

Wind on the Wires Comments on System Impact Study Alternatives
April 7th, 2016

Wind on the Wires appreciates the opportunity to comment on the proposed System Impact Study (SIS) alternatives presented to the Interconnection Process Task Force on March 10th, 2016. We believe that more data is needed to support taking action at this time and that if action is deemed necessary, operational monitoring and control of generation is a more appropriate and less costly solution to the concern that the three System Impact Study Alternate Proposals are attempting to address.

It is important to keep in mind that not all possible transmission scenarios are mitigated in the generation planning process, as some scenarios have a low probability of occurring, are very costly, and therefore handled in operations. Also, in a competitive market environment like MISO, not all generation is expected to be used simultaneously and therefore transmission is not built to accommodate all generation being dispatched simultaneously. The concerns raised regarding “stressed outlets” relate to seemingly statistically rare situations where monitoring is not occurring, and therefore generation cannot be managed in day-to-day operations. Before MISO would make drastic and extremely costly changes to its study practices significantly affecting Transmission and Generation Owners across its footprint, there needs to be a better understanding of the statistical likelihood/justification of the occurrences under question across the footprint, and compare that with other rare operational scenarios that are typically handled in real time. In particular, MISO needs to understand (and share with stakeholders) the statistical likelihood of wind and solar resources coincidentally peaking. Most, but not all, off-peak hours occur during the night, and other times that solar would not be peaking, so understanding how statistically likely it is for wind and solar to coincidentally peak across the footprint is the first step to be undertaken in this process.

Wind on the Wires strongly opposes any proposal that eliminates the distinction between ERIS and NRIS. MISO Proposal #1 effectively eliminates ERIS, and Proposal #2 brings additional concerns regarding market modeling of an ERIS generator which is based on N-1 system conditions. Therefore, we strongly oppose both Proposal #1 and Proposal #2.

Wind on the Wires also has strong concerns about Proposal #3 because requiring generators and Transmission Owners to build additional, costly transmission as is proposed, does not appear to be the only solution to address concerns associated with “stressed outlets” that would need to be identified through proper analysis indicating that wind and solar could peak coincidentally. Proper monitoring equipment can be added to the “stressed outlet” to send appropriate control signals to generators, if needed, with much greater cost-effectiveness than implementation of Proposal #3, and therefore has a higher probability of actually coming to fruition. Proposal #3 has very high costs associated with it which could create barriers for new generation, and also add new upgrade costs to Transmission Owners across the footprint, who would be required to bring the existing system into compliance with the new standard through the MTEP process, before applying it to new generation in DPP System Impact Studies. The cost of Proposal #3 to both Transmission Owners and Generators may not be appropriately matched to the apparent need. Therefore, a statistical analysis across the footprint to better understand the need is clearly a first step in this process.

Again, if a genuine need is demonstrated through statistical data, a more practical approach appears to be implementing new monitoring of those lines, to be used in coordination with existing control requirements for generators wishing to interconnect. This would ensure that new generators are responsible only for their own project network upgrades, and not pre-existing conditions that came as a result of new policies. Alternately, MISO could implement monitoring and control requirements for each of its Transmission Owning members to ensure all 69kV circuits and any others not properly monitored, are properly monitored. Furthermore, as noted by MISO in previous IPTF meetings, Local Planning Criteria of individual Transmission Owners already address these and other scenarios where Transmission Owners have concerns that standard studies are not sufficient. Wind on the Wires therefore encourages MISO that, if it is seeking system-wide solutions verses using Local Planning Criteria, it should first present actual data to establish the need, and then, if a system-wide solution is deemed necessary, it should pursue monitoring options to meet that need, and present that as a proposal to be considered.

Respectfully submitted,

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