

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

Midcontinent Independent System Operator, Inc.)

Docket No. ER25-1674-000

**MOTION FOR EXTENSION OF TIME OF THE COALITION OF MIDWEST
POWER PRODUCERS**

Pursuant to Rules 212 and 2008 of the Federal Energy Regulatory Commission’s (“FERC” or the “Commission”) Rules of Practice and Procedure,¹ the Coalition of Midwest Power Producers, Inc. (“COMPP”),² respectfully submits this motion seeking a 14-day extension of the comment and intervention period for the Midcontinent Independent System Operator’s (“MISO”) Expedited Resource Adequacy Study filing (“ERAS”).³ On March 17, 2025, MISO, pursuant to Section 205 of the Federal Power Act (“FPA”),⁴ proposed revisions to its Open Access Transmission, Energy, and Operating Reserve Markets Tariff (“Tariff”) that would establish a “process for the accelerated study of generation projects.”⁵ On March, 18, 2025, the FERC Noticed the ERAS filing and

¹ 18 C.F.R. §385.212, 18 C.F.R. §385.2008

² The Coalition of Midwest Power Producers or COMPP is a non-profit trade association where member companies work together on a cooperative basis to maintain and develop independent, transparent, non-discriminatory, robust, and fully competitive wholesale energy, capacity and ancillary service markets within the Midcontinent Independent System Operator, Inc. (MISO) region. COMPP members strive to create a “level playing field” in the further development and evolution of MISO’s market design working within the open stakeholder process where MISO operates as the nation’s first FERC approved Regional Transmission Organization managing the reliable supply and transmission of power within a 15-state region ranging from the Gulf of Mexico to the Canadian province of Manitoba. For more information visit the COMPP website at www.compp.org.

³ Revisions to the Open Access Transmission, Energy and Operating Reserve Tariff Interconnection Queue Cap Filing, Docket No. ER24-341-000 (“MISO Interconnection Filing”)

⁴ 16 U.S.C. § 824d.

⁵ Midcontinent Independent System Operator, Revisions to the Open Access Transmission, Energy and Operating Reserve Tariff Expedited Resource Addition Study Filing, March 17, 2025, at 1, (“MISO ERAS Filing”).

established an initial comment date of April 7, 2025.⁶ COMPP is requesting the FERC to establish an adjusted comment date of April 21, 2025.

I. COMPP AND OTHER INTERESTED PARTIES NEED ADEQUATE TIME TO ADDRESS MISO'S ERAS FILING

MISO's ERAS proposal seeks to overhaul generator interconnection, the co-development of generation and load, and transmission cost allocation. The ERAS filing is 928 pages in length and includes a transmittal letter, testimony, Tariff sheets, related governing document revisions, and a new RERRA notification form. COMPP needs additional time to evaluate the filing, its elements, and review the proposed Tariff language against the positions stated in the transmittal letter and testimony.

As MISO acknowledged, COMPP has been an active participant in MISO's development of the ERAS proposal since the initial November 18, 2024, workshop.⁷ Despite our monitoring of the ERAS proposal development, the provided comment period is insufficient to assess MISO's Tariff changes and policy reform. A response to these reforms requires a grasp of the filed Tariff revisions, interactions with other portions of the MISO Tariff, and an assessment of whether MISO's proposal is appropriately tailored to achieve its stated goals.

II. CONCLUSION

COMPP submits that good cause exists to grant the request for an extension of the comment period. This additional time is necessary for all impacted parties to provide the Commission with

⁶ FERC Combined Notice of Filings #1 at 3, March 18, 2025.

⁷ See, *MISO ERAS Filing* at 25 (referencing COMPP's proposal to integrate guardrails and a scoring system based on demonstrated resource adequacy needs and commercial readiness).

informed views on a complicated series of reforms. Moreover, the extension of the comment period will not harm customers or impact MISO's ability to follow Commission directives at the conclusion of this proceeding.

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Respectfully submitted,
On behalf of the Coalition of Midwest
Power Producers Inc.

/s/ Scott R. Storms

Scott R. Storms
Counsel for Coalition of Midwest Power Producers
March 21, 2025

CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically served the foregoing document upon each person designated on the official service list compiled by the Secretary of the Commission in this proceeding.

Dated this 21st day of March 2025.

/s/ Scott R. Storms

Scott R. Storms

Counsel for Coalition of Midwest Power Producers