

Response to Comments – Transition Process

BPA Transmission Business Practice

Version 1

Posted 6/7/2024

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This document contains comments and BPA responses regarding Version 1 of the Transition Process Business Practice posted for comment from March 25, 2024, to April 30, 2024.

This is Bonneville’s final agency action in regard to this version of the business practice.

For more information on business practices out for comment, visit the BPA [Proposed Business Practices webpage](#).

Table of Contents

A. Northwest & Intermountain Power Producers Coalition (NIPPC) 1

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Comments from the Northwest & Intermountain Power Producers Coalition on BPA’s Draft Business Practices implementing interconnection queue reform

The Northwest & Intermountain Power Producers Coalition (“NIPPC”) submits the following comments on BPA Staff’s Preliminary Proposal on BPA’s Transmission Planning Workshop. The Northwest & Intermountain Power Producers Coalition is a membership-based advocacy group representing competitive electricity market participants in the Pacific Northwest and Intermountain region. NIPPC has a diverse membership including independent power producers and developers, electricity service suppliers, transmission companies, marketers, storage providers, and others. Many of NIPPC’s members are currently seeking to interconnect generation projects to BPA’s transmission grid.

General Support for Draft Business Practices Necessary to Implement TC-25 Settlement

NIPPC was an active participant in the workshops and discussions that ultimately led to the settlement of TC-25. The settlement agreement of TC-25 balanced the competing interests of a diverse set of stakeholders. Accordingly, the Business Practices drafted to implement the TC-25 settlement agreement must be consistent with the settlement agreement. NIPPC congratulates BPA staff on successfully drafting a set of proposed Business Practices that accomplishes this goal. NIPPC encourages BPA staff to reject any proposed changes to the draft Business Practices that are inconsistent with the terms of the TC-25 settlement agreement.

Transition Business Practice

Section F.

NIPPC urges BPA to state clearly how long customers have to cure any deficiency that BPA has identified. The draft currently refers to actions BPA will take after 15 days or 20 days, but there is no clear statement of how long customers have to cure any deficiency.

BPA Response 1

Bonneville clarifies that Section F of the Transition Process Business Practice outlines timelines that Interconnection Customers can expect Bonneville to follow when processing Transition Requests. The length of the cure period and the actions that commence that period are clearly stated in Section 3.7 of the LGIP (BPA OATT, Attachment L):

“ . . . (I)f Interconnection Customer fails to adhere to all requirements of this LGIP, except as provided in Section 13.5 (Disputes), Transmission Provider shall deem the Interconnection Request to be withdrawn and shall provide written notice to Interconnection Customer of the deemed withdrawal and an explanation of the reasons for the deemed withdrawal. Upon receipt of such written notice from Transmission Provider, Interconnection Customer shall have fifteen (15) Business Days in which to either respond with information or actions that cures the deficiency or to notify Transmission Provider of its intent to pursue Dispute Resolution.”

Section F.2.b states that BPA will terminate Interconnection Agreements under certain circumstances. NIPPC believes this should read as “Interconnection Study Agreements”.

BPA Response 2

Bonneville thanks NIPPC for catching this error. Bonneville has corrected Section F.2.b of the Transition Process Business Practice to read “Interconnection Study Agreements”.

Bonneville did not intend to refer to Interconnection Agreements.

Section H. and I.

BPA proposes to use announcements through “techforum” to notify customers in the transition cluster of developments in the study process, including whether restudies will be necessary. While “techforum” announcements are a useful way to disseminate information to a broad range of stakeholders, NIPPC suggests that BPA should send notices to customers in the transition cluster through the mechanisms identified in the study agreements.

Thank you for the opportunity to comment.

BPA Response 3

Thank you for this suggestion. Bonneville will continue to issue Tech Forum notices based on customer subscription to keep customers apprised of developments in the study process. Bonneville will also send Interconnection Customers a separate notice to the email address

identified in an Interconnection Customer's Transition Request, Section 11 of Appendix 1 of Attachment R.

Bonneville has updated Sections H.4.b, H.4.c.i, H.4.c.ii, I.3.b, I.3.c.i, and I.3.c.ii of the Transition Business Practice to read, "...by sending an email to the email listed in Section 11 of their Transition Requests and a Tech Forum announcement..."

Bonneville appreciates NIPPC's support for the generator interconnection queue reform business practices and its engagement in Bonneville's business practice process.