

WPPI Energy proposes issues for consideration by the MISO-PJM JPRC for this cycle's annual issues review as detailed below.

We are concerned about congestion issues that appear frequently in market operation along the MISO-PJM seam, as these are costly and—we expect—limit transfer in ways that may be deleterious to reliability under certain circumstances.

1. The easternmost segment of the ComEd Rock Falls-Garden Plain 138 kV line is a frequent limiting element in system operation. One typical constraint in MISO RT operations is designated as follows:

| Constraint Name | Branch Name (Branch Type / From CA / To CA) | Contingency Description |
|--|---|------------------------------|
| Garden_Plain_15518_138_kV_L_o_Cordova_Nelson_345 | 15518 15518_2 1 (LN/CE/CE) | CORDOVA-NELSON 345 B (15503) |

This line segment appears to have a substandard rating. We would ask the JPRC to consider whether it would be appropriate to study upgrade options for this line segment.

2. West-to-east congestion in the Gary, IN area remains common. The worst single contingency is often loss of Wilton Center-Dumont 765 kV. Typical constraints, as represented in the MISO RT market, include the following:

| Constraint Name | Branch Name (Branch Type / From CA / To CA) | Contingency Description |
|--|---|----------------------------------|
| Chicago_Praxair_13831_flo_WiltonCenter_Dumont765 | CHICAGO 13831 A (LN/NIPS/NIPS) | WILTON CENTER-DUMONT 765 (11215) |
| Stillwell_Dumont345_flo_WiltonCenter_Dumont765 | DUMONT DUMONSTILL34_1 1 (LN/AEP/NIPS) | WILTON CENTER-DUMONT 765 (11215) |
| Crete_St_Johns_Tap_345_kV_L_o_Dum_Wi_Cent_765_kV | ST_JOHN 34519 A (LN/NIPS/AEP) | WILTON CENTER-DUMONT 765 (11215) |
| Chicago_Usstock_138_FLO_WiltonCenter_Dumont_765 | CHICAGO 13859 A (LN/NIPS/NIPS) | WILTON CENTER-DUMONT 765 (11215) |
| Duneare_Michigan_City_13839_138kv_flo_Wilton_Cen | DUNEACRE 13839 A (LN/NIPS/NIPS) | WILTON CENTER-DUMONT 765 (11215) |

We see potential for a joint MISO-PJM project to address this major congestion pattern via new 345 kV transmission connecting the ComEd Davis Cr.-Burnham double circuit tower line to the NIPSCO St. John-Schahfer 345 kV tower line (which includes a large number of double-circuit structures. The route could parallel the 765 kV line over much or all of the 14-mile distance.

Note that MISO is proposing to add a 2nd Schahfer-Burr Oak 345 kV circuit as part of the recently approved LRTP Tranche 2.1, and that a 345 kV circuit that currently passes through the St. John Substation could be connected to the bus there. We would ask the JPRC to consider whether it would be appropriate to study ways to address NW IN congestion, with particular attention to the approach described above.

Please let me know should you want to discuss further.

Thanks very much,

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