

June 25, 2015

Wind on the Wires Comments on Transmission Capacity Utilization Inefficiencies in the PJM to MISO Direction:

Wind on the Wires represents numerous wind companies within the MISO footprint and appreciates the opportunity to submit comments on Transmission Capacity Utilization Inefficiencies in the PJM to MISO Direction.

External NRIS as a MISO tariff product was approved by FERC on February 27, 2013 in Docket ER 12-817. Although a few specific aspects and requirements were outlined in the tariff filing, many details of how External NRIS would be processed and treated were left to internal BPM definitions, and are still being worked out through the MISO stakeholder process. Currently approximately 7000MW of External NRIS projects are being processed in DPP groups in the MISO queue. To date, no external NRIS requests have completed DPP SIS studies.

Wind on the Wires and member companies, have been very active in the discussions on External NRIS in the IPTF (Interconnection Process Task Force) in making the case to MISO that the proposal to omit a critical ERIS study of External NRIS projects is deeply flawed and will result in highly negative unintended consequences. To the contrary, PJM, which has a long-standing and effective process for interconnecting external resources, made a timely presentation at the May 27th JCM, illustrating how external resources are processed with the same rigor and requirements as internal resources. MISO has proposed extremely lax requirements for External NRIS generators that will have the unintended consequence of inviting speculation that can result in restudies for an already extremely burdened queue, and also result in shifting interconnection costs for External NRIS generators to other entities within MISO. This has caused External NRIS to be hung up in the stakeholder process for approximately a year now. External NRIS must be studied under system off-peak conditions with delivery to MISO, in addition to peak conditions, since it will be granted rights to inject under off-peak conditions. Without studies (and required mitigation of overloads the External NRIS injection causes) under system off-peak conditions, higher congestion will result, lack of access to the transmission system by generators that previously paid for upgrades, and the cost to mitigate new overloads caused by External NRIS generators will be put on transmission owners and existing and new internal generators, which is not fair to those stakeholders, as it violates the principle of cost-causation. MISO had at one point in the IPTF (September 2014), put forth a proposal for processing External NRIS requests that would require ERIS studies with delivery to MISO, unless delivery to MISO loads was previously studied under ERIS conditions. This proposal was strongly supported by generators and transmission owners alike, with expectations to move forward, but to everyone's surprise, and for unknown reasons, MISO reverted to the position of removing ERIS studies and upgrade requirements for External NRIS interconnection requests, causing further delays in the approval process.

Wind on the Wires is not opposed to External NRIS as a concept, but strongly believes it must be studied with the same rigor and requirements as internal MISO generation, for the purpose of maintaining system reliability, fairness to internal customers, and to prevent restudies and delays which negatively impact many stakeholders. External NRIS projects must be required to meet the same readiness milestones as new internal interconnection projects, including the M2 milestone which is

intended to demonstrate that a project is ready to move forward, committed to completing the process, and responsible for restudies should they withdraw during the DPP. External NRIS must be studied under both NRIS and ERIS conditions with injection to MISO loads, and made responsible for upgrades to mitigate overloads and violations identified in those studies.

Thank you for your consideration of these comments and recommendations.

Sincerely,

Rhonda Peters,
Consultant to Wind on the Wires