

Comments by PJM and MISO Consumer Advocates on the 2025 IPSAC AIR

The undersigned consumer advocates from PJM and MISO states appreciate the opportunity to submit comments for the 2025 PJM-MISO Inter-Regional Planning Stakeholder Advisory Committee (IPSAC) Annual Issues Review (AIR) process. The Interregional Transfer Capability Study (ITCS) coming out of last year's AIR is an important step forward. As many advocates commented last year,¹ well-planned interregional transmission provides multiple consumer benefits, which we are eager to see realized.

Just as the ITCS was an important step forward, there are remaining steps to be taken. Like all transmission planning, any interregional projects need to be evaluated for costs and benefits. Order 1920-A provides a list of benefits that should be a minimum starting point for interregional cost-benefit analysis. While we are aware that the ITCS is considering reliability, economic, and transfer needs, it is unclear what the specific drivers are for each type of need, and how those will be evaluated. Transparency around solutions options and trade-offs, informed by a full cost-benefit analysis, will lead to better outcomes for consumers.

Many of the undersigned advocate in our respective regions for a holistic approach to transmission planning. Planners should consider interregional projects in context alongside regional and supplemental projects, and evaluate the extent to which interregional projects can supplant other projects and bring efficiency to the entire system. This also requires a longer view; the ITCS is currently only evaluating near-term projects, but we recommend that interregional projects be planned to match the timelines outlined in Order 1920-A.

In particular, we are concerned about significant price differentials across the PJM and MISO seam. We echo the recommendation by OMS and OPSI to evaluate an increased number of interfaces and determine whether these differentials are due to interregional transfer capacity or something else.²

As we detailed last year, there is a need to improve management of our existing interties. NREL has identified uneconomic transfers across the seam for almost half of hours of the year.³

¹ Comments by PJM and MISO Consumer Advocates on the 2024 IPSAC AIR, January 30, 2024.
<https://www.pjm.com/-/media/DotCom/committees-groups/stakeholder-meetings/ipsac/2024/20240325/20240325-third-party-issues-consumer-advocate.pdf>

² OMS-OPSI Response to MISO-PJM Joint Interregional Study, October 24, 2024.
https://www.misostates.org/images/stories/Filings/Board_comments/2024/OMS_OPSI_Interregional_Study_Letter_20241024.pdf

³ Simeone, C., & Rose, A. (2024). Barriers and Opportunities to Realize the System Value of Interregional Transmission. <https://doi.org/10.2172/2371670>

Just as more interregional transmission is needed, it is critical to ensure that our existing interregional transmission capacity is managed appropriately. We ask that intertie optimization be an additional focus of the ITCS.

Given the need for well-planned, proactive interregional transmission between PJM and MISO, we encourage continued expansion of the ITCS, as outlined above, to fully realize the cost and reliability benefits of an interconnected grid. We will look forward to regular stakeholder updates and conversations about any necessary tariff changes to effectuate consumer-centric interregional planning. Thank you for your consideration and efforts.

Sincerely,

Sarah Moskowitz
Executive Director
Citizens Utility Board of Illinois

John Liskey
General Counsel
Citizens Utility Board of Michigan
921 N. Washington Ave
Lansing, MI 48906
517-913-5105


Geoff Marke
Chief Economist
Missouri Office of Public Counsel
Governor Office Building, Suite 650
200 Madison St., P.O. Box 2230
Jefferson City, Missouri 65102

Susan L. Satter
Chief, Public Utilities Bureau
Office of the Illinois Attorney General

Arthur W. Iler
Deputy Consumer Counselor, Federal Affairs
Scott R. Jones
Senior Utility Analyst, Federal Affairs
Indiana Office of Utility Consumer Counselor

New Jersey Division of Rate Counsel
Brian O. Lipman, Esq
Emily Lam, Esq.
T. David Wand, Esq.
140 East Front Street, 4th Floor
P.O. Box 004
Trenton, NJ 08625 (609) 984-1460

Olivia Carroll
Regulatory Advocate
Citizens Utility Board of Minnesota
332 Minnesota St., Suite W1360,
St. Paul, MN 55101
651-300-4701


Logan Atkinson Burke
Executive Director
Alliance for Affordable Energy
January 22, 2023

Dana Nessel
Michigan Attorney General
P.O. Box 30212
Lansing, Michigan 48909

Robert F. Williams
Director
Consumer Advocate Division
Public Service Commission of West Virginia
300 Capitol Street, Suite 810
Charleston, WV 25301

Corey Singletary
Director, Regulatory Affairs
Citizens Utility Board of Wisconsin
625 N. Segoe Rd.
Suite 101
Madison, WI 53705

Ruth Ann Price
Acting Public Advocate
Delaware Division of the Public Advocate

William Fields
Deputy People's Counsel
Maryland Office of People's Counsel
6 St. Paul Street, Suite 2102
Baltimore, MD 21202

Maureen Willis
Ohio Consumers' Counsel
Office of the Ohio Consumers' Counsel
65 East State Street, 7th floor
Columbus, Ohio 43215-4213
(614). 466-9567