FERC Technical Conference
Review of Generator Interconnection
Docket Nos. RM16-12-000 and RM15-21-000
May 13, 2016, Washington, DC

Panel Discussion Topics - Idaho Power's Submission

Transparency and Timing in the Generator Interconnection Study Process

1. The length of time it takes to complete the interconnection process, causes of variances in receiving study results, causes of variances in length of time in the queue, and how delays (and their causes) are reported to interconnection customers.
    - Idaho Power adheres to the timelines set forth in the OATT for interconnection studies. Generally, a large generator customer will complete the interconnection process in 18 – 24 months and a small customer will complete the process in 10 – 18 months. The variances in receiving study results and variations in length of time in the queue are mostly a result of incorrect, incomplete, or inappropriate data submissions by the interconnection customer. Additionally, restudies may result in delays. Each reason for delay, and the specific action that is required by either party, is reported to the customer via letter, phone call, and/or email.

2. How study costs are determined, how consistent these costs are between markets and regions, whether (and how) interconnection customers are made aware of study costs in advance of requesting interconnection service.
    - Study costs are determined and billed based on actual study time by Idaho Power or contract personnel (generally engineer hours). A detailed summary of hours worked and associated charges are accompanied with each invoice.

3. The information (models, assumptions, cost estimates, etc.) interconnection customers currently have access to and the stage in the interconnection process such access is provided (pre-request, study stage, etc.). Whether additional information (historical and/or projected curtailment or pricing information, etc.) should be available to interconnection customers to assist them in planning projects, and the challenges and/or barriers to providing this information.
    - Models and assumptions are discussed at the scoping meeting and are documented along with cost estimates in each Study Report. Modeling data are made available upon request and subject to applicable NDAs.

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4. How the capacity factor used for variable generation modeling is determined (in general terms) and shared with interconnection customers.
    - Idaho Power studies the interconnecting resource at 100% of its rated output. The resources located in the same geographical area are modeled at historical coincidental peaks. For solar PV interconnection studies, resources located in the same geographical area are modeled at historical coincidental peak during daytime hours. These assumptions are explained to the customer during the scoping meeting.

5. The triggers for restudy, how they are determined, and whether they are stated in the tariff. The possible effect that limiting the number of restudies would have on reliability or cost estimates, allocations, or assignments.
    - The triggers for restudy are based on factors that would change the customer's interconnection costs (e.g. a higher queued customer modification, withdrawal and the customer's modification to the interconnection request). These triggers are stated in the OATT. Idaho Power will not allow an interconnection to adversely impact reliability or shift costs to other transmission customers. Thus, limiting the number of restudies may adversely impact the Interconnection Customer when their interconnection is assigned costs at the time of interconnection without prior notice through a restudy. Idaho Power has found that most restudies can be completed quickly and in parallel with the current interconnection study phase.

Other Interconnection Queue Coordination and Management Issues

Speakers should be prepared to discuss the following topics:

1. Coordinating interconnection requests with affected systems and the challenges associated with affected system coordination and areas for improvement.
    - Coordinating interconnection requests with affected systems is challenging, due to each utility frequently having different interconnection requirements. The tariff is unclear whether the Interconnection Customer should work and contract directly with the Affected System, or whether the Interconnection Customer should work through the Transmission Provider to coordinate with the Affected System.

2. The types of changes to a project that should be allowed without changing the project's position in the queue, i.e., determining an appropriate threshold for modifications to a project before it should lose its place in the queue.
    - Idaho Power follows the OATT provisions regarding the types of changes allowed without changing queue position. These types of changes include: electrical output (60% at the System Impact and 15% at the Facility Study),

modifying the technical parameters, and extensions of less than three cumulative years in the Commercial Operation Date

3. How to manage the effects of project withdrawals from the interconnection queue and possible best practices to keep the queue moving despite project withdrawal. The appropriate balance between attempts to prevent speculative projects from entering the queue and the recognition that the study process is designed to iteratively provide information that project developers will use to decide whether to proceed or withdraw (possibly causing restudies).
    - In order to keep the queue moving, at any given time, both Idaho Power and the Interconnection Customer know which party has an action item and when that action is due. Additionally, Idaho Power informs lower queue projects of all Network Upgrades assumed in service due to higher queued projects when studying their interconnection. The transparency associated with the higher queued projects allows lower queued projects to prepare for higher queued project withdraws. Through transparency and constantly enforcing due dates, Idaho Power has managed to keep the queue moving, and quickly produce project restudies, despite project withdrawal.

4. How transmission providers, transmission owners, and interconnection customers coordinate during the interconnection process, and possible areas for improvement.
    - Coordination between the TP and the Interconnection Customer is sufficient and is directly related to the desired involvement of the Interconnection Customer. Idaho Power believes there is an opportunity for improved clarity for the coordination between TPs and Affected Systems.

5. Technologies, tools, or administrative processes that could improve the accuracy of cost and time estimates, reduce the processing time, or increase the efficiency of the interconnection queue process.
    - During times of heavy volume, we have augmented with contractors to maintain the ability to process the studies within the OATT timelines. In order to reduce processing time, and increase the efficiency of the interconnection queue process, Idaho Power supplies information on our website regarding the process to make the process more transparent to all involved. This minimizes routine questions to allow our point of contact to effectively manage the queue.