



November 17, 2011

Commissioner Philip D. Moeller

STATEMENT

Statement of Commissioner Philip D. Moeller on FERC's Upcoming Reliability Conference

"On Monday I released a comprehensive list of questions related to whether or not reliability might be impacted by upcoming rules of the EPA. While I am certain that all of my fellow Commissioners could have arrived at an equally comprehensive list, I wanted to circulate my thoughts on this topic well in advance of the technical conference.

By circulating these questions in advance, I hope to provide interested people with an opportunity to provide "hard" and "real" evidence of reliability problems. The debate over EPA and reliability is too often a debate lacking in substance, where one person might say this nation has a reliability problem, and another person will say the opposite. So the purpose of these detailed questions is to move the debate away from mere allegations, and into the substantive analysis of reliability issues and how to resolve them.

Just as I firmly believe that reliability issues associated with renewable energy can be adequately resolved, I believe that given enough time and study, any reliability issues associated with EPA rules can be resolved. Since its inception, electricity providers have been continuously addressing reliability issues and overcoming them. In the early days it was a debate between direct current and alternating current. During the Second World War transmission lines became one of the many solutions to the risk of sabotage and the problems of energy shortages that were fueled by wartime demand. After the war, the reliability problem of integrating increasingly large power plants, including nuclear plants, resulted in the development of many large pumped-storage facilities.

All of these earlier challenges to reliability were addressed successfully, and I have no doubt that any new challenges that we face can also be addressed. To clarify a few details on my list of questions:

First, these are my questions alone, and not an official request by the Commission. Thus, as should be obvious, any response is optional and intended to help guide the public on the issues that could become important for the written record.

Second, I have suggested no due date --- and that is intentional. To the extent that anybody can provide their responses before the technical conference, that would help me prepare for the conference. But given the importance of reliability to the power grid, I'd rather have complete and accurate responses than anything rushed or uncertain.

Third, I don't expect, and would actually be surprised if anybody answered every question asked. I've asked a variety of questions that are based upon conversations that I've had over the past year or so on this topic. But a conversation is not evidence in the record that can be acted upon, and that's why decisions aren't based upon mere conversations. Thus, my questions are an opportunity to submit evidence into the record. And importantly, when evidence is submitted into the record, that evidence then provides people who have differing views an opportunity to challenge that evidence with their own evidence.

I look forward to the upcoming conference.