

## RECBWG: LRTP Cost Allocation Tariff redlines

During the October 14, 2021, Regional Expansion Criteria and Benefits Working Group (RECBWG) meeting, stakeholders were invited to provide feedback on the LRTP Cost Allocation Tariff redlines.

<https://www.misoenergy.org/stakeholder-engagement/stakeholder-feedback/recbwg--lrtp-cost-allocation-tariff-redlines/>

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The OMS CAPCom appreciates this opportunity to respond to MISO's draft tariff redlines shared with the RECBWG and posted to the November 2021 RECBWG materials. This feedback does not represent a position of the OMS Board of Directors on the substance of MISO's LRTP cost allocation proposal and should not be construed as supporting or opposing the proposal. This feedback is simply an attempt to guide MISO towards useful additional information to aid the CAPCom and other stakeholders in understanding the proposal, the filing process, and MISO's contingency plan if FERC rejects the filing.

First, OMS requests additional clarification regarding the "pause" of the original MVP methodology, which implicitly assumes a resumption of the original MVP methodology. MISO proposes to insert a start date/effective date for the sub-regional MVP proposal in the draft tariff language, but there is not an associated end date. If MISO intends to resume application of the original MVP methodology, how will MISO ensure, either in the tariff language itself, the transmittal letter to FERC, or in the stakeholder process pre-filing, that stakeholders will not be having the same conversations they are having today at the conclusion of this "pause"? Part of this clarification could include an explanation from MISO regarding how they will include the "guardrails" detailed at the October RECBWG in either its transmittal letter or the tariff language itself.<sup>1</sup>

The OMS CAPCom encourages MISO to begin its work drafting BPM language for this proposal prior to FERC acceptance to build stakeholder confidence and understanding in how any "guardrails" will be formalized either in the tariff or in BPM language.

Second, the CAPCom believes it is imperative for MISO to detail what it intends to do should this proposal be rejected by the Commission. It is important that MISO discuss this with stakeholders before filing and possibly include a similar discussion in its transmittal letter.

This feedback simply requests additional information and should not be construed to mean that all OMS members agree with both points in this feedback, nor should it be construed as a substantive OMS position on the LRTP cost allocation proposal itself. Individual OMS members have the right to file separate comments.

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<sup>1</sup> The CAPCom recognizes that any transmittal letter filed with these tariff revisions will not be legally binding, but it could be useful in setting expectations both for stakeholders and retail regulators.