

Generation Interconnection Business Practices

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1. Site Control Requirements

1.1 Overview

All requests for generating facilities to interconnect to Idaho Power's distribution and transmission system are required to submit demonstrations of exclusive site control. Site control demonstration applies only to the land needed for the generating facility¹ and does not apply to the interconnection facilities or tie lines.

Interconnection requests **not** subject to Idaho Power's Federal Energy Regulatory Commission (FERC) -jurisdictional Large Generator Interconnection Procedures (LGIP) require demonstration of 100% exclusive site control be provided at the time interconnection request is submitted.

Interconnection requests subject to Idaho Power's FERC-jurisdictional LGIP require demonstration of site control at the following three specific points in the interconnection process:

1. Submission of the interconnection request
2. Execution of the Facilities Study Agreement (FSA)
3. Upon execution of the Large Generator Interconnection Agreement (LGIA) or filing of the unexecuted LGIA with FERC

Idaho Power is aware that there are instances in which evidence of site control for interconnection requests subject to the FERC-jurisdictional LGIP cannot be provided due to qualifying regulatory limitations and has developed a definition for and guidance around requirements in these limited circumstances.

This Site Control Requirements Business Practice includes details on the following topics:

- Site Control Demonstrations in LGIP
- Exclusive Site Control
- Acreage Requirements
- Qualifying Regulatory Limitations

¹ FERC Order No. 2023, para. 604

1.2 Site Control Demonstrations in LGIP

1.2.1 Transition Process Site Control Requirements

Interconnection requests with an assigned queue position as of November 1, 2023, are subject to the Procedures for Transitioning to the Cluster Study Process (LGIP Section 5). For these interconnection requests, interconnection customer must demonstrate site control for 100% of the proposed generating facility at the time the transition study agreement is signed and returned to Idaho Power. This demonstration of site control must meet the acreage requirements outlined in this Site Control Business Practice or sufficient reduced footprint evidence must be provided.

Qualifying Regulatory Limitations are not accepted for the transition process.²

1.2.2 Annual Cluster Process Site Control Requirements

For interconnection requests subject to the FERC-jurisdictional LGIP, beginning with the initial cluster study in March 2025, interconnection customer must demonstrate no less than 90% exclusive site control for the generating facility at the time of the interconnection request submission. The 90% threshold is measured by the interconnection customer demonstrating exclusive site control for 90% of the minimum acreage requirements to site the size and fuel type of the generating facility that it is requesting to interconnect to Idaho Power's transmission or distribution system.

For the avoidance of doubt, the 90% threshold is not a measure of interconnection customer's progress through a negotiation process for site control.³

If 100% exclusive site control is not submitted with the interconnection request subject to the LGIP, 100% exclusive site control will be required no later than execution of the FSA and again upon execution of the LGIA or filing of the unexecuted LGIA with FERC.

In limited instances where an interconnection customer demonstrates a qualifying regulatory limitation to obtaining exclusive site control, which is further discussed in this Business Practice and subject to Idaho Power's review prior to acceptance, a deposit in lieu of site control may be submitted in accordance with Idaho Power's FERC-jurisdictional LGIP. Per LGIP section 3.4.2, interconnection customers facing qualifying regulatory limitations must demonstrate 100% exclusive site control within 180 calendar days of the effective date of the LGIA, or the LGIA may be terminated.

² Ibid., para 870

³ Ibid., para. 597

1.3 Exclusive Site Control

Pursuant to the definition of site control in Idaho Power’s FERC-jurisdictional LGIP, exclusive site control is “the exclusive land right to develop, construct, operate, and maintain the Generating Facility over the term of expected operation of the Generating Facility.”⁴ This exclusive land right may be demonstrated by presenting one or more of the following for a site of sufficient size to construct and operate the generating facility, as further defined in the Acreage Requirements section of this Business Practice:

1. Ownership of, a leasehold interest in, or a right to develop the site
2. An option to purchase or acquire a leasehold for the site⁵
3. Any other documentation that clearly demonstrates the right of the interconnection customer to exclusively occupy the site

As further clarified by FERC, the right to “exclusively” occupy the site to develop, construct, operate, or maintain a generating facility means both that the right belongs solely to the interconnection customer (i.e., no other entity shares the right to use the site for those purposes), as well as that the right is solely for purposes of a single interconnection request.⁶

Permitting multiple interconnection requests to use the same land to demonstrate exclusive site control would inherently result in at least one commercially non-viable interconnection request entering the interconnection queue. Therefore, interconnection customers are prohibited from submitting demonstration of site control that uses the same land for multiple interconnection requests unless the site is large enough to host multiple generating facilities.⁷

To support the exclusivity of the site control, interconnection customer must include an Attestation as well as a detailed KMZ as part of its site control demonstration. The KMZ must include the following information:

- Outline of geographic site control area
- Site layout
 - Generating facility
 - Generating facility substation
 - Collector system
- Location and layout of devices on site

⁴ LGIP, Section 1

⁵ FERC Order No. 2023, para. 588, “evidence of active negotiations for a lease is not a sufficient demonstration of site control at any time during the interconnection process.”

⁶ *Ibid.*, para. 585

⁷ *Ibid.*, para. 586

1.3.1 Acceptable Documentation

The following list includes, but is not limited to, the types of documentation that may be considered acceptable as demonstration of exclusive site control, provided the documentation 1) demonstrates the exclusive land right to develop, construct, operate, and maintain the generating facility over the term of expected operation of the generating facility, and 2) is for a site of sufficient size to construct and operate the generating facility pursuant to Idaho Power's Acreage Requirements Business Practice:

- Lease agreement
- Option to lease/option to purchase
- Title, deed, or tax bill
- Memorandum of Lease
- Easement
- Right of Way
- Signed lease agreement with the applicable Tribe-owner prior to approval by Bureau of Indian Affairs (BIA)
- A FERC license for generating facilities at non-powered dams
- Lease of power privilege for non-FERC-jurisdictional hydropower projects
- Written exemption statement for small hydro exempt from FERC licensing under the Federal Power Act (FPA) including a statement that the exemption is issued in perpetuity

Idaho Power reserves the right to evaluate the contents of all site control documentation submitted and any conditions contained therein to determine whether they sufficiently demonstrate exclusive site control.

1.3.2 Documentation Not Accepted

The following list includes, but is not limited to, types of documentation that are not acceptable as demonstration of exclusive site control:

- Active negotiations for a lease
- Memorandum of Understanding (MOU)
- Officer Certification
- Preliminary permit for pumped storage or other hydro facility⁸

⁸ Ibid., para. 591

- Draft preliminary plan of development on government or other regulated lands⁹
- Agreements that do not provide exclusive land right to develop, construct, operate, and maintain the generating facility over the term of expected operation of the generating facility (e.g., Type 1 or Type 2 BLM permits and Wind Energy Evaluation Lease [WEEL] through the BIA)
- Other non-binding or non-exclusive agreements

1.4 Acreage Requirements

To demonstrate site control for a proposed generating facility, interconnection customer must provide evidence that it has exclusive site control of sufficient land to site the size and fuel type of the generating facility over the term of expected operation of the generating facility that it is requesting to interconnect to Idaho Power's transmission or distribution system. Interconnection customer must provide site control that meets the following applicable acreage requirements.

Table 1

Minimum Site Control acreage requirements by fuel type.

Fuel Type	Land Required
Wind	40 acres per MW
Solar	6 acres per MW
Battery	0.35 acres per MW or per manufacturer specifications
Geothermal	4 acres per MW
Hybrid	Summation of various fuel types represented in the Hybrid facility based on each fuel type's acres per MW

Additional fuel types will be added to Table 1 as they are identified. If a fuel type is not listed in Table 1 at the time the interconnection request is submitted, the interconnection customer should provide with the interconnection request manufacturer specifications that support the acreage provided in the demonstration of exclusive site control.

1.4.1 Additional Hybrid Facility Information

All hybrid interconnection requests must include the installed capacity of each fuel type. A breakdown of capacity is to be included with the site control submission.

The following is an example of how to calculate the minimum site control acreage required for a hybrid 100 MW solar + 50 MW energy storage facility with a 100 MW maximum injection capacity at the Point of Interconnection (POI).

⁹ Ibid., para. 593

100 MW Solar (x) 6 acres per MW	600 acres
50 MW Battery (x) 0.35 acres per MW	+ 17.5 acres
Total	617.5 acres

1.4.2 Insufficient Land—Reduced Footprint Evidence

If an interconnection customer's site control does not meet the minimum acreage requirements outlined in Table 1, the following documentation must be provided to justify how the site will accommodate the generating facility with the reduced acreage. This documentation is required in addition to the required exclusive site control evidence outlined in this Business Practice.

- Site plan drawing stamped by a Professional Engineer licensed in the State of the POI. The site plan drawing must depict the proposed generation arrangement and specify the maximum facility output for that arrangement.
- Detailed justification document that includes:
 - Design specifics
 - Calculation of land utilization
 - Spacing and setbacks
 - Detailed KMZ map with evidence of equipment being able to fit on the site

1.5 Qualifying Regulatory Limitations

Section 3.4.2 of Idaho Power's FERC-jurisdictional LGIP allows for deposits in lieu of site control (\$10,000 per MW, subject to a minimum of \$500,000 and a maximum of \$2,000,000) to be submitted in limited circumstances where an interconnection customer demonstrates a qualifying regulatory limitation. These deposits are refundable and cannot be applied toward interconnection studies or withdrawal penalties.¹⁰

As noted in section 1.2.1 of this Site Control BP, Qualifying Regulatory Limitations are not accepted for the transition process.¹¹

Idaho Power defines a Qualifying Regulatory Limitation as a federal, state, or Tribal process that prohibits interconnection customer from obtaining exclusive site control at the times detailed in Idaho Power's LGIP for an interconnection request proposing to interconnect to Idaho Power's distribution or transmission system. This definition is applicable to lands managed by the following entities or entity types:

- State Lands
- County & City Lands
- Bureau of Land Management (BLM)
- Bureau of Indian Affairs (BIA)
- Forest Service
- Bureau of Reclamation

Pursuant to Idaho Power's LGIP, interconnection customer must provide the following information along with the deposit in lieu of site control to be considered for a qualifying regulatory limitation:

1. A signed affidavit from an officer of interconnection customer's company indicating that site control is unobtainable due to a qualifying regulatory limitation as defined by Idaho Power.
2. Documentation sufficiently describing and explaining the source and effects of the qualifying regulatory limitation, including a description of any conditions that must be met to satisfy the regulatory limitations and the anticipated time by which the interconnection customer expects to satisfy the regulatory restrictions.

Interconnection customers facing a qualifying regulatory limitation are permitted to proceed through the interconnection process and execute, or request the unexecuted filing of, an LGIA

¹⁰ Ibid., para. 612

¹¹ Ibid., para 870

before obtaining site control. However, interconnection customers must provide documentation that demonstrates they are taking identifiable steps to secure the necessary regulatory approvals from the applicable federal, state, and/or Tribal entities, as described above. Such interconnection customers must provide the above-required documentation at the time of interconnection request submittal. Updated documentation demonstrating identifiable steps have been and will continue to be taken must be provided at execution of the FSA and when executing, or requesting the unexecuted filing of, the LGIA. Alternatively, such interconnection customers may demonstrate site control in accordance with the requirements of Idaho Power's FERC-jurisdictional LGIP.¹²

¹² Ibid., para. 609

2. Cluster Areas

2.1 Overview

Pursuant to Idaho Power's FERC-jurisdictional Large Generator Interconnection Procedures (LGIP), Idaho Power may segment and perform cluster studies according to geographically and/or electrically relevant areas on Idaho Power's Transmission System (cluster area). This Business Practice describes when and how Idaho Power identifies and defines cluster areas.

2.2 Defining the Cluster Areas

Idaho Power will initially identify cluster areas before the scoping meeting. The cluster areas for each cluster will be based on the valid interconnection requests submitted during the cluster request window and will be refined and finalized by the end of each customer engagement window.

Major transmission lines in the Western Interconnection are grouped into numbered paths for planning and operational purposes. Additional information on these numbered paths can be found on the [Western Electricity Coordinating Council \(WECC\) website](#). Idaho Power's primary method of defining cluster areas is based on these WECC and Idaho Power internal paths and their associated cut-planes.

Using this method, Idaho Power's anticipated cluster areas are as follows and are further depicted in Figure 1:

- *Cluster Area 1*—East of Path 17
- *Cluster Area 2*—Between Path 17 and Midpoint West and connections at Borah Substation
- *Cluster Area 3*—Between Boise East and Midpoint West and connections at Midpoint Substation
- *Cluster Area 4*—Greater Treasure Valley Area
- *Cluster Area 5*—East of Path 14

While the above cluster areas are anticipated, Idaho Power reserves the right to study interconnections outside of its Balancing Authority Area (BAA) or on lines remote from any load as its own cluster area to mitigate potentially large network upgrades from impacting other interconnection requests.

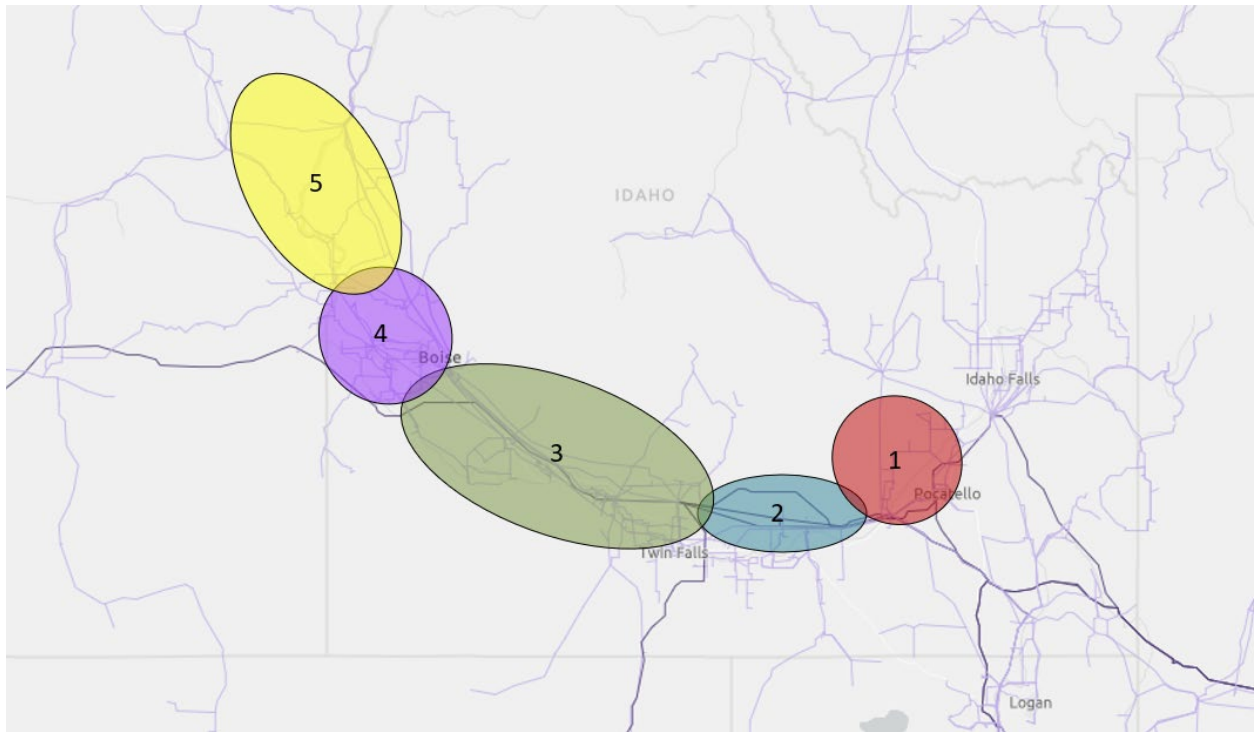


Figure 1
High-level diagram of the anticipated Idaho Power cluster areas.

3. Proportional Impact Method for System Network Upgrade Allocations

3.1 Overview

Pursuant to Idaho Power's FERC-jurisdictional Large Generator Interconnection Procedures (LGIP), System Network Upgrades will be allocated based on a proportional impact method. This Business Practice describes the metrics and thresholds for implementing the allocations described in LGIP Section 4.2.1b.

3.2 Allocation Metrics & Thresholds

Idaho Power will use PowerWorld to identify the proportional impact each interconnection request has on a voltage violation or network overload that requires a Network Upgrade.

A minimum impact of 5% will be applied. If the calculated proportional impact of any interconnection request is less than 5%, the applied proportional impact will be 0%, and the proportional impact will be recalculated among the remaining interconnection requests with greater than 5% proportional impact.

Idaho Power has provided the following scenarios which describe how Idaho Power will calculate the proportional impact cost allocation in such situations. The use of each method will be at the discretion of Idaho Power. Unforeseen scenarios may lead to alternative proportional impact method allocation, which will be added to this Business Practice once encountered.

- **Isolated overloads.** Network Upgrade cost will be allocated based on the calculated percentage impact on the overloaded element relative to other interconnection requests in the cluster study.
- **Multiple overloads mitigated by a single Network Upgrade.** The most severe overload will be used to determine the proportional impact.
- **Model divergence or many overloads requiring large Network Upgrade.** Network Upgrade cost will be allocated pro-rata based on requested megawatts of interconnection for each interconnection request in the cluster study. In this scenario, the 5% minimum proportional impact will not apply.
- **Transmission congestion without an overload.** Network Upgrade cost will be allocated based on the calculated percentage impact on the Network Upgrade relative to other interconnection requests in the cluster study. In this scenario, the 5% minimum proportional impact will not apply.

4. Requested Points of Interconnection

4.1 Valid Points of Interconnection

Idaho Power will typically consider any requested Point of Interconnection (POI) in its Balancing Authority Area valid if the requested POI is on a solely or jointly owned line or facility in which Idaho Power is a Transmission Provider and/or Transmission Owner.

4.2 Invalid Points of Interconnection

Idaho Power may deem an interconnection customer's requested POI invalid if the POI is a line tap within 5 miles or 10% of the overall length of a line, whichever is greater, from an existing station or a proposed station (e.g., a senior-queued interconnection station). The line length is breaker-to-breaker; tapped load stations are not included in the calculation.

In an instance where a requested POI meets the above criteria and is therefore deemed invalid, the invalid POI will be rejected, and Idaho Power will propose a valid POI at the nearest substation or proposed substation on the same line and voltage level originally requested. Any such evaluation and proposed change to an interconnection customer's requested POI will be determined and communicated to the interconnection customer prior to or during the scoping meeting. Idaho Power reserves the right to consider exceptions on a case-by-case basis.

4.3 POI Changes Due to Clustering

Pursuant to Idaho Power's FERC-jurisdictional LGIP Section 3.1.2, Idaho Power may propose changes to an Interconnection Customer's requested POI to facilitate efficient interconnection of multiple projects in a cluster area at a common POI. In these instances, Idaho Power will notify the interconnection customer of any intended changes, and the POI shall change only upon mutual agreement.

Review/Revision History

This document has been approved and revised according to the revision history recorded below.

Review Date	Revisions
01/01/2024	Generation Interconnection Business Practices 1, 2, 3, and 4 were implemented.