UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Offshore Wind Integration in RTOs/ISOs	)	Docket No. AD20-18-000
	)	

COMMENTS OF WIRES

Pursuant to Rules 212 and 214 of the Federal Energy Regulatory Commission's ("FERC" or "Commission") Rules of Practice and Procedure,[1] and the Commission's March 11, 2021 Notice Inviting Post-Technical Conference Comments ("Notice"), WIRES submits the following comments.[2]

I. COMMUNICATIONS

In accordance with Rule 203(b)(3) of the Commission's Rules of Practice and Procedure, all communications and correspondence regarding these proceedings should be directed to:

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[1] 18 C.F.R. §§ 385.212 and 214 (2019).

[2] This filing is supported by the full supporting members of WIRES but does not necessarily reflect the views of the RTO/ISO associate members of WIRES.

II. INTRODUCTION

WIRES is a non-profit trade association of investor-, publicly-, and cooperatively-owned transmission providers and developers, transmission customers, regional grid managers, and equipment and service companies. WIRES promotes investment in electric transmission and consumer and environmental benefits through development of electric transmission infrastructure.[3] Since its inception, WIRES has focused on supporting investment in needed and beneficial transmission infrastructure – investments that Congress and the Commission have recognized are critical to establish a resilient, reliable, cost-effective, modern, and clean bulk power system.

On October 27, 2020, FERC staff convened a technical conference to discuss whether and how existing transmission planning, interconnection, and merchant facility frameworks in Regional Transmission Organizations/Independent System Operators (RTOs/ISOs) can accommodate anticipated growth in offshore wind generation in an efficient and cost-effective manner that safeguards open access principles, and to consider possible changes or improvements to the current frameworks should they be needed to accommodate such growth. Subsequently, the Commission issued a Notice inviting all interested persons to file post-technical conference comments in response to certain questions. WIRES submits the following general comments in response to the Petition.

[3] For more information about WIRES, please visit www.wiresgroup.com.

III. COMMENTS

The demands on the nation's transmission system are extensive, and the need for greater investment in transmission is growing. Offshore wind is only a part of the need for investment in the nation's transmission infrastructure, but it could nonetheless become a significant driver of transmission infrastructure development. Thus, WIRES commends the Commission and its staff for highlighting this important issue.

Investment in transmission to integrate offshore wind projects will help to address at least two critical and timely needs: one is meeting ambitious clean energy mandates and goals established by the states; the other is providing an economic jumpstart through the sales and resales of goods and services and support for a high number of fulltime jobs (both of which are badly needed during the current economic recovery in the wake of the COVID-19 pandemic).

The states have set extremely ambitious timelines relating to their goals for integrating offshore wind, in some instances starting within the next couple of years. These deadlines are in addition to the various goals states have set for the integration of renewables separate and apart from any goals relating to offshore wind.

There are legitimate concerns regarding how a large volume of renewable resources will be able to be integrated into the transmission system starting within the next few years, given the reality that it takes on average several years to get new transmission projects through the process of permitting, siting, and construction. All of this is simply to say that as the Commission considers what actions to take, if any, regarding changes to the transmission planning processes, it is important to bear in mind that time is of the essence.

The fact of the matter is that rules and planning processes exist today that can accommodate the addition of generating resources, including offshore wind. These rules and processes can be refined to better facilitate offshore wind development (such as through the incorporation of scenario analyses, as appropriate). But absent a broad consensus on what rules and processes would be better, the situation weighs in favor of incremental changes to the existing framework for regional transmission planning, as opposed to broader or generic changes. The one outcome to avoid is any action, no matter how well intentioned, that has the consequence of slowing down the development and integration of offshore wind resources. This is not the time to engage in experimentation or explore economic-driven theory to see how things work out.

Another consideration for the Commission to bear in mind is that the integration of offshore wind generation does not end at the shoreline, and in order to accommodate added offshore wind capacity, significant investment in onshore transmission infrastructure will be needed. Transmission systems in general have historically been designed to carry power inland out to the coasts, rather than vice versa.

That said, there is clearly a need to coordinate the construction of extensive offshore interconnection facilities along with the expansion of the onshore transmission system to ensure that the electricity generated by these facilities is deliverable to customers. Because, in some regions, existing capacity on and points of interconnection to the onshore transmission system are limited, without coordination, they could quickly be exhausted. Where needed, a holistic planning process can help coordinate the development of the offshore transmission system and the enhancement of the onshore grid in a way that efficiently and cost-effectively balances the location and development of offshore and onshore infrastructure. Such coordination could help optimize the use of existing onshore infrastructure, maximize use of existing rights of way and points of interconnection, and reduce environmental and community impacts of constructing new transmission infrastructure.

As to whether Order No. 1000 interregional coordination provisions could facilitate the development of transmission projects to integrate remote generation such as offshore wind, to date, interregional coordination processes under Order No. 1000 have not proven particularly successful in spurring transmission projects. For instance, if offshore wind is interconnecting to a single RTO or ISO, interregional planning would not necessarily come into play, certainly not in all situations. Moreover, given the aggressive timelines associated with offshore wind goals, there are legitimate concerns about how coordinating with an interregional planning process might further delay the process. If there are specific situations where more interregional coordination is needed, in those specific situations FERC may be able to play an effective role in bringing the players to the table and encouraging progress.

A separate planning and interconnection process may be warranted, depending on the region, to address the unique challenges associated with developing the offshore infrastructure and the onshore network upgrades needed to accommodate the large influx of generation from offshore generation and limited coastal interconnection points. Moreover, the Commission should allow for flexibility with respect to the timing needs of the states and the timing needs of the offshore generators themselves, bearing in mind that how best to accommodate those timing needs will vary by region and by planning process. Given the

significant amount of offshore wind generation capacity anticipated over time, consideration should be given to the coordinated deliverability plan of the offshore resources and making sure that the capacity remains deliverable as the onshore transmission system evolves. Over the longer term, holistic regional and interregional planning may enhance economic supply opportunities for both customers and suppliers. That said, the need for interregional planning and coordination should not delay the development of local and regional infrastructure needed to facilitate offshore wind.

Respectfully submitted,

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May 10, 2021