

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Interconnection for Wind Energy) And Other Alternative Technologies)	Docket No. PL04-15-000
Standardization of Small Generator) Interconnection Agreements and Procedures)	Docket No. RM02-12-000
Standardizing Generator Interconnection) Agreements and Procedures)	Docket Nos. RM02-1-001, RM02-1-005

**COMMENTS OF THE
NEW YORK INDEPENDENT SYSTEM OPERATOR, INC.
ON AMERICAN WIND ENERGY ASSOCIATION'S PETITION FOR
RULEMAKING, ALTERNATIVE REQUEST FOR CLARIFICATION OF
ORDER 2003-A, AND REQUEST FOR TECHNICAL CONFERENCE**

Pursuant to Rule 213 of the Federal Energy Regulatory Commission's ("Commission") Rules of Practice and Procedure, the New York Independent System Operator, Inc. ("NYISO") files these Comments in response to American Wind Energy Association's ("AWEA") Petition for Rulemaking, Alternative Request for Clarification of Order 2003-A, and Request for Technical Conference ("Petition") filed in this proceeding on May 20, 2004.

In its Petition, AWEA requests that the Commission adopt certain national standards for the interconnection of wind facilities. The Petition addresses provisions of Order No. 2003-A¹ that the Commission held would not apply to wind generators and makes suggestions for alternative requirements. AWEA intends its proposed standards to

¹ *Standardization of Generator Interconnection Agreements and Procedures*, Order No. 2003-A, 106 FERC ¶ 61,220, *rehearing pending*.

address generic concerns of typical wind facilities and relies on Transmission Providers to waive standards that may not be required from small projects. On August 23, 2004, the Commission granted AWEA's request for a technical conference.² The NYISO plans to attend that conference.

As discussed below, the NYISO supports AWEA's efforts to develop interconnection requirements that would apply specifically to wind generation. While the NYISO does not take a position on AWEA's specific proposals at this time, the NYISO submits the following Comments.

I. Comments

A. Interconnection Procedures Ultimately Adopted by the Commission Must be Flexible Enough to Address Regional Transmission System Requirements.

While the NYISO is not taking a position at this time regarding AWEA's specific proposals, the NYISO wishes to emphasize that any interconnection procedures for wind generation ultimately approved by the Commission must be flexible enough to address regional requirements of individual transmission systems. Special provisions for newer technologies, such as wind power, should be permitted to differ on a regional basis depending upon the electrical characteristics of the system to which such technologies are to be interconnected and the relative magnitude of such technologies. Any interconnection procedures adopted by the Commission must be flexible enough to accommodate these regional differences.

² *Interconnection for Wind Energy and Other Alternative Technologies*, Docket No. PL04-15-000, Notice of Technical Conference (August 23, 2004).

In New York, for example, the NYISO and the New York State Energy Research and Development Authority are sponsoring a study which is investigating the special requirements for wind generation that is proposed to be interconnected to the New York transmission system. Phase I of this study is complete. It provided a preliminary review of the reliability impacts of adding significant wind resources and also listed certain specific features or capabilities that New York should require for all new wind farms. Phase I of this study specifically recommended that New York State require all new wind farms to have four features: (1) voltage regulation at the point-of-interconnection, with a guaranteed power factor range; (2) low voltage ride-through; (3) a specified level of monitoring, metering, and event recording; and (4) power curtailment capability. Phase II will recommend, among other things, changes to reliability standards, criteria, and rules for planning and operating the New York transmission system (*e.g.*, any special requirements or conditions that should be placed on wind generation development) to meet the overall needs of New York for a reliable electric grid. Phase II will also refine the conclusions made in Phase I of the study. Phase II of the study is expected to be finalized early next year.

Any interconnection procedures adopted for new wind facilities in New York should reflect the findings of this study when it is complete. Accordingly, Transmission Providers, including the NYISO, should be permitted to file the appropriate modifications to their recently-approved Interconnection Procedures to implement interconnection procedures applicable to wind generation that reflect the specific reliability requirements of their transmission systems.³

³ The NYISO has previously indicated to FERC that the NYISO anticipates making such a filing to implement the results of the New York investigation of wind power. See the NYISO Compliance Filing (at

B. Interconnection Procedures Ultimately Adopted by the Commission Should Reflect the Fact that Additional Interconnection Requirements May Be Necessary in Certain Circumstances.

Interconnection procedures adopted for wind generators should recognize that additional requirements may be necessary for reliability purposes in certain circumstances. AWEA's Petition emphasizes that Transmission Providers should have the discretion to permit wind plants with less than the capability identified in AWEA's proposed procedures when the circumstances warrant (Petition at 4, 8). The NYISO asserts that such discretion should also permit a Transmission Provider to impose additional requirements on a proposed wind generator if necessary for reliability purposes.

The NYISO recognizes that interconnection requirements should not be unnecessarily burdensome so as to act as a barrier to new project development. However, the Commission must recognize that in some cases interconnection requirements in addition to those identified in the interconnection procedures may be necessary to ensure reliability. For example, additional requirements may be necessary if wind generation exceeds a certain percentage of the system peak load. At high penetration levels, wind resources may have a significantly greater reliability impact than they would at lower levels. Therefore, interconnection procedures must give the Transmission Provider sufficient flexibility to impose additional interconnection requirements as appropriate to maintain system reliability.

5-6) submitted on April 26, 2004, in *Standardization of Generator Interconnection Agreements and Procedures*, Docket Nos. RM02-1-001, *et al.*

II. Conclusion

The NYISO requests that the Commission develop interconnection procedures applicable to wind generators consistent with the NYISO's Comments submitted herein.

Respectfully submitted,

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