National Association of Regulatory Utility Commissioners Winter Committee Meetings Committee on Electricity

INTERCONNECTION QUEUEING PRACTICES



Suedeen G. Kelly, Commissioner Federal Energy Regulatory Commission Washington, DC February 18, 2008 INTERCONNECTION QUEUEING PRACTICES

- CURRENTLY GOVERNED BY ORDER NO. 2003
- FIRST-COME, FIRST-SERVED APPROACH TOWARDS QUEUE MANAGEMENT



ORDER NO. 2003

- MODIFYING REQUEST = LOSS OF QUEUE POSITION
- MULTIPLE REQUESTS FOR SAME PROJECT WITH MINIMUM DEPOSIT
- 3-YEAR, NO-COST SUSPENSION PERIOD
- WITHDRAWALS AND DELAYS COMPLICATE STUDY PROCESS



INTERCONNECTION QUEUEING CHALLENGES

• HUGE INCREASES IN GENERATION DEVELOPMENT, PARTICULARLY RENEWABLES



MISO INTERCONECTION REQUESTS

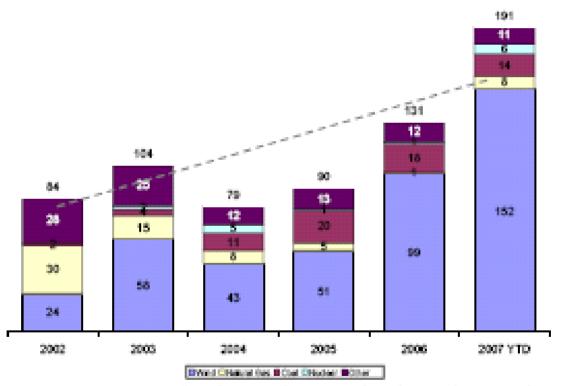
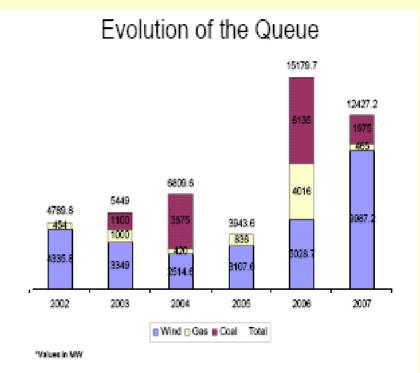


Figure 1: Number of Generator Interconnection Requests by type for the Midwest ISO from 2002 to 2007 as of November 30, 2007



SPP QUEUE HISTORY





LIMITS ON WIND CAPABILITY

 FPL ESTIMATES MISO, CAISO, ERCOT, PJM, NYISO, AND ISO-NE INCLUDE 120,000+ MW OF NEW WIND GENERATION REQUESTS; ANNUAL WORLD SUPPLY OF WIND TURBINES ONLY 20,000 MW



WHO IS AFFECTED?

• NOT LIMITED TO RTO/ISOs

• INTERCONNECTION QUEUES v. TRANSMISSION QUEUES



TECHNICAL CONFERENCE

- STATE PUCs
- RTO/ISOs
- NON-INDEPENDENTS
- INDUSTRY PERPSPECTIVE



QUEUING CONCERNS

OVEREMPHASIS ON QUEUE POSITION, RATHER THAN PROJECT VIABILITY

- EXITING QUEUE EVEN EASIER THAN ENTERING
- SUSPENSIONS COMPOUND PROBLEM



PROJECT WITHDRAWAL RATES

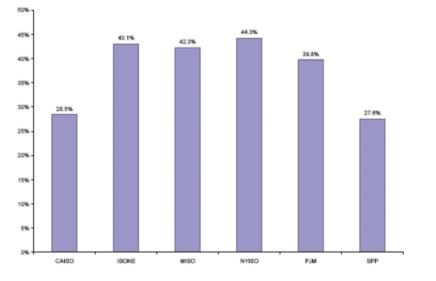


Figure 3: Project Withdrawal Rates



QUEUEING CONCERNS (cont.)

- IMPACTS TO FORWARD CAPACITY MARKETS
- SEQUENTIAL APPROACH = ALLOCATING DISPROPORTIONATE COST RESPONSIBILITY



GENERAL RECOMMENDED ACTION

• NO GENERIC ACTION FROM FERC

• REGIONAL SOLUTIONS BEST

• SHORT TERM vs. LONGER TERM



QUEUE MANAGEMENT

MODIFY QUEUE POSITION

• CLUSTERING



MODIFY QUEUE PRIORITY

OPEN SEASON



ALTERNATIVES TO MODIFYING QUEUE PRIORITY

• GREATER FLEXIBILIY TO ESTABLISH CLEARLY DEFINED CRITERIA



IMPROVE THE PROCESSING OF INTERCONNECTION REQUESTS

1) ENHANCED FINANCIAL COMMITMENTS AND MILESTONES



IMPROVE THE PROCESSING OF INTERCONNECTION REQUESTS

2) CHANGE SUSPENSION POLICY



IMPROVE THE PROCESSING OF INTERCONNECTION REQUESTS

3) ENHANCE ROLE OF TRANSMISSION PROVIDER



• IMPROVE THE PROCESSING OF INTERCONNECTION REQUESTS

4) STREAMLINE AND IMPROVE INTERCONNECTION REQUEST AND STUDY PROCESS



COST ALLOCATION

CHANGE COST ALLOCATION POLICIES FOR NEW TRANSMISSION UPGRADES



ONGOING STAKEHOLDER PROCESSES

• PROPOSALS EXPECTED TO BE FILED ANYWHERE FROM LATE APRIL TO NEXT OCTOBER



STAKEHOLDER PROCESSES

- ALTERNATIVES TO SCOPE OF FEASIBILITY STUDIES
- GROUP INTERCONNECTION REQUESTS WHERE TP CONDUCTS STUDIES IN CLUSTERS
- INCREASE MAGNITUDE OF MILESTONES
- CLARIFY PRO-FORMA TARIFF LANGUAGE
- IMPROVE INTEGRATION WITH LONG-TERM PLANNING



WHAT'S NEXT?

• REGIONAL DIFFERENCES DO NOT FAVOR NATIONWIDE APPROACH

• ALLOW STAKEHOLDER PROCESS TO MOVE FORWARD

