

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

Midwest Independent System Operator, Inc.)

Docket No. ER17-156-000

**NOTICE OF INTERVENTION AND INITIAL COMMENTS OF
THE ORGANIZATION OF MISO STATES**

Pursuant to Rule 211 and 214(a)(2) of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. §385.211 and §385.214(a)(2), the Organization of MISO States (“OMS”) submits its Notice of Intervention and comments in the above-captioned docket.

On October 21, 2016, the Midcontinent Independent System Operator, Inc. (“MISO”) filed proposed revisions to its Open Access Transmission, Energy and Operating Reserves Market Tariff (“Tariff”) amending its Generator Interconnection Procedures (“GIP”). MISO conducted additional stakeholder review of its Generator Interconnection Queue process, as a result of the Commission’s order of MISO’s GIP tariff in Docket No. ER 16-675 dated March 29, 2016 (“March 29th Order”). MISO worked with its stakeholders and has submitted this updated and revised GIP proposal, which was designed to reduce processing delays in MISO’s Generator Interconnection (“GI”) queue and provide increased flexibility and certainty to affected stakeholders and interconnection customers. MISO’s reforms are designed to ensure that commercially viable projects have an opportunity to succeed while allowing Interconnecting Customers to withdraw non-viable projects from the queue at designated points. The OMS supports MISO’s efforts to improve the efficiency and timeliness of the queue process and supports this GI Queue reform. The OMS believes these changes are appropriate and encourages MISO to continue to improve this process in order to reduce uncertainty and restudies.

I. Notice of Intervention

The OMS is a non-profit, self-governing organization comprised of representatives from the seventeen regulatory bodies with jurisdiction over entities participating in the MISO and serves as the regional state committee. The purpose of the OMS is to coordinate regulatory oversight among its members; make recommendations to the MISO, the MISO Board of Directors, the Commission, and other relevant government entities and state commissions as appropriate; and intervene in proceedings before the Commission to express the positions of the OMS member agencies. As such, the OMS files its Notice of Intervention in this proceeding under Rule 214(a)(2), 18 C.F.R. §385.214(a)(2), of the Commission's Rules of Practice and Procedure.

Service of pleadings, documents, and communications should be made on the following:

Tanya Paslawski
Executive Director
Organization of MISO States
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II. Comments

The OMS appreciates MISO's continued efforts to improve the GIP. The current process has caused numerous GI delays which, in turn, impact the ability to get needed generation online in a timely manner. A more efficient approach to bring new generation online will become increasingly important with impending coal plant closures and other changes to the generation mix in the region to ensure that reliability is not adversely impacted.

These proposed Tariff revisions should minimize the amount of unscheduled GI restudies which have led to the prolonged GI queue process. MISO proposes to subdivide the Definitive Planning Process (DPP) into three sequential phases,(*i.e.*, DPP I, DPP II, and DPP

III) to provide for a structured restudy process that establishes two designated off-ramps to enable withdrawal of non-viable projects from the GI queue. MISO is also proposing to remove the requirement that a GI customer with a completed GI agreement undergo a restudy due to a change in a higher-queued project, except when ordered by the Commission. These are appropriate and positive changes.

The OMS also supports the proposals by MISO to add new milestone payment points in the DPP. Interconnection customers will now make payments at three consecutive stages: at the initial application called “M2”, at the second milestone called “M3” (which is at the DPP I), and at the final milestone payment “M4” (which is after the DPP II and must be paid prior to the DPP III can be started). The ability for an interconnection customer to later apply milestone payments to their initial GIA payment is a beneficial improvement as well.

The OMS also supports MISO’s posting of the base model for each DPP on its extranet site free of charge and MISO’s proposed changes to its template Study Services Agreement. These proposed changes to the agreement require a more definitive time schedule, estimate of related costs, and designate the Interconnection Customer as an intended beneficiary of the agreement.

Lastly, the OMS believes this filing appropriately accounts for recommendations made by FERC in the March 29th Order and reflects large amounts of input received through the stakeholder process.

The OMS submits these comments because a majority of its members have agreed to generally support them. Individual OMS members reserve the right to file separate comments regarding the issues discussed in these comments.

Respectfully Submitted,

Tanya Paslawski

Tanya Paslawski

Executive Director

Organization of MISO States

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Dated: November 14, 2016

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 this 14th day of November, 2016.

Tanya Paslawski