

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

**Midcontinent Independent System)
Operator, Inc.)**

Docket No. ER19-1065-000

**COMMENTS OF THE
AMERICAN WIND ENERGY ASSOCIATION AND CLEAN GRID ALLIANCE**

Pursuant to Rule 212 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“FERC” or the “Commission”),¹ the American Wind Energy Association (“AWEA”) and Clean Grid Alliance (“CGA”) respectfully submit these limited comments in support of the Midcontinent Independent System Operator’s (“MISO”) Revisions to Attachment X of the Tariff to Effectuate MISO’s Generator Replacement Proposal (“Generator Replacement Proposal”). For the reasons discussed below, AWEA supports the proposal and requests that the Commission accept it, effective May 16, 2019, as requested by MISO.

I. COMMENTS

MISO’s Generator Replacement Proposal is the result of a lengthy undertaking by MISO and its stakeholders to develop an expedited process for generator replacement. The proposal represents a balanced approach for generator replacement and repowering and will result in a more flexible and streamlined process for repowering generation, which will benefit all new generation resources.

In contrast to other organized markets, MISO does not have an efficient process for generator facility replacements. This has impeded the transition from less efficient and older generating units to newer and cleaner resources. The Generator Replacement Proposal provides a

¹ 18 C.F.R. § 385.212.

solution that will streamline MISO’s current inefficient “dual-track” retirement and replacement process in a way that will maintain the reliability of the MISO-controlled grid.

The proposal will also supplement, and is consistent, with the interconnection process reforms directed by the Commission in Order Nos. 845 and 845-A (directing transmission providers to revise their interconnection procedures to include, among other things, a process by which an interconnection customer could use surplus interconnection capacity). Under the Generator Replacement Proposal, generators will have an opportunity to efficiently replace or repower inefficient generation and to pair the Replacement Generating Facility with additional resources, including storage, thereby improving the reliability of the MISO-controlled grid.

II. CONCLUSION

WHEREFORE, for the foregoing reasons, AWEA and CGA respectfully request the Commission to approve the Generator Replacement Proposal.

Respectfully submitted,

By: /s/ Gene Grace

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Date: March 8, 2019

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document has been served this day upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, DC this 8th day of March 2019.

/s/ Gene Grace

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