

OMS Resources Work Group  
Feedback on Locational & Seasonal Detailed Design Documents  
December 17, 2015

The OMS Resources Work Group (“RWG” or “work group”) appreciates this opportunity to provide feedback on MISO’s updated Locational Considerations and Seasonality detailed design documents. Our response is focused on reacting to the documents as they are written and the discussion that took place at the December 2-3 LOLE and SAWG meetings.

**Process Feedback**

The OMS RWG appreciates the amount of time and information that has been put into the detailed design documents. The group finds these documents much more valuable than a PowerPoint presentation and believes that they have already contributed to a more informed stakeholder discussion.

**Locational Feedback**

The recommendation related to the stability of locational requirements is not fully supported by the OMS RWG. As discussed at the December 2 LOLE meeting, it will be beneficial to examine what drivers to changes in the Capacity Import Limit (CIL) and Capacity Export Limit (CEL) exist on the front end of the LOLE study and then check to see if the results meet expectations. The work group does not have confidence the trigger approach to reevaluation of the CIL/CEL parameters will likely reduce the workload or variability in the near-term given the large amount of expected changes; however, it may do so in the future. The RWG views the trigger approach as another “tacked-on” solution that has the potential to mask actual system changes. As it relates to the out-year uncertainty bands, MISO should provide additional clarifications to what uncertainty these bands will capture and whether or not there will be any integration of this analysis with MTEP futures.

The OMS RWG agrees with the other stakeholder concerns voiced at the December 2 LOLE meeting related to MISO’s external resource zone recommendation. It appears that what was once inequity between internal and external resources is now an inequity between internal/external non-coordinating member resources and external coordinating member resources. Although this special treatment may be the best solution, additional clarification would be helpful.

The work group’s feedback dated September 17, 2015 expressed concerns with the capacity transfer right (CTR) proposal. The key aspects of the recommendation made by MISO, including allocation prioritization and the eligibility requirements, have eliminated the majority of these concerns. It is unclear, however, whether or not CTRs can be granted to customers in retail choice areas. The “Granting” portion of Section 2.4 only mentions LSEs, but the discussion on retail choice in Section 1.3.5 indicates that customers/load can also be holders of CTRs. Additionally, there is confusion on the difference between Stage 3 and 4 of the allocation priorities. For example, since MVPs are paid for on a pro rata basis, should Stages 3 and 4 be the same?

## **Seasonal Feedback**

The OMS RWG believes that MISO's recommendation of a two season construct was largely driven by its self-imposed timeline. The benefits become harder to quantify beyond two seasons and require an in-depth analysis. Since this study was not completed, it was impossible to reach stakeholder consensus.

The work group is concerned about MISO's lack of consideration for seasonal transmission line ratings. Although keeping line ratings at their summer values adds a layer of conservatism to analysis, if the point of the two season approach is to have transparency and flexibility, then having accurate line ratings should be a priority. In Section 2.3, seasonal requirements, it isn't clear whether or not MISO will allow for the differences in transmission system and planning resources between the two seasons. If MISO does allow for the differences, then it would be logical to also allow for the differences in transmission system capabilities, including winter line ratings to match winter generation ratings at a plant. The winter combustion turbine ratings could easily exceed a summer line rating.

The OMS RWG requests additional information on the planned method of capacity accreditation, including outage rate calculations. The work group supports the changes to the accounting of Outside Management Control (OMC) events, but is unable to support the inclusion of planned outages without further clarification. The group supports a method that deters generators from scheduling a planned outage during seasonal peaks, but is unsure how the proposed method of determining "system critical hours" after the fact will allow for adequate planning by generation owners. The group believes that the first component of "system critical hours," seasonal peak hours, can be planned for with reasonable certainty. The second component, hours with operational alerts, seems much harder to plan for. An example, or historical information on the number of operational alerts, would be helpful.