

Given the delay in the Annual Issue Review meeting to March 25, are you still accepting feedback from 3rd parties?

We would like PJM and MISO to reconcile the inconsistent study processes they use to study and accept Short-Term and Long-Term Firm PTP TSRs.

In my view, the existing transmission system is being extremely underutilized. Currently, very little Firm PTP service is reserved from PJM to MISO (~2.8 GW) relative to the Total Transfer Capability of the transmission system connecting the two RTOs (~27 GW) and relative to the peak energy flows that occur from PJM to MISO during recent emergencies (13 GW during WS Elliott).

The inconsistency in the study processes is partially responsible for the low volume of Firm PTP reservations. For example, recently PJM Oasis showed no ATC from PJM to AMIL for this coming Summer and >2.5 GW in the rest of the year, while MISO showed Availability in the Summer, but no ATC in September and October. As a result, no Firm PTP service could be secured for either period, limiting Firm PTP service in the Summer to an existing TSRs of 100 MW managed by 1 market participant on a transmission system that was designed to support over 3 GW of service.

The inconsistency in the study processes also contributes to the volatility in capacity prices recently experienced by both RTOs. For example, for the 2022-'23 Delivery Year, MISO North capacity cleared \$236.66/MW-day in the PRA, while PJM RTO capacity cleared \$19/MW-day in the 3rd IA just a few weeks prior. If the RTOs were not capable of firm interchanges then this sort of price difference between the pools might be understandable, but PJM and MISO are extremely well connected. Capacity price differences should be just as important as energy price differences for the IPSAC.

Firm PTP service enables capacity transactions between the ISOs. Artificial scarcity of firm transmission service prevents capacity transactions that would support reliability while allowing uneconomic and higher polluting resources to retire. Given the economic magnitude of retirement decisions, it is even more important to reconcile the study processes for Long-Term TSRs to ensure that the existing transmission system is utilized as reliably and efficiently as possible. I realize that LT TSRs are complicated by the current queue backlog and reform process, but I hope the IPSAC can be a forum for both RTOs to decide on a unified plan for utilizing the existing transmission system to achieve policy goals as efficiently as possible.

Given that we are still 30-days from the Annual Issue Review meeting, I was hoping we could still suggest issues for the Committee to consider. Is that true?

Thanks
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