



**ORGANIZATION OF MISO STATES, INC.
Board of Directors Meeting
Conference Call Minutes
April 16, 2015**

Approved May 21, 2015

Libby Jacobs, President of the Organization of MISO States, Inc. (OMS), called April 16, 2015 meeting of the OMS Board of Directors to order via conference call at approximately 1:00 p.m. (CST). The following board members or their proxies participated in the meeting:

Randy Rismiller, proxy for Sherina Maye, Illinois
Angela Weber, Indiana
Libby Jacobs, Iowa
Talina Mathews, proxy for Jim Gardner, Kentucky
Noel Darce, proxy for Eric Skrmetta, Louisiana
Regis Gosselin, Manitoba
Sally Talberg, Michigan
Betsy Wergin, Minnesota
David Carr, proxy for Brandon Presley, Mississippi
Robert Kenney, Missouri
Kirk Bushman, Montana
Phil Movish, proxy for Jason Williams, City of New Orleans
Jerry Lein, proxy for Brian Kalk, North Dakota
Greg Rislov, proxy for Gary Hanson, South Dakota
Richard Greffe, proxy for Ken Anderson, Texas
Mike Huebsch, Wisconsin

Absent

Arkansas

Agency members participating

David Johnston – Indiana
Chancy Bittner – Iowa
Bret Eknes, Hwikwon Ham, Nancy Lange, Cezar Panait – Minnesota
Adam McKinnie – Missouri
Andrew Kell – Wisconsin

Others on the call

Chris Miller, Patrick Clarey – FERC
Bill Smith, Tanya Paslawski, Colleen Dougherty, Amy Schmelzer – OMS Staff

The directors and proxies listed above established the necessary quorum for the meeting of at least nine directors being present.

Approval of Minutes from the March 19, 2015 Board Meeting

The minutes were approved as submitted.

Treasurer's Report

The March 2015 treasurer's report was accepted as submitted.

Review of the April 2, 2015 Executive Committee Meeting:

This meeting was cancelled.

Executive Director's Report

A written report was distributed prior to the meeting. Bill Smith highlighted several items from the FERC docket report.

BUSINESS

1. FERC Update

- Patrick Clarey provided the FERC update.

2. MISO Advisory Committee

- Sally Talberg provided the MISO AC update. She highlighted the following:
 - The candidates for MISO's Nominating Committee;
 - MISO budget amendment recommendation;
 - MISO denial of Consumer Advocate request for funding to participate in the ROE litigation;
 - Stakeholder Governance Work Group will be discussing changing the Hot Topic process;
 - August Hot Topic will be Electric & Gas Coordination.
- Dave Johnston led discussion on the April Hot Topic regarding Interregional Planning. It was accepted as amended during the meeting.

3. MISO Planning Advisory Committee

- Angela Weber highlighted the following from the PAC Meeting:
 - MISO will be considering stakeholder feedback for weighting the MTEP futures;
 - MISO provided an overview of the PLEXOS model they intend to use for the Clean Power Plan Phase 3 study;
 - An update on the Market Congestion Planning Study;
 - MISO gave an update on the Out of Cycle review process and requested feedback on it;
 - An update on Interregional Planning.

4. OMS/MISO Resource Adequacy Survey 2015

- Libby Jacobs gave an update on the survey and indicated that OMS will get weekly updates from MISO on who has responded so states can follow-up with LSEs. The Board will be providing a draft letter for Commissions to use for that follow-up.

5. Action Item: Fuel Assurance AD13-7 and AD14-8

- Tanya Paslawksi introduced this issue and led the discussion.

Angela Weber moved to approve the document as amended subject to the inclusion of Kentucky's information. Kirk Bushman seconded. The motion passed by unanimous voice vote.

6. Action Item: PJM Export Charges ER10-1791-003

- Pursuant to the OMS by-laws, this item was taken in closed session.

7. Open Mic

- There were no additional topics or comments.

Updates and Work Group Status Reports

Demand Response WG

- Andrew Kell provided a brief verbal update. Written update contained in WG Reports to BOD 150416 send-out;

Transmission Cost Allocation WG

- Written update contained in WG Reports to BOD 150416 send-out;

Markets and Tariffs WG

- None;

Resources WG

- Written update contained in WG Reports to BOD 150416 send-out;

Regional Planning WG

- Dave Johnston provided a brief verbal update. Written update contained in WG Reports to BOD 150416 send-out;

Governance and Budget

- No report;

Seams WG

- Written update contained in WG Reports to BOD 150416 send-out;

Administrative Ad Hoc WG

- No report;

Ad Hoc 111d WG

- No report;

ADJOURNMENT

The meeting of the OMS Board of Directors meeting adjourned at 1:45 pm CDT.

The Organization of MISO States Board of Directors will hold its monthly meeting via conference call **Thursday, April 16, 2015 at 1:00 pm (Central)**.

- Call-in number is **866-848-2216**. The conference code is **7422895954** followed by the # sign.
- Board members who cannot attend the call should notify Kirk Bushman at kbushman@mt.gov with a copy to Colleen at (colleen@misostates.org) to designate a proxy for this meeting.

Agenda

Call Meeting to Order – President Libby Jacobs 1:00
Attendance, Recognition of Proxies, Declaration of a Quorum
Approval of Minutes from the March 19, 2015 Board meeting
Treasurer’s Reports – March 2015
Review of Executive Committee meeting – April 2, 2015 meeting cancelled

Administrative Update

Report from the Executive Director – Bill Smith 1:05

- FERC dockets

Business

1. FERC Update – FERC Representative 1:10
2. MISO Advisory Committee – Sally Talberg 1:20
 - April Hot Top: Interregional Planning 1:25
3. Planning Advisory Committee – Angela Weber 1:35
4. OMS/MISO Resource Adequacy Survey 2015 – Libby Jacobs 1:40
5. Action Item: Fuel Assurance AD13-7 and AD14-8 – Tanya Paslawski 1:45
6. Action Item: PJM Export Charges ER10-1791-003 – Tanya Paslawski 2:00
7. Open Mic – membership comment opportunity 2:15

OMS Work Group Status Reports

- a. Demand Response WG
- b. Transmission Cost Allocation WG
- c. Markets and Tariffs WG
- d. Resources WG
- e. Regional Planning WG
- f. Governance and Budget WG
- g. Seams WG
- h. Administrative Ad Hoc WG

Announcements

- Next OMS Executive Committee meeting: Thursday, April 30, 2015 at 1:00 pm CT
- Next regular OMS Board of Directors meeting: Thursday, May 21, 2015 at 1:00 pm CT

Adjourn 2:30



**Organization of MISO States
Report of the Treasurer
Commissioner Ken Anderson, Texas Public Utility Commission
to the Board of Directors
Report for March 2015**

CASH ON HAND

The beginning balance for the Wells Fargo Business Performance Savings Account on March 1 was \$25,338.06. Interest earned for this month totaled \$0.65 and there was no other activity. The March 31, 2015, ending balance was \$25,339.31.

The beginning book balance for the Chase Bank One Checking account on March 1 was \$82,236.79. The total disbursements from the checking account for March 2015 amounted to \$142,883.95. Deposits, interest and adjustments were \$60,000.77 which includes MISO funding of \$60,000.00. As of March 31, 2015, the checking account bank balance was \$27,364.62 (with 28 check payments outstanding) and the book balance was \$(646.39).

The total savings plus checking account balance as of March 31, 2015, is \$24,692.92.



TREASURER'S REPORT
Organization of MISO States
March 31, 2015

Wells Fargo Business Performance Savings Account

Book Balance as of 02/28/2015				\$	25,338.66
3/31/2015	DEP	Interest on Savings		\$	0.65

Business Performance Savings Account Balance at 03/31/2015

\$ 25,339.31

Chase Bank One Commercial Checking with Interest

Book Balance as of 02/28/2015				\$	82,236.79
3/4/15	ACH	Midcontinent ISO	\$	60,000.00	
3/31/15	DEP	Interest on checking	\$	0.77	

Total Deposits

\$ 60,000.77

Checks and Charges

Date	Check #	Descriptions		
03/02/2015	5080	MG Trust Co.	\$	6,099.75
03/05/2015	5089	Bonnie Janssen (MI)	\$	1,344.90
03/05/2015	5084	David Johnston (IN)	\$	1,261.39
03/05/2015	5090	Walt Cecil (MO)	\$	1,236.14
03/05/2015	5086	Pradeep Sircar (IN-OUCC)	\$	959.16
03/05/2015	5085	Andrew Wells (IN)	\$	593.70
03/05/2015	5082	Libby Jacobs (IA)	\$	400.06
03/05/2015	5088	State of Iowa (Libby Jacobs)	\$	324.80
03/05/2015	5083	Bill Smith	\$	168.99
03/05/2015	5092	Bill Smith	\$	101.75
03/05/2015	5081	Tanya Paslawski (OMS-DED)	\$	100.00
03/05/2015	5093	Bill Smith	\$	1.00
03/12/2015	5098	RTO Insider	\$	25,000.00
03/12/2015	5115	Julia C. Mitchell	\$	12,780.97
03/12/2015	w/d	VISA (Chase Bank One)	\$	4,435.08
03/12/2015	5114	Julia C. Mitchell	\$	3,998.32
03/12/2015	5095	100 Court Investors LLC	\$	1,849.90
03/12/2015	5113	Brian Kalk (ND)	\$	1,650.10
03/12/2015	5105	Kenneth Anderson (TX)	\$	1,370.06
03/12/2015	5108	State of Iowa (Chancy Bittner)	\$	1,291.53
03/12/2015	5103	Chris Devon (MI)	\$	1,223.70
03/12/2015	5110	State of Iowa (S. Bents)	\$	1,182.19
03/12/2015	5102	Chris Devon (MI)	\$	1,104.66
03/12/2015	5109	State of Iowa (Libby Jacobs)	\$	944.83
03/12/2015	5111	State of Iowa (V. Bujimalla)	\$	881.81
03/12/2015	5107	Melissa Watson (LA)	\$	571.92
03/12/2015	5104	David Shaffer (NOLA)	\$	536.51
03/12/2015	5112	Walt Cecil (MO)	\$	439.86
03/12/2015	5099	Thor Projects LLC	\$	250.00
03/12/2015	5096	Combined Systems Technology (CST)	\$	159.00
03/12/2015	5097	Energy Data LLC	\$	150.00
03/12/2015	5101	Triplett Office Essentials	\$	55.10
03/12/2015	5094	Michigan Unemployment Insurance Agency	\$	43.78
03/12/2015	5100	Triplett Office Essentials	\$	37.60
03/18/2015	5127	Customized Energy Solutions	\$	3,500.00
03/18/2015	5129	Ryun.Givens & Co. PLC	\$	1,285.00
03/18/2015	5118	Angela Weber (IN)	\$	1,116.34
03/18/2015	5119	Darren Christle (MB)	\$	1,115.80
03/18/2015	5121	Kirk Bushman (MT)	\$	1,033.52
03/18/2015	5125	Samson Mabry IV (MS)	\$	762.24
03/18/2015	5117	Al Freeman (MI)	\$	514.51
03/18/2015	5116	Al Freeman (MI)	\$	308.38
03/18/2015	5126	CenturyLink	\$	285.26
03/18/2015	5128	Premier Copiers	\$	56.82
03/31/2015	w/d	Pachex	\$	18,134.20
03/31/2015	w/d 2	Paychex	\$	14,142.95
03/31/2015	w/d 3	Paychex	\$	69.36
03/05/2015	5091	Diane Hopingardner (TX)	\$	724.14
03/12/2015	5106	Kirk Bushman (MT)	\$	1,650.10
03/18/2015	5120	Darren Kearney (SD)	\$	1,611.29
03/18/2015	5124	Robert Mork (IN-UCC)	\$	960.04
03/18/2015	5123	Richard Greffe (TX)	\$	845.72
03/18/2015	5122	Manitoba (D. Christle)	\$	472.92
03/30/2015	5135	Diane Hopingardner (TX)	\$	1,227.20
03/30/2015	5138	Jonathan Beyer (KY)	\$	1,141.88
03/30/2015	5143	Wisconsin PSC (J. Wheeler)	\$	1,048.35

03/30/2015	5139	Minnesota Dept of Commerce (C. Shaw)	\$	1,001.84
03/30/2015	5141	State of Iowa (S. Bents)	\$	960.73
03/30/2015	5142	Wisconsin PSC (Don Neumeyer)	\$	942.66
03/30/2015	5132	Bonnie Janssen (MI)	\$	932.06
03/30/2015	5133	Carolene Mays-Medley (IN)	\$	708.69
03/30/2015	5130	Angela Weber (IN)	\$	700.00
03/30/2015	5134	David Charles (ND)	\$	540.49
03/30/2015	5137	Jerry Lein (North Dakota)	\$	522.54
03/30/2015	5136	Indiana URC (A. Wells)	\$	506.60
03/30/2015	5140	Qin Liu (IL)	\$	436.00
03/30/2015	5131	Indiana URC (Angela Weber)	\$	227.16
03/31/2015	5149	Jennings Strouss	\$	5,332.59
03/31/2015	5144	Expert Plan - MG Trust Co.	\$	5,018.96
03/31/2015	5145	Combined Systems Technology (CST)	\$	262.88
03/31/2015	5147	Combined Systems Technology (CST)	\$	161.39
03/31/2015	5146	Triplett Office Essentials	\$	57.21
03/31/2015	5148	Crystal Clear Water	\$	17.57

Total Disbursements - Checks and Charges

\$ 142,883.95

CHECKING ACCOUNT BALANCE at 03/31/2015

\$ (646.39)

TOTAL Certificates of Deposit, Savings and Checking Account Balances as of: 03/31/2015

\$ 24,692.92

CHASE CHECKING ACCOUNT RECONCILIATION

Bank Balance 03/31/2015		\$	27,364.62
<u>Less Checks Outstanding</u>			
3/5/2015	5091	Diane Hopingardner (TX)	\$ 724.14
3/12/2015	5106	Kirk Bushman (MT)	\$ 1,650.10
3/18/2015	5120	Darren Kearney (SD)	\$ 1,611.29
3/18/2015	5124	Robert Mork (IN-UCC)	\$ 960.04
3/18/2015	5123	Richard Greffe (TX)	\$ 845.72
3/18/2015	5122	Manitoba (D. Christle)	\$ 472.92
3/30/2015	5135	Diane Hopingardner (TX)	\$ 1,227.20
3/30/2015	5138	Jonathan Beyer (KY)	\$ 1,141.88
3/30/2015	5143	Wisconsin PSC (J. Wheeler)	\$ 1,048.35
3/30/2015	5139	Minnesota Dept of Commerce (C. Shaw)	\$ 1,001.84
3/30/2015	5141	State of Iowa (S. Bents)	\$ 960.73
3/30/2015	5142	Wisconsin PSC (Don Neumeyer)	\$ 942.66
3/30/2015	5132	Bonnie Janssen (MI)	\$ 932.06
3/30/2015	5133	Carolene Mays-Medley (IN)	\$ 708.69
3/30/2015	5130	Angela Weber (IN)	\$ 700.00
3/30/2015	5134	David Charles (ND)	\$ 540.49
3/30/2015	5137	Jerry Lein (North Dakota)	\$ 522.54
3/30/2015	5136	Indiana URC (A. Wells)	\$ 506.60
3/30/2015	5140	Qin Liu (IL)	\$ 436.00
3/30/2015	5131	Indiana URC (Angela Weber)	\$ 227.16
3/31/2015	5149	Jennings Strouss	\$ 5,332.59
3/31/2015	5144	Expert Plan - MG Trust Co.	\$ 5,018.96
3/31/2015	5145	Combined Systems Technology (CST)	\$ 262.88
3/31/2015	5147	Combined Systems Technology (CST)	\$ 161.39
3/31/2015	5146	Triplett Office Essentials	\$ 57.21
3/31/2015	5148	Crystal Clear Water	\$ 17.57
Total Outstanding Checks		\$	28,011.01
Book Balance 03/31/2015		\$	(646.39)

OMS

OMS Treasurer Report for Month of March 2015

Wells Fargo Business Performance Savings Account

Beginning Balance	25,338.66	
Interest Earned this Month	0.65	
Ending Balance		<u><u>25,339.31</u></u>

Chase Bank One Checking Account

Beginning Balance	82,236.79	
Total Disbursements	(142,883.95)	
Deposits/Interest/Adjustments	<u>60,000.77</u>	
Ending Balance		<u><u>(646.39)</u></u>
Ending Bank Balance	27,364.62	
Outstanding Deposits	0.00	
Outstanding Checks	<u>(28,011.01)</u>	
Book Balance	<u><u>(646.39)</u></u>	

Total Savings & Checking Balances as of March 31, 2015

24,692.92

26 checks outstanding at 3/31/2015



Organization of MISO States

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OMS Executive Director Report April 16, 2015

FERC Issues

1. FERC's Central region technical conference on the Clean Power Plan was held March 31st in St. Louis. Bill attended to monitor.
2. The transmission owners filed testimony in the MISO Transmission Owner Return on Equity lead docket (EL14-12) on April 6th. OMS ROE Ad Hoc Work Group meeting April 17th to discuss testimony.

MISO Matters

1. Staff filed comments on the MISO "Issues Statement on Facilitating Resource Adequacy in the MISO Region" and participated in the first workshop held April 2nd.
2. OMS/MISO resource adequacy survey/balance sheets were distributed April 1st. Responses are due May 1st and results are expected to be available in early June.

Public Relations and Other Meetings

- Bill and Tanya, as well as representatives from MISO, met with the Kentucky PSC on April 2nd to provide an OMS and MISO orientation.
- President Jacobs and Bill Smith participated in the Black Sea Regional Workshop March 25-26. The regulators met with Transmission System Operators from the region on March 27.
- Tanya will be on a panel about capacity in MISO at the Michigan Energy Innovation Business Council Annual Meeting on April 20th.
- Tanya attended the Midwest Regional Energy Bar Association meeting in Chicago on March 30-31.
- Tanya attended the OPSI Spring Meeting on April 12-13 to update OPSI staff and commissioners on current OMS issues.
- Bill and Tanya attended the Heartland Institute Dialog on Electricity Networks in Chicago on April 15-16.

Upcoming dates:

- Next Executive Committee Meeting: April 30
- Next Board Meeting: May 21
- Future OMS Board meetings: June 11, July 16
- Future OMS Executive Committee meetings: May 28, June 25

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Centralized Capacity Markets in Regional Transmission Organizations and Independent System Operators))))	Docket No. AD13-7-000
Winter 2013-2014 Operations and Market Performance in Regional Transmission Organizations and Independent System Operators))))	Docket No. AD14-8-000

REPLY COMMENTS OF THE ORGANIZATION OF MISO STATES

On November 25, 2014, in the above-captioned docket, the Federal Energy Regulatory Commission (Commission) ordered Regional Transmission Operators (RTOs) and Independent System Operators (ISOs) to file reports on efforts to address market and system performance associated with fuel assurance issues. The Midcontinent Independent System Operator (MISO) filed its Fuel Assurance Report on February 18, 2015 (February 18 Report).¹ The Organization of MISO States (OMS) respectfully submits these comments to add additional detail on the activities related to fuel assurance that take place within regulatory commissions in the MISO footprint.

Background on Applicable Retail Regulatory Construct

As MISO noted in the February Report, “state regulated utilities make up the vast majority of the MISO footprint [,]” and as such, direct decisions regarding fuel assurance within MISO “generally are the outcome of the traditional, vertically-integrated state regulatory

¹ *Midcontinent Independent System Operator, Inc. Fuel Assurance Report*, FERC Docket No. AD-13-7 and AD14-8 (February 18, 2015) (the February Report).

planning processes, rate cases and oversight.”² MISO retail regulators typically monitor resource availability issues for jurisdictional entities under the basic tenet of utility regulatory authority: ensuring safe and reliable utility service at reasonable rates. Though most states’ enabling statutes do not specifically address fuel assurance, they do encompass maintaining adequate fuel to ensure reliable service in a cost-effective manner.

Under the traditionally vertically-integrated framework, retail regulators rely on two major tools to oversee fuel assurance issues. The first is cost recovery. In addition to general rate cases, many jurisdictions have fuel adjustment clauses or “trackers” that can be adjusted throughout the year. Typically these mechanisms require some type of fuel procurement plan that is reviewed by the regulator prior to implementation, as well as a prudence review after the fact, typically through retail cases and fuel reconciliation procedures. These types of cases provide an opportunity for discussions around the right balance of firm and non-firm transportation, fuel inventory management, and supply hedging activities. Because these regulated entities are not subject to the competitive pressures that exist in open retail environments, conservative approaches to fuel procurement are more likely to be adopted and prove quite valuable during times of high demand or unusual weather.

The other tool is the utility planning process employed by the individual states, typically known as Integrated Resource Plans (IRPs). Other forward-looking reviews include filings such as energy assessments, individual utility plan filings, or special reviews when NERC’s Annual Long Term Reliability Assessment (10 years) highlights an issue. These plans provide a prospective assessments that include, but are not limited to, new generation additions, retirements, contracts, fuel mix choices and procurement approaches. When evaluating the

Commented [TP1]: From IL: This appears to imply that competitive providers play fast and loose with their fuel supply decisions. Given that there are often stiff financial penalties for non-delivery, I would think that they too, would be engaged in the above activities to ensure adequate fuel supply. Perhaps it is more accurate to say that traditional regulation typically allows the recovery of fuel stockpiled for the purpose of ensuring reliability, so the utilities tend to slightly over-procure fuel for that purpose.

² February Report at 12-13. The OMS notes that the Michigan Public Service Commission and the Illinois Commerce Commission do not have the same jurisdictional authority over these issues as the other OMS members.

reasonableness of the aforementioned filings, retail regulators consider other things (e.g. portfolio diversity, transportation security) to ensure the utilities' plan manages externalities, uncertainty, and market inefficiencies.

In addition to formal cases or procedures, utility regulators meet with jurisdictional entities, formally and informally, throughout the year where issues and concerns are discussed. Utilities would be remiss to fail to inform regulators about issues that could impact their ability to provide reliable service since their ability to recover costs could be impacted. Utilities typically submit general fuel procurement plans as part of rate filings, many of which are also subject to some form of prudence review. An open dialog about any unusual activity in this area is the best approach for utilities and regulators have found that they are kept well informed.

Emergency Management

Retail regulators usually have a role in emergency response, sometimes with explicit authority and generally in coordination with other state response agencies. Retail commissions also maintain awareness of situations that may lead to limitations on the ability of utilities to maintain adequate service levels. Most are focused on ensuring priority service to essential services like hospitals and nursing homes while others allow government officials, sometimes the regulators themselves, to waive laws or rules that restrict access to necessary fuel supply.

In response to requests from the regulators, MISO established a communication system to provide emergency notification to state officials. Certain commission staff receive email/text alerts of any real time, severe emergency power crisis event. The system is tested weekly. The purpose is to coordinate communications within the regulators and the public.

What MISO Can/Should Do

As noted in its February 18 report, MISO supports the work of its member utilities, with oversight from regulators, in meeting resource adequacy and fuel assurance needs by providing a regional view of these issues.³ MISO should continue to share data concerning regional availability and deliverability of various types of generator fuels to inform regulators and utilities of developing concerns that may not be apparent in an individual jurisdiction.

The OMS also supports continued efforts by MISO to coordinate and increase communication with natural gas pipelines in the region to provide greater transparency into how each industry manages operations, particularly during times of potential shortages.⁴ Individual regulators' staff participate in MISO's Electric and Natural Gas Coordination Task Force (ENGCTF) and monitor the issues with other RTO's.

What the Commission Can/Should Do

As noted above, retail regulators in the MISO footprint actively and successfully use the tools available to ensure that energy is provided to customers in a reliable and cost-effective manner, which includes the availability of resources necessary to keep generators online. Therefore, the need for Commission involvement specific to the MISO region is limited. However, there are some general things the Commission can do to support retail regulators' activities. For example, the Commission can continue to monitor and facilitate efforts in the coordination of electric and natural gas processes nationwide which will have significant value as reliance on natural gas for generation grows.

Further, the OMS has expressed support for raising or eliminating offer caps to provide market certainty of cost recovery in well-functioning markets that are not subject to

³ MISO report pg. 13.

⁴ MISO report pg. 10.

manipulation. However, the OMS remains concerned that incentives could result in excessive charges and believe that retail regulators are better situated to find the appropriate balance of certainty and risk as it applies to each LSE.

The fuel assurance issues that have impacted the MISO region tend to be those applicable nationally, like coal delivery issues, and not usually related to the economic issues of spot market fuel procurement. Therefore, most of the market-focused enticements under consideration in other RTOs are unnecessary in MISO due the prevalence of the traditional vertically-integrated, state-regulated model therein.⁵

Retail Jurisdiction Summaries

The following is a summary of each state's authority and methods to monitor and assess fuel assurance:

Arkansas

- The Commission staff regularly communicates with the jurisdictional utilities regarding operations throughout the year. The sessions are informal. They include fuel procurement practices and solid fuel inventory management.
- In the event of any events or factors affecting the availability of fuel, the utilities notify staff and their plans in response.
- The Commission's general statutory authority encompasses fuel assurance issues including energy emergencies and related circumstances.
- The Commission is authorized and has approved energy cost recovery tariff mechanisms for reasonable and prudent incurred fuel costs.

Indiana

- State quarterly fuel filings are made by jurisdictional utilities
- Public meetings are held as summer approaches for utilities to report on reliability preparations.
- Specific concerns like low-river flow conditions that limit planned operations or barge deliveries are addressed as they arise and tracked through informal reporting.
- IC8-1-2-42(d) authorizes fuel adjustment mechanisms and includes required finding, specifically a finding that the utility has provided supply at the lowest reasonable fuel cost. A fuel cost audit (conducted by the Consumer Counselor's office) is a statutorily required part of the process.

⁵ The vast majority of MISO load – 92% - reliably served by utilities subject to state or local jurisdiction.

Illinois

- Pursuant to The Electric Service Customer Choice and Rate Relief Law of 1997 (220 ILCS 5/16-101, et seq.), electric utilities in Illinois have either sold their generation assets or established affiliate generation companies. Accordingly, the Illinois Commerce Commission does not have regulatory authority over generators or their fuel supply decisions.
- The ICC holds annual public meetings with Illinois utilities to discuss both summer and winter preparedness.
- Electricity customers that have not switched to competitive suppliers are supplied by the local utility as a basic service provider.
- The ICC does not regulate municipals or cooperatives.

Iowa

- Iowa law provides for use of an energy adjustment clause (EAC) and EACs are currently in place for the three utilities that the IUB rate regulates. Iowa law allows the board to initiate a proceeding to review fuel procurement practices (which address energy supply and cost review) through a contested case proceeding.
- The board has the authority to work with other state agencies to coordinate on propane supply issues.
- Fuel supply issues can also be addressed in rate case proceedings.

Louisiana

- The LPSC's constitutional authority includes cost recovery of fuel purchases.
- Jurisdictional utilities (does not include municipals) are required by General Order dated November 6, 1997 ("FAC Order") to file with the LPSC a monthly calculation of their fuel cost adjustment and are required to include enough detail to permit the LPSC and staff, as well as customers, to determine the type and quantity of all fuel used by the utilities for generation.
 - The FAC Order includes specific language encouraging utilities to use risk management tools in order to meet their particular fuel needs and to accommodate the risks associated with those needs. The LPSC has final authority for the approval of such plans.
 - IRPs conducted at least every four years include fuel-related issues.
 - The FAC Order allows dollar for dollar recovery of fuel purchases, subject to a later prudence audit of all purchases, which is required bi-annually.
 -
 - Emergency fuel and power are also covered in the FAC Order and those costs are considered recoverable.
- Fuel supply emergencies would be communicated to the Executive Secretary of the LPSC, as well as to the Commissioners, as they arise.
- The LPSC currently has a rulemaking docket in progress to address long-term natural gas hedging.
- LA Rev Stat. 30:571 grants the governor the power to declare a state of emergency as a result of extreme shortages of intrastate natural gas. The priorities are given to public health, safety, and welfare to maintain service for priority customers such as hospitals.

Manitoba Public Utilities Board

- The Public Utilities Board does not routinely receive fuel reports and is not statutorily responsible for resource planning (government and Manitoba Hydro issue). Fuel availability is not an issue as Manitoba generators are mostly powered from dams. The water supply is monitored for use over a period of years.
- On average Manitoba exports about 30% of its electric generation

Michigan

- Michigan has an abundance of natural gas storage that helps hedge any unusual activities in the markets.
- Act 3 of 1939 gives the MPSC authority to put into rates appropriate cost of service items.
- Act 304 of 1982 establishes cost recovery clauses in rates and requires MPSC review of both plans for upcoming procurement plans to serve customers and a review afterward for prudence.
- AP 191 of 1982 authorizes the Governor to declare an energy emergency and allows actions to ease an emergency, including:
 - Suspending statutes or other rules that hinder the ability to cope with an energy emergency
 - Directing specific use of resources to provide for the health, safety, and welfare of certain facilities, like hospitals and schools.

Minnesota

- Utilities are subject to automatic energy cost adjustment mechanisms that are subject to monthly and annual prudence reviews.
- MN DOC assesses the cost and benefit of firm fuel supply as part of a risk analysis.
- Minn. Stat. 216B.01 – utilities are required to provide adequate and reliable electric service at reasonable rates
- Minn.Stat.216B.045 – commission may declare a natural gas supply emergency and maybe suspend any contract providing for the sale and transportation of natural gas through an intrastate pipeline.

Mississippi

- Consultants and staff annually audit fuel-related aspects of jurisdictional IOUs and evaluate utility fuel management as required by statute.
- Fuel assurance is part of IRP. The commission may adjust at any time the rates for fuel cost recovery on a forward looking basis with an annual true up.
- The commission may adopt recommendations on utility fuel management practices that are implemented by the utility and subject to compliance filings

Missouri

- 4 CSR 240-3.190(3)(D) requires the utility to report reductions of coal inventory below a 30 day supply and reductions of oil inventory below 50% of normal inventory. Reported on an as needed basis.
- 4 CSR 240-3.190(1)(B) requires utilities report monthly burned fuel for each carbon based fuel generating unit. Reported on a monthly basis.

- The PSC is the lead agency for Emergency Response Function for Energy (ESF-12) with the State Emergency Management Agency (SEMA).
- IOU resource planning is based on minimum requirements in 4 CSR 240-22 Electric Utility Resource Planning. A key component of Chapter 22 is risk analysis, and fuel available is a risk factor which is first evaluated when screening supply-side options. As the planning analysis proceeds, fuel price risk is evaluated.
- Missouri statutes (RSMO 386.266) and the PSC rules (4 CSR 240.3-161 and 4 CSR 240-20.090) include provisions for Commission approval of fuel adjustment clauses. The statute allows for periodic rate adjustments for fuel and purchased power costs.

Montana

- The Montana Public Service Commission receives monthly tracking filings from utilities, which detail changes in fuel and energy purchase costs and result in immediate rate adjustments. Once a year, an “annual true-up” is filed, which incorporates all tracker adjustments over the past year and makes a permanent adjustment to the rate. All tracker and true-up filings include data on coal, natural gas, and energy purchase contracts.
- Montana law allows the Public Service Commission to establish temporary rates. Through orders in rate cases for individual utilities, the Commission has established guidelines for tracker and true-up filings.
- Resource plans in Montana are filed every two years. Fuel assurance issues are addressed prospectively. The actual cost recovery processes, i.e., trackers and true-ups, are executed according to terms adopted in individual rate-case orders.

City of New Orleans

- Utilities have an obligation to notify the Council if their fuel costs are projected to increase by more than 25%.
- Under Section 3-130 of the Home Rule Charter, the Council has issued decisions related to generation capacity and location, fuel diversity, and cost recovery that indirectly address fuel assurance, as well as to take action during emergency situations that impact the supply of electricity to protect ratepayers.
- Utilities are required to provide information on financial and physical hedging on an annual basis.
- IRP process accounts for fuel type and available sources in the modeling. Sources that are not as reliable are de-prioritized to produce a plan based on fuel sources that are reasonably available.

North Dakota

- Generally, voluntary reports/communications on coal and gas supply situations come on an “as-needed” basis, when there is an issue the company wants to make the commission aware of.
- Under the Commission’s general authority, fuel assurance is incorporated into the overall risk assessment of resource decisions. Fuel adjustment clauses are also allowed for recovery of fuel purchases.

South Dakota

- The SDPUC regulates 6 IOU's and each reports its fuel supply in different manners
- The normal process is an annual basis, but reports and communication can come on an "as-needed" basis when the Commission needs to be made aware of.
- The fuel assurance is a part of overall risk assessment covered under general authority.
- There is a fuel adjustment clause for recovery of purchases.

Texas (Regulated Entities)

- Utilities are required to file monthly fuel cost and use information reports covering fuel cost, fuel efficiency, fuel purchases, and monthly peak demand and sales. Contracts are required to be provided upon request.
- Utility fuel costs are recovered through monthly fuel factors rather than base rates. They are recovered through fuel factors that cover fuel and purchased power, may be adjusted and subject to periodic reconciliation. There are rules for recovery of fuel costs, including the determination of eligible fuel expenses, calculation of fuel factors, and the schedule and procedures for fuel factor adjustment and reconciliation.
- PUCT rules specifically allow a utility to request an emergency interim fuel factor if it believes it has materially under-recovered fuel costs due to fuel curtailments, equipment failure, strikes, embargoes, sanctions, or other unforeseeable circumstances.
- Where there is potential for supply disruption, such as frigid weather or hurricanes, the PUCT maintains information communications with the affected entities and requires them to provide information and reports as needed.

Wisconsin

- Initiated a special "General File" Docket 5-GF-256 for checking Wisconsin coal inventory statistics for electric power plants serving Wisconsin customers. This covers 6 major electric utilities with coal inventories at 15 plant stations. This was done with full confidential filing protection of the data per State administrative code. The report covers all major utilities, including cooperatives and wholesale municipal groups, which are not under PSC rate jurisdiction. Reports are due every two weeks.
- Utilities have an adjustment clause that allows changes in inventory or fuel sources if necessary.
- The PSCW is the lead coordinating agency in Emergency Support related to energy by state statute.
- The PSCW can issue an order to build more generation than the minimum planning reserve level.

Conclusion

The OMS appreciates the opportunity to share the numerous activities that are taken by retail regulators in the MISO region to ensure needed fuel is available to maintain reliability.

Any action considered by the Commission related to fuel assurance would be best focused on

purely interstate activities that will not impede the important and effective efforts already underway under regulators retail jurisdiction.

The OMS submits these comments with the support of a majority of its members.

Respectfully Submitted,

Tanya Paslawski
Tanya Paslawski
Deputy Executive Director
Organization of MISO States
E-mail: tanya@misostates.org
Tel: 515-243-0742

OMS Work Group Chairs Board Report

April 16, 2015

WG	Issue	Description	Status
Demand Response and Technology	Potential for OMS (as a whole or only those state interested) to collaborate with outside groups on DR issues.	This is an idea carried forward from 2014. RAP is interested in helping out. Perhaps the group known as Association for Demand Response and Smart Grid is as well. CES should be looked at as a resource. MISO DRWG may want to collaborate on workshop type event. Other reliable resources are FERCs "National Assessment of DR Potential" and the Applied Energy Group who conducted an independent EE/DR/DG forecast for the MISO Region.	Now that the OMS DR Principles have been updated and revised, there is a need to determine OMS Board desire for education/collaboration opportunities. The DR&TWG co-chairs are engaging stakeholders for input, and will develop options with workgroup in March and April. The workgroup will then present options to the Board for direction.
Demand Response and Technology	Analysis of IMM 2012 State of the Market Recommendations #20: Evaluate capacity credits provided to wind resources and DR resources to increase their accuracy.	This item focuses on LMR capacity credit (resources used in emergency protocols). Based on limited observations, the IMM recommended that MISO review the amount for which LMRs receive capacity credit.	#20: Discussed at 2014 Dec AC Hot Topic, and will now will receive further discussion at DRWG in early 2015, and later likely at the SAWG. MISO and stakeholders seem in agreement that credit changes aren't needed, however review of M&V and similar issues should be pursued. At the March DRWG, MISO staff said they are working on a white paper on how to move this item forward.
Transmission Planning	South TSTF	Michoud Unit 3 SSR Alternatives Review	Review final results and alternatives in 4 to 6 weeks.
Transmission Planning	MTEP16 Futures	The RPWG recommended age related retirements for all generation types for all futures except for the High	The OMS voted yes on a vote of confidence on the Futures via an electronic vote that was due April 1. Should the RPWG

OMS Work Group Chairs Board Report

April 16, 2015

WG	Issue	Description	Status
Transmission Planning	Entergy Out of Cycle (OOC) Requests	This is one of the largest single transmission projects in Entergy's history with two new substations, expansion of a third and 25 miles of 500kV and 230-kV transmission at a cost of \$187 million. Transmission developers are questioning the expedited approval request since it denies them a chance to compete for the project. MISO says that the aggressive timeline to complete the project by summer of 2018 requires that the project be started in the first half of 2015. The cost of the project will be allocated to the Entergy pricing zone and built by Entergy. The Transmission Developers are saying that if the Lake Charles project is approved by the Board that they will take this forward to another process (FERC we assume).	The motion for approval passed in the February PAC; System Planning Committee will be discussed again on April 7. This will be voted on at the next System Planning meeting on April 21 with the entire Board Present.
Transmission	Hot Topic for AC	RPWG and TCAWG is working on the third draft.	Work Group meetings on April 8 and 10.
Resources	The OMS/MISO Long Term Resource Adequacy Survey	Work with MISO to establish parameters for participation in 2015 as directed by the OMS Board	Balance Sheets sent to LSE's first of April. OMS office copied all with instructions. First workshop Apr. 8. Back to MISO May. Final in June. Then to NERC for LTRA.
Resources	Resource Adequacy - Issues Statement by MISO draft	MISO released a draft Issue Statement on the combined issues concerning Resource Adequacy such as, seasonal, winter performance, retirements,, operations, etc.	First workshop Apr. 2. It will be an 18 process. Next workshop May 15. Working on defining issues and the "problem definition" to solve.
Resources	SSR Filing by MISO	MISO was directed Feb. 19th to modify its SSR cost allocation process and methodology. Several FERC Dockets.	Various stakeholder comments suggesting better cost allocation offered. Next MISO SSR Workshop April 20th. Filing extension at 90 days - May 20th
Resources	Fuel Assurance	MISO filed their response to FERC as directed on 3 specific questions	MISO filed their report to FERC using the State information. OMS staff working on providing comments to FERC detailing state efforts in Fuel Assurance in the context of Resource Adequacy

OMS Work Group Chairs Board Report

April 16, 2015

WG	Issue	Description	Status
Seams	MISO-PJM	For Interchange Optimization/CTS, the RTOs have not met their expected timelines and currently have or will be requesting stakeholder approval of their individual efforts. FERC issued an Order in AD14-3 directing the RTOs and IMMs to file reports on the status of these issues: (1) interface pricing; (2) capacity deliverability; (3) Day-Ahead market coordination; (4) modeling of the Ontario/Michigan phase angle regulators for congestion management; (5) Firm Flow Entitlement Freeze Date; and (6) use of commercial flow in the Market-to-Market process.	Next JCM meeting May 27, 2015 (Wednesday) Carmel, IN. AD14-3 informational reports the IMMs and RTOs deadline to file the information in this docket were first scheduled to be due April 10, 2015 with comments on these filings to be due April 27, 2015. On April 2, 2015, the RTOs jointly filed a motion for a 30-day extension of time to submit an information filing as required by FERC. On April 9, 2015 FERC issued an order granting the RTOs' motion for an extension of time, extending the deadline to submit the information filing to be due May 11, 2015; and reply comments due May 26, 2015.
Seams	MISO-SPP JOA Dispute	Contains confidential information	MISO offered an official settlement on February 14, 2015. In the last few weeks, MISO SPP and the Joint Parties have been meeting in Atlanta to continue negotiations. The March 26th settlement conference was cancelled in lieu of further discussions. The next FERC Settlement Conference is scheduled for May 28, 2015 in Washington D.C.
Transmission Cost Allocation	ER10-1791-003	MVP Cost Allocation to PJM	Current deadline to submit comments to FERC is February 21, 2015. That deadline may be extended to April 22, 2015.
Transmission Cost Allocation	ER13-1943-000 and 001	MISO-PJM Inter-regional Order 1000 compliance.	MISO is seeking comments and suggestions on the cost allocation approach for cross-border reliability projects and public policy projects. Due February 27, 2015.



**ORGANIZATION OF MISO STATES, INC.
Board of Directors Closed Meeting
Conference Call Minutes
April 16, 2015**

Approved May 21, 2015

Libby Jacobs, President of the Organization of MISO States, Inc. (OMS), called the April 16, 2015 Closed meeting of the OMS Board of Directors to order via conference call at approximately 1:50 p.m. (CST). The following board members or their proxies participated in the meeting:

Randy Rismiller, proxy for Sherina Maye, Illinois
Angela Weber, Indiana
Libby Jacobs, Iowa
Talina Mathews, proxy for Jim Gardner, Kentucky
Noel Darce, proxy for Eric Skrmetta, Louisiana
Regis Gosselin, Manitoba
Sally Talberg, Michigan
Betsy Wergin, Minnesota
David Carr, proxy for Brandon Presley, Mississippi
Adam McKinnie, proxy for Robert Kenney, Missouri
Kirk Bushman, Montana
Phil Movish, proxy for Jason Williams, City of New Orleans
Jerry Lein, proxy for Brian Kalk, North Dakota
Greg Rislov, proxy for Gary Hanson, South Dakota
Richard Greffe, proxy for Ken Anderson, Texas
Mike Huebsch, Wisconsin

Absent

Arkansas

Agency members participating

Nancy Lange – Minnesota

Others on the call

Bill Smith, Tanya Paslawski, Colleen Dougherty – OMS Staff

The directors and proxies listed above established the necessary quorum for the meeting of at least nine directors being present.

BUSINESS

1. Action Item: PJM Export Charges ER10-1791-003

After discussion, it was agreed that the document would be revised and recirculated electronically with an email vote following.

ADJOURNMENT

The closed meeting of the OMS Board of Directors meeting adjourned at approximately 2:10 pm CST.

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Midwest Independent Transmission)
System Operator, Inc.)

Docket No. ER10-1791-003

INITIAL COMMENTS OF THE ORGANIZATION OF MISO STATES

In response to growing public policy support for a more diverse energy resource mix, the Midcontinent Independent System Operator (MISO)¹ developed a new category of transmission project to facilitate the most efficient and cost effective movement of power over long distances. Multi Value Projects (MVPs) were planned as a regional overlay to the pre-existing categories of baseline reliability projects and market efficiency projects. A cost allocation plan for these new projects was developed with broad stakeholder input and submitted to the Commission in 2010.

Among other findings, the Commission approved the proposal to assign costs for MVP projects to entities outside of MISO that benefit from the facilities, but exempted PJM due to concerns raised in a 2003 policy aimed at eliminating rate pancaking between the two RTOs.² A number of parties, including the OMS, filed unsuccessfully for rehearing of the MVP Order.³ On review, the Court of Appeals found the Commission’s decision arbitrary with regard to it “prohibit[ing] MISO from charging anything for exports of energy to PJM enabled by the multi-value projects while permitting [MISO] to charge for exports of energy to all the other RTOs.”⁴

¹ At the time of the filing, MISO was the Midwest Independent Transmission System Operator.

² *Midwest Indep. Transmission Sys. Operator, Inc.*, 133 FERC ¶ 61,221 (2010) (MVP Order) at P 440 (citing July 23, 2003, Order, 104 FERC ¶ 61,105 at P 35), *order on reh’g and compliance filing*, 137 FERC ¶ 61,074 (2011) (MVP Rehearing Order).

³ MVP Rehearing Order.

⁴ *Illinois Commerce Commission v. FERC*, 721 F3d 764, 778-780 (7th Cir. 2013), *cert. denied sub nom. Schuette v. FERC*, 134 S.Ct. 1277 (2014) and *cert. denied sub nom. Hoosier Rural Energy Co-op., Inc. v. FERC*, 134 S.Ct. 1278 (2014).

The Court vacated the Commission’s decision with regard to the exemption from charges for PJM for MISO MVP costs and on remand clarified that the Commission must “determine in light of current conditions what if any limitation on export pricing to PJM by MISO is justified”.⁵ In response, the Commission issued its January 22, 2015 Order in this docket echoing the Court’s requirement by asking that parties comment on, “... in light of current conditions, what if any limitation on export pricing to PJM for MVPs by MISO is justified.”⁶

Accordingly, the Organization of MISO States (OMS) submits these limited comments to voice support for long-standing Commission precedent that beneficiaries of transmission projects be allocated costs that are at least roughly commensurate with the benefits that are expected to accrue.⁷ Limitations on export costs to PJM should be in line with this principle and be bound by the extent of the benefits provided to the payer absent the existence of a specific, time-limited agreement between parties.⁸

The wide range of MVP project benefits were well articulated in the section of the Commission’s MVP Order approving export charges to entities other than PJM, noting they would “improve system reliability, reduce congestion, satisfy documented energy policy mandates or laws, and enhance market efficiency, which would benefit all users of the integrated transmission system, regardless of whether the ultimate point of delivery is to an internal or external load.”⁹ PJM is receiving the same type of benefits from MVP facilities that other

⁵ *Id.* at 780.

⁶ *MISO*, 150 FERC ¶ 61,026 (Jan. 22, 2015) at P 11.

⁷ *Illinois Commerce Commission*, 576 F.3d at 476-77 (citing *Midwest ISO Transmission Owners*, 373 F.3d at 1369; *Sithe*, 285 F.3d, at 5).

⁸ The Entergy utilities in the MISO South region negotiated, as part of their MISO membership, a 5-year transition period during which MVP project costs from the North and Central regions would not be allocated. This is a very specific, time-limited provision that can be distinguished from the Commission’s decision directed at PJM. OMS does not advocate altering that agreement in any way.

⁹ MVP Order, P 439.

external entities do for which the Commission approved cost sharing and therefore, under the Commission's cost allocation precedents, should pay for those benefits.¹⁰

In its Request for Rehearing, the OMS explained that the Commission was endorsing free ridership by failing to allocate MVP costs to PJM members, and noted that, "Such an outcome is discriminatory and not conducive to just and reasonable rates."¹¹ This premise was based largely on the increasing demand for renewable energy in PJM driven by state and local public policies. With the MVP projects, abundant renewable energy resources in MISO would be deliverable across a much wider geographic area than would be possible without the MVPs, allowing entities outside of MISO to meet those policy requirements more efficiently. These benefits will continue to grow as reserve margins decrease with implementation of carbon-reduction policies and the changing energy mix. As such, any limitation on export pricing to PJM in this matter would be inconsistent with OMS' prior position to this Commission. In summary, "While imposing MVP costs on non-beneficiaries would be unreasonable, it is just as unreasonable to allow direct beneficiaries of MVPs to free-ride based on a prior Commission decision."¹²

Conclusion

The OMS members have diverse interests across a wide geographic area but have come together in these comments to support a policy consistent with that which it has presented to the Commission and that is the core of cost allocation guidance in the country. Costs for transmission projects should be allocated in a manner that is roughly commensurate with the benefits received.

¹⁰ The OMS is not urging any modification to the Commission's policy eliminating pancaking of the categories of baseline reliability and market efficiency projects, whose benefits are largely local or regional in reach. Rather, the Commission's consideration should address only the matter of limitation on MVP charges directed by the Court.

¹¹ OMS Rehearing pg. 7.

¹² *Id.*

The OMS submits this pleading because the following members, which represent a majority, generally support the contents:

Arkansas Public Service Commission
Iowa Utilities Board
Kentucky Public Service Commission
Michigan Public Service Commission
Minnesota Public Utilities Commission
Mississippi Public Service Commission
Missouri Public Service Commission
Montana Public Service Commission
City of New Orleans
North Dakota Public Service Commission
South Dakota Public Utilities Commission
Public Utility Commission of Texas
Wisconsin Public Service Commission

The Louisiana Public Service Commission, Manitoba Public Utilities Board and City of New Orleans abstained. The Illinois Commerce Commission does not support these comments.

Respectfully Submitted,

Tanya Paslawski

Tanya Paslawski
Deputy Executive Director
Organization of MISO States
E-mail: tanya@misostates.org
Tel: 515-243-0742

Dated: April 22, 2015

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Carmel, Indiana, on this 22nd day of April, 2015.

Tanya Paslawski



Organization of MISO States

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Des Moines, Iowa 50309

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Fax: 515-243-0746
www.misostates.org

April 24, 2015

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

RE: Docket No ER10-1791-003

Dear Ms. Bose:

After the OMS filed Comments in this docket on April 22, 2015, the Michigan PSC, an OMS member, requested additional clarification of its position in this docket. That clarification is included as footnote 13 on the attached revised page 4 of the pleading.

Please replace page 4 of the filing with the revised page 4 which is attached.

Very truly yours,

William H. Smith, Jr.

William H. Smith, Jr.
Executive Director
Organization of MISO States
100 Court Avenue – Suite 315
Des Moines, IA 50309

Attachment – corrected page 4

The OMS submits this pleading because the following members, which represent a majority, generally support the contents:

Arkansas Public Service Commission
Iowa Utilities Board
Kentucky Public Service Commission
Michigan Public Service Commission¹³
Minnesota Public Utilities Commission
Mississippi Public Service Commission
Missouri Public Service Commission
Montana Public Service Commission
City of New Orleans
North Dakota Public Service Commission
South Dakota Public Utilities Commission
Public Utility Commission of Texas
Wisconsin Public Service Commission

The Louisiana Public Service Commission, Manitoba Public Utilities Board and City of New Orleans abstained. The Illinois Commerce Commission does not support these comments.

Respectfully Submitted,

Tanya Paslawski

Tanya Paslawski
Deputy Executive Director
Organization of MISO States
E-mail: tanya@misostates.org
Tel: 515-243-0742

Dated: April 22, 2015

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Carmel, Indiana, on this 22nd day of April, 2015.

Tanya Paslawski

¹³ Notwithstanding the Michigan Public Service Commission's objection to the existing MVP methodology, it recognizes the US Court of Appeals' finding that all beneficiaries, including users in PJM, must shoulder a reasonable portion of MVP costs.