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: OMAR MARTINO
DIRECTOR, TRANSMISSION
EDF RENEWABLE ENERGY, INC.

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

DATE: MAY 13, 2016

Good afternoon. My name is Omar Martino. I am the Director of Transmission Strategy within the Valuation and Transaction Group at EDF Renewable Energy, Inc.

EDF Renewable is a subsidiary of Électricité de France, S.A., a French electric utility company. In North America, EDF Renewable has developed over 6 gigawatts ("GW") of generation since 2012. EDF Renewable currently owns 3.1 GW of generation, has another 1.1 GW currently under construction and provides operations and maintenance service for another 10.5 GW of generation.

I want to thank the Commission for inviting me to speak today.

Better coordination with the RTOs and transmission owners and management of the grid is vital if there is going to be an efficient interconnection process in this nation. EDF Renewable Energy has several recommendations.

First, coordination with Affected Systems is a real problem. A generation developer cannot move forward through the queue, sign a GIA and develop new generation when Affected System impacts and mitigation costs are not known.

There is a significant gap in the Commission's interconnection policies for non-jurisdictional entities as Affected Systems. EDF Renewable Energy can speak from experience that, when the RTO does not take responsibility to ensure non-jurisdictional impacts are addressed, commercial

operation of new generation can be held up. Worse, it has placed the non-jurisdictional entity in a leveraged position without any required timeline to complete studies and upgrades.

The Tariffs need measures that require the transmission provider (and not the interconnection customer) to address Affected System needs. I am not a lawyer, but I understand that the Commission has means to close this gap with Affected Systems that are non-jurisdictional.

Second, there are several means that RTOs and transmission owners can put in place within the current GIP format that will reduce costs and construction schedule risks, improve accuracy and reduce processing times. These include:

- Increase resources at RTOs to manage interconnection studies. (We should be working to have a 12-month interconnection process.)
- Allow interconnection customers to self-build interconnection facilities and network upgrades. (This is rarely allowed now and the reasons for denial are usually not supported.)
- Involve the transmission owner earlier in the process to reduce late-stage network upgrade cost "shocks."
- Require the transmission owner to provide a detailed breakdown of line item costs supporting interconnection facility and network upgrades. (This also will reduce disputes).
- Provide more reasonable modification standards.
- Eliminate or severely limit restudies. (CAISO has done this.)

Finally, there are other means that are new, but have the potential to bring great value to all market participants. These include:

- Dynamic ratings should be part of the interconnection and transmission planning processes. This will increase use of existing grid capacity.
- Generators could provide a flat fee for interconnection. This would severely reduce the interconnection study timeline. RTOs and transmission owners would look at all projects seeking to interconnect and shore-up the grid accordingly.
- Alternatively, generators could pay for grid improvements on a tiered-basis. For example, a 5% overload can be mitigated by dynamic ratings, smart grid and grid modernization tools; a 10% overload can be mitigated by re-conductoring; a 30% overload would require additional network upgrades.
- The interconnection and transmission planning processes should be better integrated. Coordinated evaluation of economic and congestion issues and the use of PROMOD analysis could avoid restudies based on queue withdrawals and better manage congestion.

We likely will not have the time to explore all of these issues fully on this panel. Thus, EDF Renewable Energy would urge the Commission to consider providing for the submission of post-conference written comments.

Thank you, again, for inviting me to speak to you. I look forward to your questions.

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