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

MISO and PJM reviewed their regional planning processes and metrics at the October 2\textsuperscript{nd} IPSAC meeting. To facilitate a productive stakeholder discussion at the October 24\textsuperscript{th} 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 17, 2014

Stakeholder feedback:

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<tr>
<th>Should joint metrics continue to be calculated – <strong>Important (RANK N/A)</strong></th>
<th>Yes. Joint metrics should be the only metrics used to measure cross border projects.</th>
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| If joint metrics are needed, how many and what is their use – **Important (RANK #1)** | - There needs to be only one inter-regional metric for cross border Market Efficiency Projects instead of the current process with three tests (inter-regional + two individual regional tests). The regional processes are disconnected and measure opposing sets of benefits that don't align around constraint mitigation.  
  - The metrics need to be inclusive of upgrades 100kV and above  
  - The metrics need to capture both short term and long term costs including, but not limited to congestion relief, inter-RTO payments, and value of firm entitlements hedging against further inter-RTO payments.  
  - Models need to be benchmarked against results from real-time operations  
    - Consideration should be given to the impact pre-existing outages |
| How JOA metrics are calculated – **Important (RANK #2)** | - Eliminate or heavily reduce hedging assumptions inherent in the current approach to calculating NLP and APC. These hedging assumptions heavily discounts or even eliminates the benefits to relieving constraints on shared seams facilities utilized by both RTOs for their internal transactions (i.e., PJM generation to PJM load, MISO generation to MISO load). These facilities are the same ones that are chronic bottlenecks impacting the two markets independently, but also require market-to-market binding and redispatch to maintain the combined flow from the two RTOs within the physical limits of the facilities. |
| Data assumptions issues in coordinated planning – **Important (RANK #3)** | - Siting of new generation beyond those with signed interconnection agreements in order to meet an RTO's planning Reserve Margin requirement can highly impact the study results. The location chosen for these theoretical generating units can help or hurt existing congestion and thus impact the benefits derived from a proposed project. Does it make sense to maintain the Planning Reserve Margin or would it be more appropriate for the RTOs to maintain an average experienced reserve margin (for example, a reserved margin based on capacity reserves.
historically available during summer peak)? NIPSCO believes use of the averaged experienced reserve margin ensures an approach more aligned with experience from operations, which would also reduce the need for hypothetical generation siting.

Regional planning difference issues - **Unimportant**

- Regional differences should not impact inter-regional planning. Inter-regional planning is intended to address different planning objectives than regional planning, as such the process for inter-regional projects should be independent of regional processes to ensure regional differences do not hold back needed inter-regional projects.

Inter-regional planning cycle timing – **Important (RANK #5)**

- Inter-regional planning cycle should be incorporated into the RTO planning cycles to ensure consistency in and coordination of data, modeling, and input assumptions.

Generator retirement study process – **Important (RANK #4)**

- The study process needs to be formalized as does the cost allocation methodology for upgrades identified during the study process.

Modeling, study, mitigation identification improvement – **Important (RANK #6)**

- There should be consistency between the MISO and PJM planning analyses in the application of reliability criteria and modeling assumptions. MISO and PJM planning analysis should be consistent in how they address:
  - The generation interconnection process – specifically, there need to be alignment on proper generation dispatch assumptions.
  - Reliability – the analyses must ensure that preferences contained in individual RTO processes are studied and that the RTO who employs reliability measures that may be more strict is able to fund upgrades needed to maintain its preference.

Legal name of organization submitting feedback: Northern Indiana Public Service Company

MISO/PJM sector membership: Transmission Owners

Feedback submitted by:

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