

March 11, 2015

Via Electronic Mail and U.S. Mail

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 East Seventh Place, Suite 350
St. Paul, MN 55101

Re: **Supplement of Calpine Corporation**

In the Matter of the Petition Northern States Power Company for Approval of Competitive Resource Acquisition Proposal and Certificate of Need

Docket Nos.: E-002/CN-12-1240, E-002/M-14-788 and E-002/M-14-789

Dear Mr. Wolf:

On March 6, 2015, Calpine Corporation and its affiliate Mankato Energy Center, LLC (“Calpine”) submitted their Answer to the Minnesota Department of Commerce’s (“Department”) Request for Clarification or Reconsideration (“Department Request”) and Invenergy Thermal Development LLC’s (“Invenergy”) Petition for Rehearing and Reconsideration (“Invenergy Petition”) in the above-captioned proceedings.

In its Answer, Calpine committed to keeping the Minnesota Public Utilities Commission (“Commission”) informed regarding any action taken by the Federal Energy Regulatory Commission (“FERC”) on the Midcontinent Independent System Operator Inc.’s (“MISO”) request for approval of the Calpine Generator Interconnection Agreement (“GIA”). Attached as Exhibit A is FERC’s March 10, 2015 Order accepting the Calpine GIA effective October 16, 2014, and rejecting Invenergy’s Protest. In its Order FERC concluded “that MISO has provided sufficient information through its Deficiency Letter Response and Answer for the Commission to determine the appropriateness of the proposed amendments to the Original GIA.” *See Midcontinent Independent System Operator Inc.*, 150 FERC ¶ 61,180 at P 23 (2015).

Accordingly, Calpine’s reiterates its request that the Commission reject the Petitions seeking reconsideration and rehearing of its February 5 Order. The February 5 Order reflects reasoned and

Daniel P. Wolf
March 11, 2015
Page 2

reasonable decision-making and nothing in the filed Petitions raise issues or arguments that were not fully considered in the issuance of the Order.

Thank you for your attention to this matter.

Sincerely,

STINSON LEONARD STREET LLP

Brian Meloy

Brian M. Meloy

BMM/cw
Attachments

EXHIBIT A

FERC's March 10, 2015 Order Accepting Calpine Generator Interconnection Agreement

150 FERC ¶ 61,180
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Cheryl A. LaFleur, Chairman;
Philip D. Moeller, Tony Clark,
Norman C. Bay, and Colette D. Honorable.

Midcontinent Independent
System Operator, Inc.

Docket No. ER15-104-001

ORDER ACCEPTING GENERATOR INTERCONNECTION AGREEMENT

(Issued March 10, 2015)

1. On October 15, 2014, Midcontinent Independent System Operator, Inc. (MISO) filed, pursuant to section 205 of the Federal Power Act (FPA)¹ and Part 35 of the Commission's regulations,² an executed Amended and Restated Generator Interconnection Agreement (Amended GIA) among MISO, Mankato Energy Center, LLC (Mankato), and Northern States Power Company, a Minnesota corporation (Northern States Minnesota) (October 15 Filing). We accept the Amended GIA for filing effective October 16, 2014, as discussed in the body of this order.

I. Background

2. On January 21, 2005, the Commission accepted a Generator Interconnection Agreement (Original GIA) among MISO, Mankato, and Northern States Minnesota, by letter order in Docket No. ER05-344-000. MISO's October 15 Filing proposes to make various changes to the Original GIA to reflect Mankato's completion of Phase I of the large generating facility subject to the agreement and the build out of Phase II, which requires installation of network upgrades on Northern State Minnesota's transmission system. MISO also proposes to revise (1) section 5.9 to reflect how the maximum permissible output of the facility will be updated if the network upgrades necessary for interconnection are not in service six months following the commercial operation date

¹ 16 U.S.C. § 824d (2012).

² 18 C.F.R. pt. 35 (2014).

(COD); (2) section 11.4.1 to update how repayment of amounts advanced for required network upgrades will be determined; (3) Appendix A to reflect an extension of the COD for Phase II of the project from June 1, 2007 to June 1, 2018, including updated costs associated with the network upgrades required to complete Phase II and a current listing of higher-queued projects; and (4) Appendix B to include the new milestones associated with Phase II of the project.³

3. On December 12, 2014, Commission staff, pursuant to delegated authority, issued a letter informing MISO that its October 15 Filing was deficient and that the Commission would need further information in order to process the filing (Deficiency Letter). More specifically, Commission staff asked MISO to explain how the 11-year COD extension is appropriate under MISO's Generation Interconnection Procedures (GIP) and the Original GIA, and to include all factors that MISO took into consideration in finding that the proposed extension is appropriate. On January 9, 2015, MISO filed a response to the Deficiency Letter (Deficiency Letter Response).

II. Notice of Filing and Responsive Pleadings

4. Notice of MISO's October 15 Filing was published in the *Federal Register*, 79 Fed. Reg. 63,111 (2014), with interventions and protests due on or before November 5, 2014. Calpine Corporation (Calpine) filed a timely motion to intervene. Great River Energy filed an out-of-time motion to intervene and comments. On December 1, 2014, MISO filed an answer to Great River Energy's out-of-time motion to intervene and comments. On December 8, 2014, Great River Energy withdrew its out-of-time motion to intervene and comments.

5. Notice of MISO's Deficiency Letter Response was published in the *Federal Register*, 80 Fed. Reg. 2688 (2015), with interventions and protests due on or before January 30, 2015. In response, Great River Energy and American Wind Energy Association (AWEA) filed timely motions to intervene. Calpine filed timely comments. Invenergy Thermal Development LLC and Invenergy Wind Development LLC (collectively, Invenergy) filed a timely motion to intervene and protest. On February 3, 2015, AWEA and Wind on the Wires (WOW) jointly filed comments.⁴

³ While the *pro forma* GIA is organized into articles, this order uses the same nomenclature used by the parties to the proceeding, i.e., sections.

⁴ AWEA and WOW title their February 3, 2015 filing as comments; however, they state that the filing is in response to Invenergy's protest. Therefore, we will treat this filing as an answer for procedural purposes herein.

On February 18, 2015, MISO filed a motion for leave to answer and answer. On March 2, 2015, Calpine filed out-of-time comments.⁵

6. MISO's Deficiency Letter Response explains that, under section 5.16 of the Original GIA, Mankato has three years of suspension rights, which permitted Mankato a COD extension from June 2007 to June 2010.⁶ MISO further explains that, pursuant to section 2.3.1 of the Original GIA, "MISO would wait an additional three consecutive years (until June 1, 2013) from the planned Commercial Operation Date (2010) before considering whether to file to terminate Phase II of the GIA for failing to reach Commercial Operation had the Interconnection Customer [Mankato] not advanced the project."⁷ MISO states that, at some point between June 1, 2010 and June 1, 2013,

⁵ Calpine titles its March 2, 2015 filing as comments; however, the filing almost exclusively addresses arguments advanced in protests by Invenergy and AWEA and WOW. Therefore, we will treat this filing as an answer for procedural purposes herein.

⁶ Section 5.16 of the Original GIA provides the Interconnection Customer suspension rights and states that

[i]n the event Interconnection Customer suspends work by Transmission Owner required under this [Large GIA (LGIA)] pursuant to this Article 5.16, and has not requested Transmission Owner to recommence the work required under this LGIA on or before the expiration of three (3) years following commencement of such suspension, this LGIA shall be deemed terminated. The three-year period shall begin on the date the suspension is requested, or the date of the written notice to Transmission Provider, if no effective date is specified.

⁷ Deficiency Letter Response at 2. Section 2.3 describes agreement termination procedures. As relevant to MISO's argument, section 2.3.1 provides that the Original GIA

may be terminated...by Transmission Provider if the Generating Facility has ceased Commercial Operation for three (3) consecutive years, beginning with the last date of Commercial Operation for the Generating facility, after giving the Interconnection Customer ninety (90) Calendar Days advance written notice. The Generating Facility will not be deemed to have ceased Commercial Operation for purposes of this Section 2.3.1 if the Interconnection Customer can document that it has taken other

(continued ...)

Mankato informed MISO that it was ready to proceed with Phase II, and that MISO began the interconnection studies to determine the necessary transmission upgrades to accommodate Phase II of the agreement.⁸ MISO states that the October 15 Filing and the new 2018 COD are products of the restudies.

7. MISO further explains that it does not require a project to achieve Commercial Operation prior to the In-Service Dates of the full required Network Upgrades and Contingent Facilities for the project. MISO states that while an interconnection customer may voluntarily choose to utilize MISO's limited operations provisions in order to begin operations prior to the completion of other projects' Network Upgrades (often with long-term In-Service Dates), it does not require interconnection customers to do so. MISO notes that in Exhibit A10 of the Amended GIA, the restudies found that Phase II of the project is conditional upon MISO Multi-Value Projects being completed. These projects have in-service dates in 2018. Consequently, the interconnection customer requested a 2018 COD for the Phase II portion of the GIA, and MISO was agreeable with that date.⁹

8. Calpine filed comments supporting MISO's Deficiency Letter Response, claiming that MISO fully satisfied the Commission's request for information and that the COD extension is consistent with the terms of the Original GIA.¹⁰ Calpine believes that MISO correctly applied sections 5.16 and 2.3.1 to permit a COD extension until June 1, 2013 before MISO would consider whether to terminate Phase II for failing to meet commercial operation. Calpine states that before June 1, 2013, Mankato informed MISO it was ready to proceed with Phase II, and that MISO performed the interconnection

significant steps to maintain or restore operational readiness of the Generating Facility for the purpose of returning the Generating Facility to Commercial Operation as soon as possible.

⁸ Deficiency Letter Response at 2 (citing *Midwest Indep. Transmission Sys. Operator, Inc.*, 116 FERC ¶ 61,252, at PP 39-42 (2006) (rejecting proposed revisions to add specific post-suspension procedures in the Appendices of an LGIA, but noting that a Transmission Owner may reasonably find that developing a new schedule after suspension requires restudy consistent with sections 6.4, 7.6, and 8.5 of the then-effective GIP); *Jeffers South, LLC v. Midwest Indep. Transmission Sys. Operator, Inc.*, 144 FERC ¶ 61,033, at P 77 (2013) (after a suspension period, the Commission noted that it was appropriate to "take into account the existing interconnection queue.")).

⁹ *Id.* at 2-3.

¹⁰ Calpine Comments I at 1-2.

restudies accordingly, consistent with the GIP and Commission precedent.¹¹ Calpine urges the Commission to accept the Amended GIA because the Minnesota Public Utility Commission (Minnesota Commission) recently approved a long-term power purchase agreement (PPA) between Mankato and Xcel Energy (Xcel) that requires deliveries from Phase II in 2018, and because the Minnesota Commission determined that Phase II is a required capacity addition to ensure reliability for Xcel and its customers.¹²

9. Invenergy protests the October 15 Filing because it believes that MISO's Deficiency Letter Response did not adequately respond to the Deficiency Letter and that MISO improperly implemented section 2.3.1 of the Original GIA to allow a three-year COD extension beyond that attendant to the suspension rights provided in section 5.16. Invenergy requests that the Commission seek further explanation from MISO and clarify the applicability of section 2.3.1 of the Original GIA and section 3.3.1 of the MISO GIP in processing requests for COD extensions.¹³ Invenergy believes that section 2.3.1 may

¹¹ *Id.* at 3 & n.11 (citing *Midwest Indep. Transmission Sys. Operator, Inc.*, 138 FERC ¶ 61,233 (2012) (Queue Reform III Order), *order on reh'g and compliance*, 139 FERC ¶ 61,253, at P 36 (2012) (Queue Reform III Rehearing Order) (finding that Mankato "would not be required to transition to [MISO's] revised GIP at this time" because the Original GIA had been filed with the Commission but "that section 8.7 of the GIP provides that a restudy shall be performed subject to the GIP in effect at the time that an interconnection customer receives notice of a restudy from MISO.")).

¹² *Id.* at 4.

¹³ Section 3.3.1 of MISO's GIP states, in relevant part, that

[t]he expected In-Service Date of the Generating Facility shall be no later than the process window for the Transmission Provider's regional expansion planning period not to exceed seven years from the date the Interconnection Request is received by Transmission Provider, unless Interconnection Customer demonstrates that engineering, permitting and construction of the Generating Facility will take longer than the regional expansion planning period, nor shall it be any sooner than the process time described in the Generator Interconnection Procedures and confirmed in the Pre-Queue Phase. The In-Service Date may succeed the date the Interconnection Request is received by Transmission Provider by a period up to ten years, or longer where Interconnection Customer and Transmission Provider agree, such agreement not to be unreasonably withheld.

have been improperly applied because it believes that section 2.3.1 addresses circumstances that arise when a project has reached commercial operation and subsequently goes out of service, rather than providing a three-year extension to the COD of a project that has not reached commercial operation, such as the extension of the Phase II COD to June 1, 2013. Further, in light of MISO's endorsement of Mankato's COD extension, Invenergy requests clarification that section 3.3.1 of MISO's GIP does not prohibit accommodating a COD for any project that extends more than ten years beyond the date of the Interconnection Request. Invenergy further requests that the Commission require MISO to demonstrate that it applies its practices consistently and/or has not harmed other generation developers through its practices and notes that, because Market Participants have no way to monitor MISO's administration of queue procedures and GIAs, Market Participants must rely on the Commission to oversee such practices. Accordingly, Invenergy proposes a set of directives to MISO to provide information regarding its generator interconnection practices.¹⁴

10. AWEA and WOW state that they are concerned about the issues highlighted in Invenergy's protest. Specifically, they have concerns that MISO is giving preferential treatment to certain interconnection customers, and that MISO is failing to follow its tariff and the terms of GIAs and the GIP.¹⁵ AWEA and WOW suggest that MISO's treatment of Mankato's COD extension is inconsistent with MISO's recent efforts to terminate GIAs for wind projects that do not meet their GIA schedules. They also encourage the Commission to clarify the procedures that should be used to properly extend a project COD, specifically that section 3.3.1 is not a bar on extending a project COD beyond ten years of the project's interconnection request.¹⁶

11. In its answer, MISO disagrees that its actions did not comply with the GIP and GIA, or that it acted in an unduly discriminatory manner.¹⁷ MISO reiterates that Mankato was put into suspension under section 5.16 of the Original GIA, extending the COD for Phase II until June 1, 2010. MISO further explains that because Mankato's Phase II was considered suspended from 2007 to 2010, MISO would not have sought to terminate the Original GIA with respect to Phase II until three years later, as called for in section 2.3.1

¹⁴ Invenergy Protest at 7-10.

¹⁵ AWEA and WOW Answer at 2.

¹⁶ *Id.* at 3.

¹⁷ MISO Answer at 3.

of the Original GIA and consistent with treatment applied to other customers.¹⁸ MISO disputes AWEA's and WOW's assertion that MISO improperly permitted Mankato's Phase II to proceed while moving to terminate the GIAs of recent wind projects, noting that MISO applied the same treatment accorded the Mankato project to recent filings to terminate GIAs for failure to reach commercial operation pursuant to section 2.3.1 by waiting the required three years afforded under section 2.3.1 before filing to terminate those GIAs. MISO explains, however, that Mankato ultimately notified MISO that it was ready to proceed with Phase II before it faced the risk of termination under section 2.3.1 (prior to June 2013).¹⁹

12. MISO also explains that MISO's current process requires more recently negotiated GIAs to include readiness milestones that were not required in the Original GIA for Phase II of the project, and failure to meet these milestones or other payment milestones has been the basis for the recent GIA termination filings identified by AWEA and WOW.²⁰ MISO states that any appearance of differing treatment of Mankato and other customers whose GIAs have been terminated is not due to any undue discrimination, but is the result of Phase II of the project not being similarly situated to other projects in the queue because of its vintage and the lack of milestones in the Original GIA.²¹ MISO also states that this is particularly true because MISO's *pro forma* GIA now limits suspension rights under section 5.16.1 to situations where "a *Force Majeure* event occurs."²² MISO also argues that because the Commission found that Mankato would not be subject to the

¹⁸ *Id.* at 4-6. MISO states it has recently filed notices of termination based on section 2.3.1 of the *pro forma* GIA. *See id.* at 4 n. 8 (citing filing in Docket No. ER15-254 (letter order issued January 27, 2015, accepting notice of termination based on failure to achieve Commercial Operation)).

¹⁹ *Id.* at 6-7.

²⁰ *Id.* at 7.

²¹ *Id.* at 8.

²² *Id.* at 7 (citing MISO Tariff, Attachment X, Appendix 6 (*pro forma* GIA), section 5.16.1).

new GIP,²³ the new required milestones did not apply and Mankato retained its suspension rights under section 5.16 of the Original GIA.²⁴

13. MISO disagrees with Invenergy's argument that section 2.3.1 of the Original GIA only applies in circumstances when a project begins commercial operation and then goes out of service, and argues that Invenergy misapplies language from MISO's Order No. 2003 compliance filing.²⁵ MISO states that in its Order No. 2003 compliance filing MISO spoke generally about concerns of hoarding capacity, which applies to both projects that enter then cease commercial operation, as well as those that never reach commercial operation.²⁶ MISO also clarifies that the *pro forma* GIA now expressly states that section 2.3.1 applies "if the Generating Facility or a portion of the Generating Facility fails to achieve Commercial Operation for three (3) consecutive years following the Commercial Operation Date, or has ceased Commercial Operation for three (3) consecutive years, beginning with the last date of Commercial Operation for the Generating Facility"²⁷

14. MISO also disagrees with Invenergy's concern that MISO did not perform adequate analysis regarding the state of the interconnection queue. MISO states that it followed its process to restudy the project taking into account the queue at the time, and as a result Mankato will be required to construct upgrades for Phase II.²⁸ Furthermore, MISO states that it restudied the project separately, but in accordance with its usual Definitive Planning Phase process, including all study deposit and entry milestone payments.²⁹ With regard to Invenergy's request that the Commission provide clarification regarding section 3.3.1 of the GIP, MISO states that, as Invenergy acknowledges in its protest, section 3.3.1 applies only to the COD requested at the

²³ MISO Answer at 8 (citing Queue Reform III Rehearing Order, 139 FERC ¶ 61,253 at P 36).

²⁴ *Id.* at 8.

²⁵ *Id.* at 5 (citing Invenergy Protest at 11).

²⁶ *Id.*

²⁷ *Id.* at 5 (citing MISO Tariff, Attachment X, Appendix 6 (*pro forma* GIA), section 2.3.1).

²⁸ *Id.* at 8-9.

²⁹ *Id.*

application stage, and as such the provision is irrelevant in this proceeding involving modifications to the Original GIA. MISO also states that if Invenergy has general questions regarding the MISO tariff, Invenergy should raise those questions with MISO or in the MISO stakeholder process.³⁰ MISO also states that the Commission should deny Invenergy's request for additional information.³¹

15. In its March 2, 2015 comments, Calpine again urges the Commission to accept the Amended GIA and denies that MISO had acted improperly or engaged in any unduly preferential or discriminatory behavior. Calpine emphasizes that, as MISO states, any differing treatment between Mankato and other customers results from the vintage of the Original GIA and the associated lack of readiness milestones. Calpine states that Mankato fully complied with the terms of the Original GIA in invoking its suspension rights and the terms of the GIP during the restudy process.³²

III. Discussion

A. Procedural Matters

16. Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214 (2014), the timely, unopposed motions to intervene serve to make the entities that filed them parties to this proceeding.

17. Rule 213(a)(2) of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.213(a)(2) (2014), prohibits an answer to a protest unless otherwise ordered by the decisional authority. We will accept the answers because they have provided information that assisted us in our decision-making process.

B. Commission Determination

18. We accept the Amended GIA for filing, effective October 16, 2014, as requested, including MISO's application of sections 5.16 and 2.3.1 in the Original GIA to extend the COD of Phase II to June 1, 2013. Notably, the Original GIA's suspension and termination provisions differ from those in the current *pro forma* GIA. The Original GIA provides interconnection customers unqualified suspension rights under section 5.16, while the current *pro forma* GIA now limits suspension rights to situations where a

³⁰ *Id.* at 9.

³¹ *Id.* at 10.

³² Calpine Comments II at 4.

Force Majeure event occurs such that the initial three-year suspension rights utilized here by Mankato are no longer available under GIAs negotiated more recently.

19. We disagree that section 2.3.1 must be interpreted to apply only where a project has gone into commercial operation and subsequently gone out of service. As MISO notes, section 2.3.1 contemplates the reservation of interconnection capacity for non-operational projects, and MISO has since clarified this section in its *pro forma* GIA to expressly include projects that “fail[] to achieve Commercial Operation for three (3) consecutive years following the Commercial Operation Date.”³³ Section 2.3.1 of the Original GIA grants the Transmission Provider a positive and *permissive* right to terminate an agreement when the project fails to achieve commercial operation three years after its COD.³⁴ On the other hand, section 5.16 of the Original GIA provides interconnection customers three years of positive suspension rights, the purpose of which is to allow interconnection customers to maintain their position in the interconnection queue for three years in the event of unforeseen delays. It is a justifiable interpretation of the contract, and an interpretation apparently shared by the parties of the Original GIA, that these provisions provide two distinct three-year periods, and that MISO may apply its section 2.3.1 termination rights rather than deeming the agreement terminated under section 5.16. As noted above, the current *pro forma* GIA provides suspension rights to interconnection customers only in *Force Majeure* circumstances, and *Non-Force Majeure* instances of failure to achieve Commercial Operation are subject only to the termination provisions in section 2.3.1 under the *pro forma* GIA.

20. As Mankato notified MISO prior to June 1, 2013 that it was ready to proceed with Phase II, MISO, consistent with Commission precedent,³⁵ “followed its process to

³³ MISO Answer at 5 (citing MISO Tariff, Attachment X, Appendix 6 (*pro forma* GIA), section 2.3.1.).

³⁴ Section 2.3.1 of the Original GIA provides that the Transmission Provider *may* terminate the agreement after the three-year period.

³⁵ See *Midwest Indep. Transmission Sys. Operator, Inc.*, 116 FERC ¶ 61,252 at PP 39-42 (noting that a Transmission Owner may reasonably find that developing a new schedule after suspension requires restudy consistent with Sections 6.4, 7.6, and 8.5 of the then-effective GIP); *Midwest Indep. Transmission Sys. Operator, Inc.*, 144 FERC ¶ 61,033 at P 77 (after a suspension period, the Commission found it “appropriate that MISO must consider configurations consistent with a ‘but for’ analysis and which take into account the existing interconnection queue.”).

restudy the project taking into account the state of the queue at the time.”³⁶ Upon restudy, MISO determined that a number of network upgrades would be necessary to accommodate Phase II, and a COD of 2018 was consistent with the timing of other projects that must be in-service for Phase II to proceed. MISO notes in its Deficiency Letter Response that it does not require a project to achieve commercial operation prior to the in-service dates of the full required network upgrades and contingent facilities for the project.³⁷ As MISO states, an interconnection customer may often voluntarily choose to utilize MISO’s limited operations provisions in order to begin operations prior to the completion of other projects’ network upgrades with long-term in-service dates, but MISO does not require interconnection customers to do so.³⁸ Furthermore, we note that the Commission has found that a transmission provider should not force a customer to use a COD that is earlier than the in-service date of the network upgrades that would permit the requested interconnection service.³⁹ According to Exhibit A10 of the Amended GIA, the restudies found that Phase II of the project is conditional upon the completion of certain MISO Multi-Value Projects with in-service dates in 2018.⁴⁰ In this instance, the interconnection customer requested a 2018 COD for the Phase II portion of the GIA, and MISO was agreeable with that date.⁴¹ We therefore accept the Amended GIA with the extension of the COD for Phase II to June 1, 2018.

21. We are not persuaded by AWEA’s and WOW’s assertion that MISO is giving preferential treatment to certain interconnection customers and is failing to follow its tariff and the terms of its standard GIA and GIP. MISO notes that any appearance of differing treatment of Mankato and other customers whose GIAs have been terminated is due to the fact that the Original GIA significantly predates MISO’s recent queue reform efforts⁴² and includes language that does not conform to more recent GIAs.⁴³ For

³⁶ MISO Answer at 8.

³⁷ Deficiency Letter Response at 2.

³⁸ *Id.* at 2-3.

³⁹ *Southwest Power Pool, Inc.*, 147 FERC ¶ 61,201, at P 114 (2014).

⁴⁰ Deficiency Letter Response at 3.

⁴¹ *Id.*

⁴² *Id.* at 6 (citing *Interconnection Queuing Practices*, 122 FERC ¶ 61,252, at P 3 (2008) (noting surging volumes of new generation that were taxing queue management in 2008); *Midwest Indep. Transmission Sys. Operator, Inc.*, 124 FERC ¶ 61,183, at PP 4, 17, 105-111 (2008) (Queue Reform I Order) (responding to FERC’s concern by replacing

instance, while MISO's current process requires that readiness milestones be included in more recent GIAs,⁴⁴ the Original GIA only sets forth the COD for Phase II and did not contain specific Phase II milestones.⁴⁵ This difference is pertinent here because, as noted by MISO, failure to meet readiness milestones has been the basis for recent GIA termination filings identified by AWEA and WOW.⁴⁶ Moreover, as noted above, the *pro forma* GIA's suspension rights section differs from that in the Original GIA, thus it is permissible that MISO's treatment of the Original GIA differs from that of those GIAs negotiated more recently.

22. Furthermore, as both Calpine and MISO point out, the Commission has previously found that Mankato would not be subject to MISO's revised GIP when the revised GIP was adopted.⁴⁷ Specifically, the Commission found that because Mankato's Original GIA had been submitted to the Commission and the necessary interconnection studies had already been completed before implementation of the revised GIP, Mankato would not meet the definition of an "outstanding request" and would not be required to transition to MISO's revised GIP at that time.⁴⁸ However, the Commission also stated "that section 8.7 of the GIP provides that a restudy shall be performed subject to the GIP in effect at the time that an interconnection customer receives notice of a restudy from MISO."⁴⁹ The Commission also stated in the Queue Reform III Order that

a "first-come, first-served" methodology with a "first-ready, first-served" emphasis and accepting limitations on suspension under new GIAs)).

⁴³ *Id.* at 6-8.

⁴⁴ In the Queue Reform I Order, the Commission conditionally accepted revisions to the MISO GIP that provided for "a milestone-based approach that would allow projects to proceed based on readiness, rather than solely on queue position." Queue Reform I Order, 124 FERC ¶ 61,183 at P 16.

⁴⁵ Revised Appendix B of the Amended GIA now includes specific payment milestones and dates for Phase II of the project to reach commercial operation.

⁴⁶ Deficiency Letter Response at 7.

⁴⁷ Deficiency Letter Response at 8 (citing Queue Reform III Rehearing Order, 139 FERC ¶ 61,253 at P 36); Calpine Comments I at 3 n.11; Calpine Comments II at 4.

⁴⁸ Queue Reform III Rehearing Order, 139 FERC ¶ 61,253 at P 36.

⁴⁹ *Id.*

“interconnection customers with ‘outstanding requests’ are required to transition to the revised GIP within a reasonable amount of time not to exceed 90 days,” and “MISO defines ‘outstanding requests’ to include... any interconnection request that is in the process of being studied (including restudies).”⁵⁰ Therefore, because MISO has provided notice of its restudy and completed those studies, the project is now considered an “outstanding request,” is now subject to Queue Reform Order III, and is required to transition to the revised GIP. It appears that MISO has transitioned the Original GIA, and now the Amended GIA, to the revised GIP. In fact, MISO states that it “restudied the project separately, but in accordance with its usual Definitive Planning Phase process, including all study deposit and entry milestone payments,”⁵¹ suggesting that MISO has performed the necessary steps to transition the GIA to the revised GIP.

23. Finally, we disagree with Invenergy that the Commission should require MISO to file additional information to address the questions posed in the Deficiency Letter and find that MISO has provided sufficient information through its Deficiency Letter Response and Answer for the Commission to determine the appropriateness of the proposed amendments to the Original GIA. We also decline to require MISO to demonstrate that it applies its practices consistently and/or has not harmed other generation developers through its practices, as Invenergy requested. Such inquiries are beyond the scope of this proceeding. Similarly, regarding requests for clarification of section 3.3.1 of the MISO GIP, we agree with MISO that section 3.3.1 of the GIP only applies to the COD requested at the application stage and is beyond the scope of this proceeding, which involves modifications to the Original GIA.

The Commission orders:

The Amended GIA is hereby accepted effective October 16, 2014, as requested, as discussed in the body of this order.

By the Commission.

(S E A L)

Nathaniel J. Davis, Sr.,
Deputy Secretary.

⁵⁰ Queue Reform III Order, 138 FERC ¶ 61,233 at P 101 (citation omitted).

⁵¹ MISO Answer at 8.

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

*In the Matter of the Petition of
Northern States Power Company to
Initiate a Competitive Resource
Acquisition Process*

) **Docket Nos.: E-002/CN-12-1240**
) **E-002/M-14-788**
) **E-002/M-14-789**
)
) **CERTIFICATE OF SERVICE**

Catherine M. Wood, certifies that on March 11, 2015 she served true and correct copies of the **Supplement of Calpine Corporation** upon the following parties via e-filing and/or U.S. Mail:

ELECTRONIC SERVICE

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