MOTION TO FILE COMMENTS OUT OF TIME AND COMMENTS
OF THE ILLINOIS COMMERCE COMMISSION

Pursuant to Rules 211 and 212 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission ("Commission")\(^1\) and the Combined Notice of Filings issued by the Deputy Secretary of the Commission on August 4, 2017 setting August 25, 2017 as the comment deadline in this proceeding, the Illinois Commerce Commission ("ICC") respectfully submits this Motion to File Comments Out of Time and Comments regarding the proposed revisions to Attachment FF and Attachment FF-6 of the MISO Open Access Transmission, Energy and Operating Reserve Markets Tariff ("Tariff") that would establish a methodology for assigning costs within the MISO region for targeted market efficiency projects ("TMEPs") between the Midcontinent Independent System Operator ("MISO") and the PJM Interconnection LLC ("PJM") filed by MISO in the above-captioned proceeding on August 4, 2017 ("August 4 Filing"). The ICC timely filed a Notice of Intervention on August 22, 2017, and therefore, is a party to this proceeding.

\(^1\) 18 C.F.R. §385.211 and §385.212.
I. MOTION TO FILE COMMENTS OUT OF TIME

Pursuant to Rule 212 of the Commission’s Rules of Practice and Procedure, the ICC respectfully moves to file comments out of time. The ICC timely filed a Notice of Intervention on August 22, 2017, and therefore, is a party to this proceeding. Because of the ICC’s administrative process and other obligations, it was unable to meet the August 25, 2017 comment filing deadline. Because the outcome of this proceeding could impact Illinois, the ICC believes that its comments on the matters at issue here will help the Commission in its deliberations and are in the public interest. The ICC accepts the record to date and does not wish to disrupt proceedings.

II. BACKGROUND

The August 4 Filing proposes revisions to Attachment FF and Attachment FF-6 of the MISO tariff to provide a cost allocation methodology for TMEPs between MISO and PJM. The August 4 Filing proposes to assign the MISO-allocation share of costs of MISO-PJM TMEPs to all transmission pricing zones (“TPZs”) that receive a positive congestion contribution benefit from the TMEP. The August 4 Filing states that the share of the cost allocated to each TPZ is in proportion to the relative positive congestion contribution benefit accruing from the TMEP to the TPZ over the evaluation period. The August 4 Filing also states that during the second planning area’s transition period, MISO will not allocate costs for TMEPs that are located wholly outside of MISO or terminate exclusively in the first planning area, constituting the classic MISO area, to a TPZ.

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2 18 C.F.R. §385.212
4 August 4 Filing, at 4-5.
5 August 4 Filing, at 5.
6 See MISO FERC Electric Tariff, Transmission Expansion Planning Protocols, Attachment FF, Section III.A.2(h)(iv) proposed.
located in the second planning area, one that includes the MISO-South region.\(^7\) Finally, MISO seeks to make the proposed revisions for assigning costs of TMEPs effective only for the duration of the second planning area’s transition period and commits to hold a stakeholder process to develop a cost allocation for TMEPs on the MISO-PJM seam that will apply after the end of that transition period.\(^8\)

**III. COMMENTS**

The ICC supports MISO’s request that the proposed TMEP cost allocation tariff provisions be made effective only until the end of the second planning area’s transition period. In the August 4 Filing, MISO commits to conducting an “exhaustive stakeholder process to develop a cost allocation methodology for TMEPs that will apply after the Transition Period terminates.”\(^9\) In particular, MISO commits to filing new cost allocation proposed tariff modifications to be effective January 1, 2019, by mid-2018.\(^10\) In this context, it is appropriate for the Commission to grant MISO’s request that the proposed TMEP cost allocations remain in effect only until the end of the second planning area’s transition period.

**IV. CONCLUSION**

For the reasons described above, the ICC recommends that if the Commission accepts MISO’s proposed TMEP cost allocation proposal, it be made effective only until the end of the

\(^7\) See proposed Attachment FF, Section III.A.2(h)(iv). MISO defines the “second planning area” as, the portion of MISO that includes the Entergy Corporation and its Operating Companies that own and/or operate transmission facilities (i.e., located in Arkansas, Louisiana, Mississippi, or Texas) that are conveyed to the functional control of MISO to provide transmission service pursuant to Module B of the tariff.
\(^8\) August 4 Filing, at 6.
\(^9\) August 4 Filing, Attachment A, at 20.
second planning area’s transition period and that the tariff provisions which implement that cost allocation terminate at that time.

Respectfully submitted,

/s/Christine F. Ericson

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Dated: September 27, 2017
CERTIFICATE OF SERVICE

I hereby certify that I caused copies of the foregoing document of the Illinois Commerce Commission to be served this day upon each person designated on the official service list compiled by the Secretary in this proceeding, a copy of which is attached, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure.

Dated at Chicago, Illinois, this 27th day of September, 2017.

/s/ Christine F. Ericson

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