

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

Managing Transmission Line Ratings)

Docket No. RM20-16-000

COMMENTS OF THE ORGANIZATION OF MISO STATES, INC.

On November 19th, 2020, the Federal Energy Regulatory Commission (“FERC” or “Commission”) issued a Notice of Proposed Rulemaking (“NOPR”) regarding its Transmission Line Ratings Policy.¹ The Organization of MISO States, Inc. (“OMS”) appreciates the opportunity to share its views on the issues raised in the NOPR.² The OMS is a non-profit, self-governing organization comprised of representatives from the seventeen regulatory bodies with jurisdiction over entities participating in the Midcontinent Independent System Operator (“MISO”) and serves as the regional state committee for the MISO region. The purpose of the OMS is to coordinate regulatory oversight among its members, to make recommendations to MISO, the MISO Board of Directors, the Commission, and other relevant government entities and state commissions as appropriate, and to intervene in proceedings before the Commission to express the positions of the OMS member agencies.

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

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¹ *Managing Transmission Line Ratings*, 173 FERC ¶ 61,165 (2020) (“NOPR”).

² The Minnesota Department of Commerce, an associate member of the OMS, joins these comments.

I. INTRODUCTION

In the NOPR, the Commission observes that current line rating methodologies “do not accurately represent the transfer capability of the transmission system.”³ For all the work regional transmission organizations (“RTOs”) and stakeholders put into efficiently planning the expansion of the bulk power system, there should be an equal emphasis placed on making efficient use of the bulk power system as it currently exists. This NOPR is a good first step in that direction. The Commission also finds that “[i]naccurate transmission line ratings may result in Commission-jurisdictional rates that are unjust and unreasonable.”⁴ To remedy this the Commission proposes specific requirements with respect to the use of Ambient Adjusted Ratings (“AARs”) and seasonal line ratings, asks for comment on the future use of Dynamic Line Ratings (“DLRs”), and asks for comment on transparency into these ratings and how they are formulated.⁵ The Commission also seeks comment on the implementation of unique emergency ratings and on the extent to which line ratings should be shared with the market monitors and transmission providers.⁶

The OMS is highly supportive of this NOPR and encourages the Commission to issue a final rule in line with this NOPR for the benefit of ratepayers and believes that it is import for the Commission to encourage transmission providers to gather information and identify opportunities for DLR deployment.

³ NOPR at P 2.

⁴ *Id.* at P 1.

⁵ *Id.* at P 3-5, 7.

⁶ *Id.* at P 6-7.

II. BACKGROUND

The MISO Independent Market Monitor (“ IMM”) first brought this issue to the attention of MISO stakeholders in its 2015 State of the Market Report.⁷ Since then, the IMM has attempted to work with the MISO transmission owners for an extended period of time with little progress. Then, in August 2019, the Commission released a Staff Paper on Managing Transmission Line Ratings⁸ and held a technical conference in September 2019.⁹ After this conference, it took the OMS close to a year to get basic information on the prevalence of different ratings techniques to better understand the current landscape by working collaboratively with MISO and transmission owners.

In April 2020, the OMS began to review potential action to encourage the use of more advanced and accurate transmission line rating techniques within the MISO region and began meeting with MISO stakeholders and industry experts. Throughout 2020, the OMS conducted over 15 meetings with industry experts, MISO transmission owners, the North American Electric Reliability Corporation (“NERC”) Regional Entities, FERC staff, and the MISO IMM to learn more about line ratings. Through these conversations, the state and local regulators in the MISO region learned the importance and limitations of partnering with the transmission owners to make progress in this area, and it became clear that line ratings fall into a gap where no single entity assumes accountability for ensuring these ratings appropriately benefit electric customers. Through this educational process, the OMS gained an appreciation for the lack of transparency surrounding line ratings and their methodologies.

⁷ Potomac Economics, 2015 State of the Market Report for the MISO Electricity Markets at xiv and 83-4 (June 2016).

⁸ Federal Energy Regulatory Commission, Staff Paper, Managing Transmission Line Ratings, Docket No. AD19-15-000 (Aug. 2019) (Commission Staff Paper) available at: <https://www.ferc.gov/sites/default/files/2020-05/tran-line-ratings.pdf>.

⁹ *Managing Transmission Line Ratings*, Notice of Technical Conference, Docket No. AD19-15 (Oct. 2, 2019).

By August 2020, the OMS Board of Directors approved a position statement underscoring the value of using enhancements to ratings and calling for them to be used more widely in the MISO region.¹⁰ This position statement is included with these Comments as “Attachment A.” The OMS presented this position statement to the MISO Advisory Committee in September 2020.

III. COMMENTS

As responsibility to ensure the benefits that come from more accurate transmission line ratings accrue to ratepayers does not squarely reside with a single entity, the OMS believes that Commission action is the best path forward to maximize benefits to customers, ensure just and reasonable rates, and to promote the production of safe and reliable energy within RTOs when it comes to incorporating the use of more accurate transmission line ratings.

As RTOs already have the responsibility to maintain the reliability and market efficiency of the bulk power system, it is logical for the Commission to connect the dots and step in to require RTOs to use these reliability and market efficiency responsibilities in this area as well. Currently RTOs are restricted as to what types of recommendations they can make related to transmission line ratings. Although this restriction may not be codified in any way, RTOs follow the path of least resistance and rely on the values provided by transmission owners despite having the responsibility to accept and verify these ratings as appropriate when they affect reliability.¹¹

¹⁰ Organization of MISO States, OMS Position Statement – Enhanced Line Ratings, available at: https://www.misostates.org/images/PositionStatements/OMS_Position_Statement__Enhanced_Line_Ratings.pdf (last accessed March 22, 2021) (“OMS Position Statement”).

¹¹ Rate Schedule 1 of MISO’s Open Access Transmission, Energy and Operating Reserve Markets Tariff, Appendix B, Section V (“TOA”) (“Each Owner shall file with MISO information regarding the physical ratings of all of its equipment in the Transmission System. This information is intended to reflect the normal and emergency ratings routinely used in regional load flow and stability analyses. In carrying out its responsibilities, MISO shall apply ratings that have been provided by the respective Owners and have been verified and accepted as appropriate by MISO where such ratings affect MISO reliability.”)

The Regional Reliability Organizations likewise do not review these ratings methodologies to ensure that they are working for the benefit of ratepayers. Instead, they focus on ensuring consistency of ratings between various models and ensuring the value aligns with the facility owner’s documented rating method in the audit process.¹² These entities are limited by their narrow focus on reliability and are unable to scrutinize market impacts or reliability enhancements beyond a limited reading of the standard.

State and local regulators recognize that their ability to promote meaningful changes across an entire RTO through their existing oversight of their regulated utilities would require extensive coordination. Therefore, it could be difficult to realize the benefits from the use of more consistent and accurate line ratings consistently across an entire region if left to state and local action alone.

Now, as in its initial comments in this docket, the OMS encourages the Commission to “remain focused on areas where benefits exist and recognize that the MISO transmission owners have little to no incentive to promote these practices.”¹³ The modifications proposed in this rulemaking appropriately identify that significant benefits exist and that realizing these benefits is not inherently costly or burdensome. As detailed below, the proposed rulemaking satisfies OMS’ current concerns, and the OMS looks forward to more specific conversations regarding this rule’s implementation in the future.

¹² NERC, ERO Enterprise CMEP Practice Guide: Evaluation of Facility Ratings and System Operating at 2 (June 17, 2020) available at: https://www.nerc.com/pa/comp/guidance/CMEPPpracticeGuidesDL/ERO%20Enterprise%20CMEP%20Practice%20Guide_%20Evaluation%20of%20Facility%20Ratings%20and%20System%20Operating%20Limits.pdf.

¹³ *Managing Transmission Line Ratings*, “Motion for Leave to File Out of Time and Post-Technical Conference Reply Comments of the Organization of MISO States, Inc.” Docket AD19-15-000 at 4 (filed Dec. 19, 2019) (citing “Post-Technical Conference Comments of Potomac Economics, Ltd.”, Docket No. AD19-15-000 at 7 (Nov. 1, 2019)).

A. The Commission's Identified Need for Reform

1. The Commission's Proposal

The Commission identified that inaccurate line ratings may result in unjust and unreasonable rates because they do not reflect the actual transfer capacity of the bulk power system.¹⁴ By more accurately rating transmission facilities, transmission providers will be able to import less expensive power from other regions and may reduce the amount of scarcity pricing events which can indicate the need for new transmission investment.¹⁵ The Commission also identified that not all transmission providers can accept DLRs or require unique emergency ratings, both of which can provide a better picture of the true transfer capability of transmission facilities and better reflect the actual value of delivered energy.¹⁶

Finally, the Commission identified that without more transparency into these line rating methodologies, it could be difficult to determine the accuracy of transmission owner-submitted line ratings and whether or not this is needlessly creating congestion on the bulk power system.¹⁷

2. The OMS Believes Existing Practices and the Current Regulatory Framework Deprive Consumers of Significant Benefits.

The Commission's preliminary finding that current line rating practices directly affect the cost of wholesale energy costs and artificially limit transfers within and between regions is obvious and correct. Except for when temperatures exceed the conservative assumptions embedded in static line ratings, AARs provide a more accurate picture of the transfer capability of the system, and in the hours when ambient conditions are more extreme than static ratings assume, AARs provide reliability benefits by reducing the chance that transmission facilities

¹⁴ NOPR at P 38, 40.

¹⁵ *Id.* at P 41-42.

¹⁶ *Id.* at P 43-46.

¹⁷ *Id.* at P 47.

exceed their reliable operating limits. This helps protect transmission owner investments in the system that customers have already paid for. Further, AARs and seasonal line rating techniques can provide both economic benefits stemming from increased access to lower cost resources and reliability benefits from mitigating the impacts from scheduled and unscheduled outages through greater system flexibility.

The OMS has confirmed that current rating practices often fail to require the use of unique emergency line ratings. The OMS has reviewed the prevalence of unique emergency ratings with stakeholders, and it is abundantly clear that use of emergency ratings varies widely.¹⁸ Some areas within MISO do not have a single line with a unique emergency rating, while other areas have unique emergency ratings on a majority of lines. All told, 67% of lines under MISO's functional control have emergency ratings that are the same as normal ratings.¹⁹ The OMS has heard no rational reason nor seen analysis that explains why the use of these ratings should vary so much within a single region. MISO stakeholders have ranked the use and implementation of unique emergency line ratings high, recognizing that improvements are needed.²⁰

In this proposed rulemaking, the Commission has identified an area of reform that could greatly benefit electric customers, and the OMS looks forward to working with MISO, transmission owners, the IMM, and other stakeholders once the Commission issues a final rule

¹⁸ MISO, Review of MISO's Rating Process, presented to the MISO Transmission Line Ratings Workshop, at slide 19 (Jan. 15, 2021) available at: <https://cdn.misoenergy.org/20210115%20Transmission%20Line%20Ratings%20Workshop%20Item%20004%20of%20MISO%20Rating%20Processes%20and%20Statistics%20513174.pdf> ("Workshop Materials").

¹⁹ *Id.* at slide 14.

²⁰ MISO, Emergency Line Rating Use and Methodologies RSC-2021-54B, available at: <https://www.misoenergy.org/stakeholder-engagement/issue-tracking/emergency-line-rating-use-and-methodologies/> ("MISO Line Ratings Item") (This issue specifically relates to transmission line rating methodologies and time duration for post-contingent actions. It is a component of the broader effort to ensure efficient and reliable use of more advanced transmission technologies, such as ambient adjusted and dynamic line ratings.)

in this docket.

B. Ambient-Adjusted and Seasonal Ratings

1. The Commission's Proposal

The Commission proposes to require AARs for near-term point-to-point and network service and associated curtailments, to use seasonal line ratings for longer-term point to point and network service and curtailments, and to limit the duration of a season to 3 months.²¹ The Commission also proposes to require RTOs/ISOs to revise their tariffs to require implementation of AARs in both the day-ahead and real-time markets and to update AARs at least hourly.²² The Commission proposes to require the use of AARs and seasonal ratings on all lines, with these ratings being implemented on the most congested lines within one year and all lines within two years.²³ Importantly, the Commission proposes an exception that would allow transmission providers to temporarily use a different rating to ensure the safety or reliability of the system.²⁴

2. The Proposed Ambient-Adjusted and Seasonal Rating Requirements are Reasonable and Would Lead to Customer Benefits.

In its position statement, the OMS Board of Directors wrote, “Customers are harmed when transmission line ratings do not reflect the actual capabilities of the facilities based on changing ambient conditions. This can lead to higher energy prices and increased levels of congestion due to sub-optimal flows on the system.”²⁵ The OMS supports the Commission’s proposal to require AARs on the most congested lines within one year and on all lines after two years and to use seasonal line ratings. However, the OMS recognizes that there may be

²¹ NOPR at P 87-89.

²² *Id.* at P 91.

²³ *Id.* at P 92.

²⁴ *Id.* at P 98.

²⁵ OMS Position Statement.

instances where it is not reliable or economic to require an AAR or seasonal rating on a particular transmission facility or most limiting element. As such, the OMS does not support implementing AARs on facilities where it is not economic or reliable to do so. The Commission should require RTOs to develop a process where transmission owners transparently work with the RTO and market monitor to demonstrate why an exemption from the requirement is justified. Broadly applying this requirement and limiting exceptions would improve consistency, competition, and reliability.

Further, the implementation timeline suggested seems reasonable and necessary. Some transmission owners in the MISO region already use these types of ratings and MISO itself can easily accommodate these ratings values and even has a preference on how it would like to receive them.²⁶ Other MISO stakeholders are also already working on this issue and recognize its importance. MISO has an Integrated Roadmap item called “Application of Forecasted and Real-time Ambient Adjusted Ratings” since 2016, and stakeholders have ranked this item high in MISO’s 2021 Integrated Roadmap Work Plan.²⁷ And finally, the transmission owners within the MISO footprint have begun to develop a framework to identify candidate facilities for AAR implementation based on historical congestion and should therefore have a head start on the first phase of compliance.

The OMS agrees with the Commission and believes it is appropriate that AAR requirements generally apply to all transmission lines, and not just those with historical congestion.²⁸ The OMS also agrees with MISO, which while not taking a position on whether AARs should be required, did state that if AARs were required, they should not be implemented

²⁶ Workshop Materials at slide 6.

²⁷ See MISO Line Ratings Item.

²⁸ NOPR at P 60, 93.

solely on the most congested facilities.²⁹ The most expensive energy prices typically occur after unforeseen outages or weather events and are not the result of chronic, well understood scenarios.³⁰ If AARs were not required to be applied to all lines, the system would continue to experience artificial congestion and artificial reliability concerns, like those identified in the Commission’s joint inquiry on the 2018 cold weather event.³¹ The FERC-NERC joint inquiry identified the “Critical Role of Accurate Facility Ratings” and recommended “different summer and winter ratings, for both normal and emergency conditions” as a potential way to prevent future reliability challenges after that 2018 cold weather event.³² This recommendation stemmed from the finding that system operators used artificially restrictive summer line rating values during this extreme cold weather event. As these comments were being developed, a similar extreme weather event took place and RTOs and transmission owners were no closer to having implemented the lessons learned from 2018. During the February 2021 cold weather event, MISO, which typically sees west to east flows, experienced unprecedented east to west flows throughout the footprint, highlighting uncommon ways the system could be used during extreme circumstances.³³ Urgency on the part of the Commission may be the only way to ensure the added reliability and flexibility benefits from these rating methods will be implemented in time for the next extreme weather event.

While the OMS recognizes there could be up-front work required by transmission owners who do not currently utilize an AAR rating methodology, there is plenty of industry

²⁹ *Managing Transmission Line Ratings*, “Post-technical Conference Comments of the Midcontinent Independent System Operator, Inc.” Docket AD19-15-000 at 2-3 (filed Nov. 1, 2019).

³⁰ *Id.* at 81.

³¹ FERC and NERC Staff, *The South Central United States Cold Weather Bulk Electric System Event of January 17, 2018* at 13 (July 2019) available at: <https://cms.ferc.gov/sites/default/files/legal/staff-reports/2019/07-18-19-ferc-nerc-report.pdf>.

³² *Id.* at 56 and 96.

³³ MISO, *Overview of February 2021 Arctic Weather* at slide 7 (March 11, 2021) available at: <https://cdn.misoenergy.org/20210311%20MSC%20Item%2004%20Max%20Gen%20Feb%2015530356.pdf>.

experience, examples of successful implementation, and existing standards to draw upon. Further, the weather data required to implement the proposed rule is already widely available through public sources and is utilized by market participants for load forecasting or resource forecasting purposes. Nonetheless, the Commission should allow RTOs to accommodate any practical implementation concerns of their members, such as the development of necessary Energy Management Systems and enhancements or the development of other software from outside vendors.

The OMS does not believe the Commission's proposal would harm reliability. Currently, in the MISO region, if there is ever an interruption in receiving AAR data, the rating value defaults to a more conservative static or seasonal value, addressing concerns that human error in forgetting to input this data or communication systems failures could possibly threaten reliability.³⁴ The Commission also explicitly proposes an exception that would allow transmission providers to temporarily use a different rating to ensure the safety or reliability of the system.³⁵ This proposed exception would allow the transmission provider to resort to non-AARs under certain circumstances when reliability or safety are in question and aligns with MISO's hierarchical rating structure that is in use today.

Therefore, the OMS supports this part of the Commission's proposal and urges the Commission to implement it, taking into account implementation practicalities, cost-benefit considerations, and reliability concerns.

³⁴ Workshop materials at 8.

³⁵ NOPR at P 98.

C. Dynamic Line Ratings

1. The Commission's Proposal

The Commission seeks comment on the extent to which DLRs should be required.³⁶ The Commission proposes to require that RTOs/ISOs accept ratings at least hourly via an electronic update.³⁷ The Commission also seeks comment on whether RTOs/ISOs should conduct a one-time study of the cost-effectiveness of DLR implementation.³⁸ And lastly, the Commission seeks comment on whether or not these requirements should extend to transmission providers outside of RTO/ISO regions.³⁹

2. The Commission Should Continue to Assess the Benefits Associated with Dynamic Line Ratings

OMS encourages greater visibility into the benefits and cost-effectiveness of DLR implementation on a wide range of lines. While AARs provide significant benefits in most if not all parts of the year, the OMS believes it is necessary for the industry and regulators to better understand the potential benefits of DLRs. There have been multiple case studies that show the benefits of implementing DLRs on a single line within a particular RTO,⁴⁰ and the OMS is interested in learning to what extent DLRs can provide additional benefits above the use of AARs alone. If DLRs definitively provide economic and reliability value above what AARs can provide, having this information would be extremely useful in determining whether Commission action is needed here. At this point, it is not clear if requiring RTOs to consider

³⁶ *Id.* at P 100.

³⁷ *Id.* at P 108.

³⁸ *Id.* at P 110.

³⁹ *Id.* at 109.

⁴⁰ Dumitriu, N, Marmillo, J, Mehraban, B, Murphy, S, and Pinney, N, Simulating the Economic Impact of a Dynamic Line Rating Project in a Regional Transmission Operator (RTO) Environment, CIGRE US National Committee 2018 Grid of the Future Symposium (finding \$4M in savings over a single year from the use of DLRs on a single line in PJM); Verga, N, Pinney, and J. Marmillo, Incorporating Dynamic Line Ratings to Alleviate Transmission Congestion, Increase Wind Resource Utilization, and Improve Power Market Efficiency, CIGRE US National Committee 2016 Grid of the Future Symposium (concluding that DLRs could increase transfer capacity of the Neosho-Riverton in 97% of the hours when congestion was present).

DLRs as a potential solution in reliability or economic transmission planning processes or a more foundational requirement is more appropriate. Regardless, transmission providers should continue to study the benefits this technology could provide their systems.

Transmission providers and regulators should work together collaboratively to better understand the added value that could come from greater use of DLRs. As risk shifts away from the summer peak and into other parts of the year, having the ability to dynamically rate lines could provide great value to a system that does not know when to expect tight operating conditions.

D. Emergency Ratings

1. The Commission's Proposal

The Commission asked whether or not it should require transmission providers to use unique emergency ratings, meaning ratings that are different than transmission providers' normal ratings.⁴¹ The Commission also states that it does not have good data on how widely normal and emergency ratings are the same, how beneficial this reform would be, and whether requiring these ratings would impact reliability.⁴²

2. It is Critical That Unique Emergency Ratings Reflect Actual System Transfer Capability.

Given that 90% of congestion within MISO is based on transmission elements binding on the post-contingent, or emergency rating values,⁴³ the OMS believes it is critical for emergency ratings to accurately reflect the capability of the transmission element for a standardized, limited period of time. This requirement is needed in order to realize the economic benefits of AARs. Without ensuring that the rating values that are actually utilized in economic

⁴¹ NOPR at P 111.

⁴² *Id.* at P 111-113.

⁴³ Workshop Materials at slide 8.

dispatch processes truly reflect system capabilities, the system is left with changes to normal ratings that have no impact on economics or reliability.

MISO has provided a good picture of the levels of unique emergency ratings throughout the MISO footprint.⁴⁴ The use of emergency ratings in MISO is inconsistent and there are a wide variety of rating setting practices used for emergency ratings. Some MISO local balancing authorities (“LBAs”) have 100% of their emergency ratings set to the same value as their normal ratings, while others have set only 13% of these ratings to the same value.⁴⁵ Emergency ratings in some LBAs are up to 20% greater than normal values.⁴⁶ Other anomalies noted are that transmission owners provide emergency ratings that can be utilized from between 30 minutes and 4 hours, but after contingencies occur MISO returns emergency ratings back to normal ratings after only 30 minutes.⁴⁷ The Commission should request that transmission providers provide an assessment on their past performance and how long they sustain an emergency rating after a contingency before returning to a normal condition.

Although MISO stakeholders have only been able to review data on how often emergency ratings are set equal to normal ratings, discussions with transmission owners and the MISO IMM have revealed that assumptions that inform these emergency ratings vary widely. MISO has the ability to request a transmission owner’s line ratings methodology but does not have the expertise or ability to do anything with that information. The MISO TOA requires that transmission owners provide MISO with emergency ratings but does not provide any definition for what constitutes an emergency rating.⁴⁸ This leaves MISO with no basis by which to assess

⁴⁴ *Id.* at slide 19.

⁴⁵ *Id.*

⁴⁶ *Id.*

⁴⁷ *Id.* at slide 8.

⁴⁸ See *supra* n. 11.

the appropriateness or efficacy of emergency ratings and allows transmission providers to easily disregard the intent of this requirement.

The Commission should require transmission providers to clearly and thoroughly define what constitutes an emergency rating in their region, how emergency ratings should be used, and how their use syncs with transmission providers' market efficiency and reliability responsibilities. The Commission should require additional clarity specifying what information transmission owners should provide to transmission providers. The Commission should allow regional flexibility, but the reasonableness of using non-unique emergency ratings should fall to the transmission owner subject to transmission provider and market monitor review.

Again, the reliability of the system is paramount, and the Commission has proposed an exception that would allow transmission providers to temporarily use a different rating to ensure the safety or reliability of the system.⁴⁹ If the use of these ratings poses a reliability threat, transmission owners should be able to prove that to the satisfaction of market monitors and transmission providers.

E. Transparency

1. The Commission's Proposal

The Commission seeks comment on whether to require transmission owners to share their line ratings and methodologies with their transmission provider and market monitors, for those transmission owners in an RTO/ISO.⁵⁰ The Commission also sought comment on whether to make transmission owner line ratings and rating methodologies open to other stakeholders as

⁴⁹ NOPR at P 98.

⁵⁰ *Id.* at P 125.

well.⁵¹ The Commission does not propose any new auditing requirements beyond what it currently does as a part of its general tariff compliance audits.⁵²

2. **The OMS Supports Requiring Transmission Owners to Share Line Ratings and Methodologies with Transmission Providers and Market Monitors**

The OMS agrees with the Commission’s preliminary finding that requiring the sharing of this information will provide transmission providers and market monitors better “operational and situational awareness” into the use of these ratings.⁵³ Efforts to assess the potential benefits from enhanced line ratings methods in MISO have been hampered by the lack of transparency and prevented progress from being made sooner. All stakeholders should be able to see the ratings, and the market monitor and MISO should be granted complete transparency into the methods used to create these ratings, recognizing that the regional entities are strictly focused on reliability.

Past standards provide some guidance. In 2012 NERC retired a set of FAC-008-3 reliability standards that gave reliability coordinators more authority to comment on rating methodologies and requiring transmission owners to respond. However, NERC argued that “posting the rating methodology for comment and responding to comments in and of itself has no reliability benefit.”⁵⁴ The OMS does not believe that additional scrutiny and review of these ratings by reliability coordinators is purely administrative in nature as NERC concluded, and the OMS urges the Commission to consider an enhanced comment and response process between

⁵¹ *Id.* at P 129.

⁵² *Id.* at P 130.

⁵³ *Id.* at P 126.

⁵⁴ NERC, Standards Authorization Request Form: Retirement of Reliability Standard Requirements at 1 (June 29, 2012) available at: https://www.nerc.com/pa/Stand/Project%20201302%20Paragraph%2081%20DL/Final_draft_Retirement_of_Reqs_Standards_Authorization_Request_Form_080212.pdf.

transmission owners, transmission providers, and market monitors to provide additional oversight into the appropriateness of ratings throughout the bulk power system.

Finally, by way of example, PJM requires its line ratings methodologies to be transparent in their transmission owner guidelines and posts its ratings to its public website.⁵⁵ NYISO also publicly posts ratings on its system.⁵⁶ Further, and more importantly, FERC's regulations require this transparency.⁵⁷ FERC could also revisit the data it currently collects in Form 715 to better analyze why and how the data already being collected can be used to understand some transmission owner ratings and methodologies but not others.

IV. CONCLUSION

Wherefore, the OMS respectfully requests the Commission move forward and issue a final rule in this docket. The OMS submits these Comments because a majority of OMS members support this filing. Individual OMS members reserve the right to file separate comments regarding the issues discussed in these comments. The following members generally support this filing:

Arkansas Public Service Commission
Illinois Commerce Commission
Indiana Utility Regulatory Commission
Iowa Utilities Board
Kentucky Public Service Commission
Louisiana Public Service Commission
Michigan Public Service Commission
Minnesota Public Utilities Commission
Mississippi Public Service Commission
Missouri Public Service Commission
North Dakota Public Service Commission

⁵⁵ PJM Line ratings, available at: <https://www.pjm.com/markets-and-operations/etools/oasis/system-information/ratings-information.aspx>; PJM Transmission Owner Guidelines and available at: <https://www.pjm.com/planning/design-engineering/maac-to-guidelines.aspx>.

⁵⁶ NYISO, Power Grid Data – ATC-TTC Module, available at: <https://www.nyiso.com/power-grid-data#atc-ttc>.

⁵⁷ 18 C.F.R. § 37.6, (“Posting transfer capability. The available transfer capability on the Transmission Provider's system (ATC) and the total transfer capability (TTC) of that system shall be calculated and posted for each Posted Path as set out in this section.”)

South Dakota Public Utilities Commission
Public Utility Commission of Texas
Public Service Commission of Wisconsin

The Council of the City of New Orleans abstains in the vote on this filing.

The Manitoba Public Utilities Board and the Montana Public Service Commission did not participate in the vote on this filing.

Respectfully submitted,

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Dated March 22nd, 2021

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list prepared 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.

DATED at Madison, Wisconsin this the 22nd of March 2021.

/s/ Marcus Hawkins

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“Attachment A”

OMS Position Statement Enhanced Transmission Line Ratings

The Organization of MISO States (OMS) supports a well-functioning wholesale power market that delivers maximum value and reliability to customers in the MISO region and believes that full utilization of the transmission system through transparent, enhanced transmission line rating techniques is critical to achieve this objective.

In promoting this objective, the OMS recognizes:

1. Transmission Owners have the ultimate responsibility for submitting the line ratings used for their facilities to MISO in accordance with the Transmission Owners Agreement.
2. NERC standard FAC-008-3 requires consideration of ambient conditions and provides for review by MISO as the region's Balancing Authority.
3. FERC is contemplating changes in this area and has an open docket (AD19-15).
4. There are a variety of benefits from enhanced line ratings, including those related to: economics, reliability, increased access to resources, mitigation of impacts from outages (scheduled and unscheduled), greater flexibility of the system, deferred uprating of circuits, and lower consumer costs.
5. "Enhanced Line ratings" are ratings more advanced than fixed static ratings that can account for variations in weather or other system conditions (i.e., seasonal, Ambient Adjusted Ratings (AAR), and Dynamic Line Ratings (DLR).)
6. Enhanced line rating techniques can be applied to both normal and emergency ratings.

OMS Position:

1. Transparency into transmission line rating methodologies is essential to ensure an efficient energy market and opportunities for benefits to be identified.
2. Enhanced line ratings need to be considered in order to achieve the MISO Vision: [to be] "The most reliable, value-creating RTO."¹
3. Customers are harmed when transmission line ratings do not reflect the actual capabilities of the facilities based on changing ambient conditions. This can lead to higher energy prices and increased levels of congestion due to sub-optimal flows on the system.
4. There is a need for an increased, centralized role for MISO and/or the IMM to assist Transmission Owners and stakeholders to identify where enhanced line ratings could produce the largest net-benefits.
5. Implementation costs should be transparently considered as part of an analysis of enhanced line ratings.
6. Enhanced line rating methodologies will increase visibility and situational awareness. Increased transparency and consistency of methods and ratings could also increase reliability.

The OMS calls for Transmission Owners and MISO at a minimum to:

1. Provide greater transparency and consistency in line rating values and methodologies.
2. Provide both normal and emergency line ratings as required by the Transmission Owners Agreement.
3. Develop a procedure to identify appropriate facilities for potential implementation of enhanced line ratings, including estimation of benefits and costs of implementation to be transparently analyzed.

¹ https://www.misoenergy.org/about/miso-strategy-and-value-proposition/MISO_Strategy/