

## OMS Regional Planning WorkGroup Staff Feedback to MISO's Out of Cycle Straw Proposal

The OMS Regional Planning WG Staff appreciates MISO's consideration of our October 2012 comments on the Out of Cycle Review process. During MISO's latest straw proposal presentation at the PAC, it became apparent that more clarity is needed on elements of this proposal. In particular, MISO should include in the straw proposal and corresponding BPM language, specific details about all of the need drivers (inherent or otherwise, such as state mandated needs), applicable project types, review time, and MISO Board review as proposed in these updates and discussed with stakeholders. This clarification would provide a greater understanding of what, when, why, and how the OOC process would proceed.

- 1. Need Drivers:** We understand that there may be additional need drivers that are unknown at this time, which may in fact warrant an OOC review. We suggest that MISO articulate what is known now or being considered as drivers for OOC projects in the BPM so there is less uncertainty going forward.
- 2. PAC Review Process:** The time frame for PAC review is unclear. A minimum of one month for review by PAC sectors seems reasonable but clarification of a minimum review period needs to be incorporated into the tariff and BPM. It is also unclear what the time frame is for PAC sectors to submit comments to MISO on candidate OOC projects. Will they be posted before the PAC meeting discussion of any OOC project? We also would support further discussion of the concept of having a different minimum time frame for PAC review based on the cost of the proposed OOC project.
- 3. MISO Board Approval:** OMS RPWG Staff recommend that all transmission projects (including OOC projects) be submitted for review and approval of the MISO BOD.<sup>1</sup>
- 4. Cost shared projects:** RPWG Staff still believes that this OOC review process is lacking in certain key elements, as mentioned in our October 2012 comments. Cost shared projects should not be eligible for OOC treatment. We recognize that there may be projects that may require an expedited review schedule to meet new interconnecting loads, urgent reliability needs, or to meet legislative mandates. However, if a project is cost shared, more stakeholders will bear the costs, and as such more time should be allotted for MISO and stakeholder examination, which could be more time than an expedited review process would afford.
- 5. Project analysis:** Another key element that we believe should be fully considered is a minimum timing threshold<sup>2</sup> for analysis of the project by MISO. In MISO's current straw proposal a

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<sup>1</sup> If however, MISO continues forward with the proposed process and a given OOC project is not deemed necessary for MISO BOD approval then we request clarifications be made. We would like clarification that any level of dissenting comments (i.e., substantive dissenting comments, voting "no" on a motion for MISO approval, abstention, etc.) from any PAC sector about a candidate OOC project presented at the PAC would require MISO BOD review. In addition, we would like clarification that MISO staff would still bring all OOC projects to the PAC for sectors to vote on MISO's approval of a project, whether it is slated for MISO Staff "approval" or MISO BOD approval.

maximum threshold of six months of review time is suggested, for what we assume is all OOC projects? Placing only a maximum timing threshold on a review process could limit both MISO and stakeholders review time, should unforeseen events occur that would require more time for additional analysis and review. Specifically, with an unknown defined review time line required for a thorough analysis of the proposed projects and possible adjustments or alternatives, how will stakeholders be assured that they will have ample opportunity to review the final OOC project proposal? This supports why MISO should reconsider using a minimum timing threshold, instead of a maximum timing threshold for analysis and approval of a project. If instead the maximum threshold is still desired, then the OMS RPWG staff suggests MISO consider a minimum threshold for MISO analysis and a minimum threshold for stakeholder review within the six month window. Determining the appropriate amount of time that should be allocated to both MISO analysis and stakeholders' review is challenging because OOC projects will vary in the level of analysis needed, however there should be at least one month of review time allotted for stakeholders to review and provide feedback. There is also the issue of when this review time would begin. MISO's straw proposal suggests this time period would begin once MISO has "receipt of supporting analysis". We suggest the time period begin when stakeholders are made aware of a candidate OOC project at the first available Planning Advisory Committee meeting following the receipt of supporting analysis. This would be the best venue, given that this meeting occurs monthly and is usually well attended by all sectors.

Thank you again for your time and consideration of our comments.

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<sup>2</sup> The summary of stakeholder comments provided at the January PAC meeting, several stakeholders suggested placing a minimum threshold on review time, ranging anywhere from three to six months, while only one stakeholder suggested a maximum threshold.