

Comments and questions on the Scope of the MISO-SPP Coordinated System Plan (CSP)

OMS Regional Planning Work Group (RPWG)

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Futures

The RPWG endorses the use of the two BAU futures for joint analysis and no more at this time. Keeping the approach more narrow may promote more progress.

Questions on futures' assumptions:

Why is the coal retirement in SPP assumed to be only 1GW?

What is the basis for the 1.3 percent growth rate for demand and energy in SPP?

Reliability Projects

We suggest continued analysis of reliability issues and possible project as solutions for two reasons – (1) knowing what the interregional reliability issues are, and how many of them there are, may be key to knowing whether to press FERC / MISO to change MISO's position on the matter; (2) we also need to press MISO for a better explanation of how they currently handle reliability problems at the seams, to know whether MISO's current approach is sufficient and whether we would need to press MISO to evaluate interregional reliability projects in a coordinated System Plans such as this one. There is a need for better information on how the differences in the reliability assessments of MISO and SPP will affect the reliability needs near the seam. For example, if MISO does not analyze how their dispatch of energy resources, such as wind farms, affects neighboring regions, how will this affect their view on the need for reliability projects on a neighbor's transmission grid?

1,000 MW Transfer Limit

How will the current 1,000 MW transfer limit on dispatch between MISO South and MISO Classic be modelled for the purpose of Adjusted Production Cost (APC) calculations and/or other modeling?

Is it possible to model two cases? One case where there is no transfer constraint and SPP imposes a transmission charge when the 1,000 MW transfer limit is exceeded? And one case where the 1,000 MW transfer limit is not allowed to be exceeded?

Also, could the changes in parallel flows across neighboring systems be reported for both of these cases?

Other Considerations

It is good that first tier neighbors will be modelled within the CSP, to the extent it is feasible and does not take extra work. APC benefits should be calculated and shared with stakeholders for those tier one neighbors in order to know how parties other than MISO and SPP will be affected by the construction of potential interregional projects. Please explain how MISO models first tier neighbors if MISO has no control over their dispatch. What assumptions are made to do this

type of modelling? This results of this modelling should only be used for informational purposes only.

To the extent congestion analysis is done within the scope of the CSP, whenever possible, maps should be utilized to help stakeholders visualize where congestion occurs in the network. This is especially important in interregional planning, where stakeholders of one RTO may not be as familiar with the flow gates of the neighboring RTO.

Please explain the differences between the interregional modellings and regional modelling of projects studied in the CSP.

Will MISO be considering any of the SPP-MISO interregional projects from this CSP for Appendix A of MTEP15?

Finally, the RPWG supports full transparency of the decision making process of the CSP.