

# Site Control

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## **BPA Transmission Business Practice**

Version 2

8/18/2025

## Site Control

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### Version 2

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](mailto:techforum@bpa.gov).

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## A. Site Control Requirements

1. For an Interconnection Customer's Interconnection Request to be valid and remain valid, Interconnection Customer must provide and maintain evidence of Site Control for the Interconnection Request throughout the interconnection process. Interconnection Customer must provide evidence of its exclusive land right to develop, construct, operate, and maintain the Generating Facility identified in the Interconnection Request.
  - a. A site is the land identified by Interconnection Customer to be used to develop, construct, operate, and maintain the Generating Facility. Interconnection Customer must clearly identify the land that comprises the site. The site could be land identified in a single document or in multiple documents evidencing Site Control. The site could be comprised of some but not all parcels of land granted in a particular document evidencing Site Control. Multiple Interconnection

Requests may utilize the same site, when clearly identified and where all BPA OATT and business practice requirements are met.

- b. A site may consist of parcels of land that are not contiguous.
    - i. Interconnection Customer must explain, in the Site Control Demonstration form (Exhibit A), site plan maps, and models; how the non-contiguous site will be utilized to develop, construct, operate, and maintain the Generating Facility on the site.
    - ii. If the site consists of parcels that are not adjacent, Interconnection Customer will need to provide evidence that either:
      1. Elements of the Generating Facility on non-touching parcels are connected by lines traversing land that Interconnection Customer has Site Control for through an Easement or Right of Way; or
      2. A gen tie line extends from a collector station on each non-touching parcel to the single POI. The collector station identified by Interconnection Customer as the coordinates of the Generating Facility in the Interconnection Request is used to establish a single POI.
  - c. All land making up a site must be designated with the appropriate zoning classification to allow the development, construction, operation, and maintenance of the Generating Facility or Interconnection Customer must demonstrate ongoing efforts with the local jurisdiction to rezone the site or remove the usage restriction to ensure the Generating Facility can be developed, constructed, operated, and maintained on the site and that those efforts will not delay the development of the Generating Facility.
  - d. If Interconnection Requests by different Interconnection Customers are sharing a site, Interconnection Customers must either provide a Co-Location Agreement to BPA or provide to BPA an explanation of why BPA should accept documentation of Site Control that is not in an Interconnection Customer's name as outlined in Section A.4.
    - i. Each Interconnection Customer must meet all requirements of this business practice, including site plan map requirements identifying a layout allowing multiple Generating Facilities to utilize the site as outlined in Section B.3.
2. As identified in Section B.1, Interconnection Customer must submit:
    - a. Site Control Demonstration form (Exhibit A) signed by a person with appropriate signatory authority for Interconnection Customer.
    - b. Supporting documentation evidencing Site Control, in the form of a single or multiple documents establishing a land right, as described in Section A.3.
  3. Interconnection Customer must submit documentation evidencing Site Control consistent with the definition of Site Control set forth in Section 1 of the LGIP.
    - a. BPA accepts documentation showing that an Interconnection Customer owns property or that the titled landowner of property has granted Interconnection Customer the exclusive right to develop, construct, operate, and maintain the Generating Facility on the property.

- b. Documents submitted to evidence Site Control may be provided in whole, excerpted, or with redactions of commercially sensitive information, such as pricing information. 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 agreement.
  - vii. Co-location Agreement must be provided for Co-Located Resources.
  - viii. For lands managed by the United States Department of the Interior's Bureau of Land Management (BLM), BPA will accept less than a perfected Right of Way if Interconnection Customer and the BLM have entered a Cost Reimbursement Agreement.
    - 1. Interconnection Customer must provide the Cost Reimbursement Agreement, the Standard Form (SF-299), and the Plan of Development.
    - 2. Interconnection Customer must demonstrate ongoing performance if the estimated timelines in the Cost Reimbursement Agreement indicate that performance should have been completed.
    - 3. The specifications of the project identified in the materials must match the Generating Facility as identified in the Interconnection Request and other materials submitted to BPA.
  - ix. Other documentation consistent with the definition of Site Control set forth in Section 1 of the LGIP.
- c. In determining if a document evidences Site Control, BPA will evaluate the content of the document, rather than its title alone. The following are examples of documents that will not establish evidence of Site Control:
  - i. Non-binding document solely evidencing an intent to take future action, including but not limited to:
    - 1. Active negotiation;
    - 2. Memorandum of Understanding;
    - 3. Letter of Intent;
    - 4. Officer Certification; or
    - 5. Request to a public land entity for Site Control.

- ii. Document indicating that the entity granting the land right may revoke the grant at will, such as a license.
  - iii. Purchase Agreement.
  - iv. Document purporting to provide Interconnection Customer with a land right granted from an individual/entity that is not the titled landowner.
  - v. Document granting a person, in that person's individual capacity, a land right.
- 4. Documentation evidencing Site Control must grant the exclusive land right to develop the site to the Interconnection Customer, as identified on the corresponding Interconnection Request. If the exclusive land right is held by another entity, Interconnection Customer must demonstrate to BPA's satisfaction the relationship between the entity granted the exclusive land right and Interconnection Customer.
  - a. BPA may accept an attestation or Officer's Certificate from a person with appropriate authority demonstrating the relationship between the entity holding the exclusive land right and Interconnection Customer.
  - b. BPA is not obligated to accept documentation of Site Control that is not in Interconnection Customer's name.
- 5. When using an option to lease or purchase as documentation evidencing Site Control, the rights secured if the option is exercised must extend over the term of expected operation of the Generating Facility.
  - a. When using an option to lease or purchase as documentation evidencing Site Control, Interconnection Customer must demonstrate that all option periods have been extended to provide for a presently maintained option to lease or purchase.
- 6. Interconnection Customer must demonstrate Site Control over a site of sufficient size for the Generating Facility.
  - a. Acreage requirements are based on the proposed MW plant size (nameplate capacity) of a Generating Facility.
  - b. In determining if a site is of sufficient size, only the usable acreage of a site qualifies.
    - i. Any portion of a site that cannot be used, such as land containing a road, water body, or land subject to a Right of Way or Easement grant to another party, is excluded in evaluating if the site is of sufficient size.
  - c. When documentation evidencing Site Control indicates a limitation on the size of the Generating Facility that may be built on the site, the limitation indicated in that documentation will be considered the maximum size of the Generating Facility supported by the site even if the acreage of the site would support a larger project under criteria outlined in Section A.7.
- 7. 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 (Generating Facility comprised of multiple resource types): The sum of required acreage for each fuel type.
  - i. Hybrid 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 = 405 acres

## B. Site Control Submittal

1. Interconnection Customer must submit documentation evidencing Site Control as outlined in Section A.2 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 documentation of Site Control, Interconnection Customer must submit updated documentation.
  - 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](mailto: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. A Google Earth Site Plan Map in .kmz format that identifies the following in a color contrasting against the background color, such as red, orange, yellow, or purple, rather than blue, green, or brown.
    - i. Site boundary.
    - ii. Boundaries of individual parcels of land.
      1. Each parcel must be labeled to identify the parcel number identified in the document establishing the right to the parcel, the title of the file containing the document establishing the right to the parcel, and the acreage of the parcel.

- iii. Boundaries of any unusable portion of the site, such as land containing a road, water body, or land subject to a Right of Way or Easement granted to another party, must be identified, labeled to identify that the land is unusable, and labeled with the acreage of that portion.
  - iv. Proposed collector station(s) and lines between collector station(s) all within the boundaries of the site.
    - 1. The collector station reflecting the coordinates of the Generating Facility in the Interconnection Request must be marked with the coordinates and be within the boundaries of the site.
  - v. Optional: proposed tie-line to requested Point of Interconnection.
  - vi. If more than one Generating Facility is located on a site, the map submitted for each Interconnection Request must clearly identify each Generating Facility located on the site, including identification of the Generating Facility by G# and the coordinates of each Generating Facility.
- b. Site Plan Map in Portable Document Format (PDF):
- i. Screen capture of the map in .kmz format that has been saved as a PDF file. Ensure the screen capture of the map is at the appropriate zoom level so that all information is within frame but still clearly legible.

## C. Site Control Review

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 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 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 as shared by Interconnection Customer under Section B.1.b.

## D. Insufficient Land – Acreage Dispute

1. If Interconnection Customer has identified a site that does not meet the site size requirements outlined in Sections A.6 and A.7, Interconnection Customer must submit a site plan drawing depicting how the site is of sufficient size for the Generating Facility.
  - a. BPA will only accept a site plan drawing that meets the following criteria:
    - i. Stamped by a Professional Engineer licensed in the state where the site is located.

- ii. Layout of Generating Facility showing equipment locations, spacing, and site setbacks.
    - 1. The layout and location of all generating equipment on the site must be identified, including solar panels, inverters, turbines, batteries, collector stations, and generator step-up transformers.
      - a. A Generating Facility with multiple fuel sources must clearly identify the location and layout of all devices on the site for every fuel source.
    - 2. The site topography and access roads must be displayed.
    - 3. String and panel spacing must be displayed.
    - 4. Detailed route of the feeder lines, the low voltage lines extending from generating elements to the collector station(s).
  - iii. Calculation showing proposed acre/MW.
- b. Interconnection Customer must submit supplemental evidence showing that the equipment identified can fit on the site, such as providing design specifics from a manufacturer showing equipment footprints.
- 2. It is Interconnection Customer's responsibility to clearly demonstrate that a site is of sufficient size to develop, construct, operate, and maintain the Generating Facility.
- 3. If more than one Interconnection Request is using a site, an acreage dispute must clearly identify each Generating Facility on the site.
  - a. A site plan drawing to show a site is of sufficient size for multiple projects on the site must meet these standards for each Generating Facility and clearly identify how the site is being used by each Generating Facility.

## **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](mailto: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](mailto: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, 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](mailto:GI_ClusterStudies@bpa.gov) if there is any material change in the previously provided documentation 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.

# Exhibit A

## Site Control Demonstration

Each request to interconnect a Large Generating Facility, identified by G#, requires a separate redemonstration form.

### 1. Interconnection Request Information:

- A. Queue # of requested Large Generating Facility:
- B. Name of Interconnection Customer:
- C. Submission Type: Initial application submittal; updated documentation or redemonstration; modification request

### 2. Site Information:

- A. Total Acreage of site:

Usable Acreage of site (the overall size of the site minus unusable land, such as land containing a road, water body, land subject to a Right of Way or Easement granted to another entity):

- B. Acreage Dispute submitted? Yes / No
- C. Type of land that makes up the site: Private / Public
- D. Are all parcels of land that make up the site appropriately zoned for the development of the project? Yes / No

If no, Interconnection Customer must provide an explanation of steps being taken to ensure that zoning will allow the project to be developed without delaying the project. BPA will not accept Site Control for sites that contain residentially zoned parcels. Refer to the Site Control Business Practice.

[Please provide the title/s of the file/s containing the explanation]

## E. Table of Parcels that Make up the Site:

For each parcel of land that makes up the site, Interconnection Customer will identify the parcel number, the title of the supplementary document that was submitted to evidence the right to use that parcel, the type of document, and the usable acreage of that parcel.

<b>Parcel ID #</b>	<b>County, State</b>	<b>Title of file/s containing document/s evidencing Site Control</b>	<b>Type of document</b> <i>(drop-down options: Option to Lease; Option to Purchase; Option to Lease or Purchase; Lease; Deed; or Other)</i>	<b>Usable Acreage of Parcel</b>

## F. Is this site made of noncontiguous parcels? Yes / No

If yes, indicate (check box): Interconnection Customer is demonstrating Site Control (easement or right of way) on land connecting noncontiguous parcels; or Generating Facility configuration includes multiple collector stations with multiple transmission lines connecting to the Point of Interconnection.

\*Note that Interconnection Customer is obligated to clearly identify how its proposed project is utilizing the site in the mapping and modeling materials submitted to BPA.

### 3. Documents Evidencing Site Control:

- A. If using a deed, complete the following for each deed provided:
- a. Identify title of file containing documentation provided:
  - b. Grantee:
  - c. Is the Grantee the Interconnection Customer? Yes / No
    - i. If the Grantee is not the Interconnection Customer, Interconnection Customer must provide an explanation as outlined in Section A of the Site Control business practice.

[Please provide the title/s of the file/s containing the explanation]

- d. Effective Date:
  - e. Signed by Grantor and Grantee? Yes / No
  - f. Recorded? Yes / No
- B. Fill out the following for each Option or Lease:
- a. Identify title of file containing documentation provided:
  - b. Type: Option to lease; Option to purchase; Option to purchase or lease; Lease
  - c. Grantor:
    - i. Citation (page/section):
  - d. Is the Grantor the titled landowner? Yes / No  
*\*If the Grantor is not the titled landowner, this document does not meet the requirements of Site Control.*
  - e. Is this a Co-Location Agreement? Yes / No
  - f. Grantee/s:
    - i. Citation (page/section):

- g. Grantee is the Interconnection Customer? Yes / No
- i. If the Grantee is not the Interconnection Customer, Interconnection Customer must provide an explanation as outlined in Section A of the Site Control business practice.

[Please provide the title/s of the file/s containing the explanation]

- h. Effective Date:
- i. Citation (page/section):
- i. Signed by Grantor and Grantee? Yes / No
- i. Citation (page/section):
- j. Nearest expiration date:
- i. Citation (page/section):
- k. Lease term (max term):
- i. Citation (page/section):
- l. Demonstrate the extension of the term of options, as applicable, below:

Term	Expiration Date	Explain how extension was exercised	Citation (document, page, section)
Example: Original			
Example: Extension 1			

- C. Fill out the following for each document submitted to evidence Site Control that is not a deed, option, or lease:
- Identify title of file/s containing documentation provided:
  - What is document intended to establish:
    - Documentation that clearly demonstrates the right of Interconnection Customer to exclusively occupy a site of sufficient size to construct and operate the Generating Facility.
    - For Co-Located Resources, a contract or other agreement that allows for shared land use for all Co-Located Resources that meet the provisions of this Site Control definition.
  - Provide an explanation how the document or documents demonstrate that Interconnection Customer has Site Control and provide citations (document page and sections) to that information in the documentation.

[Please provide the title/s of the file/s containing the explanation]

#### 4. Multiple Interconnection Requests on a Site

- Are multiple Generating Facilities represented in an Interconnection Request seeking interconnection or already interconnected to BPA's transmission system sited on the site? Yes / No
- If yes, complete the following table:

G# of Generating Facility on the Site	Acres Used by Generating Facility

- If multiple Interconnection Requests are sited on multiple sites, Interconnection Customers must clearly identify how all requests will share sites, how the site for each request is of a sufficient size, and how each Interconnection Customer has met the definition of Site Control. BPA will reject Site Control demonstrations for all Interconnection Requests when an Interconnection Customers does not clearly explain how a site will be shared.

[Please provide the title/s of the file/s containing the explanation]

**5. Transmission Service Reservation**

If Transmission Service Reservation is not CONFIRMED or the Point of Receipt of the Transmission Service Reservation does not match the Interconnection Request's Point of Interconnection as identified in the most recently issued study report, provide an explanation of how Interconnection Customer has reasonable evidence of transmission service reservation (or comparable evidence) for the Generating Facility.

[Please provide the title/s of the file/s containing the explanation]

**6. Affirmation**

I, the undersigned, am a person holding contractual signatory authority on behalf of Interconnection Customer.

I affirm all documents required to demonstrate Site Control have been submitted.

I have reviewed this form and the attached documents and have personal knowledge of their contents.

I affirm that documents are provided in their entirety or that excerpted or redacted sections of documents do not prevent documentation from evidencing Site Control. I affirm that only commercially sensitive information is redacted.

I affirm that Interconnection Customer has Site Control. I acknowledge that Interconnection Customer is responsible for notifying BPA of changes in Site Control, including changes to the information submitted in this form and documentation supplementing this form. I acknowledge that Interconnection Customer is responsible for notifying BPA upon the expiration or extension of any right in the documentation supplementing this form. I acknowledge that a failure to retain Site Control throughout the entirety of the interconnection process or a failure to provide updated documentation when required will result in BPA considering the Interconnection Request deemed withdrawn. I acknowledge that BPA may at any time identify that a previous failure to retain Site Control throughout the entirety of the interconnection process will result in BPA considering the project deemed withdrawn.

By (signature):

Name (type or print):

Job Title:

Date: