

**Comments by the OMS Regional Planning Work Group (RPWG)
on the MISO South Market Efficiency Planning Study**

April 11, 2014

South to Midwest Transfer (STM) Future

The RPWG is in complete agreement with the feedback expressed by the Entergy Regional State Committee Working Group (ERSCWG) in their letter to John Lawhorn and Lynn Hecker regarding the South to Midwest Transfer (STM) Future in the South Market Efficiency Planning Study. The ERSCWG supports the elimination of the STM Future and its underlying current assumptions from the MEP South process. MISO's proposal to study transmission projects to increase transfer capability between MISO South and MISO Midwest does not belong in the MEP South process. The MEP South process should focus only on projects that will reduce congestion costs in MISO South. The RPWG shares the concern of the ERSCWG that MISO is using the MEP South process to propose a Transfer Capability Study. Because such a study will have MISO-wide implications, MISO should openly and fully identify and communicate all rationales and drivers for this study through a MISO-wide stakeholder process.

Stakeholder Weighting of Future Scenarios

During the March 26, 2014 meeting, stakeholders were asked to provide weights for the three Future Scenarios included in the MISO South MEP planning study. Since the weighting of the futures is a crucial component in the calculation of the B/C ratio criterion for an MEP project, the RPWG has concerns and questions over the weighting process that MISO is going to employ for the MISO-South MEPs. What is MISO planning to do with these weightings? Will the weightings of all stakeholders who happen to respond be averaged? Since the STM Future scenario has MISO-wide implications, the weighting of such a future needs to be conducted in a MISO-wide forum such as the Planning Advisory Committee (PAC). In addition, the B/C ratio for the MEPs in the rest of the MISO footprint is based on the weightings solicited by *PAC sector not by stakeholder*. The same process should apply to the MEPs in the South.