

**Western Area Power Administration (WAPA)
Interconnection Requests Below the Generating Facility Capacity
Business Practice**

The Federal Energy Regulatory Commission’s Order No. 845 required Transmission Providers to include in their Large Generator Interconnection Procedures (LGIP) a process for considering requests for Interconnection Service below the Generating Facility Capacity. To comply with this requirement, WAPA included in its LGIP Section 3.1 a combination of *pro forma* and non-*pro forma* language providing that:

Interconnection Customer may request a level of Interconnection Service below the Generating Facility Capacity. These requests for Interconnection Service shall be studied at the Interconnection Service Level^[1] requested for purposes of Interconnection Facilities, Network Upgrades, and associated costs, but may be subject to other studies at the full Generating Facility Capacity to ensure safety and reliability of the system, with the study costs borne by the Interconnection Customer. If after the additional studies are complete, Transmission Provider determines that additional Network Upgrades are necessary, then Transmission Provider must: (1) specify which additional Network Upgrade costs are based on which studies; and (2) provide a detailed explanation of why the additional Network Upgrades are necessary. Any Interconnection Facility and/or Network Upgrade costs required for safety and reliability also will be borne by the Interconnection Customer. Interconnection Customers may be subject to additional control technologies as well as testing and validation of those technologies consistent with Article 6 of the [Large Generator Interconnection Agreement (LGIA)]. The necessary control technologies and protection systems shall be established in Appendix C of the executed LGIA. The provisions related to requests and studies for an Interconnection Service Level below the Generating Facility Capacity are set forth in Sections 3.1, 6.3, 7.3, and 8.2 of this LGIP, and in Section 5.j of Appendix 1 to this LGIP.

WAPA’s process for requesting an Interconnection Service Level below the Generating Facility Capacity is as follows:

- (1) Requests for Interconnection Service at a level below the Generating Facility Capacity shall be identified in the Interconnection Customer’s Interconnection Request (Appendix 1 to

¹ In its Order No. 845 compliance filing, WAPA added to its LGIP Section 1 the new non-*pro forma* term Interconnection Service Level, which is defined as “the maximum amount of electrical output (MW) requested by the Interconnection Customer to be injected at the Point of Interconnection.”

- WAPA's LGIP). Any control technologies proposed by the Interconnection Customer to restrict the Generating Facility's output to the requested Interconnection Service Level must be identified in the project description at the beginning of the study process.
- (2) Following the Scoping Meeting, the Interconnection Customer shall confirm the Interconnection Service Level it is requesting. Upon WAPA's confirmation of the requested Interconnection Service Level, the Interconnection Customer will not be allowed to modify the requested Interconnection Service Level except as allowed under section 4.4 of WAPA's LGIP. WAPA will inform the Interconnection Customer which studies (e.g., steady-state, short circuit/fault duty, and/or dynamic stability analysis) will be performed at which Generating Facility Capacity level.
 - (3) WAPA will determine the need for any Interconnection Facilities, Network Upgrades, and associated costs required for interconnection of the Interconnection Customer's Large Generating Facility at an Interconnection Service Level below the Generating Facility Capacity. After accounting for any proposed control technology, WAPA may determine based on Good Utility Practice and related engineering considerations that for safety and/or reliability purposes, the Interconnection Request must also be studied assuming the nameplate maximum Generating Facility Capacity is injecting energy onto WAPA's Transmission System at the Point of Interconnection. WAPA will make this determination during the Interconnection System Impact Study and will provide the Interconnection Customer results of such study with the full results of the Interconnection System Impact Study.
 - (4) If WAPA determines that any additional studies are necessary, it will notify the Interconnection Customer upon completion of the Interconnection System Impact Study. The Interconnection Customer will be required to execute any requisite study agreements for additional studies that WAPA determines are necessary and will be responsible for any additional study costs. If after the additional studies are complete, WAPA determines that additional Network Upgrades are necessary, then WAPA will: (a) specify which additional Network Upgrade costs are based on which studies; and (b) provide a detailed explanation of why the additional Network Upgrades are necessary.
 - (5) An Interconnection Customer requesting an Interconnection Service Level below the Generating Facility Capacity will be required to install system protection and control technologies (e.g. Plant Power Controller) in order to maintain the Generating Facility's output at the Interconnection Service Level studied and memorialized in the LGIA. The design, installation, ownership, and operation of these control technologies will be subject to WAPA's review and discretion in consideration of relevant technical details, reliability requirements, and Good Utility Practice. WAPA will identify any system protection and

control technologies it will install, or will require Interconnection Customer to install, as accurately as possible in the results of the Interconnection System Impact Study, with more specific requirements detailed during the Interconnection Facilities Study process. The required control technologies and protection systems shall be identified in Appendix C of the LGIA. The Interconnection Customer may be required to install, or be responsible for the costs of WAPA installing, additional control technologies as well as testing and validation of those technologies consistent with Article 6 of WAPA's LGIA.

- (6) In accordance with Order No. 845,² WAPA will enforce Interconnection Service Level limits contained in an LGIA pursuant to the terms therein, including, but not limited to, seeking indemnification or damages from the Interconnection Customer, disconnecting or curtailing the Large Generating Facility, or terminating the LGIA. Additionally, any injection of energy by the Generating Facility onto WAPA's Transmission System in excess of the associated Transmission Service reserved on WAPA's Transmission System may incur Unreserved Use Penalties pursuant to the terms of Schedule 10 of WAPA's Open Access Transmission Tariff.

Environmental Review/Operating Guide Requirements:

Generating Facilities that the Transmission Provider grants Interconnection Service at a value less than the Generating Facility Capacity shall be subject to the Transmission Provider's Environmental Review requirements for the full Generating Facility Capacity prior to interconnection or energization from Transmission Provider's Transmission System, and to any other necessary operating restrictions and coordination requirements outlined in operating guides that the Transmission Provider will develop. These provisions will be specified in the Interconnection Customer's LGIA.

² Order No. 845 at P 417; and Order No. 845-A at P 114-116.