

# ELCC-CIRS Proposal

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LS POWER

# LS Power Group Overview

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## LS Power is a development, investment and operating company focused on the North American power and energy infrastructure sector

- **Founded in 1990, LS Power has over 250 employees** in NY, NJ, MO, TX and CA, beyond which its projects and businesses have **provided thousands of construction and operations jobs**
- **LS Power has raised over \$47 billion in debt and equity** (including over \$10 billion through its investment partnerships) **to finance and support energy infrastructure investments in the U.S.**
- LS Power actively invests in competitive power markets and
  - **Manages over 14,000 MW of generation capacity and over 4,000 MW of demand response and energy efficiency, for a total of over 18,000 MW throughout the US**
  - **Makes fuel neutral investments**, including solar, wind, battery energy storage, natural gas, hydro (both run-of-river and pumped storage), demand response and energy efficiency
  - **Leaders in distributed energy through EVgo** (the nation's largest fast charging platform for electric vehicles), **Endurant Energy** (provider of on-site energy and microgrid solutions in North America), **CPower Energy Management** (leading demand-side energy management company that helps commercial, industrial and government organizations save on energy costs, earn revenue through energy curtailment, enhance sustainability efforts, and contribute to a balanced, reliable grid)
  - **Invests over \$2 billion in high voltage transmission to support U.S. renewables and grid reliability**



# Package D is Fundamentally Flawed

- Unduly Discriminatory and Preferential treatment of certain resources
- End-Run Around Commission rejection of grandfathering for existing ELCC projects
- Violates the Tariff and Interconnection Procedures

## SPECIFICALLY:

- Socializes \$100MM costs of unit specific interconnection upgrades and rights
- Contemplates allowing these resources to “jump the queue” to get quick resolution
- FERC denied special treatment to grandfather existing resources impacted by the implementation of ELCC
- The ELCC is a capacity accreditation rule that did not amend the Tariff provisions regarding the interconnection process for generation units