Organization of MISO States

# ORGANIZATION OF MISO STATES, INC.
## Board of Directors Meeting
## Conference Call Minutes
## July 14, 2016

**Approved August 18, 2016**

Sally Talberg, President of the Organization of MISO States, Inc. (OMS), called the July 14, 2016 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:

Ted Thomas, Arkansas
Sherina Maye Edwards, Illinois
Angela Weber, Indiana
Libby Jacobs, Iowa
Noel Darce, proxy for Eric Skrmetta, Louisiana
Regis Gosselin, Manitoba
Sally Talberg, Michigan
Matt Schuerger, Minnesota
David Carr, proxy for Brandon Presley, Mississippi
Adam McKinnie, proxy for Daniel Hall, Missouri
Kirk Bushman, Montana
David Shaffer, proxy for Jason R. Williams, City of New Orleans
Jerry Lein, proxy for Brian Kalk, North Dakota
Greg Rislov, proxy for Gary Hanson, South Dakota
Ken Anderson, Texas
Mike Huebsch, Wisconsin

Absent
Kentucky

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

Others on the call
Chris Miller – FERC
OMS staff and various staff participants from individual state commissions

**Approval of Minutes from the June 16, 2016 Board Minutes**

The minutes were accepted as amended.

**Approval of Minutes from the June 20, 2016 Board Minutes**

The minutes were accepted.

**Treasurer's Report**

The June 2016 treasurer's report was accepted as submitted.

**Review of the June 30, 2016 Executive Committee Meeting**

Chair Talberg highlighted the following:

- Seams Policy next steps
- Status of OMS process document
- MISO RA survey

**Executive Director's Report**

Tanya Paslawski provided a written report and highlighted the following:

- ROE docket information which is included in her written report;
- FERC order on remand issued July 13, 2016 applying MVP charges to PJM exports prospectively;
- Fall Seminar will be November 9-10, 2016 in Carmel. More information to come and members invited to give input on subject matter. Suggestion made to send a meeting invitation to members so they can save the date.

## BUSINESS

**1. FERC Update**

Patrick Clarey provided the FERC update for July. He highlighted the following:

- Commented additionally on the FERC Order on Remand issued July 13th. MISO has 30 days to make to make a compliance filing to charge MVP costs going forward;
- Thank you to OMS and Commissioner Weber on participation in Order 1000 Technical Conference.

**2. EISPC Update**

Jan Brinch was unable to attend the meeting.

**3. MISO Advisory Committee**

Commissioner Angela Weber provided this report on the Advisory Committee Meeting on June 22, 2016.

- John Bear assured sector reps that they would be able to provide feedback on CRS proposal before it was filed;
- AC priorities were presented to stakeholders and now the parent entities will try to establish priorities aligned with what was adopted by the AC.
- The September Hot Topic is Resource Adequacy, which was moved from June. The questions are the same so the Resources already has draft comments underway.
- MISO Nominating Committee met in Dallas to discuss the three open positions to be filled in December. Ten candidates were selected to interview in Chicago in August and from there 2 candidates per position will be taken to MISO board.
- Chair Talberg asked about the AC's role in the CRS proposal. Angela Weber commented that their role wasn't defined. Written comments can be provided by sector reps by July 26th.

**3. MISO Planning Advisory Committee**

Ted Thomas gave the report on the PAC and discussed the following:

- The PAC has not met since last meeting
- MTEP '17 Futures weighting ballot was posted with just slight modifications to MISO's proposal.

**5. Discussion Item: OMS Process document**

The draft document was provided in the board packet. Janet Wheeler gave an overview of some of the highlights of the document as well as challenges that the group was facing. She pointed out that some of the issues covered in the draft are email voting, role of the Executive Director, time concerns and deadlines. She then opened the floor for comments and questions.

Several board members commented in support of definitive timelines and also commented on concerns about the language in the document with regard to the role of the ED and to the presentation of alternative viewpoints. After a robust discussion, Sally Talberg pointed out that there is additional work to do on this document. She suggested that EC take this moving forward and have something ready to present something to the board at the next meeting in August. No one opposed.

**5. Discussion Item: OMS Seams Policy draft**

Sally Talberg noted that the subject is fairly complex but the policy is meant to be high level to help staff understand OMS priorities on key issues. She mentioned that the document was not at the point to present a specific proposal to the board at this time.

Adam McKinnie, Seams work group co-chair, gave a brief overview on how the process has been going and the working groups goals moving forward. The work group intends to have something to present to the Executive Committee at the August 4th meeting and then hopes to have something further to present to the Board at the meeting on EC on August 18th.

**6. Discussion Item: OMS 2017 Budget draft**

Tanya Paslawski gave a brief overview of the process and named a few line items that are going to be re-worked after hearing from several members prior to the meeting. The Governance & Budget work group will be meeting to discuss the next draft and hope to have the budget ready for recommendation to the Board at the August 18th meeting.

Mike Huebsch requested clarification on the contingency reserve column. Tanya explained that MISO asked OMS to define things that are not certain and put those items in the contingency column. Those items that are certain are what MISO bases our monthly remittance amount on. Commissioner Huebsch also requested that the OMS staff give more explanation in some line items where it may be unclear to the board members.

Sally Talberg recommended a memo explaining overall trends year over year, large ticket items of note, and line items with significant increases or decreases be included at the August board meeting.

**7. Update: Return on Equity**

Tanya Paslawski referred to her Executive Director report and a document provided comparing the major components between both ROE decisions. The ROE Ad Hoc work group met and expect a document from the OMS attorneys next week. The expectation is that FERC will be making a decision on this in the fall of 2016.

**8. Update: 2016 OMS Annual Meeting panel survey**

Sally Talberg explained that an informal survey will be distributed via email to OMS members regarding panel discussion ideas and candidates for speaking roles at the Annual Meeting.

**9. Action Item: Competitive Retail Solution Proposal**

Marcus Hawkins informed the board that MISO AC leadership requested a two page response to their proposal from each sector due July 26th. The Resource work group is looking for guidance

from board regarding OMS' response. A written document was provided in board packet with initial items to include in response. Marcus opened the floor to comments or questions. Tanya pointed out that because this request came from the AC, OMS comments will have to be board level comments. After a brief discussion, Sally mentioned that the comments would be submitted via email for board vote sometime next week.

**10. Open Mic:**

There were no open mic comments.

**11. Closed Session**

Following the open meeting which ended around 3:10 p.m. (CT), the OMS Board moved to closed session at approximately 3:15 p.m. (CT) to discuss the next item. The following board members or their proxies participated in the meeting:

Ted Thomas, Arkansas
Sherina Maye Edwards, Illinois
Angela Weber, Indiana
Libby Jacobs, Iowa
Noel Darcy, proxy for Eric Skrmetta, Louisiana
Regis Gosselin, Manitoba
Sally Talberg, Michigan
Matt Schuerger, Minnesota
David Carr, proxy for Brandon Presley, Mississippi
Adam McKinnie, Missouri
Kirk Bushman, Montana
David Shaffer, proxy for Jason R. Williams, City of New Orleans
Jerry Lein, proxy for Brian Kalk, North Dakota
Greg Rislov, proxy for Gary Hanson, South Dakota
Ken Anderson, Texas
Mike Huebsch, Wisconsin

Absent
Kentucky

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

**Discussion of ER16-1969 Protest**

David Shaffer gave a brief verbal overview of the filing and recommended that OMS file comments in support of the protest.

After a robust discussion a motion was made by Noel Darce for OMS to file late comments stating that OMS supports the previous comments that were filed. David Carr seconded that motion.

Before vote, Tanya Paslawski recommended that OMS reframe the comments in such a way that they refer to language in original compliance filing. Noel Darce referred to that as a substitute motion.

**A friendly amendment to the original motion was made by Noel Darce to refer to the language in the original compliance filing and David Carr seconded that motion.**

**The voting results were as follows:**
**11 yes votes, 2 abstentions, 3 states absent the vote**

Tanya Paslawski agreed to compose the document and circulate it to the board before filing at FERC.

**ADJOURNMENT**

The meeting of the OMS Board of Directors meeting adjourned at approximately 3:55 p.m. (CST).

100 Court Avenue
Suite 315
Des Moines, IA 50309

OMS
Organization of MISO States

**REVISED**

The Organization of MISO States Board of Directors will hold its monthly meeting via conference call Thursday, July 14, 2016 at 1:00 pm (Central).

- The call in numbers are US Toll Free 1-800-882-3610; Canada Toll Free 1-866-605-3851 and the conference code is 7121015 for both lines. All callers will be automatically muted and must push 60# to unmute/61# to mute again.
- 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 – Chairman Sally Talberg 1:00
- Attendance, Recognition of Proxies, Declaration of a Quorum – Commissioner Kirk Bushman
- Approval of Minutes from the June 16th and 20th, 2016 Board meetings – Chairman Sally Talberg
- Treasurer's Report/OMS Budget to Actuals for June 2016 – Commissioner Ken Anderson
- Review of Executive Committee meeting on June 30, 2016 – Chairman Sally Talberg

## Administrative Update

1. Report from the Executive Director – Tanya Paslawski 1:05
   - Fall Seminar dates November 9-10, 2016 in Carmel, IN

## Business

1. FERC Update – Patrick Clarey or Chris Miller 1:10
2. EISPC Update – Jan Brinch 1:20
3. MISO Advisory Committee – Angela Weber 1:25
4. Planning Advisory Committee – Ted Thomas 1:30
5. Discussion Item: OMS Process document – Janet Wheeler 1:35
6. Discussion Item: OMS Seams Policy draft – Sally Talberg 1:50
7. Discussion Item: OMS 2017 Budget draft – Tanya Paslawski 2:05
8. Update: ROE – Tanya Paslawski 2:10
9. Update: 2016 OMS Annual Meeting panel survey – Tanya Paslawski 2:15
10. Action Item: Competitive Retail Solution Proposal – Marcus Hawkins/Bonnie Janssen 2:20
11. Open Mic – membership comment opportunity 2:30

## Announcements

- Next OMS Executive Committee meeting: Thursday, August 4, 2016 at 1:00 pm CT
- Next regular OMS Board of Directors meeting: Thursday, August 18, 2016 at 1:00 pm CT

## Adjourn Open Session 2:30

Call Closes Session to Order – Chairman Sally Talberg 2:30
1. CLOSED SESSION: ER16-1969 Protest – David Shaffer 2:30

## Adjourn Closed Session 2:45

# *OMS*

## Organization of MISO States
**Report of the Treasurer**
**Commissioner Ken Anderson, Public Utility Commission of Texas**
**to the Board of Directors**
*Report for June 2016*

## CASH ON HAND

The beginning book balance for the Chase Bank One Checking account on June 1 was $57,614.01. The total disbursements from the checking account for June 2016 amounted to $78,725.16. Deposits, interest and adjustments were $96,624.73 which includes MISO funding of $96,624.05.

As of June 30, 2016, the Chase Bank One checking account balance was $77,556.28 (with 7 check payments outstanding) and the book balance was $75,513.58.

# OMS

## OMS Treasurer Report for Month of June 2016

**Chase Bank One Checking Account**

| | | |
|---|---|---|
| Beginning Book Balance | 57,614.01 | |
| Total Disbursements | (78,725.16) | |
| Deposits/Interest/Adjustments | 96,624.73 | |
| Ending Book Balance | | **75,513.58** |
| Ending Bank Balance | 77,556.28 | |
| Outstanding Checks and Deposits | (2,042.70) | |
| **Checking Account Book Balance as of June 30,2016** | | **75,513.58** |

7 checks outstanding at 6/30/2016

| | | Budget | 2016 YTD Actuals | % of Budget YTD | |
|---|---|---|---|---|---|
| | **INCOME** | | | | ***Budget Category Explanations*** |
| 1 | MISO Grant | $ 1,155,888.61 | $ 579,744.30 | 50% | *Monthly remittance from MISO* |
| 2 | Interest - Checking Account and Savings | $ - | $ 5.37 | | *Interest paid on Chase Checking Account and Wells* |
| 4 | Miscellaneous Revenue | $ - | $ 1,655.32 | | *Misc. revenue (VISA Rebates, EGEAS Grant, Travel* |
| | **TOTAL INCOME** | $ 1,155,888.61 | $ 581,404.99 | 50% | |
| | **Monthly Allotment** | $ 96,324.05 | | | |
| | **EXPENSES** | | | | |
| | **Personnel Compensation & Benefits** | | | | *Includes: salary & taxes, 401(k) match, bar dues, etc…* |
| 5 | Compensation - Director Emeritus | $ 15,000.00 | $ 6,418.23 | 43% | *Bill Smith* |
| 5b | Compensation - Executive Director | $ 140,079.24 | $ 70,686.30 | 50% | *Tanya Paslawski* |
| 6 | Compensation - Director Member Svcs | $ 103,287.00 | $ 44,311.45 | 43% | *Talina Mathews* |
| 7 | Compensation - Office Manager | $ 81,242.52 | $ 40,657.92 | 50% | *Colleen Dougherty* |
| 8 | Compensation - PT Office Assistant | $ 21,154.85 | $ 6,435.34 | 30% | *Amy Schmelzer* |
| 9 | Compensation - Health Benefits | $ 36,000.00 | $ 4,466.93 | 12% | |
| | **Total Personnel Compensation & Benefits** | $ 360,763.61 | $ 172,976.17 | 48% | |
| | **Other Personnel Expenses** | | | | |
| 10 | Staff Training | $ 2,000.00 | $ 6,520.00 | 326% | *Training materials & seminars. Vendors include: New Horizon, Fred Pryor, Intuit)* |
| 11 | Monthly Payroll & 401(K) Fees *Includes WC Insurance | $ 8,525.00 | $ 3,392.81 | 40% | *Payroll & 401(k) processing. Vendors: Merit Resources* |
| | **Total Other Personnel Expenses** | $ 10,525.00 | $ 9,912.81 | 94% | |
| | **Office Expenses** | | | | |
| 12 | Computers | $ 5,000.00 | $ - | 0% | *OMS Computers, software (programs, licenses &* |
| | *Hardware, software & peripharies* | | | | *upgrades), monitors, firewall, desktop printers, etc.* |
| 13 | Computer Support | $ 8,000.00 | $ 3,853.10 | 48% | |
| | *outside maintenance, spam filtering, anti-virus updates, etc* | | | | *Outside computer support (block time), spam filtering & anti-virus subscriptions, etc. Vendor: CST* |
| | | | | | ***Budget Category Explanations*** |
| 14 | Websites | $ 8,520.00 | $ 632.49 | 7% | *Website domain fees & hosting costs. Outside support* |
| | *misostates.org & OMS Sharepoint site hosting, support, licenses, & domain fees* | | | | *for misostates.org & OMS Sharepoint site. Vendors: DSM, Thor Projects, Microsoft, GoDaddy* |
| 15 | EGEAS software & licenses | $ 225,000.00 | $ 65,600.00 | 29% | *EGEAS software costs. Vendors: Ventyx & NG Planning. T* |
| 16 | Employee Cell Phone Reimbursement | $ 1,800.00 | $ 850.00 | 47% | *$50/month reimbursements to ED, DED & OM &* |
| 17 | Furniture/Office Equipment | $ 2,000.00 | $ 971.94 | 49% | *Deprecable office furniture & equipment. Vendors:* |
| 18 | Rent, Parking & Office Operating Expenses | $ 24,000.00 | $ 12,371.46 | 52% | *Office rent, parking & operating expenses. Vendor: 100* |
| 19 | Postage, shipping & delivery | $ 500.00 | $ 393.46 | 79% | *Vendors: USPS, FedEx, King Delivery* |
| 20 | Printing & copying | $ 1,500.00 | $ 298.90 | 20% | *Includes: monthly copier contract & toner for desktop* |
| 21 | Supplies | $ 3,600.00 | $ 838.84 | 23% | *Consumable office supplies. Vendor: Triplett & Crystal* |
| 22 | Phone, Fax & Internet | $ 7,200.00 | $ 3,378.83 | 47% | *Office phone & internet & ipad wifi. Vendors: Enventis,* |
| 23 | Miscellaneous Office Expenses | $ 1,500.00 | $ 78.63 | 5% | *Any other office expenses* |
| | **Total Office Expenses** | $ 288,620.00 | $ 89,267.65 | 31% | |
| | **Membership/Program Support Expenses** | | | | |

| | | | | | |
|---|---|---|---|---|---|
| 24 | Teleconferencing | $ 7,700.00 | $ 4,562.94 | 59% | *Telephone & web conference costs. Vendors: Intercall,* |
| 25 | Membership Subscriptions | $ 75,980.00 | $ 21,875.00 | 29% | *Publication subscriptions for OMS members. Vendors:* |
| 26 | Program Legal | $ 100,000.00 | $ 117,564.60 | 118% | *Legal expenses* ***on behalf of OMS membership.*** |
| 27 | Program Professional | $ - | $ - | | *Other professional (consulting) expenses incurred* ***on*** |
| | **Total Membership/Program Support Expenses** | $ 183,680.00 | $ 144,002.54 | 78% | |
| | **Organizational (Corp) Expenses** | | | | ***Budget Category Explanations*** |
| 28 | Accounting, Audit & Tax | $ 6,000.00 | $ 1,842.50 | 31% | *Vendor: Ryun, Givens* |
| 29 | Corporation | $ 200.00 | $ 157.14 | 79% | *Costs associated with the business existence of OMS.* |
| | *registered agent, secretary of state, etc* | | | | *Vendors: The Company Corporation, Indiana Secretary* |
| 30 | OMS Legal | $ - | | | *Potential legal expenses incurred* ***on behalf of the*** |
| 31 | OMS Professional | $ - | | | *Other professional (consulting) expenses incurred* ***on*** |
| | **Total Organizational (Corp) Expenses** | $ 6,200.00 | $ 1,999.64 | 32% | |
| | **Insurance Expenses** | | | | |
| 32 | Directors & Officers | $ 2,500.00 | $ 4,155.00 | 166% | *Vendor: The Novick Group* |
| 33 | General Office + Umbrella | $ 1,800.00 | $ 1,745.00 | 97% | *Includes: General office, auto, crime & umbrella* |
| 34 | Workers Comp | $ 1,800.00 | | 0% | *Vendor: Liberty Mutual* |
| | **Total Insurance Expenses** | $ 6,100.00 | $ 5,900.00 | 97% | |
| | **Travel Expenses** | | | | *Travel expenses are regardless of meeting type or* |
| 35 | Consumer Advocate | $ 30,000.00 | $ 6,516.16 | 22% | *All travel expenses related to Consumer Advcoates* |
| 36 | Member | $ 150,000.00 | $ 77,732.80 | 52% | *All travel expenses related to OMS member travel* |
| 37 | OMS Staff | $ 75,000.00 | $ 13,782.75 | 18% | *All travel expenses related to OMS staff travel* |
| | **Total Travel Expenses** | $ 255,000.00 | $ 98,031.71 | 38% | |
| | **Meeting Expenses** | | | | ***Budget Category Explanations*** |
| 38 | Annual Meeting | $ 20,000.00 | $ 1,500.00 | 8% | *Expenses related to the OMS Annual Meeting.* |
| 39 | Other Meetings (includes Grid School Tuition/Travel) | $ 25,000.00 | $ 4,040.79 | 16% | *Expenses related to any other OMS meeting. Includes:* |
| | **Total Meeting Expenses** | $ 45,000.00 | $ 5,540.79 | 12% | |
| | **TOTAL INCOME** | **$ 1,155,888.61** | **$ 581,404.99** | **50%** | |
| 40 | **TOTAL EXPENSES** | **$ 1,155,888.61** | **$ 527,631.31** | **46%** | |
| 41 | **INCOME-EXPENSES** | **$ -** | **$ 53,773.68** | | |
| 42 | **CASH FLOW RESERVE SAVINGS** | | | | |
| 43 | **RESERVE SAVINGS** | | | | |

State Regulatory Sector Response to MISO Board of Directors
MISO Competitive Retail Solution
July 26, 2016

## Executive Summary

The State Regulatory Sector, which constitutes the members of the Organization of MISO States (OMS), have focused on four major criteria for the Competitive Retail Solution (CRS) since the first stakeholder meeting on this subject on January 15, 2016, namely: (1) maintaining state jurisdiction[1] over resource adequacy decisions, (2) assessing the impacts to non-retail choice areas, (3) ensuring adequate analysis and information is available to make an informed decision, and (4) ensuring system reliability is maintained. Without additional analysis, the OMS cannot assess whether MISO's final CRS proposal meets these fundamental criteria. The implementation of such a significant change in market design requires meaningful opportunity for a thorough understanding of the details, which does not seem feasible under the timeline provided. Accordingly, the OMS cannot support the filing of MISO's CRS proposal at this time.

As requested by the Advisory Committee leadership, the comments below provide the OMS positon on MISO's final CRS proposal and highlight the concerns OMS and its members have raised throughout the stakeholder process. The conclusion that OMS does not support filing the CRS at this time does not imply that OMS supports the IMM's prompt-hybrid proposal. OMS has significant concerns with the IMM Proposal, and if MISO were to decide to abandon the forward proposal in favor of the prompt-hybrid, OMS and stakeholders must be given an opportunity to review and comment specifically on that proposal.

## Comments

The OMS[2] appreciates the opportunity to provide feedback to the MISO Board of Directors related to the proposed CRS. First and foremost, the MISO Board should consider any proposal ultimately adopted to address the scenario in Illinois and part of Michigan as unique and not applicable to the rest of the MISO states. If an acceptable proposal is implemented to address this unique local issue, it must not become a template to change MISO's existing PRA approach or any other aspect of the existing resource adequacy construct as such actions could undermine state jurisdictional authority. By way of example, the rest of MISO does not require a downward sloping demand curve or the minimum offer price rule approach that would likely follow.

Regarding these current proposal, because capacity planning is inherently the role of retail regulators in fully regulated jurisdictions, which is 91% of the MISO footprint, the OMS members expressed concerns about infringement on that authority and the potential impact on the planning processes utilized by regulators to maintain resource adequacy. OMS appreciates that MISO removed the opt-in provision (that would have allowed non-retail choice loads to become included in the CRS proposal) as advocated by OMS. Yet, a concern related to the Safe

[1] For purposes of this response, references to "state jurisdiction," "state" or "states" shall also include the Council of the City of New Orleans.

[2] These comments are provided on behalf of OMS because a majority of members are in support. The Indiana Utility Regulatory Commission does not join these comments. The Illinois Commerce Commission and Manitoba Public Utilities Board abstain.

Harbor provision (that determines what amount of regulated generation can be withheld from offering into the CRS proposal) remains. It is still not clear how this provision will be implemented and it is imperative that vertically integrated entities have unobstructed access to their generation assets, even if those assets are located in a zone with competitive retail loads. Decisions about what amount of generation is appropriate to offer into a forward market should be left to the utilities and their regulators.

Similarly, it is important that the CRS's impact on non-retail choice areas be analyzed and well understood. OMS does not believe sufficient data has been provided in this regard. One of two requests OMS made via the official CRS feedback process on April 25, 2016 was for analysis of the potential impacts of the proposal on non-retail choice areas, which would include how a forward auction (or any solution) would be integrated into the existing Planning Resource Auction ("PRA"). The other request was for data that illustrates the resource adequacy concern for retail choice areas beyond the antidotal justifications that had been provided up to that point. OMS members requested this information to help inform their decision on what a final proposal should look like. Though some data was ultimately provided on July 14, 2016, concurrent with MISO's announcement of the proposal it plans to file, the timing negates that point of the request.

As with any change to MISO markets, OMS is focused on potential impacts the CRS will have on system reliability. Based on OMS's understanding, the ultimate purpose of the CRS is to ensure long-term resource adequacy in retail choice states without state resource planning requirements. Yet an assessment of reliability was only recently completed and OMS was surprised to see that none of the proposals that were analyzed by the Brattle Group were able to meet reliability requirements.[3] Ensuring that a final proposal is capable of supporting a healthy bilateral market and attracting sufficient levels of merchant generation is critical. All stakeholders would benefit from additional analysis focused on this objective given the inherent complexity of a bifurcated or dual market structure for retail or non-retail choice areas of MISO's footprint.

Finally, the proposed tariff language and draft business rules, which constitute over 100 pages, were just released July 20th. Sufficient time must be provided for review to ensure that stakeholders understand and can provide feedback on the details of the implementation of this plan. Moving forward without the opportunity for meaningful input will be harmful to the ultimate success of the proposal.

OMS is not opposed to revising the market design to address concerns in retail choice jurisdictions but there is a significant risk of unintended consequences if MISO does not provide additional time to vet the concepts and refine the final tariff and business rule language. Putting forward a redesign that is not adequately vetted is unacceptable to OMS. Therefore, the MISO CRS proposal should not be filed at this time.

[3] *See* MISO RASC Presentation July 14, 2016, slides 7-9.