Organization of MISO States
Transmission Planning Work Group
Response to August 30, 2023 PAC Feedback Request
GI Queue Improvements and Draft Tariff
Submitted on September 12, 2023

In the August 30, 2023, meeting of the Planning Advisory Committee (PAC), MISO shared updates to its proposed package of Generator Interconnection Queue Improvements as well as draft Attachment X GIP Redline Queue Reform Revisions. Respondents were asked to focus their comments on updates to the proposal shared this meeting cycle.

https://www.misoenergy.org/stakeholder-engagement/stakeholder-feedback/2023/pac-gi-queue-improvements-and-draft-tariff-pac-2023-1-20230830/

The OMS Transmission Planning Work Group (OMS TPWG) appreciates this opportunity to provide feedback on MISO's proposed interconnection queue reforms. **This feedback is from an OMS work group and does not represent a position of the OMS Board of Directors.**

OMS has a demonstrated history of supporting sensible reforms to MISO's interconnection queue processes, and the TPWG agrees that it is appropriate to institute additional reforms now. The current size of MISO's generation interconnection queue is unmanageable and routinely results in unreliable, outdated, or inaccurate interconnection studies. Given recent federal incentives for the development of new generation resources, the TPWG expects interconnection requests to MISO will continue at the current pace without additional limitations or conditions. As such, the TPWG generally supports increasing milestone payments, automatic withdrawal penalties, and site control requirements in addition to the more detailed feedback below.

Site Control Requirements

While MISO has done an admirable job attempting to provide reasonable site control requirements in its Tariff, additional efforts as part of this queue reform proposal or in the future to further tighten site control requirements are recommended. Ideal site control requirements would suggest that a proposed renewable project layout be of sufficient detail and certified by a professional engineer such that relocation of more than 10 wind turbine sites or 10% of the project's solar panels would be considered a Material Change under the Tariff.

Queue-Size Cap

The TPWG broadly supports MISO's proposal to implement an automatic limitation on the size of the queue per study region. MISO has indicated that that the cap would be a limitation on the total MW size of requests determined as a function of the peak load of each study region. MISO initially suggested a 60% peak load threshold, but now proposes a percentage based on factors that include, but, are not limited to:

- the ability to develop a reasonable dispatch based on the existing system and Generation Facilities in that queue cycle;

- the regional and subregional peak load in the study model; and
- anticipated level of project withdrawals.

To ensure this threshold is transparent and enforceable, the TPWG recommends that MISO include a specific formula or replicable methodology for determining the requisite percentage of peak load that will serve as the annual queue cycle cap or backstop. The TPWG also questions whether MISO's proposed Tariff redline under 4.1.1.4 regarding the "safety valve" exception for projects with PPAs is sufficiently detailed. Given the critical need for greater certainty regarding generation interconnection timelines, these procedures should be designed so that MISO's Tariff would not be construed as potentially arbitrary or unduly discriminatory.

Queue-Cycle Timelines

If the 2023 queue submission deadline is extended past December, the TPWG requests that MISO clarify when the 2024 queue cycle would open. It may be unclear to stakeholders what queue requirements apply to which project or study group under overlapping study cycle processes.

Collaborative Stakeholder Alternative

The August 30 PAC Materials included a queue reform proposal offered by five companies as an alternative or modification to MISO's proposal. The TPWG recommends that MISO consider adopting several aspects of the proposal's pre-queue coordination attributes. It is reasonable that proposed projects performing due diligence, viability checks, or other measures of coordination with the interconnecting transmission owner(s) could receive benefits in eventual queue processing. These efforts should be standardized, documented, and verifiable.

Queue entry transparency is an element in the alternative proposal that is of particular interest to the TPWG. Making POI and other relevant information available may help address any inequities and promote efficiency as compared to current queue functioning. The TPWG would suggest MISO examine these transparency and other pre-queue improvements and we look forward to hearing more about this proposal at the next PAC.