

**Organization of MISO States (OMS)
Resources Work Group (RWG)
Response to RASC Feedback Request of July 13, 2022
Submitted on July 29, 2022**

In the July 13, 2022 meeting of the Resource Adequacy Subcommittee, MISO presented [potential seasonal construct changes](#) to the OMS-MISO Survey. Specifically, MISO asked respondents to address:

- After considering seasonal balance sheets, what is desired for how to represent them? By season? All seasons? Other?
- Post-processing changes: GIA/queue inclusion rate and default certainty settings?
- Any other ideas regarding the conversion of the OMS-MISO Survey to a seasonal format?

<https://www.misoenergy.org/stakeholder-engagement/stakeholder-feedback/rasc-oms-miso-survey-seasonal-adaptation-questions-20220713/>

Feedback:

The OMS Resources Work Group (OMS RWG) appreciates the opportunity to provide feedback to MISO regarding possible changes to the OMS-MISO Survey. The OMS RWG focuses its response on Question 2 of the feedback request, related to questions on post-processing changes.

Should all signed GIA be included?

The OMS RWG asks that MISO present the relevant data on when these resources achieve commercial operation relative to their initial request date. MISO states that resources with a signed GIA may connect 2-3 years after the initial request date, but information is needed on the distribution of in-service date vs. initial request before any changes to how they are treated in the OMS-MISO Survey are made.

MISO should also address whether the recent history of in-service date lag time is likely to change, as delays in the last 2+ years were likely influenced by the transient effects of fiscal incentives (wind), threats of import tariffs (solar), and delivery chain problems (COVID); which are unlikely to continue in the future. Ultimately, any changes/additions to the OMS-MISO Survey should be done in such a way as to avoid disrupting the continuity of information relative to past surveys.

Add queue only at a rate in-line with past additions?

While a note indicating the historical trend of interconnection requests may be warranted, the OMS RWG opposes including separate tables with an annual UCAP cap on potential new capacity additions for the following reasons:

- The current methodology already discounts capacity going through the interconnection queue by weighting the capacity based on which DPP Study Phase the generation project is currently in. These weights are based on the historical likelihood of completion.
- MISO has made recent interconnection queue reforms that should improve the process, resulting in increased (and timelier) additions of capacity.
- Given the rapid transition of the resource mix in MISO and an interconnection queue that gets larger every year, including a chart for potential new capacity in future years based off the historical rate of additions is misleading.

This feedback is from an OMS work group and does not represent a position of the OMS Board of Directors.