

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

**MIDCONTINENT INDEPENDENT SYSTEM : Docket Nos. ER24-2797-000**  
**OPERATOR, INC. : ER24-2871-000**

**SOUTHWEST POWER POOL, INC. : Docket Nos. ER24-2798-000**  
**ER24-2825-000**

**LIMITED COMMENTS OF WIRES**

Pursuant to Rule 212<sup>1</sup> of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), WIRES,<sup>2</sup> on behalf of its members, respectfully submits the following limited comments in response to the filings submitted by Midcontinent Independent System Operator, Inc. (“MISO”) and Southwest Power Pool, Inc. (“SPP”) (collectively referred to herein as “RTOs”) in the above captioned dockets.

**I. BACKGROUND**

On August 16, 2024, MISO<sup>3</sup> and SPP<sup>4</sup> submitted companion filings proposing revisions to section 9.4 of the MISO-SPP Joint Operating Agreement (“MISO-SPP JOA” or “JOA”) to

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<sup>1</sup> 18 C.F.R. § 385.212 (2024).

<sup>2</sup> WIRES is a non-profit trade association of investor-, publicly-, and cooperatively-owned transmission providers and developers, transmission customers, regional grid managers, and equipment and service companies. WIRES promotes investment in electric transmission and consumer and environmental benefits through development of electric transmission infrastructure. This filing is sanctioned by the full supporting members of WIRES but does not necessarily reflect the views of the Regional Transmission Owner/Independent System Operator (“RTO/ISO”) members of WIRES. For more information about WIRES, please visit [www.wiresgroup.com](http://www.wiresgroup.com).

<sup>3</sup> *Midcontinent Independent System Operator, Inc.*, Submission of Revisions to the MISO-SPP Joint Operating Agreement to Implement Joint Targeted Interconnection Queue Framework and Request for Extended Comment Period, Docket No. ER24-2797-000 (Aug. 16, 2024) (“MISO JOA Filing”).

<sup>4</sup> *Southwest Power Pool, Inc.*, Submission of Revisions to the MISO-SPP Joint Operating Agreement to Implement Joint Targeted Interconnection Queue Framework and Request for Extended Comment Period, Docket No. ER24-2798-000 (Aug. 16, 2024) (“SPP JOA Filing”).

implement the Joint Targeted Interconnection Queue (“JTIQ”) framework between MISO and SPP. Additionally, SPP<sup>5</sup> and MISO<sup>6</sup> filed proposed revisions to their respective tariffs that are also necessary to implement the JTIQ framework proposed in these dockets.

## **II. COMMENTS**

Overall, WIRES supports the JTIQ framework, which is aimed at resolving interconnection issues through joint planning between MISO and SPP. More than 20 years ago the Commission issued Order No. 2003 and required transmission providers to coordinate interconnection studies and planning meetings with affected systems.<sup>7</sup> The effort the RTOs and stakeholders put into the development of the JTIQ framework represents successful coordination between the two regions and offers a good example of how neighboring RTOs can collaborate to work through regional differences and proactively implement a more efficient and cost-effective alternative to affected system studies. Most importantly, the JTIQ framework will enable MISO and SPP to advance a major portfolio of interregional transmission projects, achieving concrete progress towards multiple stated policy goals of the Commission.

The JTIQ framework is an innovative transmission planning and cost allocation solution targeted at improving MISO’s and SPP’s affected system study processes by reducing the affected system study timeline and improving cost certainty for network upgrade costs associated with those generators along the MISO-SPP seam. The JTIQ framework proposes to enable RTOs to

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<sup>5</sup> *Southwest Power Pool, Inc.*, Submission of Revisions to the SPP Open Access Transmission Tariff to Implement Joint Targeted Interconnection Queue Framework and Request for Extended Comment Period, Docket No. ER24-2825-000 (Aug. 21, 2024) (“SPP Filing”).

<sup>6</sup> *Midcontinent Independent System Operator, Inc.*, Proposed Revisions to MISO Tariff to Implement Joint Targeted Interconnection Queue Framework and Request for an Extended Comment Period, Docket No. ER24-2871-000 (Aug. 26, 2024) (“MISO Filing”).

<sup>7</sup> Order No. 2003, 104 FERC ¶ 61,103 at P 118 (2003).

develop a portfolio of backbone network upgrades in both regions that will facilitate the interconnection of new generation in the RTOs' combined footprint.<sup>8</sup> JTIQ Portfolio #1 is the first JTIQ portfolio that will address the limited availability of transmission capacity on the MISO-SPP seam.<sup>9</sup> And, although the proposal, particularly the cost allocation methodology, is specific to JTIQ Portfolio #1,<sup>10</sup> the proposed tariff and JOA provisions describe a general process specific to the MISO and SPP regions that is intended to be reusable by the RTOs under subsequent section 205 filings under the Federal Power Act.<sup>11</sup>

Moreover, the United States Department of Energy (DOE) acknowledged the value of the JTIQ Portfolio #1 projects when it conditionally awarded the JTIQ Portfolio #1 projects a substantial grant under its Grid Resilience and Innovative Partnerships (“GRIP”) Program.<sup>12</sup>

Given the above described attributes of the JTIQ proposal, WIRES supports this innovative and proactive approach proposed by MISO and SPP to address the complex interconnection queue management challenges created by the ever growing amount of interconnection requests along MISO-SPP seam. WIRES expects allowing neighboring regions to collaboratively develop

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<sup>8</sup> It is anticipated that JTIQ projects will (i) support clean energy deployment in the Midwest to achieve clean energy and carbon reduction goals; (ii) support local economic development within and around communities in the great plains area; and (iii) improve grid reliability and resilience by expanding interregional transfer capability between MISO and SPP.

<sup>9</sup> See MISO JOA Filing at 2; SPP JOA Filing at 2-3; SPP Filing at 3; and MISO Filing at 3.

<sup>10</sup> See MISO JOA Filing at 11; SPP JOA Filing at 13; SPP Filing at 13 and MISO Filing at 12.

<sup>11</sup> 16 U.S.C. § 824d.

<sup>12</sup> See Grid Deployment Office, *Efficient and Collaborative Transmission Planning for the Central United States* (Oct. 2023), <https://www.energy.gov/gdo/grid-resilience-and-innovation-partnerships-grip-program-projects>; see also Minnesota Department of Commerce News, *MN Commerce Department and regional grid operators receive \$464 million from U.S. Department of Energy for innovative electric grid project* (Oct. 18, 2023), at <https://mn.gov/commerce/news/?id=17-596688>.

solutions to address unique needs in a just and reasonable and not unduly discriminatory manner may prove to be beneficial.

### **III. CONCLUSION**

For the above-stated reasons, WIRES supports this innovative and proactive JTIQ Proposal developed by the RTOs to implement a more efficient and cost-effective alternative to affected system studies that is intended to reduce the affected system study timeline and advance cost certainty for network upgrade costs associated with those generators along the MISO-SPP seam. WIRES encourages the Commission to accept the RTOs' proposed revisions to implement the JTIQ proposal.

Respectfully submitted,

/s/ Larry Gasteiger

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Date: September 19, 2024

## **CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that I have this day had served the foregoing document upon each person designated on the official service compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 19<sup>th</sup> day of September 2024.

/s/ Larry Gasteiger

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