

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

Midcontinent Independent System Operator, Inc.)

Docket No. ER25-579

**INTERVENTION AND COMMENTS IN SUPPORT OF THE MISO TARIFF
REVISIONS ON VALUE OF LOST LOAD, OPERATING RESERVE DEMAND
CURVE, AND EMERGENCY RESPONSE RESOURCES BY THE COALITION OF
MIDWEST POWER PRODUCERS**

Pursuant to Rule 212 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 requests intervention in the abovementioned docket. On November 26, 2025, the Midcontinent Independent System Operator, Inc. (“MISO”), pursuant to Section 205³ of the Federal Power Act (“FPA”), proposed revisions to its Open Access Transmission, Energy, and Operating Reserve Markets Tariff (“Tariff”) to update and improve the rules governing Value of Lost Load (“VOLL”), Operating Reserve Demand Curves (“ORDC”), and Emergency Demand

¹ 18 C.F.R. § 385.212 (2018).

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 16 U.S.C. § 824d.

Response (“EDR”) resources, in MISO’s Day-Ahead Energy and Operating Reserve Market (“Day-Ahead Market”) and Real-Time Energy and Operating Reserve Market (“Real-Time Market”). COMPP submits comments in support of MISO’s Tariff filing which seeks to update the rules governing the VOLL, ORDC, and EDR resources.

I. COMPP SUPPORTS MISO’S PROPOSAL TO IMPLEMENT A PRICING VOLL WITH A PRICE CAP OF \$10,000/MWh AND A SYSTEM VOLL OF \$35,000/MWh WHICH WILL BE UTILIZED TO SCALE THE ORDC.

As discussed in their November 26, 2024 Tariff filing, MISO’s current VOLL of \$3,500/MWh was established at the launch of MISO’s Ancillary Services Market in 2009 and has not been updated since. During that time, the potential direct and indirect costs to residential, commercial, and industrial customers that would result from a disruption in electricity supply has significantly increased and requires a higher “pricing” VOLL than what was implemented in 2009. Put simply, the price consumers are willing to pay to avoid an interruption of electrical service in 2025 is greater than it was in 2009. Over the past year, MISO, through multiple discussions with stakeholders as well as various presentations and whitepapers, has established the rationale for a pricing VOLL of \$10,000/MWh and explained why that value sends the proper real-time pricing signals during shortage conditions to encourage suppliers to take the necessary steps to prevent or minimize the time of an interruption, while also incentivizing demand side customers to reduce their usage. COMPP believes MISO’s proposed changes will correctly signal the onset of tight operating conditions to market participants and ultimately improve market reliability and efficiency.

MISO's proposed \$35,000/MWh System VOLL will be used only for purposes of scaling the ORDC and reflects the financial impact of shedding load across all customer classes. MISO's current 'stair step' ORDC approach is capped at \$2,100/MWh for most of the Operating Reserve conditions and fails to properly account for and value the increasing reliability challenges as the percentage of available Operating Reserves shrinks. Under the current ORDC design, the \$2,100/MWh value applies regardless of whether the Cleared Operating Reserves are at 80% or 10%. MISO's new proposed ORDC scaling methodology will establish more accurate prices as the Operating Reserves decrease during shortage conditions.

II. COMPP SUPPORTS THE ELIMINATION OF MISO'S EDR PROGRAM

Finally, COMPP is encouraged by the fact that MISO's tariff filing notes that MISO "may soon seek the elimination of the EDR category through a separate Tariff filing..." COMPP agrees that EDR, which has only been deployed once since its inception, is unnecessary, should be eliminated, and can be replaced by existing Load Modifying Resource and Demand Response programs and services. Additionally, as pointed out in MISO's tariff filing, the Independent Market Monitor also supports eliminating the EDR class of resources.

III. CONCLUSION

The proposed Tariff filing seeking to update the rules governing the VOLL, ORDC, and EDR resources is a just, reasonable, and nondiscriminatory proposal that will improve market reliability and efficiency. Accordingly, COMPP requests the Commission approve this filing.

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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
January 10, 2024

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 10th day of January 2025.

/s/ Scott R. Storms

Scott R. Storms

Counsel for Coalition of Midwest Power Producers