

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

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| Transmission System Planning Performance) Requirements for Extreme Weather)) | Docket No. RM22-10-000 |
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COMMENTS OF THE MISO TRANSMISSION OWNERS

Pursuant to the Federal Energy Regulatory Commission’s (“Commission”) June 16, 2022 notice of proposed rulemaking,¹ the MISO Transmission Owners² submit these Comments. The MISO Transmission Owners support the adoption of practical

¹ *Transmission System Planning Performance Requirements for Extreme Weather*, Notice of Proposed Rulemaking, 179 FERC ¶ 61,195 (2022) (“NERC Weather NOPR”).

² The MISO Transmission Owners for this filing consist of: Ameren Services Company, as agent for Union Electric Company d/b/a Ameren Missouri, Ameren Illinois Company d/b/a Ameren Illinois and Ameren Transmission Company of Illinois; American Transmission Company LLC; Big Rivers Electric Corporation; Central Minnesota Municipal Power Agency; City Water, Light & Power (Springfield, IL); Cleco Power LLC; Cooperative Energy; Dairyland Power Cooperative; Duke Energy Business Services, LLC for Duke Energy Indiana, LLC; East Texas Electric Cooperative; Entergy Arkansas, LLC; Entergy Louisiana, LLC; Entergy Mississippi, LLC; Entergy New Orleans, LLC; Entergy Texas, Inc.; Great River Energy; GridLiance Heartland LLC; Hoosier Energy Rural Electric Cooperative, Inc.; Indiana Municipal Power Agency; Indianapolis Power & Light Company; International Transmission Company d/b/a ITC*Transmission*; ITC Midwest LLC; Lafayette Utilities System; Michigan Electric Transmission Company, LLC; MidAmerican Energy Company; Minnesota Power (and its subsidiary Superior Water, L&P); Missouri River Energy Services; Montana-Dakota Utilities Co.; Northern Indiana Public Service Company LLC; Northern States Power Company, a Minnesota corporation, and Northern States Power Company, a Wisconsin corporation, subsidiaries of Xcel Energy Inc.; Northwestern Wisconsin Electric Company; Otter Tail Power Company; Prairie Power, Inc.; Republic Transmission, LLC; Southern Illinois Power Cooperative; Southern Indiana Gas & Electric Company (d/b/a CenterPoint Energy Indiana South); Southern Minnesota Municipal Power Agency; Wabash Valley Power Association, Inc.; and Wolverine Power Supply Cooperative, Inc.

reliability standards that support a resilient and reliable transmission grid capable of withstanding extreme weather events. In the furtherance of this goal, as discussed in more detail below, the Commission’s final rule should call upon North American Electric Reliability Corporation (“NERC”) to submit modifications to its reliability standards to address reliability concerns pertaining to transmission system planning for extreme heat and cold weather events that impact the reliable operations of the Bulk-Power System, and do so in a way that: (1) acknowledges and accommodates regional differences; (2) avoids overlap with existing regional and interregional transmission planning processes; and (3) provides flexibility to allow NERC’s standards drafting team to effectively address the Commission’s concerns.

I. BACKGROUND

The Commission has proposed to issue a final rule directing NERC, the Commission-certified Electric Reliability Organization, to propose modifications to Reliability Standard TPL-001-5.1 (Transmission System Planning Performance Requirements) to address reliability concerns relating to transmission planning for extreme hot and cold weather events that are likely to impact the reliability of the Bulk-Power System.³ More specifically, the Commission proposes to require NERC to modify Reliability Standard TPL-001-5.1 to require:

- developing benchmark planning cases using, *inter alia*, past data regarding major prior extreme hot and cold weather events, future meteorological projections, or both;
- planning for extreme hot and cold weather events using both steady state and transient stability analyses covering a broad range of extreme weather scenarios, including the availability of the expected resource mix during such

³ NERC Weather NOPR at P 1.

extreme conditions and the wide-ranging area impacts of such extreme weather;
and

- corrective action plans including mitigation for instances where entities fail to meet performance requirements for extreme hot and cold weather events.⁴

The Commission proposes to require NERC to submit its proposed modifications to Reliability Standard TPL-001-5.1 no later than one year after the effective date of the Commission's final rule, and for compliance obligations created by those modifications beginning no later than one year from the date of the Commission's approval of NERC's modifications.⁵ The NOPR clarifies that the Commission is "not proposing specific requirements," but is "identify[ing] concerns [it] believe[s] should be addressed. NERC may propose to develop new or modified Reliability Standards that address [the Commission's] concerns in an equally efficient and effective manner" as long as NERC's proposal explains how it addresses the Commission's concerns.⁶

II. COMMENTS

A. The Final Rule Should Acknowledge and Adjust for Regional Differences and Emphasize Regional Rather Than Individual Utility-Level Planning.

While the MISO Transmission Owners support the general direction of the NERC Weather NOPR, the Commission should ensure that any final rule in this proceeding acknowledges and accommodates unique regional needs, rather than calling for a one-size-fits-all policy. This must include providing flexibility to the NERC Standards drafting team for addressing issues in each region as best suited for that region, given that extreme

⁴ NERC Weather NOPR at P 6.

⁵ NERC Weather NOPR at P 7.

⁶ NERC Weather NOPR at P 6.

heat and cold weather risks, and the appropriate responses thereto, vary by geography. Such practical flexibility will allow studies done by Planning Coordinators and Transmission Planners to be more actionable and result in corrective action plans that address identified needs pertinent to each region.

The final rule should also account for the fact that RTO regions, Order No. 1000 planning regions, and NERC regional entity regions do not have perfectly overlapping footprints. To that end, any final rule should direct NERC to propose modifications to reliability standards to provide appropriately flexible provisions to address when such imperfect overlaps come to bear. The MISO Transmission Owners address in the next section the specific need to ensure that any planning requirements adopted here not conflict or overlap with the Order No. 1000 planning processes already established for regional transmission organizations (“RTOs”), independent system operators (“ISOs”), and other Order No. 1000 planning regions.

Any final rule requiring NERC to adopt the type of planning requirements proposed here should require planning at the regional, rather than utility, level. Regional entities are better suited to lead on such planning in their roles as Planning Coordinators. However, to the extent the Commission’s final rule calls for planning by individual utility Transmission Planners, the final rule should provide flexibility to account for utility footprint-level differences, particularly because even within a given RTO, ISO, or NERC region, the weather risks can vary significantly across the footprint. For example, the MISO region spans from the Canadian Province of Manitoba to the Gulf of Mexico while the Midwest Reliability Organization spans from the Canadian Provinces of Manitoba and Saskatchewan to portions of New Mexico, Texas and Louisiana. The extreme weather risks

across these regions differ substantially. This flexibility on all levels should include deferring to the Planning Coordinator and the Transmission Planner to discern their own definitions of extreme weather events for their footprints.

B. The Final Rule Should Not Overlap or Conflict with Order No. 1000 Regional Planning Processes.

The MISO Transmission Owners are concerned that some aspects of the proposed rule may overlap and possibly conflict with the planning processes that already occur through Order No. 1000 procedures. This concern is particularly acute where the Commission is proposing NERC adopt provisions in its reliability standards to address interregional transfer capacity.⁷ The NERC Weather NOPR specifically says, “[W]e believe that there may be potential benefits in better incorporating interregional transfer capability into corrective action plans, where warranted and encourage NERC to consider establishing requirements that appropriately recognize *the value of* interregional transfer capability.”⁸ The Commission seems to be suggesting that problems identified through a reliability planning analysis using the metrics in Reliability Standard TPL-001-5.1 could be resolved simply by considering the value of an increase in transfer capability. Existing transfer capabilities need to be respected in reliability planning in order to appropriately determine performance within a region. Increasing the transfer capabilities may help, but it is important to improve the process for determining necessary transfer levels and directions on a regional basis, which could more effectively be done through improvements to already established regional planning processes rather than through modifications to

⁷ See NERC Weather NOPR at P 88 (emphasis added).

⁸ *Id.*

Reliability Standard TPL-001-5.1. However, once transfer levels and directions are determined, entities can plan under TPL-001-5.1 at the established transfer levels.

More broadly, the Commission's proposal seems to be conflating transmission planning requirements and NERC reliability standards. The MISO Transmission Owners encourage the Commission to think about its goals and tailor any final rule more narrowly to avoid overlap with Order No. 1000 regional and interregional planning. In the event the Commission is considering a minimum interregional transfer capability requirement as an objective of interregional planning, the MISO Transmission Owners instead suggest that the Commission address it under different future rulemaking changes to its rules for interregional planning, rather than using the NERC standards to accomplish that objective. The MISO Transmission Owners agree that there is merit in taking action to bolster interregional transfer capability, but the best way to do that is through interregional transmission planning and not as a corrective action under TPL-001-5.1.

C. The Commission Should Not Narrowly Restrict NERC to Modifying Only Reliability Standard TPL-001-5.1.

Revisions to TPL-001-5.1 alone (such as use of base cases which reflect minimum transfer requirements elsewhere determined) may partly address the Commission's objectives, but there may be better avenues for meeting the Commission's objectives. For example, NERC may conclude that requirements related to the performance of transmission equipment under extreme heat and cold conditions may be a better fit in the Facilities Design, Connections, and Maintenance ("FAC") standards rather than the Transmission Planning ("TPL") standards. Addressing the resilience of field equipment need not be constrained to a planning study. This is why the Commission must be clear about its objectives and need not be rigid about achieving them solely through revisions to

TPL-001-5.1. As the MISO Transmission Owners encourage in Section II.A, above, the Commission must provide sufficient flexibility in a final rule so that the NERC standard authorization request that results from any final rule here provides latitude to the standards drafting team to effectively address the Commission's concerns. The MISO Transmission Owners agree with the NOPR's statement that "NERC may propose to develop new or modified Reliability Standards that address [the Commission's] concerns in an equally efficient and effective manner" as long as NERC's proposal explains how it addresses the Commission's concerns,⁹ but would appreciate a more explicit discussion clarifying that NERC may use its judgment to propose modifications to appropriate reliability standards, not only TPL-001-5.1, in response to any final rule issued from this proceeding.

Finally, regardless of whether NERC's reliability standards revisions are limited to TPL-001-5.1 or involve multiple standards, one year's time is not long enough to analyze and modify TPL-001 or other reliability standards, or create a new standard. The Commission should provide more time for NERC to develop the modifications required to comply with any final rule in this proceeding.

⁹ NERC Weather NOPR at P 6.

III. COMMUNICATIONS

The MISO Transmission Owners request that all communications related to these comments be directed to the following:

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IV. CONCLUSION

The MISO Transmission Owners request that the Commission consider these Comments on the NERC Weather NOPR.

Respectfully submitted,

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