



## Midwest ISO response to MPSC Expectations for MTEP09 Process

We appreciate Michigan Public Service Commission's feedback on MTEP09 process. Below, we have repeated the comments of the MPSC, and below each group of comments provide a discussion of how we intend to address these concerns or comments. We will be happy to discuss any outstanding issues that the Commission wishes to discuss around these expectations at the Planning Consortium forums, or elsewhere as the Commission desires.

### MPSC Expectation:

- 1. MPC shall mesh with and add value to the MISO transmission planning process and Michigan's state resource planning processes by identifying and resolving differences among Michigan stakeholders in a transparent and collaborative forum.*

Midwest ISO welcomes participation and input from all stakeholders and we concur that the better the agenda's of the processes mentioned are aligned the more productive the planning processes will be.

### MPSC Expectations:

- 2. Consensus-based plan for MTEP 09 projects in Michigan portion of Midwest ISO East sub region, including specific recommendations for transmission projects that should move forward for Midwest ISO Board approval. If consensus not reached:
  - a. Minority positions on projects, issues, and concerns to be clearly stated in writing and understood by all participants before draft MTEP is presented to the Midwest ISO Planning Advisory Committee (PAC), Advisory Committee, or Board of Directors.*
  - b. MTEP report and presentation to Midwest ISO Board should also reflect those minority positions.**
- 5. Requests for information and responses to be documented.*

It is our intent to use focused open planning stakeholder forums such as Subregional Planning Meetings (SPM's) and Technical Study Task Forces groups (TSTF) to share information on projects to be recommended for approval in each MTEP cycle. We will be instituting an additional task of documenting stakeholder positions and action items at each of these meetings and following up on these at subsequent meetings. Best effort will be made to resolve all outstanding issues and concerns. If any issues cannot be resolved within the planning cycle, these will be documented in the MTEP representing process for stakeholders and the Midwest ISO board.

### MPSC Expectations:

- 3. Midwest ISO planning deadlines to be met by all participants. Projects should not be reviewed by the Midwest ISO for Appendix A consideration in MTEP 09 unless all relevant project information is provided to the Midwest ISO by a pre-established deadline. Exceptions may be granted on a case-by-case for extenuating circumstances.*
- 4. Up front agreement on types of additional information that will be shared with stakeholders and timelines for responding to requests for additional information requests among MPC parties, including turnaround deadlines.*

The Midwest ISO has created specific timelines for various deliverables in the MTEP process. There were some concerns expressed during the MTEP 08 cycle, mainly in the East SPM forums, about adequate and timely information about Transmission Owner (TO) plans in order to permit meaningful stakeholder input. Issues involved at what point in the annual MTEP process all information was known about projects that were heading for Appendix-A recommendation in October of the current year. As a result, with feedback from these stakeholders and TO's, Midwest ISO staff instituted a timeline for project information exchange in the SPM process.

The Midwest ISO agrees that it is important that all parties provide information by specified dates as it ensures meaningful input by stakeholders and avoids late-breaking concerns at the end of the study cycle. Some exceptions may be expected as not all information may be available early in design phase for more complicated projects. If information is not available for a proposed project by the specified Cutoff Date:

- The TO should explain why the information is not available and when it will be available
- Projects that miss cutoff dates for information exchange that the TO insists on moving to Appendix A in the current cycle, will be flagged by staff at PAC meetings, and in the MTEP as not meeting dates
- The MTEP reporting process will describe how issues were resolved with stakeholders for these projects

Reporting requirements and dates will be posted on our website by January 15.

**MPSC Expectations:**

*6. Burden is on LSE's and other stakeholders to identify issues or concerns with planning criteria or assumptions early in the process. MPC to determine which of those issues can be addressed for implementation in the MTEP 09, and which need to be worked on for MTEP 2010 implementation.*

We appreciate MPSC's input in helping the Midwest ISO prioritize efforts in resolving issues specific to planning in Michigan.

**MPSC Expectations:**

*7. No surprises by any participant. Some changes are inevitable but need to forewarn and explain to sub regional planning meeting participants any changes (or expected changes) in project information, needs, assumptions, etc. that may affect planning analysis and decisions.*

Changes related to change in study scope and assumptions are particularly difficult for Midwest ISO staff as re-work late in the process interferes with other MTEP deliverables such as cost sharing and report writing. Furthermore, changes in assumptions usually impacts large number of projects which are difficult to re-evaluate within the same planning cycle. With upfront expectations and issues documented early on in the process, we expect to eliminate surprises by participants late in the process.

**MPSC Expectations:**

*8. Inclusive planning process that recognizes value of all parties' contributions early in the process, including the identification and scoping of new studies. Broader set of stakeholders may be affected with implementation of Michigan's new energy law.*

We support this position

**MPSC Expectations:**

*9. Process for review and potential re-evaluation of approved transmission projects should be established in the event of changes in project needs, other infrastructure development plans, state decisions, etc. (E.g., if a transmission project for wind zone offsets or changes need or timing of a medium-term reliability project.)*

The Midwest ISO will develop through the Planning Subcommittee a process for re-evaluation of projects based on the quarterly project status reviews for approved projects that already exists.

**MPSC Expectations:**

*10. Reliability, economic, and generation interconnection planning to meet Michigan's infrastructure needs and legislative requirements to be integrated.*

The Midwest ISO will continue its efforts to provide good integration of the various planning study activities so that all transmission expansion recommendations represent the best overall value to customers in meeting energy delivery needs. The Planning Advisory forum is used to continue development of the integrated "Value-Based Planning" approach, while the SPM's will discuss related plans emerging from parallel planning processes.

**MPSC Expectations:**

*11. Examine role of energy efficiency and distributed generation as potential resource options, and not just as an adjustment to the load forecast.*

The Midwest ISO encourages further discussion of this topic at both the Planning Consortium meetings, and via the work of the Demand Response Working Group.