

The OMS Resources Work Group (OMS RWG) provides comments to MISO's Resource Adequacy Subcommittee (RASC) on the following two requests: (1) Transitioning the Loss of Load Expectation Working Group (LOLEWG) to the RASC and sunsetting the working group and (2) 2018 RASC Policy Prioritization Supplemental list.

(1) Transitioning the LOLEWG to the RASC and sunsetting the working group

The OMS RWG is opposed to sunsetting the Loss of Load Expectation Working Group and transitioning all its work to the RASC. While the same group of stakeholders may follow both the LOLEWG and the RASC meetings, the focus of the two meetings is different and should be kept separate. The LOLEWG deals with very technical topics such as calculating the capacity import limits (CIL), capacity export limits (CEL), planning reserve margin (PRM), wind capacity credit, solar capacity credit, and the LOLE annual report. The LOLEWG feeds into the RASC, where the policy and final decisions are made on these technical topics. The RASC meetings currently are full day meetings and having the LOLE technical information brought into the meetings, may drag the meetings on, or at the worse, skip over the important technical details of the LOLE that should be reviewed by stakeholders.

The OMS RWG recommends that the LOLEWG continue as a technical work group with a management plan and the occasional meetings to discuss the best practices, methodologies, data, calculations, and results for the annual LOLE report and findings. The LOLEWG meetings could be moved from its current Tuesday afternoon timeslot to earlier on the same day as the RASC meeting (starting at 9:00 Eastern). LOLEWG meetings with longer agendas that will take more than an hour or two could still be scheduled on Tuesday afternoons, as needed. We reason that the LOLEWG is a mandatory meeting that needs to be covered by the OMS RWG and is necessary for all technical stakeholders to engage in as it provides numerous results required for the upcoming planning resource auction.

(2) 2018 RASC Policy Prioritization Supplemental list

(a) Alignment of LOLE Study and OMS-MISO Study

The OMS RWG would be supportive of the RASC or the LOLEWG working on the best method to better align the OMS-MISO Survey assumed retirements with how the LOLE Study assumes retirements only after an Attachment Y has been filed with MISO. There could be better correlation between the two published studies on planned retirements and their ranking in the OMS-MISO study.

(b) EFORd Assumptions

The OMS RWG supports looking at this recommendation at the Reliability Subcommittee as part of the Resource Adequacy and Need (RAN).

(c) BTMG issues assigned from PAC

No comment, still waiting on the assignment, and what the assignment will be.

(d) Improved Lead Time and Transparency of Attachment Y Process

The OMS RWG recommends that RASC add this to the list for its 2018 Priority List, as it sees value in researching the effects of extending the notification time of Attachment Y requests from 26 weeks to 52 weeks and reducing the confidentiality requirement of resources in the suspension status.

(e) Develop Forward Capacity Price Indices

The OMS RWG opposes the proposal to have MISO or RASC to work with industry trade press to report out forward market prices for bilateral contracts. Bilateral contracts are contracts between two parties and do not need to be posted in industry trade publications. As state regulators we can look at these bilateral contracts as part of our Commission review of power purchases and deem them as just and reasonable or not reasonable and just.

(f) Raise the PRA Price Cap above CONE

The OMS RWG recommends that RASC add this to the list for its 2018 Priority List, with the exploration of the benefits of raising the PRA price cap above gross CONE for each LRZ.