



January 29, 2015

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

**RE: Generation Site Report 4th Quarter 2014, Docket No. LA14-4-000**

*Beech Ridge Energy LLC*, Docket No. ER10-2137-\_\_\_\_  
*Beech Ridge Energy II LLC*, Docket No. ER14-2798-\_\_\_\_  
*Beech Ridge Energy Storage LLC*, Docket No. ER14-2799-\_\_\_\_  
*Bishop Hill Energy LLC*, Docket No. ER12-161-\_\_\_\_  
*Bishop Hill Energy III LLC*, Docket No. ER12-164-\_\_\_\_  
*California Ridge Wind Energy LLC*, Docket No. ER12-645-\_\_\_\_  
*Forward Energy LLC*, Docket No. ER10-2130-\_\_\_\_  
*Grand Ridge Energy LLC*, Docket No. ER10-2131-\_\_\_\_  
*Grand Ridge Energy II LLC*, Docket No. ER10-2138-\_\_\_\_  
*Grand Ridge Energy III LLC*, Docket No. ER10-2139-\_\_\_\_  
*Grand Ridge Energy IV LLC*, Docket No. ER10-2140-\_\_\_\_  
*Grand Ridge Energy V LLC*, Docket No. ER10-2141-\_\_\_\_  
*Grand Ridge Energy Storage LLC*, Docket No. ER14-2187-\_\_\_\_  
*Gratiot County Wind LLC*, Docket No. ER11-4044-\_\_\_\_  
*Gratiot County Wind II LLC*, Docket No. ER11 -4046-\_\_\_\_  
*Grays Harbor Energy LLC*, Docket No. ER10-2129-\_\_\_\_  
*Hardee Power Partners Limited*, Docket No. ER10-2134-\_\_\_\_  
*Invenergy Cannon Falls LLC*, Docket No. ER10-2136-\_\_\_\_  
*Invenergy Nelson LLC*, Docket No. ER15-103-\_\_\_\_  
*Invenergy TN LLC*, Docket No. ER10-2127-\_\_\_\_  
*Judith Gap Energy LLC*, Docket No. ER10-2125-\_\_\_\_  
*Prairie Breeze Wind Energy LLC*, Docket No. ER14-25-\_\_\_\_  
*Sheldon Energy LLC*, Docket No. ER10-2133-\_\_\_\_  
*Spindle Hill Energy LLC*, Docket No. ER10-2135-\_\_\_\_  
*Spring Canyon Energy LLC*, Docket No. ER10-2124-\_\_\_\_  
*Spring Canyon Energy II LLC*, Docket No. ER14-2820-\_\_\_\_  
*Spring Canyon Energy III LLC*, Docket No. ER14-2821-\_\_\_\_  
*Stony Creek Energy LLC*, Docket No. ER11-3872-\_\_\_\_  
*Vantage Wind Energy LLC*, Docket No. ER10-2764-\_\_\_\_  
*Willow Creek Energy LLC*, Docket No. ER10-2132-\_\_\_\_  
*Wolverine Creek Energy LLC*, Docket No. ER10-2128-\_\_\_\_

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Dear Ms. Bose:

Pursuant to Section 35.42(d) of the Federal Energy Regulatory Commission's (the "Commission") regulations,<sup>1</sup> Beech Ridge Energy LLC, Beech Ridge Energy II LLC, Beech Ridge Energy Storage LLC, Bishop Hill Energy LLC, Bishop Hill Energy III LLC, California Ridge Wind Energy LLC, Forward Energy LLC, Grand Ridge Energy LLC, Grand Ridge Energy II LLC, Grand Ridge Energy III LLC, Grand Ridge Energy IV LLC, Grand Ridge Energy V LLC, Grand Ridge Energy Storage LLC, Gratiot County Wind LLC, Gratiot County Wind II LLC, Grays Harbor Energy LLC, Hardee Power Partners Limited, Invenergy Cannon Falls LLC, Invenergy Nelson LLC, Invenergy TN LLC, Judith Gap Energy LLC, Prairie Breeze Wind Energy LLC, Sheldon Energy LLC, Spring Canyon Energy LLC, Spring Canyon Energy II LLC, Spring Canyon Energy III LLC, Spindle Hill Energy LLC, Stony Creek Energy LLC, Vantage Wind Energy LLC, Willow Creek Energy LLC and Wolverine Creek Energy LLC (collectively, the "Companies") hereby submit for filing with the Commission this generation site report.

Section 35.42(d) of the Commission's regulations requires that a company with market-based rate authority submit a report to the Commission within 30 days after the end of each calendar quarter in which it or its affiliates (1) have acquired rights in land (e.g., fee title, lease, option) for the development of new generation in which site control has been demonstrated in the electric interconnection process<sup>2</sup> and (2) for which the potential number of megawatts commercially feasible at such site is 100 MW or greater. The information on such sites can be reported on an aggregated basis by relevant geographic market report (i.e., the Regional Transmission Organization ("RTO") or utility balancing authority area ("Utility BAA") in which the new generation will be located) stating the number of sites, the maximum potential number

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<sup>1</sup> 18 C.F.R. §35.42(d).

<sup>2</sup> For purposes of 18 C.F.R. §35.42(d), the Commission defines "site control" by reference to the definition of that term in the Standard Large Generator Interconnection Procedures (*see* 18 C.F.R. §35.42(f)), which the Commission stated in Order No. 697-C is as follows:

"documentation reasonably demonstrating: (1) ownership of, a leasehold interest in, or a right to develop a site for the purpose of constructing the Generating Facility; (2) an option to purchase or acquire a leasehold site for such purposes; or (3) an exclusivity or other business relationship between the Interconnection Customer and the entity having the right to sell, lease or grant the Interconnection Customer the right to possess or occupy a site for such purpose."

Order No. 697-C, 127 FERC ¶61,284 at P 18 (2009) (hereafter referred to as "Order No. 697-C"). The quarterly reporting requirement is also triggered for a site if the entity with market-based rate authority or its affiliate chooses in the interconnection process to make a monetary deposit so that it can demonstrate site control later in the process. *Id.* The Commission also noted in Order No. 697-C that if a term other than "site control" is used to describe the specific means by which site control is demonstrated in the interconnection process, then the reporting requirement will be triggered when a demonstration of site control is made under that term. *Id.*

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of megawatts that are reasonably commercially feasible on those sites for the technology for which the site was acquired, and the justification for such number.<sup>3</sup>

The Commission has granted each of the Companies market-based rate authority. The Companies are indirect, partially- or wholly- owned subsidiaries of Invenergy Investment Company LLC (“Invenergy Investment”), which indirectly holds the controlling ownership interests in the Companies. Through subsidiaries, Invenergy Investment is in the business of developing, acquiring, owning and/or operating electric generation facilities. Other than the Companies, certain other subsidiaries of Invenergy Investment are developing wholesale electric generation projects that are in various stages of development.

Pursuant to Section 35.42(d) of the Commission’s regulations, the Companies are submitting this notice to report sites for new generation development described below that certain subsidiaries of Invenergy Investment have demonstrated site control through the interconnection process during the fourth quarter of 2014 (i.e., October, November, December).

<b><u>Relevant RTO or Utility BAA Geographic Market</u></b>	<b><u>Number of Sites</u></b>	<b><u>Maximum Potential MW Reasonably Commercially Feasible</u></b>
MISO (RTO)	7	1,570 MW <sup>4</sup>
NYISO (BAA)	1	24.99 MW <sup>5</sup>
Public Service Company of Colorado (BAA)	1	50 MW <sup>6</sup>
PJM (RTO)	3	493 MW <sup>7</sup>
CAISO (RTO)	1	6.5 MW <sup>8</sup>

<sup>3</sup> Order No. 697-C at P 19.

<sup>4</sup> The sites listed in this row are for development of natural gas or wind generation.

<sup>5</sup> The site listed in this row is for development of solar generation.

<sup>6</sup> The site listed in this row is for development of solar generation.

<sup>7</sup> The sites listed in this row are for development of natural gas generation.

<sup>8</sup> The site listed in this row is for development of battery storage facilities that will be located within the CAISO geographic area but would be interconnected to San Diego Gas and Electric’s distribution system and not to the CAISO-controlled transmission system.

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The estimate of the maximum potential number of megawatts reasonably commercially feasible for the site reported above is based on the proposed size of the generation project contained in the interconnection request submitted in connection with the site.<sup>9</sup>

The Companies' affiliation, through Invenergy Investment subsidiaries, with the generation sites described above does not raise any concerns under the Commission's criteria for market-based rate authority for the Companies. The Commission has adopted a rebuttable presumption that entities cannot erect barriers to entry due to the ownership or control of sites for generation capacity development.<sup>10</sup> Moreover, the Companies reaffirm that they and Invenergy Investment and its affiliates have not erected barriers to entry, and will not erect barriers, in any relevant geographic markets. Accordingly, the Companies continue to satisfy the Commission's market-based rate standards because their affiliation with the sites for new generation capacity development reported herein does not materially change the facts and circumstances the Commission relied upon in granting each of them market-based rate authority.

All communications and service related to this filing should be directed to the following individuals:

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<sup>9</sup> To the extent 18 C.F.R. §35.42(d) is applicable, the Companies will file additional reports for the applicable quarter if in the future site control through the interconnection process is demonstrated for additional generation development at the sites described in this notice. Affiliates of the Companies are developing generation facilities that will be located in Texas and plan to sell power solely within the Electric Reliability Council of Texas ("ERCOT") geographic market ("ERCOT Affiliates"). However, this report does not include sites of ERCOT Affiliates of the Companies that may have site control because generators located in Texas and selling solely into ERCOT are not selling power in interstate commerce are not subject to the Commission's public utility jurisdiction and generation located in, or to be located in, ERCOT are not considered in market power analyses for market-based rates of affiliates of such ERCOT generation (e.g., not relevant for horizontal or vertical market power criteria (which includes site control)). *See, e.g., Sharyland Utilities, L.P.*, 121 FERC ¶ 61,006 (2007) (generators located in ERCOT not selling power in interstate commerce are not subject to the Commission's public utility jurisdiction); *Backbone Mountain Windpower, LLC, et al.*, 111 FERC ¶ 61,242, at P 36 (2005) (market power analyses do not need to consider ERCOT generation when the output of such generation is not sold outside of ERCOT).

<sup>10</sup> *See Market-Based Rates for Wholesale Sales of Electric Energy, Capacity and Ancillary Services by Public Utilities*, Order No. 697, 119 FERC ¶61,295 at P 1018 (2007).

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The Companies respectfully request that the Commission accept this generation site report. Thank you for consideration of this matter.

Respectfully submitted,

/s/ Laura V. Szabo

Laura V. Szabo

*Counsel for Beech Ridge Energy LLC, Beech Ridge Energy II LLC, Beech Ridge Energy Storage LLC, Bishop Hill Energy LLC, Bishop Hill Energy III LLC, California Ridge Wind Energy LLC, Forward Energy LLC, Grand Ridge Energy LLC, Grand Ridge Energy II LLC, Grand Ridge Energy III LLC, Grand Ridge Energy IV LLC, Grand Ridge Energy V LLC, Grand Ridge Energy Storage LLC, Gratiot County Wind LLC, Gratiot County Wind II LLC, Grays Harbor Energy LLC, Hardee Power Partners Limited, Invenergy Cannon Falls LLC, Invenergy Nelson LLC, Invenergy TN LLC, Judith Gap Energy LLC, Prairie Breeze Wind Energy LLC, Sheldon Energy LLC, Spring Canyon Energy LLC, Spring Canyon Energy II LLC, Spring Canyon Energy III LLC, Spindle Hill Energy LLC, Stony Creek Energy LLC, Vantage Wind Energy LLC, Willow Creek Energy LLC and Wolverine Creek Energy LLC*

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