The OMS Transmission Planning Work Group and the OMS Resources Work Group (OMSWGs) provides comments to MISO's Planning Advisory Committee (PAC) on the questions below. The OMSWGs are supportive of the Proposal of the Coalition of Utilities of an Obligation to Serve in MISO (CUOS) as presented at the September 26th PAC meeting and at the September 7th Energy Planning and Load Shape Forecasting Workshop.

Q: How can MISO use all the data sources, including the CUOS proposal, together to meet the clarity, consistency, and efficiency principles?

A: MISO can use the CUOS proposal (all of the electric distribution companies (EDCs) or load serving entities (LSEs) provide MISO their monthly non-Coincident Peak (MW) and monthly energy (GWh) each for 20 years) and use that total forecast for the "base case/business as usual" future/scenario. The LSEs/EDCs could provide the monthly data as gross numbers in their base load forecasts and provide separate monthly data in an Excel spreadsheet with separate tabs representing the following:

1. Gross load forecast
2. Transmission losses
3. Load served by the following Planning Resource types:
    a. Behind the meter generation
    b. Load served by Demand Resources (DR's)
    c. Load served by Energy Efficiency Resources
    d. Load served by Other Planning Resources not known at this time
4. Net load forecast

Q: How does the CUOS proposal help address the consistency needs?

A:

- The EDCs/LSEs currently file their forecasts in the Model E tracking module and are the best resource of what is happening with load in their service territory. Several or most of these LSEs are using the same sources of information for the econometric, population, and GDP as MISO or SUFG will be using. However, the LSEs add more detail to their specific service territories, and thus will be included in the business as usual future as supported by CUOS.
- Under the CUOS proposal and with the filling of monthly data for the next 20 years as listed above for the gross, adjustments and net forecasts, the "consistency" should be the same for all of the LSEs/EDCs. If MISO wants more consistency on the classification of resources types, then the OMSWGs recommend a workshop on how that resource should be classified such as EE/ DR / BTMG / btmg / RBTMG / DG / DER, for example.
- An alignment of historical, existing and future assumptions can easily be set up by all involved parties if needed.

Q: What assumptions could MISO use in the absence of LSE data?

A: MISO already gets two years of data from the EDCs/LSEs, and most must also provide their state/local regulators anywhere from five to twenty years of forecasts. Thus, the missing LSE data could easily be tweaked by the LSE if it is required to be reported. The stakeholders could participate in a workshop on how best to alleviate this perceived absence of projected LSE load data. If certain LSEs do not believe they can provide the data, maybe larger LSEs could assist with the forecast, the forecast could be duplicated for the remaining ten to fifteen years, or the SUFG or MISO could help them with their forecasts after tweaking the MISO tariff.

Q: MISO currently uses EE, DR, DER, EV and storage BTMG forecast data developed by AEG and other entities. In what ways could the CUOS proposal be compatible with those forecasts?

A: As mentioned above under the CUOS proposal, the LSEs could provide the gross forecasts and the components that make the forecast that will be used for the baseload/business as usual future. For the other futures, MISO could use LSE data or data provided by AEG. The AEG values, if used in the other futures, would need to be discussed in workshops, and would need to get LSEs, state commissions and other stakeholders' input.