

**OMS Transmission Planning Work Group (TPWG)  
MTEP Futures Workshop Feedback Request (20190815)**

In preparation for its retooling of the MTEP21 Futures, MISO has requested feedback on global changes/improvements on the MTEP Futures process generally and the corresponding resource forecasting and associated siting processes.

At a high level, the TPWG believes that changes and improvements to the MTEP Futures process are warranted at this time. The TPWG previously provided feedback generally supporting the reevaluation of the MTEP Futures process, followed by the development of new MTEP21 futures.

**MTEP Futures**

The number of futures and the contingencies MISO's MTEP Futures capture should be based on tangible trends and logical extensions of those trends within the industry at the time of their creation. The OMS TPWG is cognizant of the fact that the number of futures will likely be bound by the number of models that MISO can run in a reasonable time frame. However, MISO should not run the maximum number of models just because it is possible. The number of models should be dependent on thoughtful, non-overlapping, and stakeholder supported criteria. In making any granular suggestion to a process or assumption, stakeholders should ask: Does this factor/assumption have a significant impact on potential transmission projects or plans?

As MISO is only requesting process changes at this time, the TPWG will refrain from offering any feedback on the number of futures or possible future narratives at this time. The TPWG encourages MISO to fully engage stakeholders to identify trends they believe are likely to affect the industry and trends that are likely to accelerate in the future and try to base futures around those trends.

The TPWG believes that the MTEP Futures Process should bookend futures that, while perhaps not likely to occur, could have a dramatic impact should they come to pass. However, in assigning weights to all futures, the TPWG is concerned with self-interested parties gaming the system should MISO decide to allow stakeholders the opportunity to provide input into this determination. One suggestion would be for MISO or some other disinterested party to assign weights to the various futures by the impact they could have. This would be more valuable than simply weighing each by the likelihood that it could occur. For example, a low-probability scenario that predicts a great amount of change would have a similar impact to a likely scenario that predicts a low amount of change.

The TPWG believes that re-evaluating these futures every 2-3 years would be reasonable. However, any major energy policy developments should be incorporated as soon as is practicable. Each refresh should first evaluate the accuracy of the past iteration's assumptions, incorporate any lessons learned, and move the bookends should they no longer accurately appear to capture the range of future possibilities. While the TPWG thinks MISO may be in a better position to make these assessments than stakeholders collectively, the TPWG does believe that there should be opportunity for stakeholder input should material changes within the industry occur.

Because the regions within MISO have pursued different resource mixes at various paces, the MTEP Futures process should not promote one region's long-term plans over another's by prematurely encouraging transmission intended to wheel power between the regions before each region is given a fair chance to develop their resources in line with their local IRPs and corporate objectives.

### **Resource Forecasting**

The TPWG believes that the futures development process will benefit from robust input from the states. However, each piece of information MISO uses will need to control for the shortcomings inherent in each different input source that MISO uses. For example, even though IRP information can aid the development of futures, it may not be able to completely inform all aspects of resource forecasting and siting. For instance, IRP processes do not mirror the MISO Futures process exactly, utilizing different assumptions and limited input variables.

Another shortcoming of relying on IRP information is that IRPs have comparatively short forecast period. Currently, MISO utilizes a twenty-year planning horizon for long-term planning analyses, while state IRP processes typically only produce a 5 to 10-year forecast. However, in accordance with the OMS Long-Range Transmission Planning Principles, an even greater level of coordination will be needed with state resource plans especially when looking out over longer time horizons.

The TPWG recommends that MISO solicit information in the form of a state survey that allows each state to provide information from their various resource planning processes, goals, and legislative directives as a base source of information. This would allow states to provide as much information as available, utilizing MISO's processes as a backstop. Any deficiency of the survey can be supplemented with MISO's EGEAS resource forecasting and siting processes, which would then be reviewed by states to confirm there are no glaring differences with the MISO-forecasted RRF forecasts.

The TPWG requests more information on how and in what order resources in the queue come on line and how these timing issues could affect lower queued resources in other regions so that the resource forecasting process does not become a barrier to the balanced development of resources in each region.

### **Siting**

Finally, MISO's process needs to be as transparent as possible with respect to the transmission system topologies being used during computer modelling and any assumptions or adjustments that might be needed to simplify or assist in making futures computer modelling manageable.

Any changes in the siting process of renewable RRF units must take into consideration changes to tax credit timelines that could affect the number of projects in the interconnection queue, for example, the expiration of the Production Tax Credit for wind resources that is set to expire at the end of 2019.

For load located far away from renewable resource zones, it would be useful to know, after the necessary transmission infrastructure to deliver the energy to load, what the all-in fixed and variable cost of delivered energy would be. The TPWG asks that this information be produced solely for informational purposes.