UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

PJM Interconnection, L.L.C	**)**	**Docket Nos. EL19-100-000**
	)	**ER20-584-000**

Motion to Intervene Out of Time and Comments of the National Hydropower Association

The National Hydropower Association (NHA) hereby respectfully submits the following comments in response to the PJM Interconnection L.L.C's ("PJM") motion to hold the above-captioned proceedings in abeyance and request for a shortened comment period and expedited action.

I. Motion to Intervene Out of Time

NHA represents more than 240 companies, from Fortune 500 corporations to family-owned small businesses. Our diverse membership includes public and investor-owned utilities, independent power producers, developers, equipment manufacturers and other service providers. As a national association, we have members across the country, including PJM, where our members operate several thousands of MWs of both pumped storage hydropower and run of river hydropower.

Because the determination in this proceeding will affect our members, NHA has a direct and substantial interest in this proceeding which cannot adequately be represented by any other party. Given its direct interest, NHA's motion to intervene out of time is in the public interest, and should be granted.

II. Communications

All correspondence, communications, pleadings and other documents related to this proceeding should be addressed to the following individuals:

Dennis Cakert
Manager of Regulatory Affairs and Markets Policy
National Hydropower Association
601 New Jersey Ave NW
Washington, D.C. 20001
Email: Dennis@hydro.org
Phone: 202-697-2404

III. Comments

NHA supports PJM's Motion to hold the proceedings in abeyance so PJM may engage its stakeholders in discussions regarding the use of an Effective Load Carrying Capability (ELCC) methodology as an alternative to its proposed 10- hour minimum run-time rule. NHA requests the Commission direct PJM to consider the unique operational characteristics of both pumped storage hydropower and run of river hydropower if PJM develops an ELCC methodology for these resources.

For pumped storage hydropower, NHA requests the Commission direct PJM to develop supporting analysis to consider the ability of pumped storage to provide quick-ramp capability, to provide long duration discharge, and to provide multiple daily pumping and generating cycles. NHA believes it may be necessary to consider storage in multiple tiers based on the different characteristics of different storage technologies.

For run of river hydropower, NHA requests the Commission direct PJM to consider the following unique characteristics of run of river hydropower:

First, whether or not run of river hydropower is within the scope of this proceeding given that this proceeding is a result of Order 841 which defined energy storage resource as "a resource capable of receiving electric energy from the grid and storing it for later injection of electric energy back to the grid."[1]

Second, if PJM applies ELCC to run of river hydropower, NHA requests the Commission direct PJM to consider run of river in phase II, as is outlined in PJM's Issue Charge, because NHA does not want the complexity of run of river hydropower to delay the implementation of ELCC for pumped storage hydropower and other resources.[2] Compared to run of river hydropower, PJM is significantly further along in its analysis of ELCC for storage, wind, and solar resources. Run of river hydropower is a complex resource that is difficult to model and it will take time to develop an accurate ELCC methodology.

Third, NHA requests the Commission direct PJM to consider the complexity of run of river and that the site-specific nature of individual run of run projects requires more data and individual project analysis. No two run of river projects are the same and many are operated in tandem with other projects in the same watershed. Every river has different hydrology and every run of river hydropower project has different pondage and storage capability. Establishing fleet wide assumptions for all run of river projects might not produce useful valuations of individuals projects.

Fourth, NHA requests the Commission direct PJM to work with hydropower stakeholders when considering what historical data to use to determine ELCC values for run of river

[1] FERC Order 841 "Electric Storage Participation in Markets Operated by Regional Transmission Organizations and Independent System Operators" (February 15, 2018). Available at: https://www.ferc.gov/whats-new/comm-meet/2018/021518/E-1.pdf

[2] PJM Issue Charge "Effective Load Carrying Capability for Limited Duration Resources and Intermittent Resources" available at: https://www.pjm.com/-/media/committees-groups/committees/mic/2020/20200304-special-capacity/20200304-elcc-for-limited-duration-resources-and-intermittent-resources-issue-charge.ashx

hydropower. Depending on which days are chosen, the results for run of river can vary substantially because stream flows vary from year to year and throughout the year. Every license for each run of river project is different. Some projects have limitations on storage that differ depending on the season due to ice or recreation. In addition, run of river projects have site specific emergency management procedures that may impact availability.

Fifth, NHA requests the Commission direct PJM to consider the limited growth opportunities in PJM for run of river hydropower development and whether or not that poses a potential future reliability risk for PJM. Run of river in PJM is a very small portion of overall PJM generation, representing approximately 3,000 MW out of a total installed generation of approximately 198,000 MW. Run of river is a stagnant resource with little to no expected growth. As a result, NHA believes run of river does not pose a potential future reliability risk for PJM as other resources may with higher levels of expected growth in PJM.

Lastly, NHA requests the Commission direct PJM to consider whether other RTOs or ISOs apply ELCC to run of river.

IV. Conclusion

NHA is supportive of PJM developing an ELCC methodology for pumped storage hydropower in Phase I, but, if PJM considers an ELCC methodology for run of river, that the Commission direct PJM to do so in Phase II, as is outlined in the PJM Issue Charge. NHA submits these comments for the Commission's consideration and respectfully requests that the Commission consider the points raised herein.

Respectfully submitted,

/s/ Dennis Cakert

Dennis Cakert
Manager of Regulatory Affairs and Markets Policy
National Hydropower Association
601 New Jersey Ave NW
Washington, D.C. 20001
Email: Dennis@hydro.org
Phone: 202-697-2404

Dated: March 11, 2020

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this March 11, 2020.

Dennis Cakert