

**FERC Docket No. AD18-11-000**  
**Reliability Technical Conference**  
**July 31, 2018**

Written Statement of Jay Bartlett, President and Chief Executive Officer,  
Wabash Valley Power Association

My name is Jay Bartlett and I'm the President and Chief Executive Officer of Wabash Valley Power Association (Wabash Valley), a wholesale generation and transmission (G&T) cooperative headquartered in Indianapolis, Indiana. Wabash Valley provides generation and transmission services to 23 distribution cooperatives located in Indiana, Illinois and Missouri who, in turn, provide reliable, affordable and safe electric service to nearly 750,000 retail members. Wabash Valley appreciates the opportunity to participate in the annual Federal Energy Regulatory Commission reliability technical conference and looks forward to the discussions that will occur on July 31, 2018.

Wabash Valley's power supply portfolio is diverse. We own 26 power plants that generate over 1,100 MWs. Our owned resource portfolio includes solar, landfill gas, simple and combined-cycle natural gas turbines, and partial ownership of three coal-fired units. We also have purchased power agreements in place for wind, hydro, solar, biogas, and nuclear energy.

Today, Wabash Valley believes that the bulk power system is reliable and that there are sufficient Essential Reliability Services (ERS). However, we are concerned that the rapid retirement of "traditional" spinning resources may impact reliability, as we transition to greater reliance on inverter-based technologies. We strongly believe that the incorporation of these new resources is positive on a variety of fronts. However, we are concerned that the industry may not have the tools necessary to accurately assess the impacts on reliability. By working together to develop more accurate power system models and standards, we can ensure that the reliability and resiliency of the bulk power system remains strong. Wabash Valley does not see any immediate need to change the NERC reliability standards related to the provision of ERS. Consistent with NERC's current practice, we do encourage NERC and the industry to continue to evaluate the effectiveness of standards going forward.

To improve reliability and to respond to growing expectations and challenges, Wabash Valley has placed increased emphasis on the utilization of "smart" technologies to achieve additional flexibility from our existing assets. We believe investments in demand-side management, coupled with enhanced use of technology to control these resources, will be necessary to deliver reliable and affordable energy.

To fully realize the benefits that these new technologies promise, reliable telecommunications are a necessity. Our organization will be able to provide the

necessary telecommunications required at the transmission and distribution levels. However, due to the lack of widespread broadband coverage, we will not have the ability to establish two-way communications to monitor distributed resources in much of our more rural service territory. Communicating with these resources is vital for both maximizing their value and ensuring reliability.

Wabash Valley and our twenty-three distribution cooperatives support the development of cost-effective distributed resources along with integration standards that maximize grid reliability.

We appreciate that opportunity to provide comments and look forward to the discussion on July 31.