

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Interconnection Queuing Practices) Docket Nos. AD08-2-000 et al.

**COMMENTS OF THE ORGANIZATION OF MISO STATES, INC.
FOLLOWING TECHNICAL CONFERENCE**

On December 11, 2007 the FERC held a staff technical conference to seek comment on the procedures in place for interconnection onto the FERC-jurisdictional transmission system. In 2003, FERC issued Order No. 2003 to standardize the agreements and procedures related to the interconnection of large generating facilities. In this order, FERC sought to balance the need to prevent undue discrimination with the need for resource development, system reliability and just and reasonable rates. As a result of this order, and subsequent orders for small generating facilities and wind generators, FERC has established procedures and agreements for interconnection. In noticing the December 11th technical conference, FERC sought comment on queue issues which have arisen since Order No. 2003 was issued. At present many regions, including the MISO footprint, are experiencing various issues in attempting to manage their queues. Surges in the volume of new generation development are taxing the current queue management approach for interconnections. Additionally, as many states must comply with newly enacted renewable portfolio standards (RPS), additional stress will be placed on the interconnection queue.

The state regulatory panel at the technical conference held December 11, 2007 included speakers representing the North Dakota and Iowa commissions. In that panel as well as in the regional panels, there was a high level of consensus on several points.

First, the Commission has acknowledged the importance of improving the processing of transmission interconnection studies by holding the technical conference and through the remarks of the commissioners. The ability to develop and interconnect needed transmission resources is critical to economic growth generally, the development

of energy resources specifically, and meeting energy diversity goals. The panels showed broad agreement that improvement of the queue systems is a high priority.

Second, there was agreement from all regions and sectors that the Commission should not undertake a rule making proceeding to address this issue. Beginning with the Chairman's opening statement, it was recognized that Order 2003's multiple goals can conflict with each other and that first-come first-served may undercut other fairness goals. Instead of initiating a rule making proceeding, the Commission could encourage faster improvement of these processes by clearly signaling its willingness to allow a degree of flexibility in the ways regional transmission organizations meet the multiple goals of Order 2003.

Third, the Commission should encourage the regional stakeholder discussions to move forward with the efforts already underway to explore specific improvements to their queue handling processes. The widespread involvement of stakeholders is a good method for developing timely and workable solutions to multi-faceted problems. The participation of Commission staff can help assure that these discussions go forward without delay and that they can be considered quickly by the Commission when completed.

The OMS submits these comments because a majority of the members agreed by voice vote to generally support them.

Respectfully Submitted,
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