

OMS Regional Planning Work Group
Feedback on FERC Order 1000 Compliance
Discussed at the June 14, 2013 PAC meeting

The Regional Planning Work Group (RPWG) has the following brief comments:

1. Slide 8 provides proposed tariff language that describes the selection procedure for public policy issues to be evaluated: “[§TBD] **The Transmission Provider will select Transmission Issues...**” This language is too broad. The directives in FERC’s Order about “duly enacted laws or regulations passed by a local governmental entity” (paragraph 96) were limited to public policy requirements. Therefore, any compliance filing in response to this specific directive should not involve all Transmission Issues, and should instead be limited to the process it will use to identify issues driven by public policy requirements that stakeholders may propose, for which transmission solutions will be evaluated. With a global revision to the definition of “Transmission Issue”, MISO would be dramatically over-expanding the influence that FERC’s Order gave to the local government entities. The RPWG supports the suggestion of Wind on the Wires for clarification of the local public policy requirements to be considered. In order to reinforce that the Transmission Issues related to local laws and regulations will be determined through the stakeholder process, we suggest modifying language such as: “[§TBD] **The Transmission Provider, through an open and transparent stakeholder process, will select local public policy requirements...**”
2. Slide 16 provides proposed tariff language concerning interest on bid deposits. The RPWG suggests that the interest rate should be clearly identified in the tariff language as the FERC rate described in [Order No. 727](#).
3. Slide 20 provides more detail on the “pre-designated” milestones for the projects status updates. The RPWG suggests that the backstop annual update approved in the PAC amendment to the BPM language be incorporated into the proposed tariff revision. We suggest that the following sentence from the amendment be inserted after the list of milestones: **“If no milestone is reached during the calendar year, then a project status update is required at the end of the year.”**