Environmental Sector comments in response to the posted JTIQ Draft Technical Report

The Environmental Sector appreciates the opportunity to comment on the posted Joint Transmission Interconnection Queue Draft Technical Report (Draft Report) and, more generally, the JTIQ process to date.

At the outset, we want to express our appreciation and support for the JTIQ process and recognize the significant effort by MISO and SPP to meaningfully engage with each other and with the broad set of stakeholders that this process will ultimately impact. While there is still significant work ahead, we believe that the publishing of this report and the ongoing good-faith analyses and cost allocation discussions are significant achievements.

We also want to emphasize – as the Draft Report does – the critical and urgent nature of this effort. The interconnection queues in both MISO and SPP have indeed experience transformational shifts in recent years with the influx of low-cost resources seeking interconnection and the commitments to clean energy and decarbonization driving a significant and sustained demand for renewable energy resources on both the MISO and SPP systems. While we acknowledge the complexity of this undertaking, MISO and SPP must continue to aggressively seek solutions to outstanding issues including cost allocation.

The Draft Report leaves many questions unanswered, and we support the comments of the American Clean Power Association, Clean Grid Alliance and the Advanced Power Alliance that seek clarity on several outstanding issues. In particular, the Environmental Sector emphasizes:

1) Stakeholders must have clarity on the differences between MISO and SPP study methodologies, input assumptions, and models used and how those differences are affecting results. A common understanding of – and confidence in – study methods and results among stakeholders will be critical to achieving broad support, agreement on cost allocation, and ultimately the approval of proposed projects.

2) A full understanding of the benefits to load that JTIQ projects will provide is essential to the success of this process. We understand the need to start with Adjusted Production Costs as an initial benefit metric, but several additional benefit metrics are applicable that, if quantified, will provide a more accurate reflection of benefits to load and ultimately lead to more just and reasonable cost allocation. While the Draft Report makes mention of additional benefit metrics, the final version should provide specifics about metrics being considered and stress the importance of a full accounting of benefits to the overall success of the JTIQ process. At the very least, we would like to see benefit metrics related to reliability, resiliency, and public health.

3) The process laid out in the Draft Report indicates that MISO and SPP may seek Board approvals for projects prior to finalizing and receiving FERC approval for the cost allocation methodology. We believe this runs afoul of FERC precedent and strongly encourage MISO and SPP to clarify the necessary sequence of its efforts and ensure compliance with FERC precedent.
Thank you again for this opportunity to provide comment. The Environmental Sector appreciates all the effort by MISO, SPP and stakeholders to move this process forward and we again stress the urgency with which these efforts must continue if we are going to achieve the generator fleet transition being driven by states, consumers, and load-serving entities. We look forward to doing our part to achieve the timely approval of projects along the MISO/SPP seam that will deliver significant benefits to consumers and new generators alike.

Submitted on behalf of the Environmental Sector

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