BEFORE THE
UNITED STATE OF AMERICA
ENERGY REGULATORY COMMISSION

Review of Generator Interconnection Agreements and Procedures	**)**	**Docket No. RM16-12-000**
American Wind Energy Association	**)**	**Docket No. RM15-21-000**

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TOPIC: INTRODUCTORY REMARKS
PANEL ADDRESSING "TRANSPARENCY AND TIMING IN THE GENERATOR INTERCONNECTION STUDY PROCESS"

DATE: MAY 13, 2016

Good morning. My name is Jennifer Ayers-Brasher. I am the Director of Transmission and Market Analysis for E.ON Climate & Renewables North America, LLC.

E.ON operates over 2,700 MW of renewable capacity and has many projects in development throughout the United States.

We want to thank the Commission for holding this conference. There is a desperate need to reform key features of the interconnection process.

We continue to see delays in interconnection studies. We have one project that has been in an RTO queue for over 5 years. Most projects are not that delayed, but do suffer delays. We borrow money and dedicate funds, renew land lease options, and enter into other cost arrangements based on receiving study results by the dates listed in the Tariff. It is important for the generation developer to be able to rely on these.

The RTOs let us know if study results will be delayed, but we either are not told for how long or the estimate proves not to be accurate. Further, we are not told the reasons for the delay. It is difficult to run a business, and to report to management or board of directors, with that lack of information

This delay has a snowball effect, tying up funds with milestone deposits that cannot be released and dedicated to the next generation project.

Restudies have been a tremendous problem and cause of delay, and we urge the Commission to eliminate this from the equation. Inadequate RTO/transmission owner staffing may be another cause for study delays.

Access to information needs to be enhanced. We rely on the RTO's study model. However, it's not always available before we get into the queue. Outside of an RTO, it is very difficult to get the model. No matter the interconnection point, we should be able to sign a Non-Disclosure Agreement and have access to the most current and up-to-date base case study model.

Data within studies needs to be transparent. All model assumptions need to be listed if the interconnection customer is going to have a useful tool to evaluate whether to move forward with a project.

The timing of getting network upgrade cost estimates is also a problem. Developers often do not get a real cost estimate until the Facilities Study stage. We see tremendous cost swings on the order of tens of millions of dollars. We need the transmission owner more engaged early on so we can plan better. This will translate into a better managed queue.

Congestion and curtailment is a real problem. Some of it is based on inadequate information and planning. The models that are provided to the customer need to have actual dispatch data built in; this is not usually the case. Without this, we have run into problems once a project is operational because factors affecting the expected level of ERIS service were hidden and unable to be assessed.

The distribution factor (DFAX) that is used to assess interconnection impact must not be too high. This has allowed multiple new projects to interconnect in the same location without the grid being properly shored-up. This too has contributed to congestion and curtailment.

If a project is granted a certain level of NRIS, even 100% NRIS, that level of NRIS needs to be memorialized in planning models and reserved for that project; otherwise congestion and curtailment will mount. This may require adjusting the capacity factor used for variable generation, especially if the customer funds network upgrades to receive 100% NRIS.

These are just some of the issues and solutions that need to be addressed.

E.ON very much thanks the Commission for scheduling this technical conference. I look forward to your questions.

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