

The Organization of MISO States' (OMS) Transmission Cost Allocation Working Group (TCAWG) and Transmission Planning Working Group (TPWG) (collectively, the Working Groups¹) appreciate the opportunity to submit the following comments for MISO's consideration in response to MISO's request for stakeholder feedback to update the potential Market Efficiency Project (MEP) benefit metric list.

The Working Groups do not have additional benefit metrics to propose at this time but instead submit these comments to provide feedback on the proposed process and on the current "parking lot" of 19 potential new metrics. In considering whether to incorporate additional potential benefit metrics into the MEP identification and evaluation process, the Working Groups advise MISO to focus on benefits that can be quantified and for which beneficiaries can be readily identified. MISO and stakeholders should also actively engage in discussion regarding the feasibility of any new proposed benefit metrics as part of the straw list development process. It is more efficient to remove proposed metrics that are infeasible from the parking lot earlier in the process rather than waiting until later.² The proposed metrics that MISO stakeholders consider during the prioritization phase of this process should all be realistic metrics that could feasibly be incorporated into MISO's planning and cost allocation processes.

For example, the Working Groups do not see the proposed "Resilience" metric, currently included in the High Potential Benefit List, as being a viable metric at this time.³ As MISO notes in the Appendix to the presentation on this topic given to the Planning Subcommittee on April 16, 2019, there is currently no consensus around the definition of "resilience." The Federal Energy Regulatory Commission (FERC) is still considering the definition of, and whether, or how, to value resilience attributes of bulk power system components in Docket No. AD18-7. It would be premature to spend time discussing a "Resilience" benefit metric while FERC's holistic review of the resilience of the grid in the portions of the country covered by RTOs/ISOs is ongoing. MISO should remove the Resilience metric from the High Potential Benefit List until FERC issues a decision in Docket AD 18-7. At that time, MISO should revisit this topic with stakeholders.

The Work Groups also note that the present PSC and RECBWG bifurcation has been an awkward one to follow for state staffers. Perhaps a reconsolidation inside RECBWG may be appropriate.

¹ The Working Groups are made up of Commission Staff and this document is not intended to reflect the views of the OMS Board of Directors or any individual commission.

² Minnesota staff does not agree with this statement and would like a full evaluation of candidate benefits before they are removed from consideration. The identification of benefit metrics is an essential part of eliminating free-riders in transmission planning. The delay of incorporating the unaccounted benefits will create free-rider problems under the proposed MISO cost allocation tariff.

³ Minnesota staff agrees that in its current form, the resilience benefit metric may not be efficiently evaluated. If MISO wants to keep the resilience benefit metric in the higher priority bucket, it should refine the term resilience and provide more detailed components for what constitutes resilience.