



DATE: October 18, 2017
FROM: Charles Hernick, Director of Policy and Advocacy, CRES Forum
TO: Federal Energy Regulatory Commission
RE: Grid Reliability and Resilience Pricing, Docket Number: RM18-1-000

Per the Commission's [invitation](#) on October 2, 2017, Citizens for Responsible Energy Solutions Forum (CRES Forum) hereby respectfully submits two comments in response to the Letter from the Secretary of Energy ("Letter") proposing that the Federal Energy Regulatory Commission ("FERC" or "Commission") immediately consider and finalize the provisions in its Notice for Proposed Rule Making ("NOPR") for the Grid Resiliency Pricing Proposed Rule.

CRES Forum is a non-partisan, non-profit organization committed to educating the public and influencing the national conversation about commonsense clean energy. We believe it is time for actionable, market-friendly, fiscally responsible clean energy solutions.

We agree with the [Energy Industry Associations](#) that this is one of the most significant proposed rules in decades related to the energy industry, and, if finalized, would have significant ramifications for energy markets under the Commission's jurisdiction.

CRES Forum requests that any rulemaking be informed by the best technical information to assure that market distortions are neither exacerbated, nor introduced.

Use the best data available to avoid unjustified market distortions.

Consistent with the conclusions of 2017 Department of Energy grid study, CRES Forum believes that there is no reliability emergency. Therefore, FERC must establish a high threshold to justify changes to the regulatory framework that would favor any energy generation technology over another. Federal government's best role is stimulating growth and competition in the energy sector—not dictating production quotas or protecting an industry at the expense of entrepreneurs and small businesses that are foundational to our economy. We want to ensure that small businesses can enter the clean energy space, help our economy grow, and re-position the U.S. as an exporter of clean energy technologies.

CRES Forum believes that a free-market, all-of-the-above approach to energy with the goal of implementing the cleanest, lowest-emitting technologies available is the right approach for America.

CRES Forum requests an extension to the comment, comment response, and rule development periods.

Extend comment periods by 30 days to provide adequate time for data analysis, comment preparation, and thoughtful comment responses.

On October 4, 2017, the Commission requested that commenters answer many [questions](#) on the need for reform, eligibility, implementation, and rates. The proposed deadlines for comments on October 23, 2017, and responses to comments due by November 7, 2017, are too short to collect the best possible technical information for rulemaking. Each period should be extended by 30 days to assure adequate time for data analysis, comment preparation, and thoughtful comment responses. Neither FERC nor the Letter justifies the timelines proposed. When considering a rulemaking that could affect electricity prices for millions of individuals and businesses, the Commission must allow adequate time for in-depth comments so that the agency can make a reasoned and well-informed decision.