



October 21, 2014

**VIA ELECTRONIC FILING**

The Honorable Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

**Re: *ISO New England Inc.***  
**Resource Termination Filing; Docket No. ER15- -000**

Dear Secretary Bose:

Pursuant to Section 205 of the Federal Power Act (“FPA”), ISO New England Inc. (the “ISO”) hereby electronically submits to the Federal Energy Regulatory Commission (“FERC” or “Commission”) this resource termination filing.

Under Section III.13.3.4 of the Forward Capacity Market (“FCM”) rules,<sup>1</sup> if a resource will not achieve commercial operation by the start of the Capacity Commitment Period and the Project Sponsor fails to cover the entire Capacity Supply Obligation (“CSO”) then the ISO, after consultation with the Project Sponsor, has the right to, through a filing with the Commission, terminate the resource’s CSO for any future Capacity Commitment Periods and the resource’s right to any payments associated with that CSO in the Capacity Commitment Period.<sup>2</sup> Upon Commission ruling, the Project Sponsor will forfeit any financial assurance provided with respect to that CSO.<sup>3</sup> As more fully described below, Plainfield Renewable Energy LLC’s (“Plainfield Renewable”) Resource No. 15509 failed to achieve commercial operation for its entire CSO and Plainfield Renewable failed to cover that portion of the CSO. Accordingly, by this filing, the ISO is exercising its right to terminate the portion of the CSO for which the resource did not achieve commercial operation. Upon Commission ruling, the ISO will draw down the financial assurance provided by Plainfield Renewable with respect to the terminated portion of the CSO.

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<sup>1</sup> Capitalized terms used but not otherwise defined in this filing have the meanings ascribed thereto in the ISO’s Transmission, Markets and Services Tariff (the “Tariff”). Section III of the Tariff is Market Rule 1.

<sup>2</sup> Tariff Section III.13.3.4(c).

<sup>3</sup> *Id. See, also*, ISO Financial Assurance Policy, Section VII.D.

## **I. DESCRIPTION OF THE ISO**

The ISO is the private, non-profit entity that serves as the regional transmission organization (“RTO”) for New England. The ISO operates the New England bulk power system and administers New England’s organized wholesale electricity market pursuant to the ISO New England Transmission, Markets and Services Tariff and the Transmission Operating Agreement with the New England Participating Transmission Owners. In its capacity as an RTO, the ISO has the responsibility to protect the short-term reliability of the New England Control Area and to operate the system according to reliability standards established by the Northeast Power Coordinating Council (“NPCC”) and the North American Electric Reliability Corporation (“NERC”).

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## **II. DESCRIPTION OF TERMINATION FILING**

Pursuant to Section III.13.3.4 of the FCM rules, if a resource will not achieve commercial operation by the start of the Capacity Commitment Period, then the Project Sponsor must take actions to cover the entire CSO for the portion of the Capacity Commitment Period for which the project will not have achieved Commercial Operation. Those actions include entering into a Capacity Supply Obligation Bilateral and/or participating in a reconfiguration auction.<sup>4</sup> If the CSO for the Capacity Commitment Period is not covered and the Project Sponsor still has a CSO before the resource achieves commercial operation, then the ISO, after consultation with the Project Sponsor, has the right to, through a filing with the Commission, terminate the resource’s CSO for any future Capacity Commitment Periods and the resource’s right to any payments associated with that CSO in the Capacity Commitment Period.<sup>5</sup> Upon Commission ruling, the Project Sponsor will forfeit any financial assurance provided with respect to that CSO.<sup>6</sup>

The result of the commercial operation audit for Resource No. 15509 showed that the resource did not achieve its full CSO. Plainfield Renewable failed to cover the portion of the CSO

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<sup>4</sup> Tariff Section III.13.3.4.

<sup>5</sup> Tariff Section III.13.3.4(c).

<sup>6</sup> *Id. See, also*, ISO Financial Assurance Policy, Section VII.D.

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for which the resource did not achieve commercial operation. Accordingly, pursuant to the FCM rule discussed above, by this filing the ISO is exercising its right to terminate the portion of Resource No. 15509's CSO for which the resource did not achieve commercial operation. Upon Commission ruling, the ISO will draw down the amount of financial assurance provided by Plainfield Renewable with respect to the terminated portion of the CSO.

The ISO respectfully requests that the Commission issue its ruling within 60 days of the date of this resource termination filing.

Respectfully submitted,

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