

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

**Reform of Generator Interconnection)
Procedures and Agreements)**

RM17-8-000

**JOINT COMMENTS OF ADVANCED ENERGY ECONOMY, AMERICANS FOR A
CLEAN ENERGY GRID, THE AMERICAN COUNCIL ON RENEWABLE ENERGY,
THE AMERICAN WIND ENERGY ASSOCIATION, THE ENERGY STORAGE
ASSOCIATION, AND THE SOLAR ENERGY INDUSTRIES ASSOCIATION**

Advanced Energy Economy (“AEE”), Americans for a Clean Energy Grid (“ACEG”), American Council on Renewable Energy (“ACORE”), American Wind Energy Association (“AWEA”), Energy Storage Association (“ESA”), and Solar Energy Industries Association (“SEIA”)¹ hereby respectfully submit these limited comments to the Commission’s December 15, 2016, Notice of Proposed Rulemaking (“NOPR”) in the above-captioned proceeding.² The Commission proposes to revise its regulations, the *pro forma* Large Generator Interconnection Procedures (“LGIP”) and *pro forma* Large Generator Interconnection Agreement (“LGIA”) to improve certainty, promote more informed interconnection, and enhance interconnection processes. For the reasons set forth herein, we support the Commission’s proposed reforms and, after it has had time to consider the comments submitted on the NOPR, encourage the Commission to initiate expeditiously a final rulemaking in this proceeding.

¹ AWEA, ESA, and SEIA are filing separate comments on the NOPR that provide greater detail regarding their respective views of the proposed rulemaking.

² *Reform of Generator Interconnection Procedures and Agreements*, Notice of Proposed Rulemaking, 157 FERC ¶ 61,212 (December 15, 2016) (“NOPR”).

I. COMMENTS

The time is ripe for the Commission to make certain regulatory and policy changes to interconnection procedures in order to remedy barriers to generator market access that inhibit the development of electric generation to meet the growing needs of electricity customers and to help facilitate the ongoing transformation of the electric generation mix in a timely, reliable, and cost-effective manner. Although the Commission's previous generator interconnection reforms had generally positive results, various aspects of the *pro forma* LGIP and LGIA are currently out of date and simply do not ensure that the interconnection process efficiently brings generation into the market at just and reasonable rates. This negatively impacts both interconnection customers and transmission providers. The NOPR represents an important step in modernizing the interconnection process by minimizing opportunities for undue discrimination and expediting the development of new generation, while ensuring system reliability and just and reasonable rates.

II. CONCLUSION

WHEREFORE, the undersigned respectfully submit these comments for the Commission's consideration in this proceeding.

Respectfully submitted,

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