



STATEMENT

Statement of Commissioner Cheryl A. LaFleur on Requirements for Provision of Primary Frequency Response

Date: February 15, 2018

Docket Nos.: RM16-6-000
Item No.: E-2

"In my recent separate statement on the Department of Energy resilience proposal, I observed that the Commission should work to sustain the reliability and resilience of the grid while adapting to the changing resource mix. Today's Final Rule on frequency response is such an action.

"Changes in our nation's resource mix, including particularly the lower percentage of synchronous generation, have contributed to declining frequency response performance in the Eastern and Western interconnections. However, recent technological advancements have enabled new non-synchronous generating facilities, such as wind and solar, to cost-effectively include primary frequency response capabilities in their facilities.

"I strongly support today's Final Rule, which modifies the *pro forma* Large and Small Generator Interconnection Agreement (LGIA and SGIA, respectively) to require new large and small generating facilities to install, maintain, and operate equipment capable of providing primary frequency response as a condition of interconnection. The collective ability of the power system to respond to a loss of generation event is essential to ensuring the reliable operation of the bulk electric system.

"I also note that the Final Rule recognizes the unique operational characteristics of different resources. Thus, it exempts combined heat and power resources and nuclear generation from some aspects of the new requirements. In addition, while we require new storage resources to comply with this Final Rule, we recognize the unique operating characteristics of energy storage facilities, and require that transmission providers include in their *pro forma* LGIA and SGIA specific accommodations and limitations on when electric storage resources will be required to provide primary frequency response.

"I agree with the decision not to require compensation or direct a mandatory NERC standard regarding primary frequency response at this time. However, I think the Commission should continue to monitor the impact of today's rule on frequency response performance and consider additional actions to ensure adequate frequency response if and as appropriate."