



January 19, 2023

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

SUBJECT: Request for MTEP Guiding Principles Feedback

Dear Ms. Boegeman,

Thank you for the request for OMS input into the MTEP Guiding Principles that are utilized by the MISO Board's System Planning Committee.

OMS offers this feedback based on positions taken on several enhancements to RTO planning processes proposed by FERC over the past year. Several of FERC's proposals address concerns that state regulators have related to transparency and coordination within the transmission planning process. We believe the existing guiding principles leave a gap that has allowed these concerns to grow over time and that it is appropriate to add a new principle that addresses these concerns, as explained further below.

In our comments to FERC, OMS called for "reforms that require public utility transmission providers to establish an iterative process that would ensure that stakeholders have meaningful opportunities to participate and provide feedback on local transmission planning throughout the regional transmission planning process." The comments went on to request that "all transmission projects be evaluated and approved as part of regional transmission planning processes with the opportunity for meaningful input from retail regulators."

The MTEP Guiding Principles would benefit from the addition of a principle focused on MISO's role in providing transparency into both the *regional* and *local* transmission planning process and ensuring the appropriate coordination between the two. Possible language could be:

- Ensure the MISO planning process provides a sufficient level of transparency into all aspects of transmission planning by providing a meaningful opportunity for stakeholders to ensure cost-effective and efficient expansion of the transmission system.

Again, OMS appreciates the opportunity to partner with MISO to ensure the continued expansion of the transmission system is optimized for the benefit of customers and we look forward to engaging in the details of any potential process changes.

Sincerely,

Chair Dan Scripps
President, Organization of MISO States, Inc.