

Wind on the Wires Comments to the MISO-PJM JCM on Capacity Deliverability
Sept 18, 2015

Wind on the Wires appreciates the opportunity to comment on the Capacity Deliverability presentation at the August 20, 2015 MISO-PJM JCM. MISO has requested feedback by September 18th, with the intention to present plan details in November 2015, and make a December 2015 filing, if necessary. In particular, our comments relate to External NRIS, as recently formalized by MISO in its Business Practice Manual (BPM).

As background on External NRIS, in March of 2014, MISO had proposed at the Interconnection Process Task Force (IPTF) that it's External NRIS process, differ from PJM's process, in that MISO would not perform a reliability study of external generator's seeking NRIS. This was met with strong and vocal stakeholder pushback from diverse sectors. In June 2014, MISO presented a revised proposal which allowed some External NRIS projects to be studied for reliability, but not all. In Sept and Oct of 2014, details of language related to reliability study requirements for External NRIS continued to be discussed at the IPTF. The next edit to the proposed BPM language came in March of 2015, when MISO unexpectedly reverted to the March 2014 position that no reliability studies would be performed on External NRIS projects. Again, strong stakeholder pushback followed, and in July of 2015, MISO presented BPM language that would have External NRIS studied for reliability, and called that BPM language "final". However, there were aspects of that BPM language that had not been vetted or discussed previously at the IPTF. Despite the IPTF not being given the opportunity to provide written comment on the new BPM language, MISO took that BPM language to the Planning Advisory Committee on August 19th as "final", and similarly did not allow for stakeholder comments at the PAC. Therefore, the only way to provide comment/input on MISO's final proposal was to make a motion at the PAC, of which Wind on the Wires made 4 motions to address the top 4 unaddressed concerns regarding External NRIS BPM language. Those concerns were:

1. All internal MISO Interconnection Customers must pay the M2 Milestone to enter in a reliability study, to ensure they will not withdraw from the MISO process (and hence trigger restudies). The M2 Milestone is a high financial barrier to entry into reliability studies. External NRIS should also be subject to this same requirement as a matter of fairness to internal customers.
2. External NRIS must also be subject to (current and future proposed) Operational Limitation Studies, where applicable, similar to internal projects.
3. External NRIS should have firm transmission service to the border of MISO, not only during the interconnection request, but throughout the duration of its Service Agreement.

4. The External NRIS Service Agreement should be filed with FERC, similar to how an internal customer's GIA is filed with FERC.

At the August 2015 PAC, MISO made edits to the BPM language to incorporate items 2 through 4 above, and considered that product to be final. Discussion on the M2 Milestone ensued at the PAC. Prior to the motion being called for a vote, several Sectors felt they needed more information and requested the vote be postponed, and that MISO and Wind on the Wires to submit additional information on their positions, which they did. However, MISO had noted that a vote at PAC, regardless of its outcome, would not influence its decision to move forward and exempt External NRIS from the M2 milestone fee required of internal customers for a reliability study. A complaint was then brought to FERC on September 4th by "Internal Generators", with a request for fast-track processing. (Filing attached to these comments).

Wind on the Wires requests that the MISO-PJM JCM, in its deliberations on the External NRIS process, take into consideration that PJM does not exempt external generation from any of its studies/requirements in the interconnection process, and that it also consider the arguments set forth in the aforementioned complaint that was filed with FERC on September 4th.

Thank you for consideration of these comments.

Sincerely,

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