

Comments by OMS Transmission Planning Work Group (TPWG) on the Independent Load Forecast (ILF) MISO Proposal of October 18, 2017

The OMS TPWG appreciates MISO allowing some time to respond to their ILF proposal of October 18, 2017 at the Planning Advisory Committee (PAC) meeting.

The following comments and feedback are a collection of OMS TPWG staff and do not represent any Commission, Commissioner, or State.

In summary the TPWG believes:

1. The ILF effort could be shifted from an independent load forecast to an informative check on the range of potential outcomes based on such factors as weather, national economic growth, state economic growth, price of fuels, price of technologies, customer preferences.
2. MISO could expand their long range peak and energy forecast beyond the Module E and NERC style requests by voluntarily asking the LSE for their “20 year” forecasts in a confidential manner. This exercise is for reliability planning that has a significant degree of uncertainty and needs to be protected from misuse.

The presentation at the PAC October 18th can be confusing to those not present for the concerning the graphic on slide #5. Some people were confused with the gross vs. net forecast results.

We agree the electric markets and reliability planning for transmission and generation is moving from a peak period risk to an energy capability every month. That is, the amount and type of generation and the amount of transmission available needs to be managed for weather variations to possible each week of the year.

Can or will the ILF help on load shapes used in the future Production Cost Modeling?

With significantly lower energy growth of the recent decade the risk of overbuilding becomes more acute and risking to the pricing structure of wholesale markets. This could drive some customers to self-supply their own energy in order to avoid wholesale energy and/or transmission costs.

In this uncertainty vein, the multiple futures weighting and criteria for Market Efficiency Projects is under review. It appears many projects are more sensitive to future local generation placement and local energy resource portfolios. Perhaps the forecast range of the futures could be changed to a forecast of energy source locations.

The shift could be more from a forecast accuracy range to a forecast uncertainty range.

Are there any significant errors being discovered in the current LSE load forecasting audit process? The OMS TPWG recognizes this is confidential and market sensitive, but some revelation to scale of inaccuracies would be helpful to balance the independent level of effort and compensation. A more exact nature, purpose, and logic reasoning for an independent check needs to be shared with the stakeholders.