

MISO-PJM Joint Seams Initiative – Joint Stakeholder Meetings

Comments Related to Interchange Scheduling Business Rule Alignment

Submitted by Tennessee Valley Authority (TVA)

TVA would like to submit the following comments related to joint coordination opportunities for the Interchange Scheduling Business Rule Alignment.

Reduce MISO's notification time for fixed transactions:

TVA supports the opportunity to reduce MISO lead time from 30 minutes prior to tag implementation to 20 minutes. This change would bring MISO into alignment with the current industry standard in the Eastern Interconnection.

TVA would suggest that MISO/PJM consider an exemption from the 20/30 minute time requirement when an Energy Alert/Warning may have been declared. By allowing this exemption, the PSE could adjust tags in advance of the curtailment. For example, if a Maximum Generation Warning was issued, an export tag could be adjusted down to allow MWs to stay in the RTO footprint rather than having the RTO curtail the tag at the time the Maximum Generation warning went to an actual alert.

Increase MISO's export ramp limit from 500 MW/15 minutes to 1000 MW/15 minutes

TVA supports the opportunity to increase the MISO ramp ceiling to correspond with PJM's. However, as more companies (BR, EKPC, and EES interface) enter the RTOs, the ramp ceiling may also need to be increased at PJM. To provide more flexibility to all participants, we would encourage consideration of the ramp interval to be every 10 minutes for six ramp periods rather than four ramp periods.

Align PJM's 45 minute duration requirements vs. MISO's prohibition of intra-hour schedule change

TVA is not supportive of moving to PJM's 45-minute duration but rather would support PJM reverting back to their prior practice of allowing shorter period tags like MISO which allows a 15-minute tag. TVA is also not supportive of PJM moving to the MISO prohibition of intra-hour tags. Intra-hour tags facilitate proper response to 5-minute price signals sent by the RTO, and could be facilitated by increasing the start time increments to 10-minute intervals to allow more flexibility.

TVA would like to see PJM and MISO work out the most flexible scheduling capabilities within the operating standards. Price signals are intended to initiate supply/demand responses, and the best way to allow this is to provide flexible scheduling capabilities which may require the RTO to go beyond current arrangements. For example, if MISO loses a unit, most exporters would like to be able to respond to high price signals by adjusting their schedules down as the inverse would be true for importers. These responses should allow for more efficient market operations.