

**Environmental Sector comments**  
re: [L RTP Tranche 2 Anticipated Portfolio](#)

The Environmental Sector appreciates MISO's responsiveness to stakeholder requests to provide formal feedback in response to the LRTP Tranche 2 Anticipated Portfolio presentation given at the March 15th LRTP workshop. Stakeholder support is critical to the success of Tranche 2, and that support is contingent on a clear understanding of MISO's process and the challenges it faces. To that end, we urge MISO to:

- 1. Provide additional details on how MISO settled on the current anticipated portfolio.** We understand and appreciate MISO's constraints (regulatory burden, cost, etc.) that may necessitate a bifurcated Tranche 2, and we support a second Tranche 2 portfolio. However, stakeholders need a better explanation as to how MISO designed the current portfolio of projects: what problems did MISO intend to solve with this portfolio and how did MISO determine which issues to resolve in Part 1 of Tranche 2 (Tranche 2.1) versus which to leave for inclusion in Part 2 of Tranche (Tranche 2.2)?
  
- 2. Provide additional information on whether co-location with existing infrastructure was considered in selecting the location of the proposed Tranche 2.1 substations?** Some MISO transmission owners have faced permitting difficulties when new regional lines are not collocated with existing infrastructure. Could MISO please explain whether it tried to maximize the use of existing corridors when identifying the location of substations for Tranche 2.1. Does MISO have a policy about considering the availability of existing corridors when selecting substation locations during long-range planning? Does MISO have a policy about considering sensitive areas (such as national parks, cities, socio economically depressed areas) when selecting substation locations during long-range planning?
  
- 3. Provide an explanation on why HVDC was excluded from Tranche 2.1.** Stakeholders continue to raise questions and concerns regarding the consideration of HVDC and how MISO intends to move toward developing methodologies that consider, in a fair and accurate manner, the full suite of benefits and costs that HVDC could bring to the regional system. Stakeholder consternation would be mitigated if MISO explained the metrics and data that led it to exclude HVDC from Tranche 2.1. MISO and others have explained the difficulty in accurately evaluating HVDC technologies in the LRTP portfolio process. And of course, what cost allocation methodology is most appropriately applied to an HVDC project designed through the MTEP process must be addressed. The Environmental Sector intends to file an "Issue Submission" to the Planning Advisory Committee to take up these discussions and we hope that MISO finds a role for HVDC sooner rather than later. But, in the meantime, it would be helpful to understand why MISO excluded HVDC in Tranche 2.1.
  
- 4. Consider the load growth predictions for Future 3A (F3A) when Designing Tranche 2.** We share concerns raised by others that the demand projections are too low to

accurately capture plausible bookends over the study period. Given the eight-to-ten year time horizon for construction, stakeholders must feel confident that the Futures used to develop Tranche 2 puts us on a path to meet system needs ten years out and beyond. At the workshop, stakeholders expressed that the load growth projections in even Future F3A are insufficient. (F2A is too low because it fails to capture the rapid integration of data centers, manufacturing, cryptocurrency, artificial intelligence, and other load additions that the MISO system is currently experiencing and expects to continue to experience.) Hence, MISO's current approach of using F1A and F2A as the plausible bookends could be insufficient for designing a robust backbone grid that can deliver energy to these new customers. While we recognize that MISO does not have the model built for F3A, would it be possible for MISO to conduct a sensitivity in F2A using the load growth predictions from F3A? If not feasible for Tranche 2.1, could it be done for Tranche 2.2? Or, could MISO evaluate the business case for Tranche 2.1 while anticipating higher load than is reflected in F2A? The Environmental Sector does not want to delay the adoption of Tranche 2.1 but hopes MISO can find a way to recognize the dramatic changes in load expectations.

5. **Produce a timeline and sequencing for Tranches 2.2 and 3.** MISO must balance the need for a Tranche 2.2 portfolio with the need to complete Tranches 3 and 4 in the next few years. We share stakeholder concerns whether MISO has the resources to complete future Tranches in a timely manner. Considering that Tranche 2 models are already built, can MISO complete Tranche 2.2 simultaneously with Tranche 3?