The Midwest Independent Transmission System Operator, Inc. (“MISO”) hereby requests that the Federal Energy Regulatory Commission (“FERC” or “Commission”) issue an Order directing MISO and PJM Interconnection, L.L.C. (“PJM”) to remove barriers to generation capacity deliverability between these two regional transmission organizations (“RTOs”). The record compiled in the instant proceeding demonstrates that these barriers are real and substantial and that their adverse impact on consumers and markets is significant. MISO respectfully submits that expedited Commission action is necessary to remove these unjust and unreasonable barriers and, to that effect, offers a specific proposal, as set forth herein.

I. INTRODUCTION

The Commission initiated this proceeding more than six month ago to determine “whether existing rules on transfer capability act as barriers to the delivery of generation capacity between the markets administered by [MISO and PJM], and to the extent such barriers exist, whether those rules should be modified to mitigate such barriers.”¹ The inquiry did not arise in a vacuum. Rather, the FERC Notice opening this docket expressly acknowledged growing

¹ Notice of Request for Comments, Docket No. AD12-16-000 (June 11, 2012) (“Notice”).
concerns about barriers to the delivery of generation capacity between PJM and MISO, which had been raised in other proceedings by various parties, including several state commissions.  

To address these concerns, the Notice set forth several specific questions seeking more information about provisions in the current market rules and operating protocols of PJM and MISO that may restrict generation capacity deliverability between the two RTOs. The Notice also solicited comments about potential changes to these provisions in order to eliminate or mitigate such restrictions and sought certain additional factual information on generation capacity deliverability in both markets. Finally, the Notice inquired about the procedural mechanisms, such as the Joint and Common Market (“JCM”) process under the Joint Operating Agreement (“JOA”) between PJM and MISO, that could be used to resolve the capacity deliverability issue.

Numerous parties, including MISO, PJM, their respective market monitors, and many state regulators and consumer advocates, have submitted initial and reply comments responding to the Commission’s inquiries and to each other’s proposals and comments. MISO’s submission included substantial evidence demonstrating that barriers to capacity deliverability present a genuine concern that must be promptly addressed. The evidence was set forth in the MISO Capacity Deliverability Whitepaper (“MISO Whitepaper”), which included a preliminary study for transfer capability between MISO and PJM (as well as certain modeling studies) and also contained a proposed solution to the capacity deliverability issue. A number of other parties, including the MISO Independent Market Monitor (“IMM”) also submitted comments confirming

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2 See id., at 1-3.
3 See id., at 3.
4 See id., at 3-4.
5 The full name of the JOA is the Joint Operating Agreement between the Midwest Independent Transmission System Operator, Inc. and PJM Interconnection, L.L.C.
6 See Notice at 4.
the existence of barriers to capacity deliverability across the MISO-PJM seam, including specific evidence to that effect. In contrast, PJM and some of its generating sector stakeholders either denied that the concern was genuine or suggested that should be accorded a lower priority in the relationship between the two RTOs.

The comments submitted in this docket also revealed a considerable disagreement about the specific role that the Commission should play with respect to the capacity deliverability issue. MISO and many of its stakeholders, as well as a number of state regulators and consumer advocates, have expressed their conviction that the Commission should not simply relegate the issue to the JCM process, with no oversight or firm timeframes imposed pursuant to its statutory authority. PJM and certain other parties, however, have advocated a far more modest role for the Commission in finding an acceptable solution to the capacity deliverability problem.

As a general matter, MISO agrees with PJM that the JCM process is an appropriate forum to continue to work through these issues with all interested parties, including MISO and PJM, their respective stakeholders, and state regulators from both RTO footprints. To date, the JCM process has provided for much robust discussion and opportunities for all interested parties to engage in and debate this topic. Nonetheless, it is critical that the parties progress beyond such discussions to ultimately achieve capacity deliverability goals. Unlike PJM, MISO believes that Commission oversight under its statutory authority, including firm deadlines to develop and file tariff language to resolve the issue, is both appropriate and necessary. In its August 2012 Reply Comments, MISO explained at length that it is imperative for the Commission to be directly involved to facilitate finding an acceptable solution to the capacity deliverability issue.\(^8\) MISO’s experience with the JCM process over the past six months confirms this assessment.

\(^8\) See Reply Comments of the Midwest Independent Transmission System Operator, Inc., Docket No. AD12-16-000, at 8-12 (August 27, 2012) (“MISO Reply Comments”). MISO explained that, although its discussions with PJM had been ongoing for two years by the time the Notice was issued, little progress had been made and (Continued…)
MISO also has acted unilaterally in the interim to do all it can to facilitate removal of impediments to efficient delivery of capacity into the MISO footprint. Thus, on December 27, 2012, MISO made a compliance filing in response to a Commission letter order requiring it to allow External Resources to participate in MISO’s currently effective voluntary capacity auction (“VCA”). The letter order was the latest in a series of Commission rulings seeking to broaden access by External Resources to MISO’s VCA. As part of its compliance with the Commission’s directive, MISO proposed a Reciprocal Study Coordination Approach (“RSCA”) to evaluate whether an External Resource is deliverable to Network Load within MISO and, thus, whether the External Resource is able to participate in the VCA. Under the proposal, the RSCA will be used in situations where there is a FERC-approved market-to-market congestion management seams agreement in place between MISO and a neighboring transmission provider where the External Resource is located, which includes provisions for a single, coordinated joint deliverability study. MISO further proposed that such a qualifying coordination agreement must: (1) specify the applicable joint model study requirements (including, but not limited to: model set-up procedures, initial dispatch conditions, contingency analysis requirements, and transmission line ratings); and (2) include provisions for granting firm transmission service (for the term covered by the VCA) from the External Resource to the border of the MISO Region, when the External Resource is cleared in a monthly VCA or is designated as a Network Resource by an LSE with Network Load in the MISO Region. Although the MISO-PJM JOA is “a FERC-approved market-to-market congestion management seams agreement,” it currently has no

(Continued…)

10 Capitalized terms not defined herein shall be as set forth in MISO’s Open Access Transmission, Energy and Operating Reserve Markets Tariff (“MISO Tariff”) or revisions thereto.
“provisions for a single, coordinated joint deliverability study,” which further highlights the urgency of FERC action in this proceeding. Thus, while MISO’s recent proposal will enhance the ability of External Resources to participate in the MISO VCA, the full benefits of the proposal will only be realized where reciprocal provisions are required by the Commission to be included as an element of a JOA with a neighboring region, such as the JOA between MISO and PJM.

Accordingly, MISO believes that the time has come for the Commission to put a firm framework in place to ensure that MISO, PJM and their respective stakeholders can move forward expeditiously to address this issue. The record compiled in this proceeding, as well as other proceedings, establishes that the current market rules and operating protocols of PJM and MISO that restrict generation capacity deliverability between the two RTOs are unjust, unreasonable, unduly discriminatory or preferential. The Commission’s Order sought in this Request should make a finding to that effect and direct MISO and PJM to develop a just and reasonable solution to the capacity deliverability problem, in line with the guiding principles set forth in the MISO Whitepaper. In addition, the Commission should establish a firm timeline and process for MISO and PJM to develop and file necessary tariff revisions by no later than six months after the issuance of the Order. MISO’s specific suggestions are outlined below.

II. MISO PROPOSAL

A. Substantive Elements

MISO believes that the essential substantive elements of the joint PJM-MISO solution are set forth in the MISO Whitepaper. As explained by MISO, these elements include: “(1) a reconciliation of the disjointed transmission service evaluation and reservation process that limit utilization of the transmission system, and (2) a process that allocates physical transmission
capability for capacity sales through their respective locational capacity auction mechanisms.”

Specifically, the Commission’s order should provide that the two RTOs develop a joint proposal that includes the core elements identified in Section 6 of the MISO Whitepaper, which are as follows:

- Establish Total Transfer Capability Across the Seam;
- Identify Resource Eligibility Criteria and Performance Requirements;
- Establish “Network Service” like Transmission Product Across the Seam;
- Coordinate Modeling of Zonal Transfer Limits in Capacity Auctions;
- Enforce Must-offer Obligations;
- Ensure Existing Capacity Transactions are not Impacted; and
- Establish Operating Procedures During Emergency Conditions.

These core elements will be further refined and filed with the Commission as amendments to the MISO-PJM JOA and the respective Tariffs of each RTO pursuant to the process described below.

B. Proposed Timelines and Procedures

MISO offers two possible alternatives for consideration that MISO and PJM could use to develop necessary tariff revisions. These alternatives are set forth below as “Option 1” and “Option 2.” The principal difference between the two alternatives is that Option 1 allows the Organization of PJM States (“OPSI”) and the Organization of MISO States (“OMS”) to play a more prominent role in the development of tariff changes necessary to the solution of the capacity deliverability problem. In contrast, Option 2 provides for a more traditional approach to the development of a joint filing. Under both Options, however, all of the participants will be

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13 MISO Comments at 22.
14 MISO Comments at 15-19; Attach. A, MISO Whitepaper at 10-17.
15 The leading role contemplated for the OPSI and the OMS in the solution development process under Option 1 would need to be voluntarily assumed by these organizations. To date, MISO and PJM have both received a clear indication, via a letter from Chairman Phil Montgomery of the Public Service Commission of Wisconsin and Commissioner Greg White of the Michigan Public Service Commission, that these organizations are interested in performing this role. See letter, dated December 14, 2012, available at: https://www.midwestiso.org/Library/Repository/Meeting%20Material/ Stakeholder/SMWG/2013/20130107/Request%20for%20Formalized%20Role%20for%20State%20Regulators%20Joint%20and%20Common%20Market%20Initiative_Montgomery.pdf.
subject to the firm timelines and directives established in the FERC order setting the process in motion, with the key goal being to place the capacity deliverability remedy in effect no later than six months after the issuance of the Commission’s order.

Option 1

The Commission directs PJM and MISO to remove barriers to capacity deliverability within six months of the issuance of its Order. The process is as follows:

- **Stage 1.** Within sixty (60) days of the Commission’s order, PJM and MISO shall identify barriers to the full utilization of network transmission service to optimize economic capacity transfer across the MISO-PJM seam, and submit a report of those issues to a joint committee to be formed by the OPSI and the OMS (“Joint Committee”) for the purpose of facilitating resolution of these barriers. A copy of the report also shall be filed with the Commission. MISO and PJM shall meet and report bi-weekly to the Joint Committee, which will oversee the process. If PJM and MISO arrive at an impasse, are unable to agree upon the issues and/or to produce the report, then they shall seek and submit to the direction of the Joint Committee. At the request of the Joint Committee, PJM and MISO shall provide funding for retention of an independent consultant that can assist the Joint Committee and produce the required report, if requested by the OMS and the OPSI.

- **Stage 2.** Within sixty (60) days of filing their Stage 1 report, PJM and MISO shall file tariff sheets with the Commission that provide remedies to the barriers identified in the Stage 1 report. During this stage, PJM and MISO shall continue to meet and report bi-weekly to the Joint Committee. If PJM and MISO arrive at an impasse, are unable to agree upon needed tariff revisions, then they shall seek and submit to the direction of the Joint Committee, which may determine the changes necessary and direct PJM and MISO to file the appropriate tariff sheets. PJM and MISO shall provide funding for the retention of an independent consultant that can assist the Joint Committee in producing the appropriate tariff sheets, upon request by such committee. During both Stage 1 and Stage 2, PJM and MISO shall submit monthly reports to the Commission outlining progress to date.

Option 2

The Commission directs PJM and MISO to remove barriers to capacity deliverability within six months of the issuance of its Order. The process is as follows:

- **Stage 1.** Within ten (10) days of the Commission’s order, PJM and MISO shall select and retain a mutually agreed upon independent third-party with economic and/or policy expertise sufficient to facilitate discussions between and among PJM and MISO technical staff on resolving outstanding capacity deliverability
issues. If PJM and MISO cannot agree on such a consultant within the time period set forth above, each party shall nominate a qualified candidate and the selection will be made by FERC staff.

- **Stage 2.** Within sixty (60) days of the Commission’s order, PJM and MISO shall identify barriers to the full utilization of network transmission service to optimize economic capacity transfer across the MISO-PJM seam, and file a report of those issues with the Commission. PJM and MISO shall provide bi-weekly updates of progress to FERC Staff. If MISO and PJM are unable to agree upon the issues and produce the report, then they shall notify FERC Staff, which shall determine the appropriate next steps to define the issues and produce the report.

- **Stage 3.** Within sixty (60) days of filing their Stage 2 report, PJM and MISO shall file tariff sheets with the Commission that remedy the barriers identified in the report produced in Stage 2. PJM and MISO shall provide bi-weekly updates of progress to FERC Staff. If PJM and MISO are unable to agree upon needed tariff revisions, then they shall each submit their separate proposals prior to the expiration of the sixty (60) day period provided above.

### III. SUBSTANTIAL EVIDENCE SUPPORTS FERC ACTION ON THE MISO PROPOSAL

The Federal Power Act (“FPA”) empowers the Commission to address public utility rules, regulations, procedures or tariff provisions that are unjust unreasonable, unduly discriminatory or preferential. There has been some disagreement in this docket over whether the Commission should act under Section 205 of the FPA or a proceeding under Section 206 of the FPA must be initiated. MISO believes that regardless of which procedural vehicle is used, the case for the Commission’s action, as proposed herein, is overwhelming.

Ameren Services Company (“Ameren”) has filed comments in this docket asking the Commission to “direct MISO and PJM to make a joint [FPA] Section 205 filing addressing the barriers to capacity deliverability.” To support its request, Ameren relies on the Commission’s original findings mandating the JCM remedy to the unjust and unreasonable seam created by the

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16 See 16 U.S.C. §§ 824d and 824e.
17 16 U.S.C. § 824d.
18 16 U.S.C. § 824e.
19 Motion to Intervene and Comments of Ameren Services Company, Docket No. AD12-16-000, at 1-2 (August 10, 2012) (“Ameren Comments”).
RTO choices of the former Alliance companies.\(^{20}\) Some parties have disagreed with Ameren’s proposal, arguing that the original FERC rulings are too stale to authorize a joint filing under Section 205 and that a public utility, such as PJM, cannot be compelled to make a Section 205 filing.\(^{21}\) These arguments ignore, however, that MISO and PJM have conducted their capacity deliverability discussions under the auspices of the JCM process, which supports the linkage with the Commission’s original JCM directives and findings. Compliance filings are often made under FPA Section 205, and the joint filing approach proposed by Ameren would be in the nature of compliance filing.

Nonetheless, if the Commission believes that its original JCM directives and FPA Section 205 do not provide an appropriate vehicle to address the capacity deliverability issues raised in this docket, MISO respectfully submits that the Commission should act under its FPA Section 206 authority. This authority is broad and well-established, including with regard to RTO seams issues. In this proceeding, substantial evidence has been submitted by MISO and other parties to support the findings and actions requested herein.

The MISO Whitepaper provides a comprehensive blueprint for the resolution of the capacity deliverability issues between MISO and PJM. The proposed solution is supported by the studies and analyses that were included with the MISO Whitepaper and by the record established in this proceeding and in Docket Nos. ER11-4081, ER12-817 and AD12-1. Importantly, MISO has demonstrated that the existing barriers to capacity deliverability at the MISO-PJM seam directly and adversely affect customers in both RTOs. As noted in the MISO Comments, the two RTOs’ transmission system should be capable of reliably transferring between 5,300 to 6,300 MW of capacity in the 2014/15 delivery year (excluding the capability

\(^{20}\) Id. at 4-6.

set aside for the Capacity Benefit Margin).\textsuperscript{22} Although some PJM parties dispute this gross transfer capability number, it was recently confirmed under the auspices of a joint collaboration effort, overseen by OMS and OPSI representatives.\textsuperscript{23} Actual capacity sales from MISO to PJM, however, are only approximately 400 MW net and 900 MW gross for that the 2014/2015 delivery year.\textsuperscript{24} As a result, “at least 4,000 MW of transfer capability has not been used despite available resource and strong economic incentives.”\textsuperscript{25} Adding this amount of supply to the PJM generation mix would significantly reduce PJM’s clearing capacity price, saving consumers in PJM approximately $1.1 billion in 2014/15 delivery year alone.\textsuperscript{26}

Further, contrary to some PJM parties’ suggestions, the remedies proposed in the MISO Whitepaper are narrowly tailored and appropriately take into account the differences between the capacity auction mechanisms in PJM and MISO, and without interfering with these mechanisms. There is no requirement for the capacity markets in the two RTOs to be identical, or even similar, in order to implement the proposed solutions.\textsuperscript{27} MISO’s proposal does not introduce joint dispatch or contemplate any redesign of the capacity markets. In fact, the current, albeit artificially low level, of capacity exports from MISO into PJM demonstrates that capacity deliverability does not require similar capacity market structures or a level of market coordination beyond that contained in the existing JOA. Instead, MISO’s proposal relies solely on increased coordination of transmission service between the two RTOs. Similarly, and for the same reason, reliability will not be adversely affected by the removal of the existing barriers.\textsuperscript{28}

\textsuperscript{22} See MISO Comments at 4.
\textsuperscript{24} Id.
\textsuperscript{25} Id.
\textsuperscript{26} Id. at 4-5.
\textsuperscript{27} See MISO Comments at 13-14; MISO Reply Comments at 6-8.
\textsuperscript{28} See MISO Comments at 12; MISO Reply Comments at 12.
As the MISO and PJM have demonstrated, the RTOs have a history of successfully resolving operational issues related to cross-border capacity commitments.\footnote{29}{See MISO Comments at 14-15.}

Many parties support MISO’s proposal and analyses. The IMM agrees with MISO that barriers to generation capacity deliverability exist between PJM and MISO, noting that under the current regime “1) [s]ubstantially less long-term firm transmission capability is available to be reserved for imports from MISO into PJM than the actual demonstrated capability of the system to support such imports; 2) [t]he current transmission reservation processes allow participants to hold a large quantity of the long-term firm transmission into PJM that is not used to make capacity sales into the PJM RPM market, despite the economic incentives to do so; and 3) [t]he obligations of external suppliers that sell capacity into the RPM are uncertain, costly, and potentially discriminatory, and serve as a deterrent to sell external capacity into the PJM RPM.”\footnote{30}{Motion to Intervene and Comments of the Midwest ISO’s Independent Market Monitor, Docket No. AD12-16-000, at 4-5 (August 10, 2012) (“IMM Comments”).} The IMM concludes that these barriers “seriously impair the markets’ ability to send economic signals in the Midwest that will facilitate efficient investment” and states that “Commission intervention is necessary to ensure that MISO and PJM will work together to eliminate inefficient barriers to trading capacity between the two markets.”\footnote{31}{Id. at 17.} In addition, the IMM observes that considerable resistance to removing barriers in the capacity market can be expected and has been demonstrated in the JCM process from the PJM stakeholders from the generation sector “because doing so would not be in their economic best interests.”\footnote{32}{Id. at 16.} As the IMM points out, “additional imports of capacity into the market would lower the inflated clearing prices that generators currently enjoy.”\footnote{33}{Id.}
The views articulated by MISO and its IMM are shared by a number of utilities and generating companies affected by these barriers. For example, Ameren, a vertically integrated utility with considerable generation resources in the MISO markets, confirms the existence of the barriers identified by MISO, concluding that “capacity deliverability issues have major impacts on the ability for the markets served by both MISO and PJM to function in an efficient manner.” Ameren also “supports MISO’s Whitepaper proposal to address these issues, and urges the Commission to take action to ensure that capacity deliverability is prioritized and addressed by both RTOs as soon as is practicable.”

NextEra Energy Resources, LLC (“NextEra”), an independent power producer in both MISO and PJM, notes that consumers benefit from the ability of sellers to reach various markets, whether from PJM to MISO or MISO to PJM. NextEra also agrees with MISO that there should not be barriers that may prevent Load Serving Entities (“LSEs”) from obtaining capacity at true market price by artificially forcing some LSEs to acquire capacity at higher prices (due to arbitrary, market-based or business practice based capacity deliverability barriers) than would otherwise be the case and that customers in both MISO and PJM benefit by eliminating artificial barriers to capacity transactions thereby increasing efficiency and decreasing consumer costs. Similarly, Detroit Edison Company (“Detroit Edison”) states that removing the barriers identified by MISO “will contribute to increased reliability and economic efficiency.” Detroit Edison expresses support for the analysis and recommendations set forth in the MISO Whitepaper and “encourages the Commission to enact MISO’s recommendations, as set forth therein.”

34 See Ameren Comments at 18-26.
35 Id. at 37.
36 Id.
38 Id.
40 Id.
MISO particularly notes the strong support its proposal has received from state commissions and consumer advocates. The Indiana Utility Regulatory Commission ("Indiana Commission") states that the FERC must “act to assure that the RTOs’ tariffs, rules, and modeling assumptions are not artificial barriers to the deliverability of capacity across the PJM-MISO seam.”⁴¹ According to the Indiana Commission, “evidence of these artificial barriers showed itself in the transfers of membership from MISO to PJM.”⁴² As the Indiana Commission explains,

Ostensibly, one of the reasons Duke Energy Ohio withdrew from MISO and joined PJM was that its energy and capacity was not considered deliverable by PJM into the PJM markets. As soon as the membership change occurred, and without the building of any additional transmission facilities, deliverability of electricity and capacity was no longer an issue. This illustrated that any deliverability issues across the seam are not due to the lack of transmission facilities or constraints on the flow of electricity across the seam, but are rather related to the RTOs’ tariffs and rules, and in particular to how the RTO systems are modeled.⁴³

The Indiana Commission further states that, “considering how critical capacity deliverability could be in solving potential reliability issues caused by the EPA regulations, and the potential savings in energy and capacity costs,” PJM and MISO need to work together, perform the appropriate study or studies, and address artificial barriers to efficient capacity deliverability.⁴⁴ According to the Indiana Commission, “such a joint effort also comports with FERC Order No. 1000 and the requirement of RTOs to do interregional planning.”⁴⁵ In addition, the Indiana Commission notes that “the issue of capacity deliverability has been given a low priority by PJM, which raises concerns that this issue will not be addressed by these RTOs

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⁴¹ Notice of Intervention and Comments of Indiana Utility Regulatory Commission, Docket No. AD12-16-000, at 3 (August 10, 2012).
⁴² Id. The IMM also pointed to membership changes as evidence of capacity deliverability barriers. See IMM Comments at 13-14.
⁴³ Id.
⁴⁴ Id.
⁴⁵ Id.
without FERC intervention.”

In the same vein, the OMS notes that “the inability of generator owners to efficiently sell capacity across the seam could lead to additional departures of transmission owning utilities from MISO” and that “the Commission should be concerned about such RTO switches, especially if they result from market rules which unnecessarily hinder otherwise efficient sales of capacity across the MISO/PJM seam.”

The Joint PJM Consumer Advocates note that “efficient capacity trading between RTOs could increase market efficiency and lower the overall cost to consumers” and that such trading “will become more important in the coming years as the market is affected by potential coal plant retirements and scheduled outages for environmental retrofits.” Given the importance of the issue and the potential for significant consumer benefits, the Joint PJM Consumer Advocates encourage the Commission “to closely and carefully monitor the progress of the JOA joint stakeholder process and to use its supervisory authority to ensure that the work of the joint stakeholder group moves forward and is productive in addressing the issues presented on a timely basis.” Similarly, the Office of the Ohio Consumers’ Counsel (“OCC”) notes that “barriers to capacity trade distort capacity price signals in both generation-rich and capacity-importing regions” and expresses support for “a high priority, results-oriented approach to the capacity portability issue, such as proposed by MISO.” The OCC commends the MISO Whitepaper for its “innovative approach [that] address[es] many of the inefficiencies around capacity transfers” and “shares the concerns raised by MISO in the Whitepaper attached to MISO’s comments, and recommends that the Commission adopt MISO’s proposed approach to

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46 Id. at 4.
47 Comments of the Organization of MISO States, Docket No. AD12-16-000, at 2 (August 17, 2012).
48 Reply Comments of Joint PJM Consumer Advocates, Docket No. AD12-16-000, at 3 (August 27, 2012).
49 Id. at 4.
50 Reply Comments of the Office of the Ohio Consumers’ Counsel, Docket No. AD12-16-000, at 3 (August 27, 2012).
resolving these concerns.” In addition, the OCC expresses concerns regarding the likelihood for timely action on this issue absent Commission action, noting, similar to the IMM, that “PJM generation interests may not be eager to face the additional competition that would result from removing barriers to capacity transfers between RTOs.”

Unfortunately, these predictions from the IMM and the OCC have proven to be true. PJM and some of its stakeholders from the generating sector have been less than enthusiastic about the MISO Whitepaper and the proposed remedies. In its Reply Comments, MISO already demonstrated that their criticism is unfounded and that according a lower priority to the capacity deliverability issue would be harmful to the market. MISO will not restate its rebuttal here, but would like to emphasize that the lack of progress to resolve the capacity deliverability issue to date has been due, in part, to opposition from a subset of PJM stakeholders in the reinstituted MISO and PJM JCM process. Therefore, MISO submits that a compelling case for direct involvement by this Commission has been demonstrated and requests that the proposals and procedures outlined herein be put in effect.

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51 Id. at 4.
52 Id.
53 See MISO Reply Comments at 2-14.
IV. CONCLUSION

WHEREFORE, the Midwest Independent Transmission System Operator, Inc., respectfully requests that the Commission grant the relief sought in this filing and issue an Order adopting MISO’s proposal, as set forth herein.

Respectfully submitted,

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Dated: January 3, 2013
CERTIFICATE OF SERVICE

I hereby certify that I have this day e-served a copy of this document upon all parties listed on the official service list compiled by the Secretary in the above-captioned proceeding, in accordance with the requirements of Rule 2010 of the Commission’s Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated this 3rd day of January, 2013 in Carmel, Indiana.

/s/ Matthew R. Dorsett
Matthew R. Dorsett