

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Southwest Power Pool, Inc.

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Docket No. ER20-572-000

**MOTION TO INTERVENE AND COMMENTS OF
THE ENERGY STORAGE ASSOCIATION**

Pursuant to Rule 214 of the Federal Energy Regulatory Commission’s (“FERC” or the “Commission”) Rules of Practice and Procedure,¹ the Energy Storage Association (“ESA”) respectfully submits this motion to intervene and comment as to one aspect of the tariff filed by Southwest Power Pool, Inc. (“SPP”) in the above-captioned matter. In its filing, SPP seeks the Commission’s approval to modify its Open Access Transmission Tariff, Sixth Revised Volume No. 1 Attachment AA, at Section 7.0 by including the term “accredited capacity,” without defining the term in the Tariff. For the reasons detailed below, ESA respectfully requests that SPP be directed to define “accredited capacity” and to include the definition within the Tariff.

I. COMMUNICATIONS

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¹ 18 CFR 385 §§ 211 and 214 (2019).

II. MOTION TO INTERVENE

ESA is the national trade association charged with working toward a more resilient, efficient, sustainable and affordable electricity grid – as is uniquely enabled by energy storage. With over 190 members, ESA represents a diverse group of companies, including independent power producers, electric utilities, energy service companies, financiers, insurers, installers, manufacturers, component suppliers and integrators involved in deploying energy storage systems around the globe.

ESA’s member companies have expertise in grid operations relevant to energy storage as well as firsthand knowledge of the regulatory challenges to financing and operating commercial energy storage facilities to realize full benefits to the bulk power system. Numerous ESA member companies seek to provide wholesale electric service from energy storage resources in SPP’s region. Moreover, ESA has participated fully in SPP’s Order 841 compliance dockets.

Accordingly, ESA has a direct and substantial interest in the issues being evaluated in this matter and will be substantially and specifically affected by the outcome of this proceeding. No other party could adequately represent ESA’s interest in this proceeding. Therefore, ESA moves to intervene in this docket.

III. COMMENT

On October 17, 2019, FERC issued its Order accepting in part, SPP’s filing in compliance with Order 841.² In pertinent part, that Order directed SPP to submit Tariff provisions that detail continuous run time requirements for qualifying the resource adequacy contribution of resources, including Energy Storage Resources (“ESRs”), rather than allow such a provision to be specified in business practice manuals. Thus, in the instant filing, SPP seeks approval of the minimum run-time

² *Southwest Power Pool, Inc.*, 169 FERC ¶ 61,048 (October 17, 2019).

requirements for all resources, including ESRs, for the purpose of assessing their contribution to resource adequacy. Specifically, SPP's tariff requires resources to be capable of supplying their "accredited capacity" over four continuous hours to qualify their contribution to resource adequacy. While the term "accredited capacity" is used in other parts of SPP's Tariff, there is no definition of the term in SPP's Tariff.³ Instead, SPP footnotes that "accredited capacity" is equivalent to other terms specified in SPP's business practice manuals.⁴

As FERC has directed SPP to define minimum run-time provisions for qualifying ESR contributions to resource adequacy in its Tariff, the terms that SPP uses should be defined in Tariff. To that end, ESA recommends that SPP define the term "accredited capacity" formally in its Tariff, or else use a term defined elsewhere in its Tariff that is sufficient to its purpose. Defining the parameters used to assess the resource adequacy contribution of energy-limited resources, including ESRs, will ensure compliance with FERC's directive to SPP—namely, that such parameters be subject to the "rule of reason" and should not change without SPP submitting a 205 filing, which is necessary ensure that the Tariff results in just and reasonable rates.

IV. CONCLUSION

As detailed herein, ESA respectfully requests the FERC direct SPP to include a definition of "accredited capacity" in its Tariff. Moreover, as ESA will be substantially and specifically affected by

³ While the term "accredited capacity" is not defined, Attachment AA, Section 2.0 does include a definition of the term "Firm Capacity," which is defined to mean: "The accredited capacity of commercially operable generating units, or portions of generating units, adjusted to reflect purchases and sales of capacity with another party, and that is deliverable with firm transmission service to the LRE's load." ESA is uncertain if SPP intended to use this defined term instead.

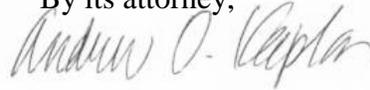
⁴ See *Southwest Power Pool, Inc.*, at footnote 19. "The term 'accredited capacity' in Attachment AA represents the same concept described by the terms 'net generating capacity' and 'net capability' used in sections 7.1 and 7.1.6(2) of the SPP Planning Criteria, respectively."

the outcome of this proceeding, FERC is respectfully requested to allow ESA to intervene in this proceeding.

Respectfully submitted,

ENERGY STORAGE ASSOCIATION

By its attorney,

A handwritten signature in black ink that reads "Andrew O. Kaplan". The signature is written in a cursive, flowing style.

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Dated: January 10, 2020

CERTIFICATE OF SERVICE

I, Anne O'Hanlon, hereby certify that the foregoing Motion to Intervene and Comment of the Energy Storage Association were served via electronic mail to the service list.

Dated in Boston, MA this 10th day of January, 2020.



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