

OGRR Comments

OGRR Number	208	OGRR Title	Voltage Ride-Through (VRT) Requirement
--------------------	------------	-------------------	---

Date	November 5, 2008
-------------	------------------

Submitter's Information	
Name	David Barnes
E-mail Address	david.barnes@babcockbrown.com
Company	Babcock & Brown
Company Address	5307 E. Mockingbird Lane, Suite 710, Dallas, Texas 75206
Company Phone	(214) 515-1141
Company Fax	(214) 368-9929

Comments

Babcock & Brown respectfully submits this statement in support of the appeals of the TAC approved OGRR208 submitted by Horizon, E.ON, FPL Energy, and Invenergy.

Babcock & Brown develops wind and infrastructure projects on a global basis and has made significant investments in renewable energy projects in the ERCOT region, as well as in other regions across the US. B&B will complete several new wind projects this year, and has plans for significant future investments in renewable energy in Texas.

Babcock & Brown Power Operating Partners (BBPOP) operates and maintains a large number of existing wind turbine generators in ERCOT. Electric reliability is a key concern of our company and we proactively support and invest in the reliability of the electric grid through stringent design and development programs based on the rules and regulations in effect at the time of development.

While Babcock & Brown supports the VRT requirements in OGRR208, for the reasons more fully set forth in the above-referenced appeals, Babcock & Brown opposes TAC's retroactive application of OGRR208. Simply put, retroactive application of those requirements was imposed without the benefit of study or consideration as to what capabilities exist or should be required and introduces significant financial risk exposure to existing operational projects in ERCOT. If allowed to stand, retroactive application of OGRR208 will have a chilling effect on further investments in generating resources within ERCOT.

Revised Proposed Guide Language
--

None.