study must submit a steady state model of the Large Generating Facility with its Transition Request. An Interconnection Customer must also submit an executed Generation Model and Performance Attestation for a Generating Facility with its Transition Request, as provided in Attachment A to Appendix 1 Interconnection Request in the LGIP, [found here](#).

BPA will accept a dynamic model of an Interconnection Customer's Large Generating Facility with a Transition Request, but Interconnection Customers have until the completion of the first Customer Review Period following the Phase One Cluster Study to submit dynamic models.

4. If your Interconnection Request is seeking Network Resource Interconnection Service, where do you specify Network Transmission Load Servicing Entity in the Transition Request?

Interconnection Requests that are entering the Transition Process and seeking Network Resource



Interconnection Service should have already identified the Load Serving Entity (LSE), which is why there is not a field for this information in the Transition Request. Interconnection Customers can email their Transmission Account Executives the name of the LSE before the Transition Request Window opens to link this information with a request.

5. Can an Interconnection Customer change a previously provided Point of Interconnection associated with a project when submitting a Transition Request?

Customers may leave the Point of Interconnection (POI) field blank on the Transition Request or enter a single, requested POI. During the Phase One Cluster Study, Bonneville will determine if the POI is feasible. If the POI is not feasible, BPA will at its sole discretion set the POI consistent with Section 3.1 of the LGIP and Section P of the LGIP Transition Business Practice.

6. Will BPA notify Interconnection Customers to submit their Transition Request application when the Transition Request Window opens on June 30?

BPA will send out a Tech Forum announcing the opening of the Transition Request Window, which will notify customers that they may begin to submit Transition Requests.

7. Will Transition Projects be refunded deposits previously provided under the TC-24 Tariff?

To enter BPA's queue prior to November 22, 2023, Transition Projects remitted to BPA a \$10,000 refundable application deposit and refundable study deposits. Transition Projects do not need to pay an application fee to enter the Transition Process. Transition Projects entering the Transition Cluster Study will be refunded previously submitted deposits less actual costs but must submit a new study deposit as specified in 6.1.1 of the LGIP when executing the Phase One Cluster Study Agreement.

8. Are MW reductions allowed during the Transition Request Window? Are MW reductions allowed for Late-Stage Projects?

Interconnection Customers can use their reduction rights under the TC-24 tariff before the new tariff is effective on June 30, 2024. After June 30, 2024, an Interconnection Customer's right to reduce the requested service level in an Interconnection Request is outlined in Sections 4.4.1 and 4.4.2 of the LGIP. Late-Stage Projects are past the point in the study process where the requested service level in an Interconnection Request could be reduced without submitting a Material Modification request.

Site Control

9. What are the Site Control requirements for Interconnection Requests?

Per the [TC-25 Settlement Agreement](#), an Interconnection Customer shall submit evidence of exclusive Site Control for projects sited on public/non-public lands with an Interconnection Request, including a Transition Request to participate in the Transition Process. The Interconnection Customer shall ensure that Site Control is effective over the term of expected operation of the Large Generating Facility. BPA will not accept a financial deposit in lieu of evidence of exclusive Site Control.

Additional information on Site Control requirements is available in the Site Control Business Practice.

10. Can two Interconnection Requests use the same Site Control documents?

In some instances. Each Interconnection Request must submit documentation showing the request meets Site Control requirements, including demonstrating an exclusive land right over a site of sufficient size for

the Large Generating Facility. Interconnection Requests for Co-Located Resources, which are facilities located on the same site and behind the same Point of Interconnection, must demonstrate a contractual right to share the use of a site of sufficient size to operate each Co-Located Resource.

11. For Site Control, do parcels submitted with initial applications need to be held through the entire interconnection process?

Each Interconnection Request must meet Site Control requirements throughout the entire study process. Interconnection Customers must demonstrate an exclusive land right over a site of sufficient size for the proposed Large Generating Facility. Interconnection Customers must show they continue to meet Site Control requirements at various stages in the study process and are required to notify BPA of any material change in the previous demonstration of Site Control so that BPA may ensure Site Control requirements are still met in light of that change. If an Interconnection Customer's control over parcels of land used to demonstrate Site Control shifts through the study process, the customer must continue to have control over a site of sufficient size and would need to notify BPA of the change in the previous demonstration of Site Control. In submitting an Interconnection Request, an Interconnection Customer must provide the latitude and longitude where the Large Generating Facility will be sited. Any change in control over parcels with that latitude and longitude would require an Interconnection Customer to follow the modification processes outlined in Section 4.4 of the LGIP to modify the information in the Interconnection Request. If BPA determined that moving the latitude and longitude of the Large Generating Facility was a Material Modification to the request, the customer would have the choice to make that change or retain the request. In either instance, BPA would deem the request withdrawn due to a Material Modification or failure to maintain Site Control.

Commercial Readiness

12. Is a Commercial Readiness Deposit fully refundable upon withdrawal?

Upon withdrawal, BPA will refund a cash deposit made as a Commercial Readiness Deposit and release funds submitted through Letters of Credit or Escrow Accounts as Commercial Readiness Deposits. As explained in Section B.3.f of the Commercial Readiness Business Practice, BPA may draw on a Letter of Credit submitted as a Commercial Readiness Deposit if the Letter of Credit is not renewed 10 business days prior to expiration.

13. When will BPA review Interconnection Customer's Commercial Readiness documentation?

During the Transition Process, BPA will review an Interconnection Customer's Commercial Readiness documentation upon its submittal as part of a Transition Request during the Transition Request Window and upon submittals made during the Customer Review Periods as specified in Attachment R. BPA will review Commercial Readiness documentation after submittal during the Customer Review Period for the durable process as specified in Sections 6.6 and 7.5 of the LGIP. BPA will not review Commercial Readiness documentation outside of the review periods specified in the Tariff.

14. Does BPA have a Letter of Credit template?

A Letter of Credit template for Commercial Readiness Deposits is available on the Large Generation Transition Process [page](#).

15. Will BPA accept one Letter of Credit for multiple Interconnection Requests?

No. As specified in Section B.3.c of the Commercial Readiness Business Practice, BPA will not accept a single Letter of Credit to meet the Commercial Readiness requirements for multiple Interconnection

Requests

16. Are Interconnection Customers penalized if they do not have Power Purchase Agreements for the entire output of a Large Generating Facility?

An Interconnection Request that meets all Tariff requirements, including Commercial Readiness requirements, throughout the study process may continue through the study stages. A customer using Power Purchase Agreements to demonstrate Commercial Readiness would need to provide a deposit or another non-financial Commercial Readiness demonstration if the Power Purchase Agreements do not cover the entire capacity requested.

If an Interconnection Customer is planning to build a Large Generating Facility with less generating capacity than the amount originally requested because it does not have Power Purchase Agreements for the entire output of the project, the Interconnection Customer should seek to lower the service level of the Interconnection Request through the modifications process outlined in section 4.4 of the LGIP. An Interconnection Customer that does not build generating capacity that meets the requested interconnection service level risks complications later in the study and build processes and may be forced to reduce service level or be removed from the queue.

BPA does not currently have any penalties for the large generator interconnection process but is addressing withdrawal penalties in the BP-26 pre-proceeding workshops.

Miscellaneous

17. Does BPA intend to create unique Scalable Plan Blocks for each Cluster Study? Do Scalable Plan Blocks apply to the Transition Process?

BPA may segment and perform studies according to geographically and electrically relevant areas, and such segmented areas will be identified as Cluster Areas. BPA may identify plans of service for a subset of Interconnection Requests within a Cluster Area, and those plans of service are called Scalable Plan Blocks. BPA will identify Cluster Areas and Scalable Plan Blocks as applicable and needed based on the requests present in a study. There may be instances where BPA identifies a Cluster Area but no Scalable Plan Block in that area. There may be instances where BPA identifies a Cluster Area and multiple Scalable Plan Blocks within that area.

BPA may identify Cluster Areas and Scalable Plan Blocks in both the Transition Cluster Study and the Durable LGIP Cluster Studies.

18. What criteria will BPA use to identify a Cluster Areas and Scalable Plan Blocks?

Cluster Areas will be defined based on geographic location and/or electrical relevance of similarly situated Interconnection Requests. Scalable Plan Blocks may be identified for a subset of Interconnection Requests within a Cluster Area, where applicable. Scalable Plan Blocks may be defined by such characteristics as reliability performance, site location, and other factors as determined by the applicable study results.

19. Will Distribution Factor Method (Dfax) be used to allocate network costs?

As agreed to in the TC-25 Settlement Agreement and specified in Section 4.2 of the LGIP, cost allocation of network upgrades, including those identified within a Cluster Area or Scalable Plan Block, will be based on proportional capacity method. After the Transition Period, BPA will hold stakeholder workshops to discuss lessons learned from network cost allocation and the potential future implementation of DFAX for

network cost allocation, as specified in Section 5.c of the TC-25 Settlement Agreement.

20. Does the date an Interconnection Request is submitted determine priority placement within a Scalable Plan Block?

Queue Position for an Interconnection Request is established by the date and time of BPA's receipt of a valid Interconnection Request. When BPA identifies Cluster Areas and Scalable Plan Blocks during a Cluster Study, the Queue Position of the Interconnection Requests in a Scalable Plan Block determines priority placement of requests within that Scalable Plan Block. During the Transition Process, Transition Requests will retain the Queue Position of the pre-existing Interconnection Request prior to the transition.

21. What deposit amount is needed for Late-Stage Projects to participate in an Interconnection Facilities Study?

The study deposit required for a Late-Stage Project to participate in an Interconnection Facilities Study will be determined as specified in Section 4.3 of Attachment R. After a Late-Stage Project's Transition Request is validated, BPA will reach out to provide the study deposit amount.

22. If an Interconnection Customer submits multiple requests with the intention of only building one project, is there a penalty for withdrawing requests after the first Cluster Study?

When an Interconnection Customer submits multiple requests with the intention of only building one project, each Interconnection Request must meet all requirements under the tariff, including a non-refundable application fee (during the durable process that takes effect after the Transition Process), study deposits, and Site Control and Commercial Readiness requirements. Generally, an Interconnection Customer cannot use the same demonstrations of Site Control and Commercial Readiness to validate multiple Interconnection Requests. BPA will study all Interconnection Requests in a Cluster Study in a clustered manner and will not explore alternatives for a single Interconnection Customer's multiple Interconnection Requests.

BPA does not currently have any penalties for the large generator interconnection process but is addressing withdrawal penalties in the BP-26 pre-proceeding workshops.

23. How does an Interconnection Customer request a change in fuel type associated with an Interconnection Request?

Customers may request a fuel type change under the modifications process outlined in Section 4.4 of the LGIP.

24. When will BPA open the Durable Standard Large Generator Interconnection Procedure process, which follows the Transition Process?

BPA will give official notice at least 180 days before opening the Cluster Request Window for the next (first non-transitional) Cluster Study. BPA expects to give official notice in July 2024 and open the Cluster Request Window in January 2025.

Questions – February 2024

1. Why did BPA revise its large generator interconnection procedures?

The reforms are intended to help BPA more efficiently process the Large Generator Interconnection

queue. The volume of interconnection requests has increased dramatically over the past five years, leading to study delays and backlogs. Study delays are further exacerbated by withdrawals from the queue, which trigger additional restudies and delays in processing requests further down in the queue. BPA is proposing reforms to help more efficiently allocate resources to manage the study process, address the backlog of requests and mitigate study delays.

Additional information is available on the [TC-25 Tariff Proceeding page](#).

2. What tariff revisions were adopted in the TC-25 Tariff Proceeding?

BPA revised the LGIP in Attachment L to its tariff to establish a two-phase first-ready, first served cluster study process. BPA also added a new attachment, Attachment R, to the tariff that establishes a process for transitioning from the current LGIP to the new procedures. Additional commitments to implement business practices and conduct workshops on specific topics were included in the TC-25 Settlement Agreement.

BPA's revised tariff, incorporating revisions to the LGIP and the new Attachment R, and the TC-25 Settlement Agreement are available on the [TC-25 Tariff Proceeding page](#).

3. What is the effective date of the new tariff revisions?

The effective date is June 30, 2024. The current tariff provisions will remain in effect through June 29, 2024.

4. How will BPA transition large generator interconnection requests that are currently in BPA's queue from the current tariff to the new procedures?

BPA's Transition Process (in the new Attachment R) applies to any valid large generator interconnection request submitted prior to 15 calendar days after publication of the Federal Register Notice for the TC-25 Tariff Proceeding ("Transition Close Date"). This Transition Close Date was Nov. 22, 2023. Only interconnection requests submitted to BPA's queue by the Transition Close Date are eligible to apply to enter the Transition Process beginning on June 30, 2024.

Under this Transition Process, customers may apply for interconnection requests to continue to be processed in the current serial study process or to be included in a Transition Cluster Study. As part of the application to the Transition Process, customers will have to meet the requirements specified in the proposed tariff, including requirements for site control and commercial readiness.

See [Attachment R](#) in BPA's Open Access Transmission Tariff for more details about the Transition Process.

5. When can a customer submit an application to include an interconnection request in the Transition Process?

If the interconnection request is both submitted into BPA's queue by Nov. 22, 2023, and is still valid as of June 30, 2024, a customer can apply to include an interconnection request in the Transition Process beginning on June 30, 2024.

From June 30, 2024 to Sept. 28, 2024, BPA will open a Transition Request Window for customers to submit applications for the Transition Process.

6. If a customer's interconnection request has completed all the Interconnection studies by June 30, 2024, does that request have to participate in the Transition Process?

If by June 30, 2024, all Interconnection studies (Feasibility, System Impact, Facility) have been completed, the interconnection request may bypass the Transition Process and continue to later stages in the interconnection process (Environmental Study Agreement, Engineering & Procurement, and Large Generator Interconnection Agreement).

Based on our current understanding of the queue and average study timelines, any interconnection request that has not already executed a Facilities Study Agreement (FAS) with BPA will be highly unlikely to complete a Facilities Study by June 30, 2024.

7. What if a customer receives notice of a study delay and the estimated date for completion of the study is after June 30, 2024?

If the estimated completion date is delayed beyond June 30, 2024, that means we will not complete it under the current LGIP, effective until June 29, 2024, and the customer will need to assess and make decisions on the eligibility of the interconnection request to be processed in the Transition Process.

BPA continues to use our existing process for issuing delay notices. We are giving the best estimated dates based on our current resource availability and our understanding of the interconnection queue at that time.

8. What will happen to an interconnection request submitted after Nov. 22, 2023 (Transition Close Date)?

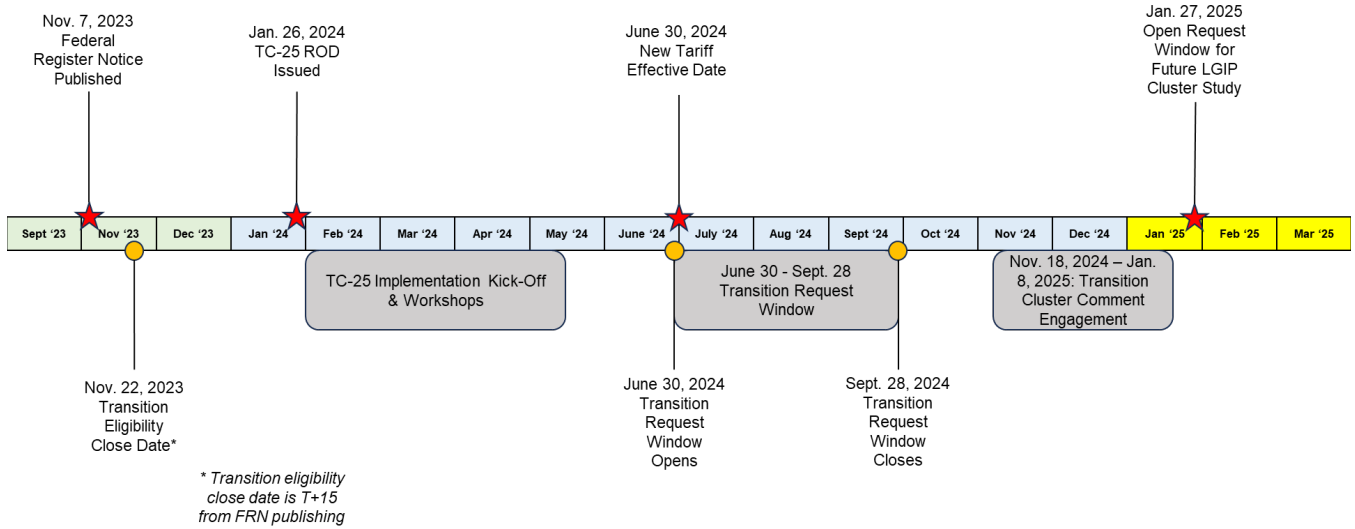
Due to current workload and backlog of interconnection requests, any interconnection request received after the Transition Close Date is highly unlikely to make meaningful progress in the current interconnection process before the tariff revisions take effect on June 30, 2024. Under the revised tariff, an interconnection request submitted after the Transition Close Date is invalid and will be withdrawn from the queue after June 30, 2024. Because new interconnection requests submitted after the Transition Close Date are unlikely to make meaningful progress under either BPA's current tariff before June 30, 2024 and will be withdrawn after June 30, 2024, BPA urges customers not to submit new interconnection requests after that date. Responding to and processing any such requests will be a low priority for BPA staff. Under the revised tariff, customers will have the opportunity to submit new interconnection requests during the next cluster study request window, which BPA anticipates opening in January 2025.

Archived Questions

1. When will BPA discuss implementation of the new tariff?

BPA will host a customer meeting on Feb. 9 to provide an update on generator interconnection queue reforms. At the meeting, BPA will share a schedule for customer engagement, including development of business practices and other related implementation efforts. Those materials are available on BPA's [Generator Interconnection Queue Reform page](#).

Frequently Asked Questions: Large Generator Interconnection Queue Reform



2. What is the process and schedule for the TC-25 Tariff Proceeding?

In TC-25 Tariff Proceeding, BPA staff will formally propose that BPA’s Administrator adopt the TC-25 Settlement Agreement and the tariff revisions. The TC-25 near-term schedule is posted on BPA’s [TC-25 Tariff Proceeding page](#).

Key dates include:

Federal Register Notice initiating the TC-25 Tariff Proceeding	Nov. 7, 2023
BPA files Initial Proposal	Nov. 14, 2023
Hearing Officer’s Recommended Decision	Dec. 15, 2023
Final Record of Decision	Jan. 26, 2024
Effective date of TC-25 tariff	June 30, 2024

Once the Federal Register Notice for the TC-25 Tariff Proceeding is published (Nov. 7), the procedural rules for the proceeding will prohibit all BPA employees and contractors from discussing issues related to the proposed tariff revisions outside of the official record for the proceeding or without providing public notice. This prohibition on “*ex parte* communications” will last until the Administrator makes the final decision in the proceeding on Jan. 26, 2024.

During this time, BPA will not be able to discuss the proposed tariff or impacts of the proposed tariff reforms on customer requests. BPA understands customers may have questions about the proposed reforms during this time but asks that you remain patient. BPA will have more information to share once the TC-25 Tariff Proceeding is over.