



Mr. John Bear
Chief Executive Officer, MISO
720 City Center Drive
Carmel, Indiana

Dear John,

The OMS believes the benefits of implementing more accurate line ratings across the MISO system will far exceed the costs. To that end we urge MISO to play a larger role in applying line ratings consistently across the footprint to safely maximize the value of the transmission system for MISO customers.

We understand the unenviable position you occupy, with some of your transmission-owning members opposed to MISO taking additional action while retail regulators like us push for action. However, the OMS believes MISO's role as the grid operator is to provide independent leadership and expertise on issues such as this to ensure the MISO system works safely and efficiently for all consumers. We urge MISO to take the actions outlined below to increase the economic and reliability benefits enhanced line ratings promise for MISO customers..

1. **Seasonal Ratings:** An easy first step for MISO is to ensure accurate seasonal ratings are in place throughout the year and to make this information publicly available. This will allow MISO and its stakeholders to have greater confidence in how the system will perform during extreme events and aligns nicely with MISO's proposed changes to its resource adequacy construct.
2. **Emergency Ratings:** We applaud MISO's recently announced efforts around emergency ratings and encourage you to build on them. The Transmission Owners Agreement requires that owners provide MISO with both normal and emergency ratings but does not define these terms. This gap results in an incomplete picture of the system's capability that has increased costs to customers and created additional work for MISO operators during tight conditions. The OMS recommends that MISO clarify the differences between normal and emergency ratings in the Transmission Owners Agreement and use its tariff-provided ability to "accept and verify" these ratings to ensure that stakeholders have confidence in MISO's determinations. MISO will not only need to request information on the methods its transmission owners use to derive their facility ratings but also to ensure that its analysis is transparent and consistently applied across the region.¹



3. **AAR Framework:** The value of region-wide transparency, the kind that only MISO can provide, cannot be overstated. The existing AAR framework MISO has developed with the transmission owners does not provide this type of transparency. We urge MISO to work with transmission owners to improve it and/or develop a new process. Visibility into the use of seasonal, ambient adjusted, and emergency ratings across the entire footprint provides context to compare methods and allows for information sharing that will improve the reliability and economic efficiency of the MISO system. The current AAR framework simply shares the results of a transmission-owner analysis with individual state commissions that do not regulate the operation of the bulk power system. This *appears* to increase transparency but accomplishes nothing in terms of meaningful operational reform. MISO operates the system, and MISO should have a role in analyzing line ratings across the footprint.
4. **System Optimization:** The optimization of the MISO system should not stop at the generator level. MISO should seek out and highlight opportunities to optimize the transmission system in order to bring untapped opportunities to light for stakeholders. If individual transmission owners are unwilling to partner with you in this effort, please communicate that directly to the OMS Board.

The OMS hopes these ideas provide more clarity into the system we envision and the outcomes we desire in regard to enhanced line ratings. Rest assured we stand ready to continue partnering with you and the transmission owners to achieve this end. Thank you for your ongoing work on this important issue.

Sincerely,

Julie Fedorchak

President, Organization of MISO States