

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL REGULATORY COMMISSION**

Indicated Load-Serving Entities)	Docket No. EL13-75-000
)	
vs.)	
)	
Midcontinent Independent Transmission)	
System Operator, Inc., and)	
PJM Interconnection, L.L.C.)	

COMMENTS OF THE ORGANIZATION OF MISO STATES

Pursuant to Rule 211 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”) 18 C.F.R. §385.211, the Organization of MISO States (“OMS”) submits the following comments in response to the *Settlement Agreement and Offer of Settlement of Indicated Load-Serving Entities, Midcontinent Independent System Operator, Inc., and PJM Interconnection, L.L.C* filed with the Commission on October 27, 2014, in the above captioned docket (“Settlement Agreement”). The OMS is a party to this proceeding, having submitted a Notice of Intervention on July 19, 2014, in the above captioned docket.

I. COMMENTS

Paragraph 4.3 of the Settlement Agreement states:

Additionally, in the event of a resettlement event involving more than \$250,000, MISO agrees to notify its Members of such resettlement at least two (2) weeks prior to releasing funds to PJM and to provide the details of any such resettlement, including all of the circumstances associated with the resettlement. MISO’s Members may request further information from MISO or a meeting with MISO before any resettlement occurs.

This paragraph provides notification and request rights to MISO members. State regulatory commissions are not MISO members. On behalf of retail ratepayers who will

ultimately pay the bill or receive the refund, State regulatory commissions have an interest in the future market-to-market settlements addressed in Paragraph 4.3 of the Settlement Agreement. Accordingly, state regulatory commissions should be provided with the same notice and information request rights that the Settlement Agreement provides to MISO members. To that end, the OMS respectfully requests that the Commission direct that paragraph 4.3 of the Settlement Agreement be modified to add the underlined language as shown below:

Additionally, in the event of a resettlement event involving more than \$250,000, MISO agrees to notify its Members and Relevant Electric Retail Regulatory Authorities (“RERRAs”) of such resettlement at least two (2) weeks prior to releasing funds to PJM and to provide the details of any such resettlement, including all of the circumstances associated with the resettlement. MISO’s Members and RERRAs may request further information from MISO or a meeting with MISO before any resettlement occurs.

Such a revision will ensure that state regulatory commissions in the MISO footprint receive both adequate notice and information regarding the details of significant resettlements between MISO and PJM.

II. CONCLUSION

Given the interest of state regulatory commissions in the market-to-market settlement issues in this proceeding, the Commission should direct that paragraph 4.3 of the Settlement Agreement be modified, as described herein, to ensure that state regulatory commissions in the MISO footprint receive both adequate notice and information regarding the details of significant resettlements between MISO and PJM.

The OMS submits this pleading because a majority of its members has agreed to generally support it. Individual OMS members reserve the right to file separate pleadings regarding the issues discussed herein. The following members generally support this pleading:

Illinois Commerce Commission
Indiana Utility Regulatory Commission

Iowa Utilities Board
Kentucky Public Service Commission
Michigan Public Service Commission
Minnesota Public Utilities Commission
Mississippi Public Service Commission
Missouri Public Service Commission
City of New Orleans
North Dakota Public Service Commission
South Dakota Public Service Commission
Public Service Commission of Wisconsin

The Arkansas Public Service Commission, Louisiana Public Service Commission, and the Public Utility Commission of Texas abstain from this filing. The Manitoba Public Utilities Board and the Montana Public Service Commission did not participate in this matter.

Respectfully Submitted,

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Dated: November 25, 2014

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Des Moines, Iowa, this 25th day of November, 2014.

William H. Smith, Jr.