

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Grid Reliability and Resilience Pricing

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Docket No. RM18-1-000

**MOTION TO INTERVENE OF MICROGRID
RESOURCES COALITION**

Pursuant to Rule 214 of the Federal Energy Regulatory Commission’s (“FERC” or “Commission”) Rules of Practice and Procedure, 18 C.F.R. § 385.214, the Microgrid Resources Coalition (“MRC”) hereby moves for leave to intervene in the above-referenced docket.

I.

The names, titles and addresses of the persons to whom communications with respect to these proceedings should be addressed are:

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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.¹

III.

On October 10, 2017, the Secretary of Energy (“Secretary”) published in the Federal Register a Notice of Proposed Rulemaking (“NOPR”)² proposing that the Commission exercise its authority under sections 205 and 206 of the Federal Power Act to impose rules on Commission-approved independent system operators (“ISOs”) and regional transmission organizations (“RTOs”) to ensure that reliability and resilience attributes of electric generation resources are fully valued. The Secretary directed the Commission to take final action on the NOPR within 60 days from the publication in the *Federal Register*. In order to meet that

¹ 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, 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.

² *Grid Resiliency Pricing Rule*, 82 Fed. Reg. 46,940 (Oct. 10, 2017).

deadline, the NOPR invited the Commission to issue a notice establishing comment procedures within two days after the NOPR’s publication and provided that comments otherwise would be due within 45 days after such publication. As confirmed by the Commission’s “Notice Denying Extension of Time,” issued October 11, 2017, comments on the NOPR are due on or before October 23, 2017 and reply comments are due on or before November 7, 2017.

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, finance, and emergency response sectors. A number of MRC members participate in the ISO and RTO wholesale electric markets that may be affected by the NOPR. 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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Counsel to the Microgrid Resources Coalition

Dated: October 23, 2017

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 23rd day of October, 2017.

/s/ s/ Christopher Berendt

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