

Please accept the following comments on BPA Transmission Services draft business practice on Integration Services.

[http://transmission.bpa.gov/ts\\_business\\_practices/Content/PDF\\_files/Integration Serviices/Integration Services V1 OFC.pdf](http://transmission.bpa.gov/ts_business_practices/Content/PDF_files/Integration_Serviices/Integration_Services_V1_OFC.pdf)

- We appreciate BPA Transmission staff's efforts to provide more information to potential generation integration customers. The Integration Services, Version 1 business practice is moderately informative in that regard, but our staff still has not been able to find one document that serves as a roadmap through the maze of BPA interconnect/transmission documents for small generators. The only thing that seems well-defined in new customer documentation (Doing Business with Transmission Services) is how to pay BPA. It may be helpful for BPA to put a link to a more global introductory document such as the recently completed guides by the Bonneville Environmental Foundation (<http://www.b-e-f.org/business/files/downloads/2012/08/bef-pug.pdf>) in the area of "Becoming a Customer" or "Doing Business Section" of the BPA Transmission public website. In general, a better guideline on the Doing Business with Transmission Services page might be a superior way to handle getting more clarification out in this area than a business practice. For generators that actually need to interconnect and transmit power across BPA's bulk transmission system there is adequate rules in the OATT, existing business practices and contracts. There should be an opportunity for all generators to obtain these services, but not a requirement on very small generators.
- Some small generators and likely many BPA Transmission customers are not aware they need "integration" services from BPA if they do not meet the normal characteristics of a merchant generator looking to move bulk power across BPA's bulk transmission system. Traditionally, small projects less than 3 MVA could just run to load in a local distribution system unless they needed to resell across BPA's system, which more often than not does not make economic sense for very small projects. Outside of BPA, many retail customers that are used to dealing directly with their local distribution provider may not be aware that BPA separates its Transmission Service, Interconnection, and Reliability processes or that they even need Balancing Authority services. Since small generators less than 3 MW nameplate are so far under the NERC Registry criteria of 25 MVA individually or 75 MVA in aggregate for Generation Owners there doesn't appear to be any NERC/WECC basis for a BAASA for integration-only customers and if they are not directly "connected" to BPA. There also doesn't appear to be any OATT jurisdiction unless they want to move bulk power across BPA Transmission. The only basis seems to be that BPA Power requires revenue metering to administer Regional Dialogue contracts. This hardly seems adequate justification for BPA Transmission inclusion in three parallel processes directly with BPA Transmission. There is basis for BPA to allow any generator (that can schedule power in whole megawatts) to go through the processes to obtain bulk transmission service from BPA, but there seems to be no basis to "require" this. BPA Transmission should reconsider integration "requirements" for behind-the-meter resources less than 3 MW nameplate.
- Specific comments on the draft business practice language:
  - The draft business practice has some inconsistencies with the document including the example of  $G < 200\text{kW}$  vs.  $G \leq 200\text{kW}$ .
  - The Definitions provide a source of potential confusion. At a local utility a Backup Generator may not be considered a Transmission asset. However, if this

is intended to be Blackstart Resources then that should be specified. The phrase Backup Generator at the local utility level may indicate to some a small generator at a retail consumer location. There are likely lots of very small backup generators throughout BPA's service territory that are not directly connected to BPA and are not in scope here.

- "Generation Serving Local Load" seems to be a new name for "Generation Behind the Meter", suggest that instead of creating a new name for something, just use "Generation Behind the Meter"
- Integration Services definition, what scheduling, dispatch, and Control Area services does a 200 kW "Generation Behind the Meter" resource really need? What is the small generator really getting for signing all these agreements, seems like this should be better defined, especially for a non-scheduled very small resource run to load that is not noticeable at the BPA point of interconnection from a load following standpoint.
- Generation Owner should not be capitalized in the Business practice because most, if not all of the generators with nameplate less than 25 MW are not Generation Owners under the NERC registry. Mixing NERC requirements that don't apply to small generators into the business practices should be avoided.
- Integration Requirements, Number 2, should be changed to say that the Generator "may" register. As it is unclear what utilization of services would actually occur for resources less than 1 MW not directly connected to BPA.
- Section D.1 should be changed to indicate that a BAASA "may" be required.

Thanks,

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