NIPSCO appreciates that the RTOs are working to develop a generator retirement coordination process and provides the following redlines on the proposed JOA language that was presented at the October Planning Subcommittee (PSC) and Interregional Planning Stakeholder Advisory Committee (IPSAC) meetings. Stakeholders were asked to provide feedback by November 11, 2016.

NIPSCO previously submitted feedback on this topic from an earlier PSC request. Those comments were posted with the October PSC meeting materials and were reviewed by MISO. However, it appears some of our comments were left unaddressed and were pushed to other stakeholder forums. Specifically, PSC Item 06, Coordination of Generation Retirement Studies presentation, page 8: "MISO Response: Proposed JOA revisions include the consideration of external projects caused by retirements/deactivations along with other candidates for interregional coordination. JRPC has been involved in these changes and future improvements to the JOA process can be undertaken in the IPSAC". Also, page 9: "MISO Response: Examples of project approvals which demonstrate the process will be taken up for a future IPSAC meeting." As of date, no examples were ever produced and presented in the IPSAC to be used for discussion and development of the JOA improvements.

To that end, NIPSCO has concerns about the proposed language and provides the following clarifications and solutions to the: study process in 9.3.6, regional and adjacent system solution responsibilities in 9.3.6(c) and (d) respectively, review of such by the JRPC in 9.3.7.3, and transparency in 9.3.7.3(b). Should you have any questions on our comments or changes to the proposed JOA language, feel free to reach out to Shaun Moran or myself. You may post this feedback.

9.3.6 Analysis of Generator Deactivations (retirements and suspensions).
Studies required for a generation owner election to retire, deactivate, or mothball (or suspend operations as defined under the MISO Tariff) a generation unit or facility will be performed in accordance with the established procedures of each Party. Each Party will determine if any study is required to evaluate potential impacts to its system due to the proposed generator deactivation in other Party's system unless the other Party's deactivation study signals a potential impact to the Party's system which then warrants a study be conducted by the Party. The Parties will provide all information necessary to the other Party in order to allow evaluation of the impacts of the generator deactivation. Regional study results will be documented and provided to the adjacent Party for informational purposes only.

(a) The Parties will exchange current power flow modeling data as necessary for the study and coordination of generator deactivations (retirements and suspensions). This will include the associated update of the other Party's generator availability, contingency elements, monitoring elements data, and other data as may be required.

(b) The Parties shall coordinate to align the assumptions of any analyses during development of the scope of any required studies to the maximum extent possible. The scope design will include, as appropriate, evaluation of the transmission system against the criteria applicable to each Party for such studies.

(c) ~~Impact on the adjacent system identified in the analysis will not be used to determine the need to retain the generator under study for deactivation.~~ Each party will be responsible for any ~~network upgrades~~regional reinforcements required on their respective system as a result of their established tariff process for a generator deactivation (retirement or suspension) within the party's footprint. Additional coordination, as may be needed, will be conducted in accordance with provisions of Section 9.3.7.

(d) Impact on the adjacent system identified in the analysis will not be used to determine the need to retain the generator under study for deactivation. ~~Each party will be responsible for A~~any network upgrades required on ~~their respective system~~the adjacent party's system as a result of a generator deactivation (retirement or suspension) shall be classified as a Cross Border Baseline Reliability Project (CBBRP) and subject its respective cost allocation. (Note: The 'Party' for Pseudo Tie generation is the RTO that dispatches the resource.) Additional coordination, as may be needed, will be conducted in accordance with provisions of Section 9.3.7.

9.3.7.3

The identification of Network Upgrades required for generator deactivation (retirement or suspension) in the adjacent system may require coordination through the JRPC as permitted under the respective Tariff of each Party. The Parties will endeavor to make information available to the JRPC in a timely manner following the release of information through the normal regional processes. The Parties will provide all information necessary to the other Party in order to allow evaluation of the impact of the generator deactivation.

Following the exchange of information under this Section above, the Party in the region which does not contain the deactivating generation will conduct screening and evaluation of projects needed to mitigate identified impacts on its system. The Party will use reasonable efforts to perform an initial assessment and provide an indication of the impacts on its system to the other Party who received the deactivation request within 65 days of the receipt of the notification from the other Party. The Party will provide a list of potential system reinforcements necessary on its system and estimated time for completion of those system reinforcements to the other Party who received the deactivation request as soon as they are available. The JRPC will meet to review the individual regional reinforcements identified under the regional processes and the CBBRPs to mitigate impacts identified by the adjacent party. The JRPC will be responsible for evaluating the proposed projects for designation as a CBBRP. In addition, the JRPC will be responsible for evaluating an Interregional Project if the project qualifies pursuant to Section 9.4.4.1 where ~~or review to determine if~~ a proposed~~n~~ Interregional Project may be more effective or efficient.

(a) Transmission upgrades identified through the analyses conducted according to this Protocol and satisfying the applicable Protocol and regional planning requirements will be included in any subsequent Coordinated System Plan after the conclusion of the deactivation study. Any project identified in the deactivation (retirement or suspension) study, if not already engaged in the regional review process, will be submitted to the regional processes for review according to Section 9.3.7.2.b (x).

(b) The JRPC shall review the results of studies performed by each Party, as per the respective regional process, and ~~may~~ shall share the study results with the IPSAC for informational review to the extent that the release of the study results does not violate any confidentiality provisions of the Parties Tariff's.

(c) The JRPC's recommended CBBRPs or Interregional Projects identified in the deactivation (retirement or suspension) study shall be reviewed by each Party through its respective regional processes. Transmission plans to resolve problems will be identified, included in the respective plans of the Parties and will be presented to the respective Parties' Boards for approval and implementation using each Party's procedures for approval. Critical upgrades for which the need to begin development is urgent will be reviewed by each Party in accordance with their procedures and presented to the Parties' Boards for approval as soon as possible after identification through the coordinated planning process. Other projects identified will be reviewed by each Party in accordance with their procedures and presented to the Parties' Boards for approval in the normal regional planning process cycle as long as this cycle does not delay the implementation of a necessary upgrade. The JRPC shall inform the IPSAC of the outcome of each Party's review of the recommended CBBRPs or Interregional Projects.