

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2349

In the Matter of

IDAHO POWER COMPANY,

Application for Revision of Interconnection
Procedures.

ORDER

DISPOSITION: STAFF’S RECOMMENDATION ADOPTED WITH MODIFICATIONS

This order memorializes our decision, made and effective at our January 7, 2025 Regular Public Meeting, to adopt Staff’s recommendation in this matter as modified. We adopt Staff’s recommendations with the exception of recommendation six, regarding addressing storage resource provisions in a different forum. The Staff Report with the recommendations is attached as Appendix A.

Made, entered, and effective Jan 08 2025.

Megan W. Decker
Chair

**COMMISSIONER TAWNEY WAS
UNAVAILABLE FOR SIGNATURE**

Letha Tawney
Commissioner

Les Perkins
Commissioner



A party may request rehearing or reconsideration of this order under ORS 756.561. A request for rehearing or reconsideration must be filed with the Commission within 60 days of the date of service of this order. The request must comply with the requirements in OAR 860-001-0720. A copy of the request must also be served on each party to the proceedings as provided in OAR 860-001-0180(2). A party may appeal this order by filing a petition for review with the Circuit Court for Marion County in compliance with ORS 183.484.

ITEM NO. RA3

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: January 7, 2025**

REGULAR X CONSENT _ EFFECTIVE DATE January 8, 2025

DATE: December 30, 2024

TO: Public Utility Commission

FROM: Ted Drennan

THROUGH: Caroline Moore, Scott Gibbens, and Curtis Dlouhy **SIGNED**

SUBJECT: IDAHO POWER COMPANY:
(Docket No. UM 2349)
In the Matter of Application for Revision of Interconnection Procedures.

STAFF RECOMMENDATION:

Staff recommends the Oregon Public Utility Commission (Commission) approve Idaho Power Company's (IPC) application for revision of interconnection procedures with modifications as discussed below.

DISCUSSION:

Issue

Whether the Commission should approve IPC's application for revision of interconnection procedures.

Applicable Rule or Law

OPUC has adopted rules and policies for how large and small Oregon-jurisdictional generators, i.e., Qualifying Facilities (QFs), interconnect under the Public Utility Regulatory Policies Act (PURPA) and Oregon law.

In 2009, the Commission adopted OAR Division 82 of Chapter 860 Small Generator Interconnection Rules, which outline the interconnection requirements for Oregon-jurisdictional generators up to 10 MW in size.¹

¹ *In the Matter of Public Utility Commission of Oregon Staff's Investigation Relating to Electric Utility Purchases from Qualifying Facilities*, Docket No. UM 1129, Order No.07-360 (Aug. 20, 2007).

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As part of the investigation into interconnection of PURPA Qualifying Facilities (QF), the Commission issued Order No. 10-132 in Docket No. UM 1401, in which the Commission established standard large generator interconnection procedures (LGIP) for generators 20 MW and larger and adopted a standard Large Generator Interconnection Agreement (LGIA).

In Order No. 24-068, the Commission adopted new rules and amendments to existing Division 82 interconnection rules for small generators.

Background

IPC currently uses a serial approach when studying interconnection requests from generators. That is, a first-come, first-served process. This is the same approach followed by Portland General Electric, while PacifiCorp transitioned in 2020 from a serial approach to a cluster study approach for Oregon as approved by the Commission in Order No. 20-268. Under a cluster study, generator requests are studied together in geographic clusters and costs are allocated between generators in a cluster according to an approved methodology. The cluster study process focuses on to a first ready, first served approach.

The Federal Regulatory Energy Commission (FERC) issued a new rule “to reform procedures and agreements that electric transmission providers use to integrate new generating facilities into the existing transmission system,” on July 28, 2003. Order 2023 and 2023-A adopted reforms designed to, “reduce backlogs for projects seeking to connect to the transmission system, improve certainty in the interconnection processes managed by the dozens of transmission providers around the country, and ensure access to the transmission system for new technologies.”

The reforms included requiring transmission providers to replace traditional serial process evaluation of interconnection requests with a cluster study approach. The approach also required penalties for both applicants who dropped out of the study process (a problem requiring often multiple rounds of re-studies) and on transmission providers to complete studies in a timely manner.

IPC has followed a serial process for both Oregon- and FERC-jurisdictional interconnection applicants. In this docket they seek to implement a cluster-study approach for Qualifying Facility (QF) interconnections larger than 20 megawatts, which are under Commission jurisdiction. This process would be aligned with that required under FERC Order 2023. For clarity, the Company did not incorporate small QFs (less than 20 MWs) in their current state-jurisdictional proposal.

IPC’s proposed approach at the state level, in general, mirrors that used on the federal level, which was approved by FERC on March 21, 2024. This was the same day FERC

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issued Order 2023-A, providing additional clarification and revisions for Order 2023. IPC submitted a second compliance filing to implement changes FERC directed in both the IPC approval order, and Order 2023-A. FERC approved this filing, with required modifications on September 19, 2024.

Several deviations between the IPC filings at the federal and state levels are highlighted in the analysis below, as are Staff's recommendations on dealing with these differences. Also of note, are FERC Order 845 policies from 2018 that are not incorporated into IPC's Oregon jurisdictional interconnection procedures and agreements. Staff addresses these as well below.

Analysis

IPC is seeking Commission approval of modifications to QF-LGIP and QF-LGIA for their request submitted to the Commission on October 11, 2024. The Company's filing is in line with their compliance filing made at the Federal Energy Regulatory Commission (FERC). That filing addressed the requirements of FERC Order No. 2203 on October 2, 2023, which was approved on March 21, 2024. The approval required additional changes, which the Company incorporated into a second compliance filing. This second filing, submitted on May 14, 2024, also addressed additional FERC clarifications contained in Order No. 2023-A. The second compliance filing was approved by FERC September 19, 2024.

Comments were received from the Interconnection Trade Association (ITA) which includes Community Renewable Energy Association ("CREA") and the Renewable Energy Coalition. Reply comments were submitted by the Company. Below Staff discusses concerns raised, responses, and makes recommendations for moving forward.

Inclusion of Penalties for Late Studies

As part of FERC Order 2023, penalties are assessed on the utility if studies are not completed timely. FERC's decision to impose penalties is based on its conclusion delays in studies were unjust and unreasonable.² FERC determined that the reasonable efforts standards were not working to address delays:

The reasonable efforts standard worsens current-day challenges, as it fails to ensure that transmission providers are keeping pace with the

² See paragraph 964 of Order 2023 which states, in part: "*We adopt these reforms to remedy the unjust and unreasonable rates stemming from interconnection queue backlogs and to ensure that interconnection customers are able to interconnect to the transmission system in a reliable, efficient, transparent, and timely manner. Specifically, these reforms will help ensure more timely processing of interconnection requests by incentivizing transmission providers to meet interconnection study deadlines.*"

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changing and complex dynamics of today's interconnection queues.³

FERC noted that interconnection customers, "face financial harm when study deadlines are not met, ultimately inhibiting their ability to interconnect to the transmission system in a reliable, efficient, transparent, and timely manner."⁴

Under the framework adopted by FERC, penalties increase as the study process progresses, as shown in the following table.

Study	Late Penalties
Cluster Study:	\$1,000 per business day
Cluster Restudies:	\$2,000 per business day
System Study:	\$2,000 per business day
Facility Study:	\$2,500 per business day

FERC requires the utilities to distribute the value of the penalty among the generators participating in the delayed study on a per request basis. The penalties do not kick in until the third cluster and include exceptions and grace periods for missing deadlines.

IPC has adopted the penalty framework in their FERC-jurisdiction tariffs, but not in the Oregon-jurisdictional tariffs, an issue raised by ITA. The Company states this is an issue to be examined in UM 2111.

Staff understands that there is time to discuss study timelines for Oregon generators in UM 2111 before IPC opens its third cluster. However, imposing penalties for late studies is a key interconnection policy reform resulting from FERC Order 2023 and Staff believes that it is more efficient and fair to put consistent penalties in place now than to leave the LGIP unbalanced against Oregon generators until the outcome of UM 2111. Staff sees the FERC study timelines and penalties as a reasonable jumping off point for UM 2111, which can focus more on delays for small generators and delays that occur after the study process.

Staff notes that enforceable timelines can cause utilities to be less flexible with generator requests for deadline extensions because they increase the utility's risk of missing their own deadline. In this case, including Oregon generators will not impose new timeline requirements on the Company. But it may reenforce the consequences of missing the timelines already required by FERC.

On balance, Staff believes that it is more efficient and fair to apply the FERC penalty

³ Order 2023 Paragraph 967.

⁴ Order 2023 paragraph 971.

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framework to Oregon-jurisdictional generators now.

Applicant Withdrawal Penalties

In opening comments, Staff argued for the Company to put caps on penalties for QFs who withdraw from the cluster study process. The reasoning was the penalties could be onerous to QFs, given their small scale and financing concerns.⁵ These caps would be consistent with caps put in place when PacifiCorp moved to cluster studies. The table below shows the proposed penalties, as well as those proposed by the Company. To be clear, the penalties faced by the withdrawing applicant would be “based either on the actual study costs or on a percentage of the interconnection customer’s assigned network upgrade costs, depending on what phase the interconnection customer withdraws its interconnection request.”⁶ These costs would be based on the costs attributable to the interconnection customer.⁷

Phase of Withdrawal	Total Withdrawal Penalty Proposed (if greater than study deposit)	Penalties from Order 20-268	
		Withdrawal Penalty	Penalty Cap
Initial Cluster Study	2 x study costs	2X actual study costs	\$1 million
Cluster Restudy	5% of Network Upgrade costs	3X actual study costs	\$1.5 million
Facilities Study	10% of Network Upgrade costs	5X actual study costs	\$2 million
Upon execution of, or after a request to file unexecuted, the LGIA	20% of Network Upgrade costs	9X actual study costs	No Cap

The Company argues that caps on withdrawal penalties are not warranted and will undermine the interconnection reforms. Allowing QFs to withdraw for reduced costs due to the caps may encourage them to stay in the process longer, causing further delays if withdrawn in later stages of the process.

⁵ Staff Comments, page 1.

⁶ FERC Order 2023, paragraph 791.

⁷ FERC Order 2023, paragraph 791 clarifies this “as the greater of the study deposit or: (1) two times the study cost if the interconnection customer withdraws during the cluster study or after receipt of a cluster study report; (2) 5% of the interconnection customer’s identified network upgrade costs if the interconnection customer withdraws during the cluster restudy or after receipt of any applicable restudy reports; (3) 10% of the interconnection customer’s identified network upgrade costs if the interconnection customer withdraws during the facilities study, after receipt of the individual facilities study report, or after receipt of the draft LGIA; or (4) 20% of the interconnection customer’s identified network upgrade costs if, after executing, or requesting to file unexecuted, the LGIA, the interconnection customer’s LGIA is terminated before its generating facility achieves commercial operation.”

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Some of Staff's concerns have been alleviated in further review of FERC Order 2023. Providers can only assess a withdrawal penalty if said withdrawal has a "material impact on the cost or timing of any interconnection requests with an equal or lower queue position."⁸ The order also allows for exemption from withdrawal penalties in cases where network costs increase substantially.⁹ FERC also states, "potential interconnection customer will have access to heatmap information, as required in this final rule, that will allow it to evaluate project feasibility without a financial commitment and thereby avoid potential withdrawal penalty risk."¹⁰ Given the protections afforded interconnection customers, and the proposal to only include large generators in the cluster, Staff believes the current IPC proposal without caps is sufficient.

QF-LGIA Article 2.2 Term of Agreement

IPC's QF-LGIA provides a ten-year term, or such other longer period as agreed upon by the parties. Following that term, the customer can renew in one-year increments if they provide notice of intent to renew and the Company doesn't identify a material change in circumstances that requires a new LGIA. The conditions under the term of agreement seem to offer less favorable options to QFs as compared to non-QF generators. Staff believes the QF-LGIA should not be stricter than the LGIA for non-QFs, and issue raised by the ITA. In response, IPC pointed to past Commission decisions that allow for one-year extensions, following an initial 10-year (or longer) term. The FERC LGIA term does not require notice, and includes no provision to account for material changes. The IPC suggests incorporating this approach for QFs, "prevents the Company from reasonably updating a QF's interconnection requirements as interconnection and reliability standards evolve over time, essentially locking in requirements that could become obsolete over an interconnection agreement that could last in perpetuity."

It is unclear to Staff why this is not an issue with all generators, only with QFs. Given no explanation by the Company, Staff is inclined to agree with the ITA that standards applicable to QFs should not be more onerous than those afforded to non-QFs.

Affected systems

ITA raise concerns related to unequal treatment of QFs under requirements related to Affected Systems Study process. FERC's final rule requires a detailed process for studying the impacts of proposed generating facilities on neighboring transmission

⁸ FERC Order 2023, paragraph 783.

⁹ FERC Order 2023, paragraph 784 states: "(1) the interconnection customer withdraws its interconnection request after receiving the most recent cluster study report and the network upgrade costs assigned to the interconnection customer's request have increased 25% compared to the previous cluster study report, or (2) the interconnection customer withdraws its interconnection request after receiving the individual facilities study report and the network upgrade costs assigned to the interconnection customer's request have increased by more than 100% compared to costs identified in the cluster study report."

¹⁰ FERC Order 2023, paragraph 786.

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systems, known as “affected systems.” ITA noted most of the requirements related to affected systems would not be applicable on a state or Commission-jurisdictional level but noted sections of IPC’s FERC LGIP that would be applicable. These include Articles 3.6 and 11.2.1.

IPC has agreed to incorporate additional provisions in Sections 3.6.1, 3.6.2, and 3.6.3 to align with the FERC-jurisdictional tariff. Similarly, the Company has also agreed to incorporate additional language in Article 11.2.1. Staff believes this addresses issues raised by the ITA.

Reduction in Capacity

The ITA point to Articles 4.4.1 and 4.4.2 in the QF-LGIP, which omit the clarification included in the FERC-jurisdictional LGIP that allows customers to decrease interconnection capacity by decreasing plant size or decreasing interconnection service level. Staff believes the approach aligns with the requirements adopted by the Commission in AR 659, where the generator is examined on the basis of ‘nameplate rating’ as opposed to ‘nameplate capacity’. The generator is able to use power control systems to limit what energy is put on the grid, similar in nature to ‘decreasing the interconnection service level’. IPC has agreed to incorporate the additional language in its QF-LGIP.¹¹

Storage Resource Provisions

ITA calls for the QF-LGIP to align with the FERC-jurisdictional tariff, stating “there is no reason to exclude this provision from the QF LGIP.” IPC disputes this contention, arguing that QFs face different charging constraints as compared to non-QFs. In the OATT the transmission provider may study the operating assumptions for storage resources, such as the ability to charge or not at peak load timeframes. Such limitations on charging and discharging can be assumed for non-QFs, but not for QFs, where the Company is subject to must-take obligations. Due to fundamental differences between the categories of generation, this is an issue that should be addressed in a different forum, with a more developed record. As such, Staff does not believe changes to address storage are warranted at this juncture.

QF LGIA Article 2.3.4 - Change in Qualifying Facility Status

Concerns raised here address the provision in the QF LGIA that would terminate the agreement if the interconnection is subject to FERC interconnection jurisdiction instead of facilitating a transition to FERC agreement, or the reverse. The article in question states the interconnection will be FERC jurisdictional if, “at any time during the term (sic) of this QF-LGIA, all or a portion of the output of the Qualifying Facility is scheduled to be, or is, sold to someone other than Transmission Provider.”¹² Staff agrees with the

¹¹ IPC Reply Comments, page 8.

¹² Idaho Power Company’s Reply Comments, page 15.

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Company that under such a scenario the interconnection customer would be FERC-jurisdictional, and not be governed by the QF-LGIA. Staff understands that the transitioning QF would not need to submit a new interconnection request, which should alleviate concerns raised by the ITA.

QF-LGIA Article 5.14 – Permits

Under Article 5.14 IPC has agreed to add language proposed by ITA to provide permitting assistance to the QF. The specific language to incorporate from the FERC LGIA is as follows:

With respect to this paragraph, Transmission Provider or Transmission Owner shall provide permitting assistance to Interconnection Customer comparable to that provided to Transmission Provider's own, or an Affiliate's generation.

Staff believes this should address concerns raised.

QF-LGIA Article 6.2 – Post Commercial Operations Date Testing and Modifications

The ITA advocate for the OPUC jurisdiction tariff to align with the FERC LGIA, requiring the utility to pay the costs associated with company-required testing arguing there is no reason for disparate treatment. IPC argues that any such arrangement would switch the cost burden from the QFs to utility ratepayers, something contrary to Commission policy. Staff agrees with the Company on this point, and does not support the ITA position. The UM 2111 docket is poised to look at costs, and responsibilities at a future phase of the investigation. At that time there can be a more fulsome discussion on the topic as warranted.

QF-LGIA Articles 11.3 & 11.4 – Network Upgrade Refunds

The ITA also argue for refunds for Network Upgrade costs, claiming OPUC policy "states customers may obtain refunds if the upgrades provide a system benefit."¹³ IPC counters that ITA does not "accurately implement Commission precedent."¹⁴ IPC further argue a refund would only be appropriate if it funds the Network Upgrades upfront, something the Commission does not require. Given this approach, the ITA argue refunds are unnecessary unless the QF is required to pay the upfront costs. In addressing Affected Systems, the Company argues this is something for the QF to address directly with the Affected System.

Staff believes the IPC approach is appropriate within the scope of this investigation and consistent with the Commission's latest guidance in Order No. 23-005.

¹³ ITA comments, page 12.

¹⁴ Idaho Power Company's Reply Comments. page 18.

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QF-LGIA Article 13 – Emergency Conditions

To make the QF LGIA and FERC LGIA align, the ITA suggests incorporating the definition of “Emergency Condition” in Section 13 of the QF LGIA. IPC does not object to this inclusion, but questions why the term should be defined twice, first in Article 1 with the other definitions, and also in Article 13. Staff believes the term only needs to be defined one time, and inclusion in Article 1 should be sufficient.

FERC Order 845 Issues

According to the Company, ITA included four recommendations that would implement reforms adopted by FERC in 2018 in Order No. 845.¹⁵ IPC notes, “Neither the Commission nor stakeholders have previously sought to implement these reforms in Oregon.”¹⁶ They argue these reforms are outside of the scope of the UM 2349 filing.

Staff agrees that the Order 845 reforms are outside of the requirements of FERC Order 2023, however sees no reason to delay getting the QF LGIP in line with these updates to the FERC LGIP.¹⁷ The Company has experience with the reforms, as they are incorporated in their existing LGIP. Staff believes implementation of the reforms could ease interconnection issues for QFs, and would put them in a similar position as the non-QF generators. The cited reforms are discussed briefly below.

Surplus Interconnection Policy

In Order 845 FERC determined:

We affirm that requiring transmission providers to establish an expedited process, separate from the interconnection queue, for the use of surplus interconnection service could reduce costs for interconnection customers by increasing the utilization of existing interconnection facilities and network upgrades rather than requiring new ones, improve wholesale market competition by enabling more entities to compete through the more efficient use of surplus existing interconnection capacity, and remove economic barriers to the development of complementary technologies such as electric storage resources that may be able to easily tailor their use of interconnection service to adhere to the limitations of the surplus interconnection service that may exist. Further, we find that facilitating the use of surplus interconnection service could improve capabilities at existing generating facilities, prevent stranded costs, and improve access to the transmission system.

¹⁵ Idaho Power Company’s Reply Comments, page 10.

¹⁶ Idaho Power Company’s Reply Comments, pages 10-11.

¹⁷ Per Commission Order No. [UM 1401, the QF LGIP and QF LGIA follow the FERC LGIP and LGIA with limited exceptions.](#)

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Staff believes the value that FERC enunciates here for the use of surplus interconnection would be applicable to QFs and non-QFs. As such Staff recommends IPC's QF-LGIP incorporate the same provisions as the non-QF version.

Provisional Interconnection Service Policy

Provisional interconnection service allows generators to interconnect before all studies or necessary transmission upgrades are complete, subject to operating restrictions. Order No. 845 required transmission providers to offer provisional interconnection service to their interconnection customers and grants transmission providers discretion to manage provisional interconnection studies and agreements. IPC states the provisions cited are "neither new nor related to Order No. 2023 and therefore are beyond the scope of this filing."¹⁸

Given the lack of discussion about the benefits and risks of provisional interconnection in this docket, Staff is concerned about the potential implications for safety, reliability, and disputes. Staff is open to considering this as a tool to combat delays in the UM 2111 investigation into interconnection delays.

Permissible Technology Advancement

FERC Order 845 also incorporated technology advancement, calling for transmission providers to identify technological advancements that would not constitute a material modification. Staff agrees with the ITA that incorporating language allowing technological advancement that will not constitute a material modification is important to include in the QF-LGIP. The Commission addressed technology in the UM 2111 investigation; for instance, the AR 659 order directed utilities to work with companies that are developing inverters that would not require additional protection equipment.¹⁹ IPC state their current practices allow "QF interconnections to change technology (e.g., use more advanced inverters) without considering the change a material modification."²⁰ Staff believes the Company should ensure this is clear in the QF-LGIP for transparency.

Option to build

The ITA raised objections to the IPC policy, finding less favorable terms compared to the OATT requirements for an interconnection customer to construct Stand-Alone Network Upgrades and Interconnection Facilities. The Company believes these differences are largely immaterial²¹ but has agreed to incorporate changes that conform the OR QF-LGIP and QF-LGIA to the FERC Counterparts. Staff believes the

¹⁸ Idaho Power Company's Reply Comments, page 11.

¹⁹ Order 24-068 page 2 states, "[W]e expect the utilities to work actively with industry toward specification of an inverter model and a set of standardized configurations that can be safely relied upon without additional equipment."

²⁰ IPC Reply Comments, page 12.

²¹ IPC Reply Comments, page 12.

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Company's changes are appropriate and should resolve the issue raised.

Conclusion

Staff believes the Company's filing satisfactorily incorporates requirements from FERC Order 2023 in order to move to a cluster study process. In its reply comments, Idaho Power addressed many issues raised by stakeholders and Staff. There are however some remaining issues Staff believes should be addressed, including some issues from FERC Order 845. While they may seem out of scope, adoption of these would be in line with Commission precedent without being overly onerous.

Staff's summary recommendations on issues raised in IPC's proposed LGIP and LGIP are as follows:

1. Inclusion of Utility Penalties for Late Studies: Adopt the penalty structure for Oregon-jurisdictional QFs that is required for federal-jurisdictional QFs.
2. Applicant Withdrawal Penalties: Use the same FERC penalties, without caps.
3. QF-LGIA Article 2.2 Term of Agreement: Allow QFs the same flexibility in extensions of contract that non-QFs enjoy.
4. Affected systems: Adopt the changes to the affected systems study process proposed by the ITA, which IPC does not oppose.
5. Reduction in Capacity: Allow QFs to decrease interconnection capacity by decreasing plant size or decreasing interconnection service level, which IPC does not oppose.
6. Storage Resource Provisions: Address in a different forum, QFs face different charging requirements than non-QFs.
7. QF LGIA Article 2.3.4 - Change in Qualifying Facility Status: Changes not needed at this time.
8. QF-LGIA Article 5.14 – Permits: Adopt ITA proposed language, with IPC does not oppose.
9. QF-LGIA Article 6.2 – Post Commercial Operations Date Testing and Modifications: Changes not needed here, QFs have different obligations compared to non-QFs.
10. QF-LGIA Articles 11.3 & 11.4 – Network Upgrade Refunds: Address issue at later point.
11. QF-LGIA Article 13 – Emergency Conditions: No changes needed; definition is incorporated already.
12. FERC Order 845 Issues
 - a. Surplus Interconnection Policy: Incorporate same provisions for QFs as for non-QF.
 - b. Provisional Interconnection Service Policy: Update QF LGIP to allow this option for QFs, consistent with non-QFs.

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- c. Permissible Technology Advancement: Incorporate language allowing for use of advanced equipment and not consider it a material modification. IPC believes this is currently allowed.
- d. Option to build: Conform the Oregon QF-LGIP and QF-LGIA to the FERC counterparts, something IPC does not oppose.

PROPOSED COMMISSION MOTION:

Approve IPC’s application for revision of interconnection procedures with the following modifications:

Include late penalty fees at the state level equal to that at the federal level. (Issue 1)

Study	Late Penalties
Cluster Study:	\$1,000 per business day
Cluster Restudies:	\$2,000 per business day
System Study:	\$2,000 per business day
Facility Study:	\$2,500 per business day

Align QF-LGIA Article 2.2 – Term of Agreement provision with the FERC LGIA term. (Issue 3)

Incorporate additional provisions in Sections 3.6.1, 3.6.2, 3.6.3, and 11.2.1 to align with the FERC-jurisdictional tariff. (Issue 4)

Add clause to QF-LGIP Articles 4.4.1 and 4.4.2 allowing reductions “through either (1) a decrease in plant size or (2) a decrease in Interconnection Service level (consistent with the process described in [Article] 3.1 of this [QF]-LGIP) accomplished by applying Transmission-Provider-approved injection-limiting equipment.” (Issue 5)

Add following language to QF-LGIA Article 5.14, “With respect to this paragraph, Transmission Provider or Transmission Owner shall provide permitting assistance to Interconnection Customer comparable to that provided to Transmission Provider’s own, or an Affiliate’s generation.” (Issue 8)

Align OPUC-jurisdictional tariff with the FERC-jurisdictional tariff, allowing interconnection customers to utilize surplus generation capacity. (Issue 12a)

Align OPUC-jurisdictional tariff with the FERC-jurisdictional tariff, incorporating Permissible Technological Advancement provisions from the FERC LGIP. (Issue 12c)

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Align OPUC-jurisdictional tariff with the FERC-jurisdictional tariff, “incorporate that are not part of an Affected System” in the definition of Stand Alone Network Upgrades.
(Issue 12d)