

**October 10, 2024**

Greetings Western Power Pool,

I am writing to present First-LightEnergy's wish to join the Western Power Pool, the Northwest Power Pool Reserve Sharing Group, and the Operating Committee.

### **Introduction**

First-LightEnergy LLC (1Lite) is requesting participation in the Northwest Power Pool Reserve Sharing Group (NWPP RSG) for the future Box Canyon Balancing Authority, registering the NERC acronym as BNBA, owned by BrightNight Power.

BrightNight Power owns a 300 MW Photo Voltaic project in Arizona providing renewable energy offtake to the Southwestern Public Power Agency. The BNBA plans to balance this project with a projected 600 MW battery installation at the site and/or Automatic Generation Control (AGC) from an adjacent 3<sup>rd</sup> party. The battery installations are to be lithium based with a 4 hour duration and 100 MW staged implementation beginning the 1<sup>st</sup> quarter of 2025 and finishing the end of the 2<sup>nd</sup> quarter of 2026.

First-LightEnergy has been contracted to provide Balancing Authority certification services and Balancing Authority operations services for the generation asset under the First-LightEnergy umbrella. First-LightEnergy has registered as Doing Business As (DBA) BNBA to satisfy NERC dual registration requirements. The Box Canyon Balancing Authority acronym will in turn be BNBA and as a NERC certified Balancing Authority, 1Lite has the control center capabilities and experienced NERC certified staff to meet each of the NWPP RSG requirements for participation in, and full compliance with each of the NWPP RSG requirements through previous experience with NWPP RSG participation. The First-LightEnergy western interconnection control center is located in Fairfield, California. First-LightEnergy has contracted with Larson and Toubro (LNT) as a First-LightEnergy sub-contractor providing additional NERC certified staff and engineering expertise.

### **Interconnection and Resource description**

The Box Canyon generation site is a 300 MW nameplate Photo Voltic facility under construction located approximately 70 Miles Southeast of Phoenix, Arizona. The unit interconnects to the WECC Bulk Electric System at the SRP Able substation. The facility is owned by BrightNight Power (<https://brightnightpower.com/>) with a Power Purchase Agreement for energy offtake from the facility with Southwest Public Power Agency (SPPA) <https://www.bloomberg.com/profile/company/1252293D:US>).

### **How the BNBA will meet the NWPP RSG Requirements**

The BNBA Balancing Authority is undergoing WECC/NERC full BA certification with the final certification review to be conducted at the First-LightEnergy BNBA control center in mid-

January 2025. After reviewing the Box Canyon project physical parameters, it has been determined that the Most Severe Single Contingency for this generator will be 300MWs. The NWPP RSG requirement for contingency reserves is 3% of Generation or 9 MWs, as identified per the operational requirements of the Northwest Power Pool Reserve Sharing Program. This will be carried via battery installation at the site and/or automatic Generation Control (AGC) from an adjacent 3<sup>rd</sup> party. The 1Lite/BNBA control center utilizes an industry standard EMS system and will be fully engaged in the required BA services 24 X 7 as test power is initiated in mid-January 2025.

**What is the NWPP RSG participation timing being requested?**

Once the BA certification is completed, the BNBA will begin the required generation site test power production processes. This test power production is scheduled to be completed at the end of May 2025. Following the successful completion of testing, the Box Canyon generation site is expected to begin full commercial operations beginning June 2, 2025. It is at that time the BNBA would request full NWPP RSG participation.

**What are our qualifications?**

The First-LightEnergy BNBA will be a NERC certified Balancing Authority in January 2025. The certification review is scheduled with the WECC and NERC review team for mid-January 2025. The First-LightEnergy/BNBA team have been fully engaged with the WECC NERC review team since July of this year (2024). The Energy Management System implemented by First-LightEnergy is the General Electric E-Terra system (formerly AREVA) using the G.E. Habitat 5.11 platform and associated SCADA 3.5. First-LightEnergy has implemented the AT&T ANIRA devices in accordance with the requirements for WECC WON access to facilitate ICCP communications as appropriate.

**Who will be the Reliability Coordinator?**

The First-LightEnergy BNBA Reliability Coordinator is Southwest Power Pool (SPP) and the associated communications are being implemented with bi-weekly technical and progress meetings engaged and ongoing with SPP.

If I can be of further assistance or can clarify any information, please feel free to contact me at any time.

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