

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

**Midcontinent Independent System Operator, Inc.,            )       Docket No. ER25-94-000**  
**and Southwest Power Pool, Inc.                                )**

**COMMENTS OF THE AMERICAN COUNCIL ON RENEWABLE ENERGY**

Pursuant to Rule 211 of the Federal Energy Regulatory Commission (“Commission”) Rules of Practice and Procedure,<sup>1</sup> the American Council on Renewable Energy (“ACORE”) submits these comments in support of the Midcontinent Independent System Operator, Inc. (“MISO”) and Southwest Power Pool, Inc. (“SPP”) request for a limited prospective waiver of certain specific requirements of the MISO-SPP Joint Operating Agreement that apply to the Coordinated System Plan (“CSP”) study (“Waiver Request”), filed on January 15, 2025.

ACORE supports the Waiver Request because, as described, it will allow MISO and SPP “to expand the CSP study scope to identify near-term upgrades that incrementally enhance transfer capability and yield multiple benefits across the RTOs’ respective footprints without limiting upgrades to the replacement of regional projects.”<sup>2</sup> MISO and SPP explain that their “proposed expanded CSP study would include reliability, economic, and transfer analysis using forward-looking models and assumptions (10-year models).”<sup>3</sup> Further, such an expansion of the CSP analysis is needed because under the current “limited benefit valuations, success in

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<sup>1</sup> 18 C.F.R. § 385.211 (2024).

<sup>2</sup> Waiver Request at 4.

<sup>3</sup> *Ibid.*

developing solutions where both RTOs benefit has proven elusive and prior CSP studies have not yielded any interregional projects.”<sup>4</sup>

ACORE agrees that the MISO and SPP plan to “consider longer-term planning drivers, assumptions, and benefit valuations” will allow for the identification of interregional transmission projects that benefit both regions. Moreover, this planned improvement to the CSP represents a best practice that more planning regions should adopt. Expanding the benefits analysis beyond just the avoided cost of regional projects<sup>5</sup> will allow the RTOs to evaluate a broader scope of interregional transmission benefits, including the significant capital cost savings from avoided generation construction and improved reliability during extreme weather events.<sup>6</sup> With regard to the latter, MISO and SPP explain that they will include in the expanded CSP an analysis of extreme hot and cold weather scenarios.<sup>7</sup>

While Commission action to spur interregional transmission is still much needed, ACORE encourages such transmission provider-initiated improvements. It has been over two years since the Commission held a two-day workshop on *Establishing Interregional Transfer Capability Transmission Planning and Cost Allocation Requirements* in December 2022. Since

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<sup>4</sup> *Ibid.*

<sup>5</sup> Waiver Request at 7, citing Section 9.6.3.1.1.b(i) and c(i) of the JOA.

<sup>6</sup> See for example, Goggin, Michael, Grid Strategies LLC, *The Value of Transmission During Winter Storm Elliott* (Feb. 2023), finding that an additional gigawatt (GW) of interregional transmission capacity between a number of regions would have saved nearly \$100 million during Winter Storm Elliott in December 2022, available at: <https://acore.org/wp-content/uploads/2023/02/The-Value-of-Transmission-During-Winter-Storm-Elliott-ACORE.pdf>; Michael Goggin and Zach Zimmerman, Grid Strategies LLC, *Billions in Benefits: A Path for Expanding Transmission Between MISO and PJM*, (Nov. 2023), found that additional interregional transmission between MISO and PJM would provide \$6.3 billion in economic value from reducing the amount of generating capacity needed, available at: <https://acore.org/resources/billions-in-benefits-a-path-for-expanding-transmission-between-miso-and-pjm/>

<sup>7</sup> Waiver Request at 9.

then, the Commission has not taken any meaningful action to improve interregional transmission planning.

While Order No. 1920, as revised under Order No. 1920-A, established requirements for multiple-scenario long-range transmission planning and the analysis of seven specific benefits in the selection of transmission solutions, several transmission providers have requested extensions of the compliance deadline.

Given these developments, ACORE strongly recommends that the Commission support steps taken by transmission providers to implement the transmission planning practices established in Order No. 1920 and apply such best practices to interregional transmission. MISO and SPP correctly note that “multi-benefit metrics are also more in line with the spirit of Order No. 1920.”<sup>8</sup> Actions such as those described in the MISO and SPP Waiver Request can provide models for other regions and will further add to the body of data on the benefits of interregional transmission. ACORE, therefore, requests that the Commission approve the Waiver Request by March 15 as requested by MISO and SPP.

Respectfully submitted,

/s/ Elise Caplan

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February 5, 2025

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<sup>8</sup> *Ibid.*

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of this pleading has been served this day upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated this 5th day of February, 2025.

/s/ Elise Caplan  
Elise Caplan