

Feb 1, 2021

Sandy Boegeman, MISO
2985 Ames Crossing Road
Eagan, MN 55121
sboegeman@misoenergy.org

SUBJECT: Request for MTEP Guiding Principles Feedback

Dear Ms. Boegeman,

The Organization of MISO States (OMS) appreciates this opportunity to provide feedback on the MTEP Guiding Principles to the System Planning Committee of the MISO Board of Directors. The OMS has been very active in the area of transmission planning throughout MISO's history, most recently issuing a set of principles regarding Long-Range Transmission Planning¹ and the cost allocation thereof². In light of the action taken by OMS and others to encourage additional planning activities, the OMS believes it is timely to consider the following proposed changes to the MTEP Guiding Principles.

1. Make the benefits of an economically efficient electricity market available to customers by identifying transmission projects and non-transmission alternatives that are informed by near-term and long-range needs and ~~which~~ provide access to electricity at the lowest total electric system cost.
- ~~1.2.~~ Develop a transmission plan that meets all applicable NERC and Transmission Owner planning criteria and safeguards local and regional reliability through identification of transmission projects to meet those needs under a variety of system conditions and scenarios.
- ~~2.3.~~ Support ~~member, state, and local, and, and~~ federal energy policy and member requirements preferences by soliciting robust input from these entities and planning for ~~access to~~ a changing resource mix.
- ~~3.4.~~ Provide ~~an~~ appropriate cost allocation mechanisms that ensures that costs of transmission projects are allocated in a manner at least roughly commensurate with the distribution of projected benefits of these projects.
- ~~4.5.~~ Analyze system scenarios and make granular information regarding costs and benefits ~~the results~~ available to state and federal energy policy makers and other stakeholders to provide context to inform ~~regarding~~ choices.
- ~~5.6.~~ Coordinate planning processes with neighbors and work to eliminate barriers to reliable and efficient operations.

Sincerely,



Chair Julie Fedorchak
President, Organization of MISO States, Inc.
jfedorchak@nd.gov

¹ See OMS Long-Range Transmission Planning Principles, June 2019, [20190613 Long-Range Transmission Planning Principles - Approved Combined.pdf \(misostates.org\)](#).

² See OMS Cost Allocation Principles, XXXX 2021.