I. Stakeholder Feedback on MISO/PJM Regional Processes and Metrics

MISO and PJM reviewed their regional planning processes and metrics at the October 2nd IPSAC meeting. To facilitate a productive stakeholder discussion at the October 24th IPSAC meeting, MISO and PJM are soliciting feedback on what issues are priorities and potential steps to further the discussion.

- Please designate the following areas as “important” or “unimportant” to resolve for interregional coordination
  - Should joint metrics continue to be calculated
  - If joint metrics are needed, how many and what is their use
  - How JOA metrics are calculated
  - Data assumptions issues in coordinated planning
  - Regional planning difference issues
  - Other, please list
- For each “important” item:
  - rank their criticality and priority to coordinated planning
  - briefly describe an approach to advance the discussion
- For reference:
  - Metrics: currently MTEP/RTEP/JOA combinations of Production Cost and Load Cost and Adjustments
  - Process: MTEP/RTEP reliability coordination
  - Process: MTEP/RTEP MEP coordination
  - Process: Interregional JOA coordination

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Submit feedback by: October 16, 2014

Stakeholder feedback:

AEP believes that any effort to develop and calculate JOA metrics will be unproductive, and thus, unimportant. Having JOA rules (models, futures, metrics, criteria, assumptions, scopes, etc.) that are different from those that the RTOs use in their respective regional planning processes will not be approved by the respective RTO stakeholders.

Today, the JOA rules are allowed to be different from the respective regional rules because the RTO stakeholders know that any project that passes the JOA metrics still needs to pass the respective regional metrics before that project is called an interregional project. With that reality, we are wasting our efforts developing JOA rules that we know will get superseded by the regional rules.

Given that reality, AEP proposes that the PJM-MISO seam be planned using a process that is similar to the processes each RTO presently uses to plan its remaining interregional seams (e.g., PJM-NYISO, PJM-SERTP, etc.). Namely, each RTO determines its respective regional reliability and market efficiency needs and then uses the JOA process to determine if any interregional projects could address those regional needs more efficiently and cost-effectively than the regional projects each RTO is considering.

For your convenience, included with this feedback submittal are the detailed comments we previously provided to both PJM and MISO back in June 3, 2014, in response to a prior request for feedback that the two RTOs issued to the IPSAC. That feedback addresses the “data assumptions issues in coordinated planning” and “regional planning difference issues”, the important areas that AEP believes the IPSAC needs to resolve to effectively address interregional planning across the PJM-MISO seam.
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<th>Legal name of organization submitting feedback:</th>
<th>American Electric Power</th>
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<tr>
<td>MISO/PJM sector membership:</td>
<td>Transmission Owners</td>
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<tr>
<td>Feedback submitted by:</td>
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