Sent to BPA via techforum@bpa.gov

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Re: BPA's Proposed Line and Load Interconnection Procedures Business Practice

Below are comments provided by the Umatilla Electric Cooperative ("UEC") in response to the Bonneville Power Administration's ("BPA") proposed Line and Load Interconnection Procedures Business Practice ("LLIP BP"), Version 4. Our understanding is that BPA's revisions were intended to provide additional procedural clarity regarding when and how BPA's customers submit Line and Load Interconnection Requests ("LLIR"). UEC shares this same goal, and we submit the following comments to meet that objective.

LLIR Submission Thresholds

We understand the intended goal of the proposed section A.1.a is to provide more clarity to Network Integration Transmission Service (NITS) Customers for when an LLIR submission is required. UEC agrees that most of sections A.1.a.i-iii provide clear and understandable thresholds for when an LLIR is necessary, and these sections are superior to BPA's current Line and Load Interconnection Procedures, which state that '*All NT Customers must submit a LLIR…when requesting a new or modified transmission system interconnection*' and are silent on any specific MW thresholds. That said, section A.1.a.iii is somewhat ambiguous where BPA proposes that "*20 MW or more of new load at an existing POD*" will require submittal of an LLIR. We request BPA clarify this provision, as it is unclear whether this will be triggered at any point at which a load at an existing POD exceeds 20 MW (i.e., a 14 MW load increases to 23 MW over the 10-year projected period), or instead whether the cumulative increase over the 10-year projected period exceeds 20 MW (i.e., a 35 MW load increases above 55 MW over the 10-

year projected period). Our assumption of BPA's intent is the latter interpretation but would appreciate additional clarity to avoid confusion.

Unfortunately, the proposed section A.1.a.v eliminates any clarity provided by sections A.1.a.i-iii. Proposed section A.1.a.v states that '*any load growth or transfer included in a LARC submittal may be deemed to require an LLIR*.' This language could mean that <u>*any*</u> load growth—even less than 1 MW—can be deemed to require an LLIR at BPA's sole discretion and only once a LARC is submitted.

Sections A.1.a.iv-v are further problematic from a timing and implementation perspective since they both rely on the LARC process to determine if an LLIR submittal is deemed necessary. BPA requires that LARC's are submitted once a year. In 2023 and 2024, it took 220 days on average for BPA to respond to UEC's LARC via a formal close out letter. Under this example, this means that if BPA identified a load requiring an LLIR via a LARC submittal, it may take up to 585 days after the load growth was identified by UEC. In the same vein, section A.1.a.iv states that an LLIR will be required for a "*New Network Load at an existing POD*", but BPA's current draft Network Integration Transmission Service Business Practice proposes to make New Network Load determinations for Non-Trended Load Growth only within the LARC process.

Therefore, UEC proposes that BPA retain sections A.1.a.i-iii as the thresholds for when a customer must submit a LLIR and remove sections A.1.a.iv-v.

Study Cost Responsibility

The proposed LLIP BP expands the potential situations where NITS customers must submit an LLIR but provides no further clarity on potential study costs. If BPA maintains the language under section A.1.a.v, there may also be situations where BPA requires an LLIR for any amount of load growth. This could lead to an uncapped cost exposure for BPA's Network Integration Transmission Customers in order to fulfill their LLIR obligations.

Thus, UEC proposes two additions to the proposed LLIR BP:

- Include the same cost provisions that BPA provides to its generation interconnection customers in the Small Generation Interconnection Business Practice—*"If BPA decides that the Interconnection Request requires a technical study, deposits for each study conducted under the SGIP will be the greater of $5,000 or the good faith estimated study costs."*
- BPA include a provision stating that BPA will provide a detailed accounting of all study costs and return any unused study funds to the customer within 30 days of study completion or LLIR withdrawal by the customer.

Materiality

The draft LLIR business practice includes materiality provisions in the event that a customer submits a modification to its original LLIR submittal. BPA proposes to require that a customer withdraw the existing LLIR and submit a new LLIR in the event that an LLIR modification is deemed to be material.

Proposed section E.3.b.i states that BPA will deem an LLIR to have a material change if the modification '*impacts the cost or timing of other LLIRs, including impacts to the schedule of energization of other LLIRs, or requires the LLIR at issue to be restudied*'. BPA's materiality determinations should not give deference to lowered queued requests, as it is standard industry practice that lowered queued requests are contingent upon higher queued requests. Thus, UEC requests that BPA delete section E.3.b.i in its entirety, and at a minimum, BPA's language should be modified to state that an LLIR modification will only be deemed to be material if the modification <u>*increases*</u> the cost or <u>*delays*</u> the timing of other LLIRs.

UEC also proposes to remove '*including a change in voltage class*' in section 3.a.ii.b. A change in voltage class may not necessarily result in any material impacts when compared to the customer's original LLIR submittal, and therefore should not automatically result in a material change determination.

Study Timelines

The current Line and Load Interconnection Procedures require BPA to complete System Impact Studies and Facilities Studies within sixty days, respectively. The proposed LLIP BP further states that BPA will '*endeavor to*' complete these studies within 180 days. This means it will likely take more than a year for a customer to receive the requested study results after submitting an LLIR. At the BPA hosted business practice meeting on June 15, 2026, BPA staff that the sole reason for tripling each of the study timelines presented was staffing constraints and resource concerns.

UEC urges BPA to maintain consistency with other study timelines for Network Integration Transmission Customers outlined in its Open Access Transmission Tariff. For example, section 33.2 of BPA's OATT states that '*Upon receipt of an executed System Impact Study Agreement, the Transmission Provider will use due diligence to complete the required System Impact Study within a sixty (60) day period*' and provides the same timeline for System Facilities Studies. UEC sees no reason why an LLIR study would take longer or require more BPA staff time than a request for a modification to Network Integration Transmission Service under BPA's OATT and do not believe staffing issues should be the a sole reason to deviate from the current 60-day timelines. Additionally, BPA's attempt to *'endeavor to'* complete the studies within a certain timeline is unacceptable. The business decisions and planning needs of UEC's end-use members rely heavily on BPA's ability to meet its study deadlines. Thus, UEC requests to remove any references to endeavoring to meeting study deadlines.

UEC also urges BPA to consider allowing the interconnection Feasibility, System Impact, and Facilities Studies to be completed by the interconnection customer itself or by a third-party engineering firm if BPA staffing resources are inadequate. This would assist in expediting study timeframes and allow customers to make efficient and timely business decisions to promote economic success of BPA and its customers.

Thank you,

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