

Date March 20, 2008 **Docket No.** AD08-2-000

Commissioner Philip D. Moeller

Item No. E-27

Statement of Commissioner Philip D. Moeller on Interconnection Queuing Practices

"I am pleased to vote for today's order. We have seen a growing problem throughout the nation about the clogged interconnection queues. Different regions are contemplating different solutions but I am hoping today's guidance will spur quicker action by all entities. I deliberately say **all entities** because even though today's order is directed towards RTOs and ISOs, I do not think the clogged queue is only a problem in those markets – it is just more transparent. I am hoping that the workable solutions and creative solutions that are brought forward by RTOs and ISOs will also be explored and adopted by other transmission providers in other regions. While I know that BPA is exploring an approach to this problem and we will be hearing from them soon, I look forward to hearing about other transmission providers' efforts as well.

One item that I would like to repeat from the ISO/RTO Council's Whitepaper filed in this docket after last Fall's technical conference, which states that:

It should be noted at the outset that although most of the focus of discussion of this issue to date has centered on the experiences of wind and other renewable generation, the issues associated with queue processing are not limited to renewable generation. In the past, other policies drove the entry of non-renewable generators into the queue, and the [ISO/RTO Council] expects that there will be alternate policy and market drivers in the future. As a result, it is imperative that the Commission examine its Order No. 2003 requirements holistically rather than solely focusing on one form of generation entering the queue.

I think this observation is important because over the next few years the circumstances and fuel choices may differ which may cause generation types change over time and that transmission providers should have the flexibility to design a queue processing mechanism that does not need to be adjusted when there are shifts in generation type.

Of course, I would be amiss if I did not mention that additional transmission facilities are also needed to help create more transmission capacity for the additional generation that needs to get on the system to serve this Nation's energy needs. I believe energy efficiency, demand response and new technologies too will help in this effort."