

## Organization of MISO States (OMS)

### Transmission Coast Allocation (TCA) and Regional Planning (RP) Work Groups

#### PAC Feedback on the MVP Triennial Review

July 21, 2014

The OMS TCAWG and RPWG have several questions and comments concerning the presentation to the PAC on the MTEP2014 MVP Triennial Review.

- Because the 2014 Triennial Review is the first triennial MVP review to be conducted, the OMS TCAWG and RPWG recommend more frequent engagement with the stakeholders and more stakeholder involvement in the design of this analysis. We recommend regular workshops during the model design period and the analysis period in order to develop a model design and provide an MVP analysis that meets the needs of the stakeholders. If MISO believes that this would require extension of the timeline, then that should be done.
- Is there a FERC imposed deadline for the completion of this review? If yes, when is it?
- Since the MTEP14 has not been approved yet, is the analysis going to be based on the topography including the MTEP13 projects? Will the futures that were used for MTEP13 project analysis be used for this analysis?
- The OMS TCAWG and RPWG would like a more in-depth explanation of determination and justification for each benefit utilized in the triennial review. For example, how will the “Decreased Wind Turbine Investment” and “Elimination of Need for Some Future Transmission” benefits be determined?
- Provide the value of each individual benefit by LRZ.
- When displaying the results of the 2014 Triennial Review, provide a direct comparison with the benefits that served as the basis for MISO Board approval of the MVP portfolio.
- In its Order Requiring Triennial Review of MVPs, the FERC stated as follows:

We believe these reviews will strengthen Midwest ISO’s transmission planning process by allowing Midwest ISO and its stakeholders to better understand the costs and benefits resulting from MVPs, **including their distribution across the Midwest ISO region**. We expect that these reviews will provide an additional safeguard that ensures that the MVP methodology is working as expected, informs stakeholder decisions regarding future transmission plans, and provides a basis for any potential adjustments to the allocation of the costs associated with those MVPs.<sup>1</sup>

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<sup>1</sup> FERC Order Requiring Triennial Review of MVPs, *Midwest ISO*, 137 FERC ¶ 61,074 (2011) paragraph 190.

Information regarding the distribution of MVP costs and benefits “across the Midwest region” would be useful to the OMS TCAWG and RPWG and, likely, to other MISO stakeholders. In this regard, granularity of the benefit and cost data is important. The OMS TCAWG and RPWG understand that the Commission’s Order authorizes MISO to present the triennial review data at a local resource zone level and on a portfolio basis. However, to the extent that MISO can go beyond the minimum granularity standard identified by FERC, OMS TCAWG and RPWG would appreciate MISO’s consideration of finer granularity. OMS TCAWG and RPWG believe there may be value in presenting the triennial review information at a more granular, less aggregated level (for example at the pricing zone) to the extent that MISO’s models allow for such level of granularity.

- The OMS TCAWG and RPWG would like a progress report at the July PAC.
- The Stakeholder Review Schedule proposed by MISO is:

August 8 – First draft posted for review  
August 20 – Planning Advisory Committee  
August 29 – Updated draft posted for review  
September 17 - Planning Advisory Committee

This schedule does not provide sufficient time for stakeholders to review and comment on the first draft. This is particularly true if MISO does not provide opportunities for stakeholder engagement and participation regarding the model design for the analysis prior to MISO’s issuance of the first draft. The OMS TCAWG and RPWG urge MISO to reconsider the proposed schedule.