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BONNEVILLE POWER ADMINISTRATION
905 NE 11TH AVENUE
PORTLAND OR 97232

Submitted via email: techforum@bpa.gov

Comments on TC-25 Generator Interconnection (GI) Reform

Seattle City Light (City Light) appreciates BPA's efforts to engage with customers on impactful changes to BPA Large Generator Interconnection Procedure (LGIP) through its TC-25 GI Tariff Reform proceeding. City Light understands the monumental task for BPA staff to address the large number of generator interconnection requests. We applaud BPA's willingness to consider customers' suggestions. City Light would like to offer the following comments regarding the proposed TC-25 GI Reform process.

TC-25 Timeline

City Light supports the rapid timeline for the pre-proceeding workshops and the TC-25 Tariff Proceeding. City Light suggests adding an early June final customer workshop specifically to allow time for customers to receive comment responses from BPA.

TC-25 Tariff Principles

City Light appreciates and supports BPA's effort to maintain a tariff that is consistent with the FERC *pro forma* tariff to the extent possible. City Light is aware of the difficulty with balancing this effort with BPA's statutory obligations, authorities, and responsibilities. This consistency and predictability foster an atmosphere that supports resource development and investment.

City Light suggests BPA apply specific focus on the TC-25 Tariff Principle to prevent significant harm or provide significant benefit to BPA's mission or region, including BPA's customers and stakeholders. Many BPA customers are currently or soon will be acquiring new resources to meet load growth and/or regulatory requirements. Significantly harming the resource development sector by greatly increasing the timeline for generator interconnection or making the cost of being "First Ready" significantly higher than other areas would also harm BPA customers. City Light further suggests that BPA seek feedback from experienced resource developers to ensure that the proposal does not have an unintended chilling effect on the development of non-federal resources that will be vital to meeting regional resource adequacy needs in the long term.

Tariff Topics for TC-25

City Light supports the proposed topics for the TC-25 GI Reform process. We look forward to the opportunity to participate and comment on these topics as the workshops progress. City Light has high level suggestions for the following areas of discussion.

First-Ready, First-Served Cluster Study Process: City Light suggests designing and implementing this principle needs to be overtly clear and involve excessive communication with both BPA customers and industry stakeholders. The transition period to this new paradigm should not include a lengthy period where generator interconnection requests cannot be made.

Increased Financial Commitments and Readiness Requirements: City Light supports BPA increasing financial commitments of generator interconnection requestors to cover BPA's cost of addressing the requests in a full and timely manner. Increased costs would raise the expectation of elevated processes, accurate estimates, and superior customer service. We would support costs increases that provide for addressing generator interconnection requests on a quarterly basis.

Technical Study Process and Modeling Requirements: City Light encourages BPA to align with and when technically possible, exceed industry best practices. We recommend BPA include lessons learned and guidance included in the NERC (North American Electric Reliability Corporation) Odessa Disturbance Report and the DRAFT NERC Reliability Guideline on Electromagnetic Transient Modeling for Bulk Power System (BPS)-Connected Inverter-Based Resources.

Links Below

https://www.nerc.com/pa/rrm/ea/Documents/Odessa_Disturbance_Report.pdf

https://www.nerc.com/comm/RSTC_Reliability_Guidelines/Draft_Reliability_Guideline-EMT_Modeling_and_Simulations_Vol_1.pdf

Study Flexibility: City Light suggests that allowing study flexibility for co-locating resources and the addition of energy storage at later stages of the process would add value to customers.

Network Costs: City Light suggests that when applying cost causation principles to projects required to support generator interconnection, that BPA consider an additional review step to the process. This step would be used to review proposed projects from an overall system point of view to identify more efficient solutions and least cost reliability necessities. This could be particularly useful in areas of the BPA transmission system where the best strategic projects are not fully supported by 100% transmission subscription. City Light suggests that an iterative holistic review of all planned transmission system projects would lead to lower customer costs.

City Light appreciates the ability to provide these comments, as well as BPA's continuing efforts and consideration.

Sincerely,

Michael Watkins
Strategic Advisor
Seattle City Light