

Organization of MISO States (OMS)
Transmission Cost Allocation Work Group (TCAWG)
Response to RECBWG Feedback Request of August 30, 2022
Submitted on September 29, 2022

In the August 30, 2022 meeting of MISO's Regional Expansion Criteria and Benefits Working Group (RECBWG), Montana-Dakota Utilities Co. (MDU) made a presentation entitled, "[Long Range Transmission Plan Generator Pays Proposal](#)." Stakeholders were asked to provide feedback on MDU's proposal as follows:

1. Do you support incorporating a generator allocation into the MVP CA method?
2. As proposed, should the generator allocation apply specifically to new renewable resources?
3. Please share other feedback on specific components of the proposal:
 - a. Using Energy (MWh) as the billing determinant for Generators
 - b. Application of Generator Allocation Weighting Factor
 - c. Others

<https://www.misoenergy.org/stakeholder-engagement/stakeholder-feedback/recbwg-generation-cost-allocation-proposal-20220830/>

Feedback:

The OMS Transmission Cost Allocation Work Group appreciates MDU's proposal submitted to the MISO RECBWG on August 30, 2022. We understand that there are several cost allocation proposals currently under consideration. As such, we do not take a position on the MDU proposal at this time.

We look forward to further discussions with MISO and stakeholders to develop a cost allocation methodology that recognizes the OMS position that "[g]enerators and load each can be considered cost causers, beneficiaries, or both and should be allocated costs accordingly." OMS Cost Allocation Principles Committee, Principle No. 4. MISO should ensure stakeholders have opportunities at future RECBWG meetings to discuss these methodologies and how best to assess beneficiaries.

This feedback is from an OMS work group, and it is not a formal response of the OMS Board of Directors.