

FEDERAL ENERGY REGULATORY COMMISSION

Technical Conference

Queuing of Generator Interconnection Requests

Comments of:

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RELIANT ENERGY

RELIANT RESOURCES

- 21,000MW of generation in operation, under construction, or under contract in US.
- 6,000MW of new generation developed and placed in service or under construction.
- New Generation Projects Completed or Under Construction in:
 - Arizona
 - Florida
 - Illinois
 - Mississippi
 - Nevada
 - Pennsylvania
 - Texas

GOOD EXPERIENCES WITH QUEUES

PJM

- Equitable Cost Allocation.
- Flexibility on project changes in A queue. However, flexibility reduced on B and later queues.
- Flexibility aided one project (Hunterstown).
- Project initially proposed as two 2x1 combined cycle units.
- Technical review by Reliant resulted in change to one 3x1 combined cycle unit.
- PJM rules for queue A allowed this change.

BAD EXPERIENCES WITH QUEUES

PJM

- Delays in completing studies.
- Queue cycle went from 3 months to 4 months to 6 months, plus backlog delays.

FLORIDA

- Multiple transmission owners involved.
- Study by first Transmission Owner reveals impacts to others.
- Required new study process with all Transmission Owners.
- Later some non-jurisdictional entities complained they were impacted but not included in study.

NEVADA

- Multiple Transmission Owners; some jurisdictional, some non-jurisdictional.
- Multiple Generation Projects; some connected to jurisdictional Transmission Owners, some connected to non-jurisdictional Transmission Owners.
- Transmission Service Requests in different queue and queue order from Generator Interconnection requests.
- Separate studies initially, ultimately one combined study.
- Transmission Owners attempt to coordinate with 3rd party systems but no “skin in the game”.

RECOMMENDED SOLUTIONS

- One queue for all interconnections within some geographic region.
 - Includes all generators – large and small.
 - Includes all Transmission Owners in region, jurisdictional and non-jurisdictional.
- All Transmission Providers in the region required to participate, whether FERC jurisdictional or not.
- Entity administering the queue process coordinates any seams issues with adjoining regions.