OPPD - Omaha Public Power District

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.
   Single Most Important: Implementation of the current M2M Congestion Management process. Next: Modeling of MISO wind in west and northwestern Iowa and southwestern Minnesota does not capture times of high MISO wind output and subsequent North to South flows on the SPP system. The variability of MISO wind also causes South to North flows to be an issue when MISO wind is not producing.

2. How should the RTOs weigh the benefits of more efficient seams operation against focusing on maximizing intra-RTO efficiencies and operation?
   Efficient seams operation needs to be a higher priority for both MISO and SPP. The issues identified below have been known issues for some time and they continue to cause problems on the system.

3. What areas of the whitepaper do you agree and disagree with? Why?
   Being located directly in the middle of the SPP/MISO seam on the SPP side and owning multiple transmission interconnections between SPP and MISO, our system can be significantly impacted by MISO's market dispatch. This is illustrated by the fact that multiple transmission constraints have been designated as SPP/MISO market to market (M2M) flowgates. During real-time operations when transmission congestion is occurring in our area, we are concerned with the growing congestion on our M2M flowgates in addition to how the M2M congestion management process is being implemented in attempting to control flows on our flowgates. The M2M congestion management process is complicated by the fact that we as the SPP Transmission Owner own the constraint or flowgate but the MISO market can have a higher impact as far as controlling flow on the flowgate. The current M2M process has led to difficulty in SPP and MISO keeping these particular M2M flowages within their operating limits.

4. Are there seams issues that you believe were left out?
   Building upon our response from #3 above, in addition to the issues that the current SPP/MISO market to market (M2M) congestion management process has in attempting to control flows on our M2M flowgates during real-time operations, the levels of congestion have increased and there are currently no plans in either SPP's or MISO's regional expansion planning process to mitigate these top congested M2M flowgates. In past SPP/MISO Coordinated System Planning (CSP) studies OPPD has submitted the aforementioned M2M flowgates as Seams issues that should be further evaluated for potential mitigation. Almost all of OPPD's M2M flowgates have made the top 10 SPP/MISO M2M flowgate list as far as economic impact since the SPP/MISO M2M congestion management process went live, but these M2M flowgate issues have yet to elevate to a level where either the regional or interregional planning processes will address them and these items need to be addressed.

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?
   Modeling of MISO wind in west and northwestern Iowa and southwestern Minnesota does not capture times of high MISO wind output and subsequent North to South flows on the SPP system. Goal of the analysis would be to find an optimal long term solution to the transmission congestion in the area.