

MISO and PJM Planning,

Invenergy appreciates the opportunity to provide the RTO's feedback as requested at the November 2024 PJM-MISO IPSAC.

Based on recent planning results between PJM and MISO and considering Order 1920 and Order 1000, we believe the RTOs continue to need a more defined approach to synthesize their planning efforts. For example, MISO developed their Long-Range Transmission Plan Tranche 2.1 without formally including PJM in their process or PJM's updated load forecast. However, to their credit, MISO planning does include scenario planning which is at the very least informative to the planning process which could advance long-lead projects.

PJM Economic and Policy Planning in many ways is very effective. PJM repeats Long-term Market Efficiency planning window annually and semi-annually, in accordance with Order 890. PJM has no arbitrary voltage cutoffs, and their benefit metric (Net Load Payment savings) correctly recognizes the planning goal which is to reduce congestion and customer costs using a "winners only" metric while ensuring net congestion is being reduced.

Each RTO and their customers could benefit by having an interregional planning process that occurs every other year and is not optional. At the very least this would allow each RTO to make timely adjustments to their regional plans to make the overall plan more efficient or cost effective and at the very least provide more visibility to their no-harm tests.

Another area of improvement would be better coordination of the existing available transfer capability of the system. Oftentimes there are significant differences between MISO and PJM transfer capability which ultimately make it difficult to exchange power between RTO's. This raises questions about the accuracy and usefulness of those systems. Perhaps this becomes more important in the future as the system is stressed and the remaining system has to help out.

Thanks,

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