

Wind on the Wires Comments Re: Frequency Response  
April 7, 2016

Wind on the Wires appreciates that the topic of Frequency Response was brought to the Interconnection Process Task Force, given the interest in this topic by many stakeholders at the IPTF, however we are concerned that it crosses multiple MISO stakeholder forums, both in affect and technical function, and therefore should be discussed within other Committees with comments received through those presentations before any proposed changes are brought to the Planning Advisory Committee. Additionally, WOW has concerns regarding differences in generation technologies and their abilities to meet proposed requirements set by MISO. For example, battery storage has tremendous potential to address the decline in frequency reserve, yet it can do nothing with droop and deadband requirements listed in a GIA. Therefore, perhaps a better approach might be for MISO to financially incentivize contributions to frequency response, rather than create requirements and penalties in Generator Interconnection Agreements that really only apply to a specific type of generation asset, and do not make sense in light of the changing grid technologies of today. Our recommendation is that MISO solicit from within the IPTF and other relevant stakeholder forums ideas on how to address declining frequency response, and present those ideas to stakeholders for discussion and feedback in all the various stakeholder forums, before moving forward with a proposal.

Thank you for consideration of these comments,

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