

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Reform of Generator Interconnection)
Procedures and Agreements) Docket No. RM17-8-000

**MOTION OF THE ISO/RTO COUNCIL TO EXTEND
THE TIME PERIOD TO COMPLY WITH ORDER No. 845**

Pursuant to Rule 212 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. § 385.212 (2016), the ISO/RTO Council (“IRC”)¹ respectfully submits this Motion to extend the period for submitting filings to comply with the Final Rule for Reform of Generator Interconnection Procedures and Agreements (“Order No. 845”).² The Commission issued Order No. 845 on April 19, 2018 with an effective date 75 days after publication in the Federal Register and a compliance deadline 90 days after publication in the Federal Register. Order No. 845 was published in the Federal Register on May 9, 2018 and, therefore, it becomes effective on July 23, 2018, and compliance filings are due on August 7, 2018. The IRC respectfully requests that the compliance deadline be extended by 70 days, so that compliance filings may be submitted on or before October 16, 2018.

¹ The IRC is comprised of the Alberta Electric System Operator (“AESO”), the California Independent System Operator Corporation (“CAISO”), the Electric Reliability Council of Texas, Inc. (“ERCOT”), the Independent Electricity System Operator (“IESO”), ISO New England Inc. (“ISO-NE”), the Midcontinent Independent System Operator, Inc. (“MISO”), the New York Independent System Operator, Inc. (“NYISO”), PJM Interconnection, L.L.C. (“PJM”), and the Southwest Power Pool, Inc. (“SPP”). ERCOT, AESO, and IESO are not FERC-jurisdictional and are not joining in this Motion.

² Reform of Generator Interconnection Procedures and Agreements, 83 FR 21342, 21432-21313 (May 9, 2018).

I. MOTION FOR EXTENSION OF TIME

In Order No. 845, the Commission amended the *pro forma* Large Generator Interconnection Procedures (“LGIP”) and the *pro forma* Large Generator Interconnection Agreement (“LGIA”) to improve certainty, promote more informed interconnection, and enhance interconnection processes. Specifically, to improve certainty for Interconnection Customers, Order No. 845: (1) removes the limitation that an Interconnection Customer may only exercise the option to build a Transmission Provider’s Interconnection Facilities and Stand Alone Network Upgrades when the Transmission Provider cannot meet the dates proposed by the Interconnection Customer;³ and (2) requires that Transmission Providers establish interconnection dispute resolution procedures that allow a disputing party to unilaterally seek dispute resolution in RTO/ISO regions.⁴

In addition, to promote more informed interconnection, Order No. 845: (1) requires Transmission Providers to outline and make public a method for determining Contingent Facilities;⁵ (2) requires Transmission Providers to detail all the network models and underlying assumptions used for interconnection studies in either their OASIS sites or on password-protected websites;⁶ (3) revises the definition of “Generating Facility” to explicitly include electric storage resources;⁷ and (4) requires Transmission Providers to post interconnection study metrics on OASIS.⁸

³ Order No. 845 at P 85.

⁴⁴ *Id.* at P 142.

⁵ *Id.* at P 199.

⁶ *Id.* at P 236.

⁷⁷ *Id.* at P 275.

⁸ *Id.* at P 305.

Finally, to enhance interconnection processes, Order No. 845: (1) allows Interconnection Customers to request interconnection service that is lower than full generating facility capacity;⁹ (2) requires Transmission providers to allow Interconnection Customers to request provisional interconnection service;¹⁰ (3) requires Transmission Providers to establish a process for the use of surplus interconnection service;¹¹ and (4) requires Transmission Providers to set forth a procedure to establish a technological change procedure.¹²

Recently, some IRC members have submitted filings to the Commission requesting fewer than ten reforms to their LGIPs and LGIAs. In those cases, the internal processes and stakeholder processes required for the reforms have taken much longer than 90 days. Given that Order No. 845 requires ten different reforms to the LGIP and LGIA, and that some of those reforms require the development of new procedures, the internal and stakeholder processes will undoubtedly require more than 90 days. For that reason, the IRC requests that the compliance period be extended for an additional 70 days, so that IRC members can have sufficient time to complete the internal processes as well as the external stakeholder processes for their Order No. 845 compliance filings. The IRC believes that no parties will be prejudiced by the requested extension of time.

⁹ Order No. 845 at P 367.

¹⁰ *Id.* at P 438.

¹¹ *Id.* at P 467.

¹² *Id.* at 518.

II. CONCLUSION

For the foregoing reasons, the IRC respectfully requests that the Commission grant this Motion to extend the period for submitting filings to comply with Order No. 845 to October 16, 2018.

Respectfully submitted,

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