

GDS - Comments provided at the end of each question. We do not have any comments for question 5.

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. **Comments:** Most aspects of SPP-MISO coordination are working, even in imperfectly. One aspect that is clearly not working is the development of seams projects in the planning process. This process should be fixed first since improving transmission access between the RTO's will help alleviate ongoing operational issues and increase the ability of MISO and SPP to assist each other during severe weather events.
2. How should the RTOs weigh the benefits of more efficient seams operation against focusing on maximizing intra-RTO efficiencies and operation? **Comments:** Seams operation needs to be a fundamental part of the intra-RTO operations rather than a separate process. The RTO doesn't worry about focusing on inter-zonal versus intra-zonal efficiencies. If the seams are treated as part of the RTO, then the question should answer itself.
3. What areas of the whitepaper do you agree and disagree with? **Why?** **Comments:** Regarding "SPP Concerns with MISO Deliverability Analysis", SPP concerns should be limited to the extent that SPP feels the MISO deliverability analysis does not adequately consider the impact to the SPP system. Note too, that not all resource interconnect with the intent to acquire transmission service (e.g., resources interconnecting solely to bid into the market). MISO could require "completion of a transmission service capability analysis (transaction analysis) from specific resource to specific load" and still not be able to address SPP's concerns about parallel flow.
4. Are there seams issues that you believe were left out? **Comments:** There are a variety of similar processes in MISO and SPP (e.g., market registrations, EMS model updates) that have different windows for when changes may be submitted and different lead times for when those changes are permitted to become effective. These timing differences can make it very difficult for entities with facilities that require both SPP and MISO updates to meet all the required deadlines without risking having assets sit idle multiple months simply because it wasn't possible to simultaneously meet both the SPP and MISO deadlines. If the RTO's had highly similar timelines; or the ability to accept, approve, and implement changes in very short order; then this issue could be mitigated.
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? **Comments:** None