

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

Managing Transmission Line Ratings

Docket No. AD19-15-000

**MOTION FOR LEAVE TO FILE OUT OF TIME AND
POST-TECHNICAL CONFERENCE REPLY COMMENTS
OF THE ORGANIZATION OF MISO STATES, INC.**

On September 10 and September 11, 2019, Federal Energy Regulatory Commission (Commission) staff convened a technical conference to discuss what transmission line ratings and related practices might constitute best practices, and what, if any, Commission action in these areas might be appropriate. In its *Initial Post-Technical Conference Comments* in this Docket, the OMS argued that TOs should be encouraged to use Ambient Adjusted Ratings (“AARs”) where practicable and beneficial.¹ In these Reply Comments, the OMS encourages the Commission to recognize that there is a range of transmission line rating approaches available to RTOs and TOs that may provide benefits to customers. The Commission does not have to either fully require the use of the most resource intensive approach or to do nothing at all. There is a wide range possibly beneficial solutions available. The Commission should find and encourage benefits to customers wherever they might exist.

I. MOTION FOR LEAVE TO FILE OUT OF TIME

Pursuant to Rule 212 of the Commission’s Rules of Practice and Procedure, the OMS hereby submits this *Motion for Leave to File Comments Out of Time* in the above captioned docket. Although the Commission’s Notice indicates that Post-Technical Conference Reply Comments were due 15 days after the deadline to submit Initial Comments, given the challenges in

¹ See *Post-Technical Conference Comments of the Organization of MISO States*, Docket No. AD19-15-000 (Nov. 1, 2019) (“OMS Comments”).

coordinating among multiple state commissions' administrative schedules within the reply comment period, the OMS respectfully requests the Commission accept this Motion. The Commission may allow an untimely response where there is no showing of any undue prejudice or delay. With these comments, the OMS does not wish to disrupt or delay the proceedings. Rather, the OMS wishes to identify concerns that may be useful to the Commission in its decision making process. The OMS submits that these reply comments will help the Commission in its deliberations and are in the public interest. Therefore, and particularly in light of the potential benefits to customers should portions of the policy the Commission is studying here be enacted, good cause exists to grant this *Motion for Leave to File Comments Out of Time*. Accordingly, the OMS hereby moves the Commission for leave to file and respectfully requests the Commission accept these comments and give them due consideration.

II. COMMENTS

In their initial comments and reply comments in this docket, the MISO TOs use the terms AARs and Dynamic Line Ratings (“DLRs”) interchangeably for the most part and do not consistently draw a difference between the two when warranted. For instance, the MISO TOs argue that, “[t]he state of knowledge in the industry is not ready to support the full implementation of AARs and DLRs on all companies’ systems”² without acknowledging the significant experience some RTOs have with various transmission line rating approaches.

For instance, ERCOT’s representative represented that it has been using AARs since 2005 and that it has “experienced significant benefit [due] to its implementation of AARs.”³ The Commission’s Staff paper noted that PJM also has experience with AARs and that CAISO, ISO-

² *Post-Technical Conference Comments of the MISO Transmission Owners*, Docket No. AD19-15-000 at 2 (Nov. 1, 2019) (“MISO TOs Comments”).

³ Testimony of Chad Thompson at 1-2.

NE, MISO, NYISO, and SPP use seasonal line ratings with MISO and SPP enabling TOs to update line ratings as frequently as hourly and in the real-time market.⁴ NYISO, alternatively, uses seasonal ratings which are used in planning and operations studies, in real-time operations, and in its markets.⁵ Stakeholders are able to view these seasonal ratings on a secure basis, and most grid equipment in New York is able to be rated using AARs and DLRs.⁶ There are many ways RTOs can, and are, integrating the use of non-static line ratings, and the contention that the only option the Commission has is to encourage a one-size-fits-all approach or nothing at all is a false dichotomy.

Some TOs also have experience with AARs. For instance, Entergy has nearly 10 years of experience with AARs⁷ and coordinates with MISO on issues relating to AARs.⁸ Entergy has also implemented AARs without local sensors.⁹

Nonetheless, the MISO TOs present this issue to the Commission as though there is either a one-size-fits-all solution or that there is nothing at all the commission can do.¹⁰ But the Commission's Staff Paper noted that AARs do not have the same implementation challenges as

⁴ FERC Staff, *Managing Transmission Line Ratings*, Docket No. AD19-15-000 at 11-13 (August 2019) ("FERC Staff Paper").

⁵ Opening Remarks of Aaron Markham at 1-2.

⁶ *Id.*

⁷ Opening Remarks of Michelle Bourg at 1.

⁸ *Id.* at 3

⁹ *Id.* at 1. ("Entergy has found that ambient temperature rating adjustments are the most predictable and efficient to implement. Entergy does not adjust any transmission facility based on projected or actual wind conditions.")

¹⁰ MISO TO Comments at 7, 11 ("Factors such as topology, congestion, and localized climate conditions can affect the need for, and benefits of, temperature-adjusted line ratings, and no one-size-fits-all solution will be appropriate.... Any implementation requirement must allow transmission owners flexibility as the impact of implementing AARs on identified lines and facilities can vary. Adopting a rigid or one-size-fits-all requirement could lead to bad or irrational investments and ineffective or inefficient use of resources.")

DLRs¹¹ and states “AARs could be applied to all transmission lines or a subset of lines.”¹² Potomac Economics wrote that it may be possible to implement AARs in the near term followed by DLRs in a two-phase approach.¹³

The TOs write that “AARs and DLRs only offer operational benefits in specific circumstances”¹⁴ with the implication that the costs outweigh the benefits in most, if not all, instances. The OMS believes that there are significant benefits to customers should the Commission encourage the use of AARs. Both Potomac Economics¹⁵ and MISO have identified benefits.¹⁶ The Commission should remain focused on areas where benefits exist and recognize that the MISO TOs have little to no incentive to promote these practices.¹⁷

Next, the MISO TOs argument that economic efficiency should or could take precedence over reliability is a distraction. The Commission’s Staff Paper states the Staff’s goal is “examining approaches to transmission line rating... in order to reduce costs and achieve increased efficiency... without undermining reliability.”¹⁸ The TOs write, “Importantly, consideration of market benefits should not take priority over reliability, and the Commission should not impose any requirements or incentives that would prioritize these benefits ahead of reliability or safety....

¹¹ FERC Staff Paper at 17 (“In particular, AARs have the potential to reduce congestion, improve planned outage coordination, and provide reliability benefits. At the same time, AARs do not implicate challenges that apply to DLR implementation such as sensor placement, sensor maintenance, and physical risks.”)

¹² MISO TOs Comments at 8.

¹³ *Post-Technical Conference Comments of Potomac Economics, LTD.*, Docket No. AD19-15-000 at 13 (Nov. 1, 2019) (“Potomac Comments”).

¹⁴ MISO TOs Comments at 2.

¹⁵ Potomac Comments at 6.

¹⁶ MISO Comments at 3. (“The use of AARs and DLRs improve market efficiency and increase utilization of the transmission system while maintaining reliability. The MISO IMM identified up to \$80M in potential annual savings if more widely utilized. Although MISO’s evaluation did not produce as high a dollar savings, it did identify significant savings to potentially be available with a more broad use of dynamic ratings. Additional rating updates also provide better situational awareness across the system in regards to system capabilities in managing reliability.”)

¹⁷ Potomac Comments at 7.

¹⁸ Staff Paper at 4.

Forcing transmission owners to operate their systems in a way that may threaten reliability to achieve market outcomes is contrary to [the Commission's] resiliency efforts."¹⁹ The OMS believes that seeking benefits without jeopardizing reliability is a foundational part of the exploration in this docket and that the effort spent debating whether or not the use of these methodologies should be allowed to affect reliability could be better used identifying economically beneficial solutions that do not impact reliability. The DOE report that the MISO TOs cite to show the difficulties of various approaches to transmission line ratings also states that, "DLR can potentially improve reliability by calculating the true thermal limit for those lines and informing relay settings used to protect transmission equipment."²⁰ Potomac Economics also highlighted how Entergy has utilized non-static transmission line rating approaches without affecting reliability.²¹

II. CONCLUSION

For the reasons stated above, the OMS moves the Commission to accept these comments out of time and continue to analyze the cost and benefits of the various transmission line approaches independently of each other to capture benefits for customers through the use of various approaches to transmission line ratings. The OMS files these comments because a majority of its members are in support. The Manitoba Public Utilities Board, the Montana Public Service Commission, and the North Dakota Public Service Commission did not participate in the vote.

¹⁹ MISO TOs Comments 6.

²⁰ DOE paper at. 13 citing J. McCall and T. Goodwin, "Dynamic Line Rating as a Means to Enhance Transmission Grid Resilience," in CIGRE U.S. National Committee 2015 Grid of the Future Symposium, 2015.

²¹ Potomac comments at 7 ("From 2017 to 2018, the actual savings totaled over \$50 million approximately 8 percent of the congestion on the transmission facilities. Over \$37 million of the savings were on Entergy's transmission facilities in the South – 9 percent of congestion on those facilities. These estimates are conservative because the costs operating to a lower limit would be higher.")

Individual members reserve the right to file separate comments regarding the issues discussed in this docket.

Respectfully submitted,

/s/ Marcus Hawkins

Marcus Hawkins
Executive Director
Organization of MISO States
699 Walnut Street, Suite 468
Des Moines, IA 50309
marcus@misostates.org

Dated December 19th, 2019

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list prepare by the Secretary for the above-captioned docket in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure. 18 C.F.R. § 385.2010 (2019).

DATED at Madison, Wisconsin this the 19th day of December 2019.

/s/ Marcus Hawkins

Marcus Hawkins
Executive Director
Organization of MISO States
699 Walnut Street, Suite 468
Des Moines, IA 50309
marcus@misostates.org