

**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

PRESENTER: JENNIFER AYERS-BRASHER
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E.ON CLIMATE & RENEWABLES NORTH AMERICA, LLC

TOPIC: INTRODUCTORY REMARKS
PANEL ADDRESSING “OTHER INTERCONNECTION
QUEUE COORDINATION AND MANAGEMENT ISSUES”

DATE: MAY 13, 2016

Good afternoon. 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.

Again, we thank the Commission for holding this conference and for the opportunity to present our views.

Turning to the issues on this panel, getting timely study results from neighboring Affected Systems can be a problem. Affected System studies are not being done often enough and response rates are slow.

E.ON had to cancel a project because the Facilities Study provided by the neighboring RTO, nearly three years after entering the queue, went from zero network upgrades to \$6 million, and was later updated by the RTO to \$14 million. All of this information came very late in the process, after significant cost had been expended and we were ready to move forward in the siting RTO. This was particularly bothersome because the Tariff and Business Practice Manuals provided that the Affected System studies were to be done much sooner.

This has happened again in the last few months. The Facilities Study from the Affected System was over a year late. When the results did come in, they too varied, being revised by millions of dollars by the RTO after the fact.

Another need is allowing a project to downsize in MW without it being a material modification if the RTO provides inaccurate study results that, once corrected, cause an increase in network upgrade costs. In that situation, the project should not be forced to pay for the upgrades or drop out of the queue. The developer relied on the Tariff provisions and the study results; the RTO committed error; the project should not feel the brunt. If downsizing will put the project in the same network upgrade cost position as when it relied and went forward, that should be allowed in Tariffs.

In terms managing withdrawals, which, in turn, can cause delay, one item needed is access to study models as a tool to assess whether to get in the queue in the first place. Once in the queue, there are ways to limit the impact of withdrawals. CAISO has a two-phased process that does just that and allows the queue to move forward. The Commission should consider this adopting this model on a generic basis.

I already addressed this morning the need for a better exchange of information, supported data assumptions and timely-provided study results. If there is one further key area for improvement it is – study accuracy. The interconnection customer has a very limited role here. It can only check data in a report pertaining to its project. There should not be a burden on the customer to confirm that all inputs and assumptions that the RTO uses in its study are correct. That is the RTO's job. It has all the data. It performs the study. Developers are relying on the RTO to follow the requirements listed in its Tariff, include all required inputs, and provide accurate results. Again, we ran into a situation recently where the RTO failed to include a required input – an input we could not have known existed – this resulted in faulty study results at the Facilities

Study stage assessing more than \$10 million in network upgrades where none were required before.

Finally, the industry needs measures to improve the timing and accuracy of study results. That may be increased RTO staff. That may also be some sharing of the increase in network upgrade costs when there is RTO study error. Something, however, needs to be done. The current Best Efforts standard in the interconnection rules is no longer applicable to today's needs and is impeding the efficient development of new generation.

Again, E.ON thanks the Commission for the opportunity to discuss these issues. I look forward to your questions.

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