Stakeholder Feedback
MISO Environmental Sector

**Important**

- Reduce differences between interregional and regional planning processes
  - Joint metrics still needed
  - Reduce $20M project cost threshold to $5M
  - Reduce MISO’s regional voltage threshold from 345 kV to 100 kV (resolve through MISO’s Regional Expansion Criteria and Benefits [RECB])
  - Perform next joint study in 2015 immediately after this process review ends

- Achieve clarity and agreement on joint futures development process
  - Clarify upfront how futures will be used to evaluate and justify projects
  - Use multiple futures (if no agreement, MISO and PJM each pick one in addition to business-as-usual)
  - Use realistic state renewable portfolio standard levels
  - Include future modeling of Clean Power Plan
Hunt Power

• **Important**
  – Focus on meaningful small or large projects on seam
  – Interregional study should be limited to only high impact projects
  – JOA metrics should be dealt with after critical seams congestion issues have been addressed
  – Examine West-to-East transfer capacity
  – Capacity import/export limits of ComEd, western MISO zones should inform process
• **Important**
  - Joint metrics should include:
    - Reliability
    - Historic and future market efficiency
    - Public policy
    - Real-time operations
  - JOA metric calculation should be clearly understood by RTOs and succinctly explained to stakeholders
  - Interregional projects evaluated only through interregional process (remove regional studies for these projects)
  - Fully supports “quick fix” approach, should also consider larger projects to address quick fix needs
  - IPSAC should allow for stakeholder presentations
  - Encourage FERC to participate in IPSAC (ensure Order 1000 objectives met)

• **Unimportant**
  - Whether joint metrics should be calculated
**Important**

- Support a one step process of joint interregional planning with its own metrics and voltage requirements
  - If this cannot be developed, need alignment of regional processes as much as possible
- Joint metrics should capture short- and long-term benefits for projects 100 kV and above
  - Include congestion relief, inter-RTO payments, value of firm entitlement hedging against further inter-RTO payments
  - Benchmark against operations
  - Reduce/eliminate hedging assumptions to improve seams constraints
- Reevaluate how new generation without signed interconnection agreements (IAs) are sited
- Incorporate interregional planning into regional planning cycles (timing-wise)
• **Important**
  – Need upfront details on developer/builder selection (presentation and discussions necessary)
  – How JOA metrics are calculated should be easily replicated and capture relevant benefits
    • NLP should use generator- and load-weighted congestion components instead of RTO locational marginal prices
    • Propose a vote and relook at other options to current 70/30% adjusted production cost (APC)/net load payment (NLP) split
  – A presentation clearly explaining the process and assumptions used in a joint model should be provided prior to model release and feedback
    • This should be standardized and shared with stakeholders

• **Unimportant**
  – Regional planning differences are unimportant, were explained fairly well in previous round
• **Important**
  - Revise JOA process to align with FERC requirements
  - Align regional reliability monitoring and contingencies
  - Seam should be planned to respect both RTO criteria and tests
  - Upgrades should be based on most efficient and cost effective solutions, blind to location
  - Cost allocation based on avoided regional costs and independent regional benefits calculations
  - Better explain process for interregional proposals and the alignment with regional processes

• **Unimportant**
  - Any effort to develop JOA metrics is unproductive, JOA rules will be superseded by regional rules
• **Important**
  – There should be one interregional metric for CBMEPs (eliminate regional tests)
    • Projects 100 kV and above
    • Metrics should capture short- and long-term costs including congestion relief, inter-RTO payments, and value of firm entitlements hedging against further inter-RTO payments
    • Models should be benchmarked against operations
  – Eliminate/heavily reduce hedging assumptions in current approach to calculate NLP/APC
  – Reevaluate how new generation without signed IAs are sited
    • Reserve margins used in assumptions may not be appropriate
  – Generation retirements and cost allocation methodology for upgrades is important
  – Incorporate interregional planning into regional planning cycles (timing-wise)
  – Consistency of modeling assumptions and reliability criteria
    • Alignment on GI process and dispatch assumptions
    • Reliability analysis should ensure that an RTO which prefers stricter reliability measures can maintain its preference

• **Unimportant**
  – Regional planning differences unimportant
MISO Transmission Developer Sector

• Important
  – Interregional-only modeling and screening process (eliminate regional processes)
    • Reduce $20M cost threshold to $5M
    • Develop formal controls process for models
    • Establish formal model review period
    • Adopt a single IPSAC model, assumptions
  – Clear process on how interregional projects are submitted
    • How cross-border construction activities are split and awarded
  – More alignment of interregional and regional approval timelines
• **Important**
  – Joint metrics
    • Should continue to be used
    • No change on number, calculation

• **Unimportant**
  – Assumptions used in coordinated planning
  – Regional planning differences
• **Important**
  – Improve processes and coordination
    - Interconnections and identification of cross border upgrades
    - Participant funded upgrades
    - Transmission service requests
    - Models, benchmarking, and error reduction
    - Align cycles, models, timelines
  – Eliminate provisional/conditional interconnections
  – Eliminate JOA metrics or align regional metrics
    - Remove $20M project cost threshold
  – One future scenario for consistency and certainty
  – No harm test on interregional projects to capture reliability costs
  – Third party review of interregional project costs
Summary of Comments

- **Majority support (or no explicit opposition)**
  - Proceed with “quick fixes”
  - Upfront details on developer/builder selection and project submittal
  - Formal model review, controls
  - Alignment of interregional and regional approval timelines

- **Some support**
  - Reduce differences between interregional and regional tests
  - Eliminate regional tests
  - Revisit assumptions
    - Modeling (generation siting, RPS, how futures are used)
    - Benefit calculation (reduce hedging assumptions, include congestion relief)
    - Qualifying projects (lower $20M, 345 kV thresholds)
  - Regional differences unimportant