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| <b>Grid Resilience in Regional Transmission</b> | ) |                              |
| <b>Organizations and Independent System</b>     | ) | <b>Docket No. AD18-7-000</b> |
| <b>Operators</b>                                | ) |                              |

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## II.

The Microgrid Resources Coalition is a consortium of leading microgrid owners, operators, developers, suppliers, and investors formed to advance microgrids through advocacy for laws, regulations and tariffs that support their access to markets, compensate them for their services, and provide a level playing field for their deployment and operations. In pursuing this objective, the MRC intends to remain neutral as to the technology deployed in microgrids and the ownership of the assets that form a microgrid. The MRC's members are currently engaged in a wide variety of Microgrid-related activities across the United States and its members are vitally interested in the regulations and sale-structures applicable to microgrids.<sup>1</sup>

## III.

On January 8, 2018, the Commission issued an order terminating the proceeding initiated in Docket No. RM18-1-000 and initiated a new proceeding in Docket No. AD18-7-000 to evaluate the resilience of the bulk power system in the regions operated by the Regional Transmission Organizations and the Independent System Operators (RTOs/ISOs).<sup>2</sup> The Commission directed ISOs and RTOs to respond to the Commission and submit information on certain resilience issues within 60 days. The RTOs/ISOs submitted their information to the Commission on March 9, 2018 and reply comments were due 30 days thereafter. On March 20, 2018, the Commission extended the time for interested entities to file reply comments until May 9, 2018.<sup>3</sup>

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<sup>1</sup> The MRC is actively engaged in advancing the understanding and implementation of microgrids across the country. MRC members hold significant energy assets connected to the electric grids, provide energy generation and supply services, and are exploring microgrid construction and ownership in different locations throughout the country. MRC members include: Anbaric Transmission, Commonwealth Edison, Concord Engineering Group, Eaton, ENGIE, ICETEC Energy Services, Inc., Massachusetts Institute of Technology, NRG Energy, Inc., Princeton University, and Thermo Systems. The MRC is affiliated with the International District Energy Association ("IDEA"), which connects members from all over the country operating combined heat and power plants and microgrids.

<sup>2</sup> *Grid Reliability and Resilience Pricing*, 162 FERC ¶ 61,012 (2018) (January 8 Order).

<sup>3</sup> *Grid Resilience in Regional Transmission Organizations and Independent System Operators*, 162 FERC ¶ 61,256 (2018) (March 20 Order).

#### IV.

The Microgrid Resource Coalition member's advanced microgrids have demonstrated the resiliency necessary to withstand severe weather events and provide electric service to support critical resources in the health care, research, and emergency response sectors, among others. A number of MRC members participate in the ISO and RTO wholesale electric markets that may be affected by FERC's actions on resilience. As a result, the MRC has a direct and substantial interest in this proceeding and may be affected by its ultimate resolution. The MRC will not be represented adequately by any other party and may be adversely affected or bound without opportunity to present its position unless it is permitted to participate fully in the proceedings.

Respectfully submitted,

Microgrid Resources Coalition

By: /s/ Christopher Berendt

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Dated: May 9, 2018

**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 of the Federal Energy Regulatory Commission in this proceeding.

Dated at Washington, D.C. this 9th day of May, 2018.

/s/Christopher Berendt

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