FERC Priorities

The Sustainable FERC Project
Allison Clements, Director
Natural Resources Defense Council



Important Dockets

- Order 1000 (RM10-23)
- Order 764 (RM10-11)
- Order 745 (RM10-17)
- Order 755 (RM11-7)
- NOPR Third-Party Provision of Ancillary Services; Accounting and Financial Reporting for New Electric Storage Technologies (RM11-24)

Order 1000 Requires:

- Regional transmission planning and interregional transmission coordination
- TPs to consider public policy drivers for transmission needs (in addition to reliability and efficiency)
- Comparable treatment of NTAs
- Elimination of TPs ROFR in some instances
- Development of regional and interregional cost allocation methods

Order 1000 Does Not:

- Require regions to act on public policy drivers
- Comparable treatment in cost recovery for NTAs
- Explicitly empower RTOs to direct NTA solutions to reliability, congestion or public policy needs
- Establish minimum requirements governing which nontransmission alternatives should be considered or the appropriate metrics to measure non-transmission alternatives against transmission alternatives P 155

Order 764

- Requires TPs to offer intra-hour transmission scheduling; and
- Requires interconnecting customers to provide meteorological and forced outage data to the TPs to assist in power production forecasting (if the TPs want it)
- Allows TPs to get FERC approval to charge varying rates for the incremental integration costs charged by VER customers
- Currently on rehearing; 17 NGOs filed a request for rehearing on integration cost issue

Order 745 and 755

745:

- In organized markets, TPs must compensate DR that meets the net benefits test at the full locational marginal price, without any reduction to reflect retail rate costs.
- Net benefits test

755:

 In organized markets, frequency regulation services must be paid for actual service provided, including a capacity payment + a performance payment

Ancillary Services/Energy Storage NOPR

- The NOPR would:
- (i) revise its Avista restrictions on the third-party sales of ancillary services;
- (ii) require each public utility to include in its tariff a mechanism for determining regulation and frequency response reserve requirements that account for speed and accuracy of resources; and
- iii) revise the accounting and reporting requirements for energy storage to better PIO also support modifying utility accounting and reporting rules to better represent the functions, benefits and costs related to energy storage devices.
- 12 PIOs submitted supportive comments but requesting FERC extend the proposed reforms for 3P provision of ancillary services to additional markets, and continue to explore the potential services and benefits of energy storage technologies together with potential reforms to monetize and reward energy storage services.

Other Stuff:

- Transmission Incentives (RM11-26)
- FERC guidance on reliability issues related to EPA rules and coal retirements (AD12-1)
- Transmission capacity rights (AD12-9 and AD11-11)
- SEIA Petition for Rulemaking on Small Generator Interconnection Reform (RM12-10)

What's Next?