

To: MISO Staff, Ron Arness; PJM Staff, Stu Bressler
From: OMS Seams Work Group
Date: January 10, 2014
Re: Comments on the Draft MISO-PJM Biennial Review of JOA Report

The Organization of MISO States Seams Work Group (OMS SWG) appreciates this opportunity to provide feedback on the Draft MISO-PJM Biennial Review of JOA Report. Please note that the recommendations contained within these comments are solely those of the OMS SWG and they have not been considered or approved by the OMS Board of Directors.

Comments:

1. Section 3.2.1 Documentation

- **Section 3.2.1.2 MISO and PJM Joint Response and Changes:**

For the major documents listed under the *Completed Documents* heading, the OMS SWG recommends that easy access to the publicly available ones be facilitated. For example, if there is a website containing these documents, a corresponding hyperlink would be helpful to include in this section of the report. If these major documents are not publicly available, the OMS SWG recommends that MISO and PJM consider making them publicly available through their respective websites and/or the Joint and Common Market website.

For the major documents listed under the *Ongoing (Under Development)* heading, the OMS SWG recommends inclusion of a proposed schedule for work and anticipated completion date for each major document listed.

- **Section 3.2.1.3 Future action items:**

This section indicates that only the Dynamic flowgate creation and M2M Flowgate Process Document will be future action items considered in continued discussion between MISO and PJM. The OMS SWG recommends these two sections of the report be modified to address the apparent inconsistency between Section 3.2.1.2's *Ongoing (Under Development)* list of major documents and Section 3.2.1.3 Future action items, to remove potential for confusion by clarifying exactly which major documents will be developed in the future. To the extent possible, the OMS SWG recommends including a proposed schedule for completion of each anticipated document.

2. Section 3.2.2 Modeling

- **Section 3.2.2.3 Future action items:**

The OMS SWG recommends the inclusion of a proposed schedule for completion of work on these future action items.

3. Section 3.2.4 Outage Coordination

- **Section 3.2.4.3 Future action items:**

The OMS SWG recommends the inclusion of details regarding the JCM schedule and work plan for addressing this issue within the JCM.

4. Section 3.2.7 Flowgate Determination

- **Section 3.2.7.1 Baseline Review Recommendations and Section 3.2.7.2 MISO and PJM joint response and changes:**

The Baseline Review Recommendation under Section 3.2.7.1 states: “With the additions of untraditional network devices, such as wind generation, similar assumption about these devices must be made to establish common outcomes in the Flowgate coordination studies. The RTOs should examine this issue and develop joint guidelines to address these devices and their assumptions in a normalized fashion.”

The OMS SWG believes that Section 3.2.7.2 only addresses the first part of the Baseline Review Recommendation under Section 3.2.7.1. Accordingly, the OMS SWG recommends that the report be revised to indicate what MISO and PJM plan for coordination of the assumptions for untraditional network devices under Section 3.2.7.2. If MISO and PJM do not plan to address that part of the Baseline Review Recommendation that decision should be indicated and explained under Section 3.2.7.2.

If it is the case that the Flowgate creation procedure document that is referenced in Section 3.2.7.2 actually does address the Baseline Review Recommendation for coordination of assumptions for untraditional network devices, that is not clearly demonstrated under Section 3.2.7.2 and the OMS SWG recommends the report be revised to clarify that fact.

5. Section 3.2.14 Use of M2M whenever Binding a M2M Flowgate

- **Section 3.2.14.3 Future action items:**

This section has been left blank. The OMS SWG recommends a revision to include the proposed schedule for future discussions of the Baseline Review Recommendation under Section 3.2.14.1 and as noted under Section 3.2.14.2. If MISO and PJM do not yet have a proposed schedule for future discussions of this issue, the OMS SWG recommends a revision to indicate that under this section.

6. Section 4.1 Summary and Section 4.2 Discussion, ER13-1054-000

- In the Summary on page 19 and Discussion beginning on page 20 related to ER13-1054-000, the report indicates that MISO and PJM have implemented use of the slice of system methodology for market flow calculation adjustments to scale loads for tagged import transactions, and that corresponding software changes were implemented on June 18, 2013.

Given the more recent developments with the Memorandum of Understanding between MISO and SPP that was signed in late October, each RTO has agreed to choose one of the three methods (slice of system, POR/POD, marginal zone) and apply it consistently for market flow calculations, and MISO has told stakeholders that it has chosen the marginal zone method.

The OMS SWG suggests the report include a footnote, or some mention of the impact of the MOU on future changes to market flow calculation methodologies and which methods MISO

and PJM have chosen to use. The OMS SWG also requests inclusion of a schedule (if available) for when anticipated market flow calculation changes, including those related to the MOU, will be filed at FERC.

7. Section 5 Summary

- The summary section only mentions three areas of work that are planned to be addressed in the future. The last paragraph states that MISO and PJM plan to continue work on implementation of the enhanced data exchange project, solutions for implementing Day-Ahead market FFE sharing provisions of the JOA, and enhancements to outage coordination data. The OMS SWG recommends including some mention of the enhanced documentation efforts included in Section 3.2.1 Documentation, such as future plans for the major documents listed as *Ongoing (Under Development)* in Section 3.2.1.2.

8. Minor Edits and Suggestions

- **Page 1, last sentence:** Suggest deletion of “And” at start of the sentence.
(And FERC orders encompass any orders relating to the JOA that have been implemented in the last two years as directed by FERC.)
- **Page 3, #1:** Edit needed to change "initiate" to "initiated".
(This is a PJM initiated project, and its purpose was to allow for automated M2M-Initiate messages...)
- **Page 3, #1:** Possible edit needed to clarify meaning of DMT acronym.
- **Page 3, #3, first sentence:** Edit needed to change “next-our” to “next-hour”.
(...allow MISO to include External Asynchronous Resources (EARs) in its real-time and next-our market flow calculations)
- **Page 4, #4:** Possible edit needed to clarify meaning of ICP acronym.
- **Page 17, Section 3.2.15.1:** Edit needed to include closing quotation mark.
- **Page 22, Summary, second to last paragraph:** Edit needed to change “initiative” to “initiated”.
(The parties have initiative new twice-monthly meetings to review longer-term outages in addition to weekly meetings to discuss more immediate outage issues.)