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Submitted via Tech Forum on July 13, 2022

### **Comments on June 29 Pre-Rate Case and Tariff Workshop**

PPC appreciates the opportunity to share these initial comments on topics from BPA's June 29 customer workshop on BP-24 rates and TC-24 tariff issues. We look forward to continuing to develop these and other issues throughout the summer and fall with BPA staff and other stakeholders.

#### *Eastern Intertie Process Update*

PPC appreciated the update on the "Eastern Intertie Process" provided by BPA staff on June 29. As part of the update, BPA explained that the Colstrip parties would look to convert their transmission rights to OATT service on 10/1/25 for service beginning 10/1/27. Agency staff also explained that rate treatment for this service would be further discussed in BP-26.

While the decision for rates in future periods should not be predetermined, PPC can appreciate that Colstrip parties are interested in some indication on future rate treatment of the Eastern Intertie segment. PPC is not aware of any changes in circumstances which would justify changing the rate treatment for the Eastern Intertie as a separate segment on BPA's system. PPC has argued repeatedly, and BPA has agreed, that the Eastern Intertie segment was developed as a generation tie line, radial to BPA's system, and as such that line should be treated as a separate segment of BPA's system. For more information see previous PPC rate testimony<sup>1</sup> on this issue.

BPA staff also mentioned that the agency had been approached by the Colstrip parties to consider divestment of the Eastern Intertie and that "[a]fter careful consideration BPA believes the Eastern Intertie continues to provide benefits to the region."<sup>2</sup> PPC would be interested in better understanding the distinct benefits to BPA from retaining the Eastern Intertie facilities and what additional considerations these "benefits" have for the future of these facilities.

PPC looks forward to additional conversations with BPA and other stakeholders regarding the future of the Eastern Intertie segment and appreciates this opportunity to offer initial comments on that discussion for BP-24.

#### *Generator Interconnection Process*

PPC appreciates the efforts that BPA is making to update its generator interconnection process to incorporate new technologies and to comply with FERC Order 845. Given the challenges that BPA has experienced with large amounts of interconnection requests, BPA should also be looking for other potential improvements to help address this request backlog. We would like feedback from BPA on the proper forum to have this more expansive discussion, including whether there is the potential to adopt

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<sup>1</sup> Previous testimony filed by PPC on this topic include BP-12-E-JP10-01, BP-14-E-JP10-01, BP-14-E-JP10-02, BP-16-E-JP07-03, BP-18-E-PP-02, and BP-22-E-PP-02.

<sup>2</sup> BP-24 Rate Case & TC-24 Tariff Proceeding Workshop presentation from June 29, 2022, slide 46  
[https://www.bpa.gov/-/media/Aep/rates-tariff/bp-24/6-29-22-workshop/BP\\_TC-24-Workshop-June29-2022.pdf](https://www.bpa.gov/-/media/Aep/rates-tariff/bp-24/6-29-22-workshop/BP_TC-24-Workshop-June29-2022.pdf)

metrics of “readiness” which have been used by other service providers to better manage the influx of requests in the queue.

*Long-Term ATC*

PPC appreciated the update on BPA’s process to improve how it grants long-term ATC in between annual cluster studies. The approach sounds reasonable. The use of assumptions closer to those used in annual cluster studies should better align the two study methodologies and create greater potential for customers to receive transmission service between annual cluster studies. PPC requests that BPA continue to work with customers after this change goes into effect to address any unintended or unforeseen consequences resulting from this change.