

Introduction

The Regional State Committees of the MISO and SPP regions (OMS and SPP RSC) have established a collaborative framework to analyze issues along the RTO seams and identify potential solutions. The Commissioner-led initiative seeks to increase benefits to ratepayers of RTO participation, ensure proper interregional planning processes are in place, and support RTO efforts to improve resource interconnection. The effort is led by four Commissioners from each region known as the “Liaison Committee” with the support from the OMS and SPP RSC boards of directors.

At the request of the Liaison Committee, MISO and SPP prepared a whitepaper summarizing the history of important seams issues, their current status, and ongoing efforts to make improvements. The paper also highlighted several areas of philosophical differences and outstanding disagreement. A copy of the whitepaper can be found on the SPP RSC website at: <https://www.spp.org/organizational-groups/regional-state-committee/spp-rscoms-liaison-committee/> or the OMS website at: http://misostates.org/images/stories/Filings/SPP_RSC_Documents/SPP-MISO-RSC-OMS-Response_SPP_MISO-FINAL-on-website-Nov13.pdf.

The Liaison Committee now seeks input from a wider group of stakeholders. Interested stakeholders are asked to provide their reaction to the whitepaper, responses to the specific questions listed below, and any additional information they believe would be helpful for the Liaison Committee to consider. Wherever possible, please try to quantify the economic impact of issues. **Please direct written responses and questions to Adam McKinnie at adam.mckinnie@psc.mo.gov by January 10th. Responses are limited to 5 pages in length.**

Questions

1. What do you believe to be the single most important/impactful seams issue and what barriers are preventing resolution? If applicable, include two to four additional priority items the regulators should focus on.

Ameren believes that there are more than one barrier preventing resolution for optimal seams operation.

We see the following barriers:

- The MISO SPP Joint Parties Settlement and Contract Path Capacity Sharing Agreement
- The interregional process itself is a barrier. The issues are:
 - Currently, each regions' process doesn't really capture Market to Market issues (i.e. – historical congestion).
 - Differences in each regions' process in evaluating benefits of a project.
 - Additional benefit metrics (such as capacity) aren't contemplated
- Differences in individual State regulations vary.
 - Streamlining approval processes for siting and building are potential areas of improvement.
- The limited use of benefit metrics
- Differences in cost allocation

The new recommendations from the MISO-SPP IPSAC are potentially good incremental steps. However, Ameren believes that a continued focus on incremental changes prevents an optimal solution. Ameren considers that taking a step back and looking at a holistic approach to the interregional process may result a more robust interregional process.

2. How should the RTOs weigh the benefits of more efficient seams operation against focusing on maximizing intra-RTO efficiencies and operation?

Ultimately, efficient RTO operations encompass both intra- and interregional operations. Ameren does not see them as mutually exclusive goals and advocates that efforts should focus on equally efficient operations.

3. What areas of the whitepaper do you agree and disagree with? Why?

Ameren views the whitepaper as a good compilation of the history of the MISO-SPP interregional process but it does not appear to advocate for positions to agree or disagree with. The whitepaper does an excellent job of explaining how we arrived at today's interregional operations and Ameren views the whitepaper as a good tool to reference as we strive for improvement.

4. Are there seams issues that you believe were left out?

As indicated in our response to question 1, we believe there are additional barriers and issues that require further discussion. In addition, the composition (or lack thereof) of the MISO-SPP seam is another issue that needs to be addressed. The seam itself is actually made up of additional parties, other than just MISO and SPP. (Please refer to the MISO-SPP Seams Overview on Page 3 of the whitepaper). The seam is made up of multiple parties that 'fill the hole' between the two RTOs. As indicated by the MISO-SPP Joint Parties Settlement, any interregional process should consider the impacts to and from additional parties. To create a robust interregional process that promotes the development of interregional solutions that will provide the ultimate benefits, a more holistic approach involving all impacted parties is required.

5. What seams issue(s) require additional analysis and study prior to solution identification? What should the goal of such an analysis/study be and what metrics or other measurable information should it include?

As indicated in our previous responses, any analysis and study should incorporate a more holistic approach to develop the best solutions. We also advocate for the review of additional benefits, similar to what was used for the Multi-Value Project process, which quantifies more efficient operations along the seam (increased capacity, utilization of renewable generation, increased contract path, etc.) while ensuring that cost allocation methods are designed to ensure that the costs are borne by those who benefit.