

## OGRR Comments

<b>OGRR Number</b>	<b>208</b>	<b>OGRR Title</b>	<b>Voltage Ride-Through (VRT) Requirement</b>
--------------------	------------	-------------------	---

<b>Date</b>	November 7, 2008
-------------	------------------

<b>Submitter's Information</b>	
<b>Name</b>	Tom Shields
<b>E-mail Address</b>	tom.shields@iberdrolausa.com
<b>Company</b>	IBERDROLA RENEWABLES, Inc. <sup>1</sup>
<b>Phone Number</b>	(281) 374-3064
<b>Cell Number</b>	
<b>Market Segment</b>	Independent Power Marketers

<b>Comments</b>
-----------------

### **Statement of Support for Appeals by E.ON Climate & Renewables North America Inc., FPL Energy, LLC, Horizon Wind Energy LLC, and Invenergy LLC of OGRR 208**

IBERDROLA RENEWABLES, Inc. respectfully submits this statement of support for the appeals filed by E.On Climate & Renewables North America, Inc., FPL Energy, LLC, Horizon Wind Energy LLC, and Invenergy LLC of OGRR 208.

IBERDROLA RENEWABLES is currently the world's leading provider of wind power with 8,500 MW of wind power in operation globally. IBERDROLA RENEWABLES is constructing two wind projects in ERCOT that will be in service within the next several months, and has plans for constructing additional wind projects within ERCOT.

IBERDROLA RENEWABLES supports voltage ride through standards in general for helping to maintain a reliable power system. IBERDROLA RENEWABLES, however, opposes the retroactive provisions of OGRR 208. There have been no studies that show reliability problems because of voltage ride through issues. Despite the lack of studies, generators with Interconnection Agreements signed after January 1, 2003 and before November 1, 2008 are required to comply with OGRR 208 by January 1, 2015.

---

<sup>1</sup> PPM Energy, Inc. changed its name to IBERDROLA RENEWABLES, Inc. on May 1, 2008.

## OGRR Comments

With six-plus years until the 2015 compliance date, certainly there is time for ERCOT to perform studies to determine if there is even a reliability problem due to voltage ride through issues. If there is a problem, there may be multiple ways that problem could be mitigated. Perhaps the problem is solved with the installation of CREZ transmission lines, or by other transmission system improvements the transmission system providers will make between now and 2015.

The point is, studies should be done to first see if there is in fact any reliability problem, and if so, what are the options for mitigating the problem. Mandating that a certain group of generation undergo extensive and expensive renovations for what is perceived as perhaps being a problem is an arbitrary decision that should be suspended until proper analysis of the problem, as well as the solutions, can be performed.