

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

Revisions to SPP-MISO Joint Operating Agreement to Enhance the Coordinated System Planning Process)))	Docket Nos. ER19-1895 ER19-1896
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**NOTICE OF INTERVENTION AND
COMMENTS OF THE ORGANIZATION OF MISO STATES, INC.**

On May 17, 2019 the Midcontinent Independent System Operator (“MISO”) and the Southwest Power Pool (“SPP”) filed revisions to the SPP-MISO Joint Operating Agreement (“JOA”). The primary proposed revisions include the removal of the joint model for evaluating transmission projects, the consideration of additional benefits within the Coordinated System Plan (“CSP”) process, and the removal of the current \$5 million cost threshold for projects to be considered in the CSP.¹ The Organization of MISO States, Inc. (“OMS”)² OMS appreciates the productive stakeholder process that led to this proposal and generally supports it as discussed below.

I. NOTICE OF INTERVENTION

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 OMS submits its Notice of Intervention. Service of pleadings, documents, and communications should be made on the following:

¹ *Midcontinent Indep. Sys. Operator, Inc.*, Revisions to SPP-MISO Joint Operating Agreement to Enhance the Coordinated System Planning Process, Docket ER19-1896 at p. 3 (“Filing”).

² OMS is a non-profit, self-governing organization of representatives from each retail regulator with jurisdiction over entities participating in the Midcontinent Independent System Operator, Inc. (“MISO”) and serves as the regional state committee in the region. The purpose of the OMS is to coordinate regulatory oversight among the states, including recommendations to MISO, the MISO Board of Directors, FERC, other relevant government entities, and state commissions as appropriate to express the positions of OMS member agencies.

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II. COMMENTS

The OMS appreciates MISO and SPP's continued efforts to improve how transmission is studied and planned along their lengthy, complex seam. Both RTOs have gained valuable experience by working through their respective planning processes and within the interregional planning process. This has informed the proposed modifications to the MISO-SPP JOA. Many OMS members participated in the robust stakeholder process, at both MISO and the Interregional Planning Stakeholder Advisory Committee, that has informed the development of the modifications in the Filing. The OMS generally supports MISO and SPP's proposal as a means to improve transmission planning along the seam and encourages continued evaluation and improvement of the process.

A. Removal of Joint Model

The OMS generally supports the removal of the joint model. Although some members of OMS saw value in the creation and study of a joint model, it was not clear to others that these benefits outweighed the obstacles the model created. The elimination of the "triple hurdle" has been previously cited by the OMS within the stakeholder process as an impediment to efficient interregional transmission planning because projects needed to be approved by an interregional planning process in addition to being approved by the two separate RTO's regional planning

processes.³ The OMS views this elimination as consistent with FERC's recognition of separate and distinct regional processes that are reflective of each region's unique nature.⁴

B. Use of Additional Benefit Metrics

The OMS generally supports the additional benefit metrics and accompanying cost allocation methodology. Confidence in the allocation of costs leads to confidence in project identification, and increased confidence in regional and interregional cost allocation for interregional projects could lead to increased stakeholder support.

C. Removal of \$5 Million Cost Threshold

The OMS supports the removal of this cost threshold. This modification could expand the number of possible solution options that can be pursued in future CSPs. Further, this improvement will not require SPP or MISO to approve any low-cost projects that either RTO might perceive as a regional project not appropriate for a CSP.

III. CONCLUSION

For the reasons discussed above and in recognition of the extensive stakeholder process that led to this filing, the OMS generally supports the instant filing. The OMS files these comments because a majority of its members are in support. The Illinois Commerce Commission and the Mississippi Public Service Commission abstained. The Kentucky Public Service Commission, the Manitoba Public Utilities Board, and the Montana Public Service Commission did not participate. Individual OMS members reserve the right to file separate comments regarding the issues discussed in these comments.

³ State Regulatory Sector Response to the March 2019 MISO Advisory Committee hot topic on Seams issues. https://www.misostates.org/images/stories/Filings/HotTopics/2019/March_2019_OMS_Hot_Topic_response_BO_D_APPROVED.pdf (last accessed June 7, 2019)

⁴ *Transmission Planning and Cost Allocation by Transmission Owning and Operating Public Utilities*, Order No. 1000, FERC Stats. & Regs. ¶ 31,323 at P 61 (2011).

Respectfully submitted,

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Dated: June 7, 2019

CERTIFICATE OF SERVICE

I HEREBY certify that I have this day caused the foregoing document to be served, *via* electronic mail, upon each person designated on the Official Service List compiled by the Secretary in these proceedings.

DATED at Madison, Wisconsin as of the 7th day of June, 2019.

Marcus Hawkins

Document Content(s)

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