UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Small Generator Interconnection Agreements And Procedures	)	**Docket No. RM13-2-000**

COMMENTS OF THE NRG COMPANIES

The NRG Companies respectfully submit the following comments to the Federal Energy Regulatory Commission ("FERC" or "Commission") in response to the Commission's January 17, 2013 Notice of Proposed Rulemaking ("NOPR") on Small Generator Interconnection Agreements and Procedures ("SGIA" and "SGIP", respectively).[1] We appreciate the opportunity to file comments in this proceeding and urge the Commission to adopt its proposed revisions to the SGIA and SGIP. We also support the comments filed by the Solar Energy Industries Association filed in this docket on this same date.

I. The NRG Companies.

NRG owns over 46,000 MW of generation and operates in almost all of the organized markets, as well as non-market areas, and owns nuclear, coal, natural gas,

[1] *Small Generator interconnection Agreements and Procedures*, 78 Fed. Reg. 7524 (2013).

wind, and solar generating facilities, including both distributed solar and utility-scale solar. NRG currently owns approximately 500 MW of operating solar generation, of which approximately 40 MWs is distributed solar. NRG currently has over 300 MW of additional solar generation under contract and in advanced stages of development. NRG has developed and is continuing to develop distributed solar arrays at schools, major universities and sports stadiums. As a developer of both utility and small scale projects, the NRG Companies offer a unique perspective in this docket and recognize the need for the proposed revisions to the SGIA and SGIP to eliminate barriers to development.

II. Comments.

A. Market Changes Necessitate the Elimination of Barriers to Develop Small-Scale Generation.

The NRG Companies support the Commission's proposed revisions to the SGIA and SGIP. The proposed rule changes set forth in the NOPR will enable the SGIA and SGIP to better track with the needs of modern distributed and small-scale development. The Commission has accurately recognized that market changes, including the growth of small scale projects necessitates reforms to its existing interconnection processes and rules.[2] Eliminating the existing limitations in the SGIA and SGIP will enable the growth

[2] NOPR at PP 2, 18-24.

of distributed or small utility scale projects, including solar and other renewable technologies.

B. Adding Transparency into the Supplemental Review Process is Important for the Continued Development of Small-Scale Projects.

The current supplemental review process lacks transparency and thereby hinders project development. The NRG Companies support the NOPR's proposal to revise the supplemental review process for interconnection customers whose projects fail any of the ten Fast Track screens, including the 15% screen under which the aggregate distributed generation interconnected on a utility circuit cannot exceed 15 percent of the line section annual peak load. While under the current rules, an applicant that fails this screen can proceed with supplemental review to obtain interconnection without going through a study process, the existing supplemental review process lack transparency and amounts to a "black box" in which the transmission provider determines whether the facility can be interconnected without affecting safety and reliability. Further, the black box nature of the current process is only enhanced by the fact that the current interconnection rules do not define the parameters that utilities are required to use during its supplemental review.

Importantly, the NOPR proposes to fill this regulatory gap by adding the missing parameters. Specifically, the NOPR proposal includes adding three supplemental review screens that are similar to the California Rule 21 screens. The three additional

screens, which include the 100% of minimum load screen, the power quality and voltage control screen and the safety and reliability screen will add more concrete parameters to the supplemental review process. Equally important, utilities will now be required to complete the supplemental review within timelines set forth in the tariff. Specifying such parameters will add much needed transparency into the interconnection process and will allow small generators to avoid lengthy and costly interconnection study processes that could ultimately jeopardize the viability of small scale projects and should be adopted.

C. The Provision of a Pre-Application Report Will Enable Developers and Investors to More Accurately and Expeditiously Assess Project Viability.

The NRG Companies also support the proposal for Transmission Providers to provide Interconnection Customers with a pre-application report on a specified Point of Interconnection upon the Interconnection Customer's request and submission of a $300 fee. The information provided in the pre-application report, including details concerning available capacity, existing and queued generation, voltage, circuit distance and peak and minimum load data, would be extremely useful to developers in evaluating siting options. The prompt and reasonably accurate identification of congestion points is especially crucial in developing small scale generation projects where slight changes in timing and costs can render a project unviable. Additionally, timely and reasonably accurate feedback on potential interconnection points is essential

to assessing project viability from an investor viewpoint. Further, the NRG Companies agree that an interconnection customer's ability to obtain a pre-application report would allow customers to make more prompt and better informed siting decisions, which would ultimately decrease the amount of interconnection requests submitted to the transmission providers. For all of these reasons, NRG recognizes the importance and usefulness of a pre-application report.

D. Additional SGIA and SGIP Reforms Will Eliminate Barriers to Small Scale Generation Development.

Increasing the 2 MW threshold for participation in the Fast Track process to 5 MW, and providing interconnection customers the opportunity to provide written comments to the transmission provider on required elements, are two additional reforms of the NOPR that will eliminate barriers to small scale generation development. NRG supports these important reforms.

The 5 MW threshold will allow more projects to take advantage of the expedited process and thereby remove these projects from a study process that can at times be time consuming and ill-suited to (relatively) small distributed solar generation projects. The opportunity to communicate with the transmission provider on required upgrades is another commonsense reform that will facilitate the interconnection process and should also be adopted.

III. Conclusion.

Wherefore, the NRG Companies respectfully request that the Commission adopt the proposed reforms to the SGIA and SGIP set forth in the NOPR as discussed herein.

Respectfully submitted,

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Dated June 3, 2013

Certificate Of Service

I hereby certify that I have served a copy of the foregoing document upon the Applicant in this proceeding.

Dated at Princeton, New Jersey this 3rd day of June, 2013.

/s/ *Gretchen Hunt*
Gretchen Hunt