

Comments

We support MISO's proposal. It recognizes that the current structure of co-mingling the members of the "environmental and other stakeholder groups" sector with representatives of other interests, especially non-aligned interests, can create structural tension within the sector and undermine good governance. Since the inception of MISO, this sector has represented nearly exclusively the interests of environmental organizations participating in the MISO stakeholder process.

The sector represents the interests of its member organizations in improving FERC-jurisdictional wholesale planning and markets rules at MISO to enhance the reliability, efficiency, and flexibility of a low-carbon power grid. Members of the sector's organizations (which collectively total in the hundreds of thousands of members) benefit from more affordable rates and the health and welfare benefits of a cleaner and more resilient power system. To participate in our sector discussions, sector participants must have as a significant organizational purpose and mission the goal of reducing climate change and other environmental, or public health and community impacts of the power sector. Sector members participate actively in at least 10 different MISO stakeholder committees, subcommittees, work groups and other Stakeholder Entities.

Despite the comparatively uniform mission alignment of the members of the sector over 20 years, the official designation of the sector is the "environmental and other stakeholder groups" sector. As MISO explained in its proposal, this designation suggests that those seeking to participate in the stakeholder process and who do not align with any of the other nine sectors should join the environmental and other stakeholders sector. This approach has created some

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sector management challenges in the past. Absent MISO’s proposal (which is the first step towards further stakeholder participation changes) will continue to do so in the future. For limited periods of time members of the sector have included gas development companies and competitive transmission developers. The non-alignment of these entities with the rest of the sector participants meant that in some cases sector representatives had to have two separate sets of meetings to seek the input of sector members – one with the aligned environmental organizations, and one with the other members. Fortunately, those experiences were short term since those participants either joined the new competitive transmission developer sector in 2014 or ceased to participate in the MISO stakeholder process and the sector’s meetings.

The primary reason to maintain mission alignment within any sector is to better convey the sense of the sector’s position to the Board and management of MISO and to other sectors. This is especially true at the MISO Planning Advisory Committee and Advisory Committee, both of which employ sector-based voting. When a sector representative speaks or votes at the Advisory Committee or the Planning Advisory Committee or participates in meetings with the MISO Board and management at the Advisory Committee, the other participants understand that the representative is speaking on behalf of a group of aligned and engaged interests at MISO.³

While it is true that sectors sometime split their vote on issues and write separate “Hot Topic” papers for the Board (part of the Advisory Committee process), the differences of opinion are those from entities who share a common purpose or business interest – e.g., independent power producers represent owners of power generation sources regardless of the energy source. The same cannot be said of a sector representing both the environmental and all of the “other”

³ We do note that anyone, whether or not they are affiliated with a sector, can participate in the meetings of nearly all of the MISO stakeholder committees, subcommittees, task forces, and other entities.

interests, especially when the core of the members of the sector represent well-defined common interests. It makes no more sense to have “other” entities in the environmental sector than it would to include such entities in any of the other sectors.

Notwithstanding the challenges of sharply divergent interests within a sector, in December 2019 in the spirit of accommodation the environmental and other sector representatives offered to accept the Lignite Energy Council into its sector for a trial period of six months, recognizing that a long-term solution probably would be necessary.⁴ However, at its February 19, 2020 meeting, the Advisory Committee voted against that approach and in favor of creating a new “affiliate” sector,⁵ which then led to MISO submitting its proposal to the Commission in this docket.

Conclusion

For the foregoing reasons, the undersigned support MISO’s proposal to increase the alignment of the environmental sector and create a new affiliate sector. MISO’s proposal will create a space for entities that may not yet have sufficient critical mass and sustained engagement in the MISO stakeholder process to justify creation of a new stand-alone sector to nevertheless participate more fully in MISO’s stakeholder process.

⁴ See Minutes of the Advisory Committee, December 11, 2019, available at <https://cdn.misoenergy.org/20200122%20AC%20Item%2001c%20Minutes%2020191211410789.pdf>.

⁵ See Minutes of the Advisory Committee, February 19, 2020, available at <https://cdn.misoenergy.org/20200325%20AC%20Item%2001c%20Minutes%2020200219431293.pdf>.

Respectfully submitted,

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Certificate of Service

I certify that I served copies of the foregoing on the Commission's official service list for this proceeding on this 23rd day of June 2020.

/s John N. Moore