

The OMS Transmission Planning Work Group and Transmission Cost Allocation Work Group members (OMS TPWG & TCAWG members) understand MISO's request for feedback as asking the question of what --if anything-- additionally MISO should do within the MCPS process to identify and review a local economic project with a threshold below the new LEP category pending before FERC.

The OMS TPWG & TCAWG members respectfully suggest that:

- The MCPS should consider economically justifiable projects.
- The MCPS should also identify and evaluate projects that address bottom-up and/or local non-congestion economic needs.
- Next, if the needs seem justifiable at a local level, and the proposing entity (local TPZ) is willing to assume the legally binding obligations to fund the capital expenditure and to obtain recovery of the associated costs (both the capital investments and the operating and maintenance costs) over the life of the project, and without obtaining such recovery through the cost allocation process operated by MISO, then:
  - There should be no minimum project size or scope threshold; and
  - Such projects need not meet MEP or LEP criteria.

The results of this study should be for informational purposes only and should in no way grant MISO any additional authority beyond its current reliability testing authority.

- Stakeholders should also submit identified additional needs to the MCPS in Option 1 of the timeline set out in Slide 4, as a separate category, where the evaluation focuses less on the economic justification at MISO or sub-regional level, and more on the binding nature and financial credibility of the underwriting commitments offered.
- The OMS TPWG & TCAWG members support MISO's inclusion of the North-South Constraint as part of the MTEP2019 MCPS.