

Comments of the Clean Energy Associations and Public Interest Organizations on the Proposed MISO-SPP Joint Study

The Advanced Power Alliance, Clean Grid Alliance, Natural Resource Defense Council, Southern Renewable Energy Association, Renew Missouri, Sierra Club, and Sustainable FERC Project (collectively “Clean Energy Associations and Public Interest Organizations” or “CEAs and PIOs”) appreciate the opportunity to comment on the latest proposal from SPP and MISO to embark on a joint interregional study to explore opportunities to address infrastructure needs, including expansion of the transfer capability between the two regions. Given MISO’s and SPP’s lack of past success in identifying cost-effective interregional solutions, we agree a different approach to seams planning is needed. ¹ We were encouraged to hear MISO and SPP staff indicate that they are looking for “out of the box” solutions for this new effort. In particular, we support using more robust need and benefit metrics that will result in meaningful analysis of cost-effective investments that will break through the log jams of past efforts.

Because we understand that this study represents a new approach, and both MISO and SPP transmission planners are currently working diligently on regional transmission planning efforts, we expect to support the proposed request for a waiver, as long as the timeline for completion of this study does not extend beyond 2025. We do, however, expect that SPP and MISO will also expand the typical cadence of IPSAC meetings from 3 each year to at least double that amount to allow for a robust dialog about the scope, methodology, and metrics to be used in this study. We would also expect the waiver to allow SPP, MISO, and stakeholders to expand the needs examined and the analysis conducted in this study. To that end we offer the following initial suggested guidelines which are important for our support.

1. CEAs and PIOs believe that this planning process should include a broader array of needs and benefit metrics, including but not limited to:
 - a. An increase in transfer capability between the regions, with this analysis comprising both an assessment of a minimum transfer capability level, and the establishment of benefit metrics for additional transfer capability (e.g. resiliency during extreme events, economic benefits during shortages of resources, and facilitation of reserve sharing);
 - b. The benefit metrics included in Order 1920;
 - c. Facilitation of generation interconnections;
 - d. Assessing new approaches to APC calculation that would avoid some of the current challenges that require benefits in both regions;

¹ While we generally support the JTIQ planning effort, recognizing that our individual entities filed some differing perspectives in the current FERC docket, JTIQ was focused on interconnection planning, which is not a substitute for more comprehensive interregional planning.

2. More broadly, the RTOs should explore an overall design of interregional planning that can provide better long-term evaluation of multiple needs that is more aligned with MISO’s LRTP/MVP processes and SPP’s ITP process or CPP concepts, rather than a line-by-line assessment. This approach could include benefits to load and generation.
3. Waivers should not interfere with transparency or process and stakeholder involvement.
4. There should be a set time for the study to begin and end, along with clarity on how it will impact the timeline of the next required MISO-SPP Coordinated System Plan study.
5. SPP and MISO should jointly pursue some of the improvements identified in the previous TMEPs discussions - including ensuring that jointly beneficial projects that are constructed in only one region can be considered.
6. To the extent that transmission needs and solutions are beneficial to other areas, such as AEI, opportunities for additional cooperation beyond MISO and SPP should be explored given time and resource constraints.
 - a. Given that SPP and AEI also hold interregional stakeholder advisory committee meetings, SPP should provide a report on the status of the SPP and MISO joint study progress at each IPSAC meeting of SPP and AEI.
 - b. In doing so, SPP should solicit feedback from AEI and bring that feedback and any opportunities for collaboration forward to MISO at the SPP-MISO IPSAC meetings.

The type of interregional transmission project being contemplated in this study is outside of what is currently included in the MISO-SPP JOA. MISO and SPP state they will work in parallel “with states and stakeholders to identify and pursue JOA/Tariff adjustments, as needed, to bring solutions forward for recommendation and approval.” This will also require additional stakeholder discussions around a new interregional project type, cost allocation, and ultimately tariff language. We urge MISO and SPP to take up this additional work expeditiously so that the study does not become stale before any new interregional projects identified by the study can be approved.

CEAs and PIOs look forward to participating in a continued stakeholder dialog on the proposed study and stand ready to assist with a broad-based interregional assessment of needs and solutions that can be cost shared in a fair way and provide optimized long-term benefits to both regions.

Advanced Power Alliance

Renew Missouri

Clean Grid Alliance

Sierra Club

Natural Resources Defense Council

Sustainable FERC Project

Southern Renewable Energy Association