

December 14, 2022

Via eFiling in Docket No. RM22-14-000

The Hon. Richard Glick, Chairman
The Hon. James Danly, Commissioner
The Hon. Allison Clements, Commissioner
The Hon. Mark Christie, Commissioner
The Hon. Willie Phillips, Commissioner
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

RE: *Interconnection Cost Consumer Protection Coalition Reply Comments on Rulemaking*

Dear Chairman Glick and Commissioners Danly, Clements, Christie, and Phillips:

The signatories to this letter (jointly, the “Interconnection Cost Consumer Protection Coalition”) represent a wide spectrum of stakeholders who support an efficient, affordable, and reliable transmission system enabled by robust regional planning and optimization of network upgrade costs.

We commend the Commission and staff for their ongoing efforts to reform the way in which we plan and develop the nation’s electric transmission system.¹ We respectfully urge the Commission to coordinate transmission planning and interconnection processes to better ensure a system that is at the lowest cost to ratepayers by taking the following steps, recognizing the importance of holistic reform.²

Adopt the Following Reforms in a Final Transmission Planning Order in Docket No. RM21-17-000

- Require that the regional transmission planning process incorporates the market for future generation, as demonstrated by the interconnection queue, across all planning scenarios by using a standardized point of the interconnection study process at which to include projects that are likely to be viable.

¹ See *Improvements to Generator Interconnection Procedures and Agreements*, Notice of Proposed Rulemaking, 179 FERC ¶ 61,194 (2022), and *Building for the Future Through Electric Regional Transmission Planning and Cost Allocation and Generator Interconnection*, Notice of Proposed Rulemaking, 179 FERC ¶ 61,028 (2022).

² Members of the Coalition have advocated for reform in this proceeding and elsewhere. See, e.g., *Comments of Cypress Creek Renewables, LLC*, Docket No. RM22-14-000 (Oct. 13, 2022); *Reply Comments of Cypress Creek Renewables, LLC*, Docket No. RM21-17-000 (Sept. 19, 2022); *Plugging In: A Roadmap for Modernizing & Integrating Interconnection and Transmission Planning*, Enel Green Power North America, Inc., 2021 (available at <https://www.enelgreenpower.com/content/dam/enel-egp/documenti/share/working-paper.pdf>); *Affidavit of Johannes P. Pfeifenberger on behalf of the Natural Resources Defense Council*, Docket No. RM21-17-000 (Aug. 17, 2022) (filed in *Comments of Public Interest Organizations*, Docket No. RM21-17-000 (Aug. 17, 2022)); *Comments of RMI*, Docket No. RM21-17-000 (Aug 16, 2022); *Comments of Rocky Mountain Institute*, Docket No. RM21-17-000 (Oct. 12, 2021); *Comments of Public Interest Organizations*, Docket No. RM22-14-000 (Oct. 13, 2022); and *Comments of Public Interest Organizations*, Docket No. RM21-17-000 (Aug. 17, 2022).

Take the Following Next Steps on Generation Interconnection Reform in Docket No. RM22-14-000

- Set minimum standards and requirements in the generator interconnection process that together improve the transparency, predictability, and certainty of resulting cost allocations to reduce costs for all parties, while ensuring reliability. In order to allow for some regional flexibility, alternative interconnection-process standards must demonstrate that they meet or exceed the minimum set of standards and requirements set by the Commission. Paired with a robust regional planning process, the minimum interconnection standards should:
 1. Focus interconnection study criteria to identify interconnection facilities and network upgrades necessary to interconnect the project as well as network upgrades needed to mitigate local transmission constraints, without requiring distant and minimally affected network upgrades as part of the interconnection process; and
 2. Require consideration and use of operational tools, like market-based or utility-based generator re-dispatch in interconnection studies, along with utilization of grid-enhancing technologies where appropriate, as these options can provide for expedited interconnection service at lower cost through identification of other capacity sources, without the need for additional upgrades or infrastructure.
- Address standardized interconnection criteria in the final interconnection rule. If the Commission determines that it must further explore these issues, then it could hold an additional technical conference or consider other process options in advance of the final rule.

Ultimately, we urge a broader, more holistic focus on robust regional planning and optimizing the cost of network upgrades—whether identified in transmission-planning or interconnection processes—which will help generators and customers alike.

Failure to take more holistic steps leveraging market signals and market-based operational strategies will perpetuate an inefficient framework that misses important cost-savings opportunities for ratepayers and—even with incremental proposed reforms—will delay the study and construction of much needed, lower-cost new generation.

-Signed-

Advanced Energy Economy	Hannon Armstrong Sustainable Infrastructure
American Clean Power*	Capital, Inc.
American Council on Renewable Energy*	Hanwha Qcells USA Corp.
Americans for a Clean Energy Grid (ACEG)**	Interwest Energy Alliance
Cypress Creek Renewables, LLC	Leeward Renewable Energy, LLC
Clean Energy Buyers Association (CEBA)	National Audubon Society
Clean Grid Alliance	Rocky Mountain Institute
Clearway Energy Group LLC	Solar Energy Industries Association
Electricity Consumers Resource Council (ELCON)	The Rail Electrification Council
Enel North America, Inc.	Working for Advanced Transmission
ENGIE North America Inc.	Technologies (WATT) Coalition*

*The views and opinions expressed in this filing do not necessarily reflect official positions of each individual member of each named organization.

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