



7/15/2026

Submitted via techforum@bpa.gov

RE: LLIR Business Practice Revisions

Clatskanie People's Utility District (PUD) offers the following comments in response to the Bonneville Power Administration's ("BPA") proposed revisions to its Line and Load Interconnection Procedures ("LLIP") Business Practice.

We additionally offer broad support for the comments offered by the NITS Customer Group, NRU, and UEC.

A) Line and Load Interconnection Request (LLIR)

- 1) Network Integration Transmission Service (NITS) Customers
 - a) Transmission Customers intending to utilize NITS must submit an LLIR for the following:
 - (i) A new Point of Delivery (POD) on BPA's Transmission System.
 - (ii) Changes to an existing POD on BPA's Transmission System.
 - (iii) 20 MW or more of new load at an existing POD, identified by the Transmission Customer in the 10-year "Projected Load" data in Section 2.E of the Line and Load Interconnection Request form.
- 2) Long-Term Firm Point-to-Point Transmission Service (PTP) Customers.
 - a) Transmission Customers intending to utilize Long-Term Firm Point-to-Point Transmission Service (PTP) must submit an LLIR for the following:
 - (i) A new POD on BPA's Transmission System.
 - (ii) Changes to an existing POD on BPA's Transmission System.
 - (iii) Increases of MW of PTP to be delivered to an existing POD.
- 3) Cost responsibility for study and transmission facilities.
 - a) Cost responsibility for study of an LLIR.
 - (i) Transmission Customers intending to utilize PTP related to an LLIR are responsible for the actual costs of BPA performing any required studies.
 - (ii) Transmission Customers intending to utilize NITS related to an LLIR are responsible for the actual costs of BPA performing any required studies when:
 - (1) An LLIR is required for New Network Load; or
 - (2) An LLIR is not for a New Network Load but the Transmission Customer has identified the request as "Exploratory" or "Preliminary" in Section 2.A of the Line and Load Interconnection Request form.
 - (a) An LLIR is considered "Exploratory" when a utility customer is seeking an informational study.

Board of Directors:

Bob Wiggins
Merle Gillespie
Jeannie Mustola
Steve Petersen
Don Hooper

General Manager:

Marc Farmer

Commented [CR1]: Are the listed determinates intended to layer on top of the most recent LARC or do they stand alone?

Commented [CR2]: "Changes" is an overly broad term. Does this include alterations to metering and telemetry?

Commented [CR3]: The language creates a circular loop where the guidance on when to fill out the form requires the form already being filled out.

It is unknown how this will be measured and used in application. Will new load identified by BPA as part of BPA's forecasting efforts be excluded from the LLIR process?

Should load materialize or coincide beyond projected amounts (ie weather events), how will customer be impacted?

Commented [CR4]: As written BPA can force an LLIR and the costs through the LARC process.

- (b) An LLIR is considered “Preliminary” when a utility customer is seeking study of a load that it has taken some action to develop, such as initiating discussions with an end user, but has not committed to developing.
- (iii) Transmission Customers intending to utilize NITS related to an LLIR are not responsible for the costs of study in instances not covered in Section A.3.a.ii above.

Commented [CR5]: The language as proposed is subjective.

C) Processing an LLIR

- 1) Within five (5) Business Days following receipt of an LLIR, BPA will acknowledge receipt of the Transmission Customer’s email.
- 2) Within 15 Business Days following receipt of an LLIR, BPA will provide the Transmission Customer with notification of any deficiencies in the LLIR. BPA will describe any deficiencies in such notification.
 - a) The Transmission Customer will have 15 Business Days from BPA’s notice of deficiencies to resolve the deficiencies and provide an updated LLIR to BPA.
 - b) If the Transmission Customer fails to resolve the deficiencies within 15 Business Days from BPA’s notice, BPA will cease processing the LLIR and the Transmission Customer will need to restart the LLIR submission procedures for any additional consideration of an LLIR by BPA.
- 3) BPA will schedule a kickoff meeting to occur between BPA and the Transmission Customer within 30 Calendar Days of receiving a completed LLIR.
 - a) During the kickoff meeting, BPA and the Transmission Customer will discuss which study steps are required.
- 4) If upon conclusion of the kickoff meeting the proposed LLIR is found to be invalid or not technically feasible at the time of the request, BPA will withdraw the LLIR from the interconnection queue.

Commented [CR6]: Will BPA notify customer if no “deficiencies” are found?

Commented [CR7]: While not explicit; does this mean the original submission date is null and void?

Commented [CR8]: This could be interpreted as a meeting will “occur” within 30 days or it will be “scheduled” within 30 days to happen at a later date.

Commented [CR9]: Who is the determining body? BPA, Customer, or both? What constitutes “not technically feasible”. Is there a dispute mechanism if the parties are not in agreement?

E) Material Change Analysis Request

- 1) Any change to information pertinent to an LLIR, contained in the LLIR form, study reports, or meeting notes, requires BPA approval.
 - a) A change that BPA deems to be a material change may require the Transmission Customer to submit a new LLIR to proceed with the change.
- 2) To request a change to information in an existing LLIR, the Transmission Customer must email an amended Line and Load Interconnection Request form (BPA F 6420.25e) to interconnection@bpa.gov and include:
 - a) Enter “LLIR Change Request” and the queue number (L####) of the applicable request in the subject line of the email to facilitate processing.
 - b) The amended LLIR form must be completed and signed to be valid.
 - c) Section 4 of the LLIR form must include a detailed description of the proposed change to the interconnection and all information necessary to support BPA’s evaluation of the proposed change.
 - (i) BPA may require the Transmission Customer to provide additional information if necessary to evaluate a proposed change.
- 3) Within 30 Calendar Days of receipt of a request for change, BPA will assess the change request and notify Transmission Customer of whether the proposed change is:

Commented [CR10]: This language implies that any change to reports or study notes would require a new LLIR. Does the submission of a material change LLIR mean the original submission date is lost?

a) Nonmaterial; or

b) A material change.

(i) A material change is a change that 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.

(ii) The following are always deemed material changes:

1. Increases to the originally requested load.
2. Change of the POD, including a change in voltage class, after a single POD has been established in the study process.
3. Decreases in power factor.

4) Within 15 Calendar Days after BPA sends the determination of whether a change is nonmaterial or a material change, the Transmission Customer shall provide BPA notice via email to interconnection@bpa.gov to either rescind or proceed with the requested change.

- a) If such notice is not received within 15 Calendar Days after BPA's determination is sent, the request for the proposed change will be deemed rescinded.
- b) If the change is deemed a material change, in order to proceed, the Transmission Customer must withdraw the existing LLIR and submit a new LLIR.

F) Line and Load Interconnection Feasibility Study (LLI FES)

1) Upon determining that conducting an LLI FES is necessary, BPA will provide the Transmission Customer the following within 30 Calendar Days of the kickoff meeting:

- a) A notice of intent (NOI) to study at BPA's cost; or
- b) An LLI FES Agreement and non-binding, good-faith estimate of the costs to complete the LLI FES.

2) Within 15 Business Days of receiving an LLI FES Agreement, the Transmission Customer must provide BPA:

- a) An executed LLI FES Agreement and a deposit for the LLI FES equal to the estimated cost of study; or
- b) A request for a Self-Study Agreement.

3) BPA will endeavor to complete the LLI FES within 180 Calendar Days of when BPA issues the NOI or receives the executed and funded LLI FES Agreement.

4) Upon completion of the LLI FES, BPA will provide the Transmission Customer with the LLI FES report.

- a) Within 30 Calendar Days of providing the LLI FES report BPA will schedule an LLI FES review meeting.

Commented [CR11]: The material change language creates barriers and disincentives to providing updated forecasts and facilities information.

Commented [CR12]: Is this applicable to increases and decreases in requested load? Should it be assumed that a change to the timing of the load is also a material change?

Commented [CR13]: Propose to develop a self study agreement and include it by reference in the business practice. Self study conditions may best be further described in a stand alone section.

For sections F, G, and H we propose reference to a new Self-Study section describing how customers and BPA will agree to such actions. Example language is provided below.

NEW SECTION – Self Study

XXX) Self-Study

- 1) Upon requesting a Self-Study Agreement, BPA will provide the Transmission Customer within 30 Calendar Days an agreement. Within the Agreement BPA will describe;
 - a) Parameters of the study, and
 - b) Time constraints for when the study will be completed and submitted to BPA, and
 - c) Description of how study results are to be formatted for submission to BPA.
- 2) Upon receiving Self-Study documentation, BPA will review the materials and notify the Transmission Customer accepting the report or of any study deficiencies needing to be resolved.
 - a) Customer will have 30 Calendar Days to resolve study deficiencies and resubmit the results to BPA.
- 3) Within 30 Calendar Days of accepting the self-study materials, BPA will schedule a review meeting.

Commented [CR14]: Draft language describing a self study process.

I) Post-Study Agreements

- 1) BPA will offer the Transmission Customer an agreement to design, procure, and build transmission facilities and equipment identified as necessary in the LLIR study process within 60 calendar days of the LLI FAS review meeting.
 - a. Agreement type, such as a Preliminary Engineering Agreement (PEA), Engineering and Procurement (E&P), or Construction/General Agreement, will be determined by scope of the interconnection and estimated schedule.
 - b. BPA will identify funding required with an agreement.
 - c. Any environmental or cultural compliance obligations will be outlined in the agreement. 2. No later than 30 Business Days after receipt of an agreement, the Transmission Customer must return the executed agreement and any required funding.
- 2) Upon Customer request, BPA within 60 calendar days will offer the Transmission Customer a Self-Design, Self-Procure, and/or Self-Build agreement.
 - a. Such agreements will be determined by scope of the interconnection and estimated schedule.
 - b. BPA will identify funding required with an agreement.
 - c. Within the agreements BPA will outline BPA's evaluation and approval process and timelines.
 - d. No later than 30 Business Days after receipt of an agreement, the Transmission Customer must return the executed agreement and any required funding.

Commented [CR15]: Proposed customer design, procure, build language.

We appreciate the opportunity to offer comments. Please reach out with any thoughts or questions

Chris Roden
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Clatskanie PUD