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Shell Energy North America (US), L.P.
4445 Eastgate Mall Suite 100
San Diego, CA 92121
+1.858.526.2109
www.shell.com/us/energy

Shell Energy North America (US), L.P. (“Shell Energy”) appreciates the opportunity to submit general comments to the Techforum regarding BPA’s work to update interconnection processes under the tariff. In the spirit of brevity Shell Energy’s general comments are condensed to bullet points in this document.

- Any durable recalibration of interconnection processes should first and foremost promote a level playing field across all project sizes and developer/customer profiles.
- Late-stage study withdrawals increase uncertainty and result in inefficient use of limited staff resources; however, maintaining offramp decision points is prudent. For this reason, Shell Energy supports a phased first-ready-first-served cluster study with escalating at risk deposits in later phase(s).
- Commercial readiness criteria *may* indicate project viability; however, they are not the only indication. Any readiness criteria must be broad enough to reflect the procurement nuances of all loads, whether an IOU, POU, end-use customer or competitive energy service provider. Access to transmission, if applicable, remains important while contract-path OATT rights are the status-quo and can be one measure to indicate readiness; however, should not be required to demonstrate readiness. In addition, financial security should satisfy readiness requirements.
- Robust and transparent data exchange is critical, such as an interconnection overview webpage/application and dissemination of data/results to the interconnection customer.
- Shell Energy agrees site control, including generation tie lines if applicable should be required at the time of application.
- Regarding interest, customer deposits should accrue interest but only at the actual interest rate being paid in escrow or other accounts BPA holds customer funds within. This would represent a pass-through to the customer at presumably market interest rates, thus reducing any concerns of submitting unviable requests to earn an administratively determined interest rate on deposits.

- Shell Energy can live with a framework which allocates study costs 50:50 between pro-rata MW and number of requests.

Respectfully submitted,

/s/ Ian D White

Director, Regulatory Affairs

Shell Energy North America (US), L.P.

ian.d.white@shell.com | +1.360.520.3013