The Organization of MISO States (OMS) supports a well-functioning wholesale power market that delivers maximum value and reliability to customers in the MISO region and believes that full utilization of the transmission system through transparent, enhanced transmission line rating techniques is critical to achieve this objective.

In promoting this objective, the OMS recognizes:
1. Transmission Owners have the ultimate responsibility for submitting the line ratings used for their facilities to MISO in accordance with the Transmission Owners Agreement.
2. NERC standard FAC-008-3 requires consideration of ambient conditions and provides for review by MISO as the region’s Balancing Authority.
3. FERC is contemplating changes in this area and has an open docket (AD19-15).
4. There are a variety of benefits from enhanced line ratings, including those related to: economics, reliability, increased access to resources, mitigation of impacts from outages (scheduled and unscheduled), greater flexibility of the system, deferred uprating of circuits, and lower consumer costs.
5. “Enhanced Line ratings” are ratings more advanced than fixed static ratings that can account for variations in weather or other system conditions (i.e., seasonal, Ambient Adjusted Ratings (AAR), and Dynamic Line Ratings (DLR).)
6. Enhanced line rating techniques can be applied to both normal and emergency ratings.

OMS Position:
1. Transparency into transmission line rating methodologies is essential to ensure an efficient energy market and opportunities for benefits to be identified.
2. Enhanced line ratings need to be considered in order to achieve the MISO Vision: [to be] “The most reliable, value-creating RTO.”
3. Customers are harmed when transmission line ratings do not reflect the actual capabilities of the facilities based on changing ambient conditions. This can lead to higher energy prices and increased levels of congestion due to sub-optimal flows on the system.
4. There is a need for an increased, centralized role for MISO and/or the IMM to assist Transmission Owners and stakeholders to identify where enhanced line ratings could produce the largest net-benefits.
5. Implementation costs should be transparently considered as part of an analysis of enhanced line ratings.
6. Enhanced line rating methodologies will increase visibility and situational awareness. Increased transparency and consistency of methods and ratings could also increase reliability.

The OMS calls for Transmission Owners and MISO at a minimum to:
1. Provide greater transparency and consistency in line rating values and methodologies.
2. Provide both normal and emergency line ratings as required by the Transmission Owners Agreement.
3. Develop a procedure to identify appropriate facilities for potential implementation of enhanced line ratings, including estimation of benefits and costs of implementation to be transparently analyzed.