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To: techforum@bpa.gov

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Comments on BPA's proposed version 4 of the Line and Load Interconnection Procedures business practice

PGE appreciates the opportunity to comment on BPA's draft version 4 of the Line and Load Interconnection Procedures business practice. PGE recognizes BPA's efforts to update the document to better reflect current operating conditions and study timelines. The following comments, in response to concepts presented on June 15, 2026, are intended to improve transparency, predictability, and efficiency while supporting timely development of transmission and load-serving infrastructure throughout the region:

1. **Section A. LLIR**

   PGE appreciates BPA's effort to provide clearer triggers for when an LLIR is required. To improve consistency and predictability, BPA should define the basis on which the proposed 20 MW threshold for new load at an existing Point of Delivery (POD) will be measured (e.g., coincident peak demand, requested firm service, nameplate capacity, or another defined metric). BPA should also clarify whether grid-charging battery storage constitutes new load for purposes of applying this threshold.

   PGE also requests clarification regarding how the proposed 20 MW threshold interacts with BPA's separate LaRC-based determination for load growth or load transfers that do not constitute New Network Load. To reduce uncertainty, BPA should include illustrative examples addressing ordinary load growth, discrete new customer loads, phased project expansions, grid-charging battery storage, and modifications to requested service at an existing POD.

   For Point-to-Point (PTP) customers, BPA should clarify whether any increase in MW delivered to an existing POD requires a new LLIR, or only increases that necessitate physical modifications to the interconnection. PGE recommends adopting a materiality standard under which only changes that could reasonably affect

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interconnection facilities study assumptions, or other transmission customers would require a new LLIR.

2. **Section E. Material Change Analysis Request**

   PGE requests that BPA establish a transparent process for situations in which a customer disagrees with BPA's determination that a proposed change is material. Because a material change determination may require withdrawal of an existing LLIR and loss of queue position, customers should have an opportunity to review BPA's preliminary determination, provide supporting information, and seek reconsideration before a final decision is made.

3. **Section H. LLI FAS**

   PGE appreciates BPA's recognition that Facilities Studies vary significantly in scope and complexity. While the draft includes milestones for certain study activities, it should also provide planning-level target completion ranges for Facilities Studies based on study complexity. This information would improve customers' ability to plan commercial development, financing, permitting, and construction activities.

4. **Section I. Post-Study Agreements**

   PGE supports BPA's proposal to remove the requirement that corresponding PTP TSRs be submitted on the same day as the LLIR request.

   PGE is concerned, however, that allowing up to six months to offer a post-study agreement following completion of the FAS could introduce significant uncertainty into project development schedules. BPA should either shorten this timeframe or provide a defined implementation schedule shortly after the FAS is completed that identifies anticipated agreement timing, customer funding requirements, major procurement milestones, and estimated energization dates.

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5. Timeline

Although BPA's LLIR business practice establishes procedures that are not expressly defined within BPA's Open Access Transmission Tariff (OATT), BPA's website states that "the interconnection of Lines and of Loads to the Federal Columbia River Transmission System (FCRTS) is governed by BPA's Open Access Transmission Tariff." As such, customers reasonably expect the LLIR process to remain generally consistent with the study timelines reflected in BPA's Small and Large Generator Interconnection Procedures (SGIP/LGIP) and the broader framework established by the FERC *pro forma*.

PGE appreciates BPA's efforts to establish study timelines that more accurately reflect current workloads and available resources, and recognizes that the timelines contained in Version 3 of the Line and Load Interconnection Procedures business practice were frequently difficult to achieve. However, extending both the System Impact Study and Feasibility Study timelines to 180 days, while leaving the Facilities Study duration effectively unbounded, results in an overall interconnection process approaching three years (assuming 180-day FAS). Such timelines create significant uncertainty for utilities, customers, and developers seeking to support regional load growth, economic development, and resource adequacy. Extended study durations may also impair customers' ability to satisfy evolving load maturity requirements under the TC-27 process.

BPA staff indicated that staffing constraints are a primary factor driving the proposed timeline extensions. Given the unprecedented pace of load growth across the Pacific Northwest, PGE requests additional transparency regarding the underlying causes of these constraints, BPA's plans to increase study capacity, and opportunities to improve study throughput over time.

PGE also encourages BPA to evaluate additional options for reducing study timelines, including allowing customers to fund studies performed by mutually agreed-upon third-party consultants, subject to BPA oversight and final approval. Similar approaches have been adopted elsewhere in the industry to supplement utility resources while maintaining study quality and consistency.

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PGE appreciates BPA's continued engagement with customers as these business practices evolve and looks forward to continued collaboration to improve the transparency, predictability, and efficiency of the LLIR process. Thank you for consideration of these comments.

Respectfully,

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