

**STATE OF IOWA
DEPARTMENT OF COMMERCE
BEFORE THE IOWA UTILITIES BOARD**

IN RE:

INVESTIGATION INTO A
COMPREHENSIVE PLAN FOR IOWA’S
TRANSMISSION GRID OF THE FUTURE

DOCKET NO. INU-2021-0001

**COMMENTS OF THE MIDCONTINENT INDEPENDENT
SYSTEM OPERATOR, INC.**

The Midcontinent Independent System Operator, Inc. (“MISO”) submits these Comments in response to the July 2, 2021 “Order Initiating Investigation, Requesting Comments, And Setting Date For Workshop” in the above-captioned docket (“Investigation Order”).¹ MISO provides this information to assist the Iowa Utilities Board (“the Board”) with its investigation.

I. INTRODUCTION

MISO is the regional transmission organization (“RTO”) that manages the interstate transmission grid and wholesale electricity markets in 15 Midwestern States, including Iowa, and the Canadian province of Manitoba. As a multi-state RTO subject to the exclusive jurisdiction of the Federal Energy Regulatory Commission (“FERC”),² MISO views the Board and other state regulators in its footprint as indispensable partners in ensuring a reliable transmission grid for the entire MISO region. MISO appreciates the opportunity to submit these comments and looks

¹ IN RE: INVESTIGATION INTO A COMPREHENSIVE PLAN FOR IOWA’S TRANSMISSION GRID OF THE FUTURE, Docket No. INU-2021-0001, Order Initiating Investigation, Requesting Comments, And Setting Date For Workshop (July 2, 2021).

² 16 U.S.C. §§ 824(b) and (e).

forward to participating in the August 30 workshop³ to further clarify the planning process and respond to any questions the Board may have.

The Board opened this docket “to investigate the development of a comprehensive plan for Iowa’s transmission grid of the future.”⁴ The Board noted “multiple petitions” it received for transmission lines which transmit electricity from a generator to a point of interconnection with the transmission grid, and raised the question of whether the lines benefitted Iowa and its residents.⁵ In particular, the Board noted that it needs “information regarding Iowa’s transmission grid, the plans for expansion of the transmission grid, the plans for expansion of generation in Iowa, and how the plans reasonably relate to an overall plan for transmitting electricity in the public interest.”⁶

MISO submits comments below explaining the MISO Transmission Expansion Plan (“MTEP”) and the generator interconnection process to respond to the Board’s inquiry regarding transmission planning and benefits to Iowa residents. MISO acknowledges the Board’s role and responsibilities under Iowa law and takes no position on the specific Iowa Code requirements referenced in the Investigation Order. MISO notes, however, that its regional transmission planning process is designed to address many of the concerns articulated by the Board. In particular, the MISO process is designed to consider and to take into account state public policies and priorities, such the various renewable energy-related policies referenced in the Investigation Order.⁷ MISO also integrates the “local” transmission plans of its utility members into its regional

³ Investigation Order at 6.

⁴ *Id.*

⁵ *Id.*, at 1-2.

⁶ *Id.*, at 4.

⁷ *Id.*, at 2-3.

plan. The key objective of the MISO planning process is to ensure that the MISO grid is sufficiently robust to accommodate energy flows across the entire region, consistent with applicable reliability requirements.

Stakeholder input, including from state regulators in the MISO footprint, is specifically provided for in the planning process. MISO has a well-structured, FERC-compliant stakeholder process that allows many opportunities for engaging in all aspects of MISO's governance and activities, including the development of the MTEP.⁸ As detailed on its website, MISO maintains an extensive network of committees, task forces, and working groups to ensure thorough review of all pertinent policy, legal and technical issues that may be of interest to stakeholders.⁹ The state regulators in the MISO footprint actively participate in this process, both independently and through the Organization of MISO States ("OMS"), which includes representatives from each state with regulatory jurisdiction over entities participating in MISO.¹⁰ As further explained below, these stakeholder venues and opportunities ensure that the Board may achieve its transmission planning objectives by working within the MISO process, in close cooperation with the FERC, other state regulators and various interested entities, such as generating companies, transmission owning members of MISO and other stakeholder groups.

II. COMMENTS

A. MISO's Role and Value Delivered

MISO is an independent, not-for-profit, member-based organization, which was created more than 20 years ago and became the first FERC-approved RTO in 2001.¹¹ MISO manages a

⁸ See MISO's stakeholder development webpage, at: <https://www.misoenergy.org/stakeholder-engagement/>.

⁹ See MISO's stakeholder entities webpage, at: <https://www.misoenergy.org/stakeholder-engagement/committees/>.

¹⁰ See the OMS' website, at: <https://www.misostates.org/>.

¹¹ *Midwest Independent Transmission System Operator, Inc.*, 97 FERC ¶ 61,326 (2001).

combined footprint of 65,800 miles of transmission, with total electric generation capacity throughout its footprint of over 198,000 MW, and provides an independent platform for its regional wholesale electricity markets. MISO has certain defined functions and responsibilities, such as Transmission Provider, Reliability Coordinator, Planning Coordinator, and Balancing Authority, which it performs in accordance with the FERC's rules and regulations, the MISO Tariff,¹² and the NERC Reliability Standards and practices.

Transmission planning is one of MISO's core responsibilities under the Tariff, the Transmission Owners Agreement¹³ and the FERC's governing mandates, such as FERC Order Nos. 890 and 1000.¹⁴ MISO performs both regional and interregional transmission expansion planning for the entire MISO region (including Iowa) and also assists its member utilities with their local transmission planning tasks. As part of these responsibilities, MISO develops the MTEP, which determines regional and interregional transmission facilities needed by the entire MISO region to ensure compliance with reliability, economic and public policy mandates and requirements. Stakeholder participation, particularly participation by the regulators in the 15-state footprint, is expressly provided for in the planning process.¹⁵ Additionally, MISO is responsible

¹² When capitalized, the term "Tariff" or "MISO Tariff" refers to MISO's Open Access Transmission, Energy and Operating Reserve Markets Tariff, available at: <https://www.misoenergy.org/legal/tariff/>.

¹³ See Agreement of Transmission Facilities Owners to Organize the Midcontinent Independent System Operator, Inc., a Delaware Non-Stock Corporation, available at: https://docs.misoenergy.org/legalcontent/Rate_Schedule_01_-_Transmission_Owners_Agreement.pdf.

¹⁴ *Preventing Undue Discrimination and Preference in Transmission Service*, Order No. 890, FERC Stats. & Regs. ¶ 31,241, *order on reh'g*, Order No. 890-A, FERC Stats. & Regs. ¶ 31,261 (2007), *order on reh'g and clarification*, Order No. 890-B, 123 FERC ¶ 61,299 (2008), *order on reh'g*, Order No. 890-C, 126 FERC ¶ 61,228 (2009), *order on clarification*, Order No. 890-D, 129 FERC ¶ 61,126 (2009); *Transmission Planning and Cost Allocation by Transmission Owning and Operating Public Utilities*, Order No. 1000, FERC Stats. & Regs. ¶ 31,323 (2011), *order on reh'g*, Order No. 1000-A, 139 FERC ¶ 61,132, *order on reh'g*, Order No. 1000-B, 141 FERC ¶ 61,044 (2012), *aff'd sub nom. S.C. Pub. Serv. Auth. v. FERC*, 762 F.3d 41 (D.C. Cir. 2014).

¹⁵ Tariff, Attachment FF, Sections I.B, and I.C.2.

for the administration of its generator interconnection rules, which ensure uniform, efficient and non-discriminatory interconnection of generating facilities throughout the MISO region.

Over the years, MISO's unparalleled expertise and state-of-the-art market infrastructure and processes have delivered significant benefits to consumers in the footprint. Currently, MISO brings over \$3 billion in net annual value to its members and their customers, with a cumulative total of approximately \$30 billion in benefits from 2009 to 2020.¹⁶ As documented in MISO's 2020 Value Proposition, the key benefits include: improved reliability (\$288-\$313 million), compliance efficiencies (\$96-\$134 million), dispatch of energy optimization (\$329-\$363 million), regulation market efficiencies (\$128-\$142 million), spinning reserve efficiencies (\$60-\$67 million), wind integration (\$450-\$517 million), footprint diversity (\$1,911-\$2,494 million), demand response efficiencies (\$116-\$211 million), and administrative cost efficiencies (\$306 million).¹⁷ The benefits reflect both more efficient use of existing assets and reduced need for additional assets.¹⁸ It is notable that the largest benefits occurred in the key areas of increasing footprint diversity and wind integration, which emphasizes the critical role MISO's processes play in ensuring continued resilience of its multi-state transmission grid.

MISO's transmission expansion planning and generator interconnection activities account for a significant portion of the delivered benefits. Through the MTEP, MISO approves approximately \$4 billion in transmission projects on an annual basis, which minimizes the total cost of delivered power to consumers. MISO's transmission expansion planning model focuses on value while maintaining reliability and reflects a longer-term time horizon, seeking to identify

¹⁶ See MISO 2020 Value Proposition ("2020 Value Proposition"), Executive Summary, at 1, available at: <https://www.misoenergy.org/about/miso-strategy-and-value-proposition/miso-value-proposition/>.

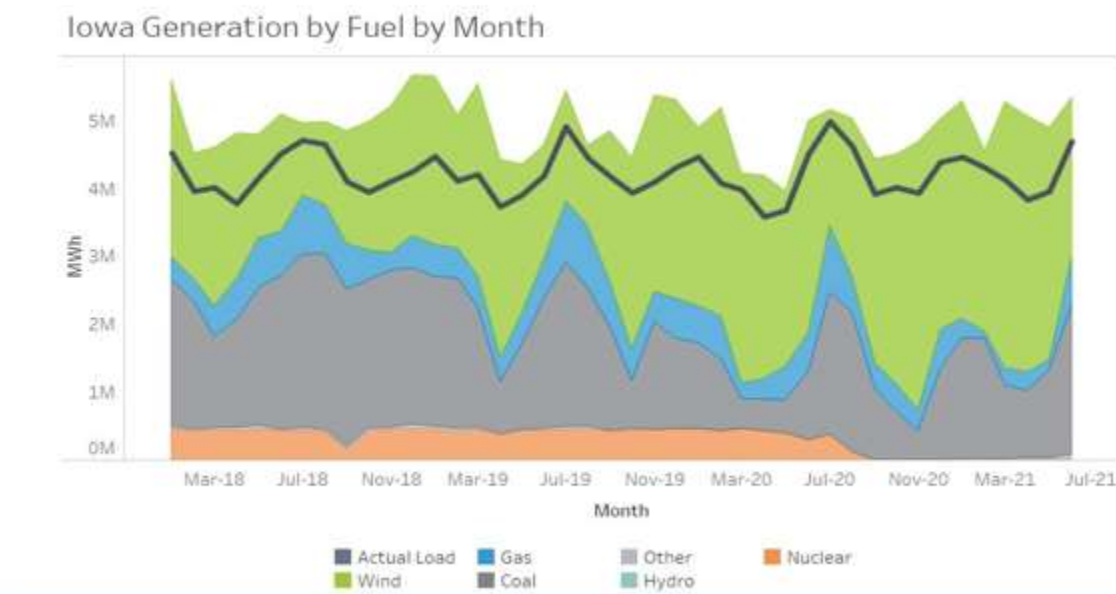
¹⁷ *Id.*, at 3-11.

¹⁸ *Id.*, at 1.

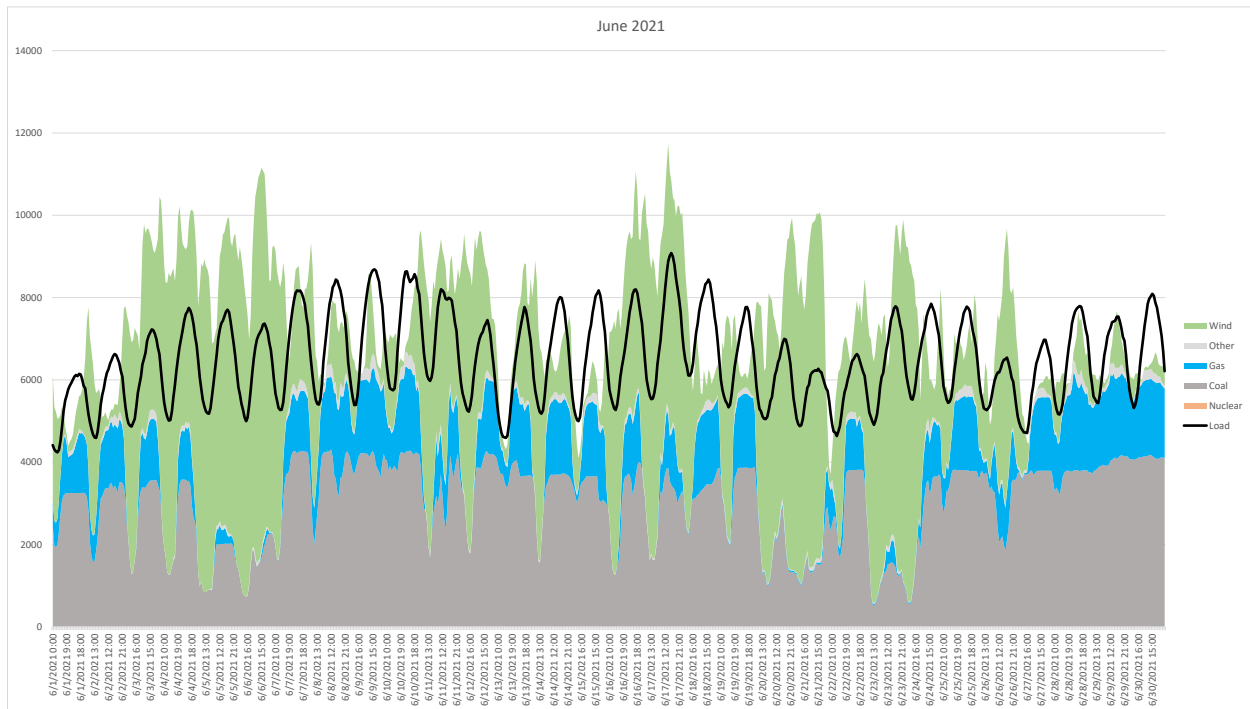
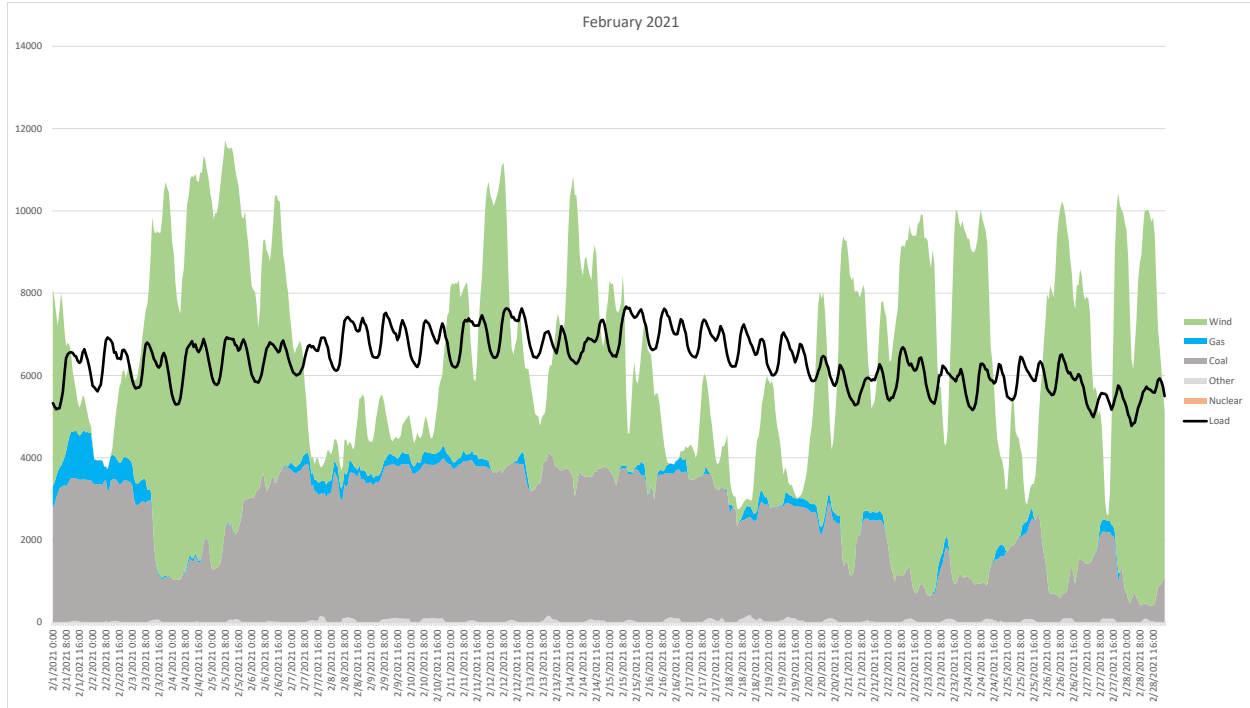
transmission infrastructure that maximizes value (reliability, economic and policy) of projects. MISO also offers efficiencies of scale that allow it to address aggregate regional needs consistent with value-based plans, in addition to meeting local needs, and provides opportunities to find efficiencies across multiple member utilities' transmission systems. Customers across the entire footprint benefit from the enhanced transmission identified and implemented by MISO through the MTEP process.¹⁹

B. Benefits to Iowa

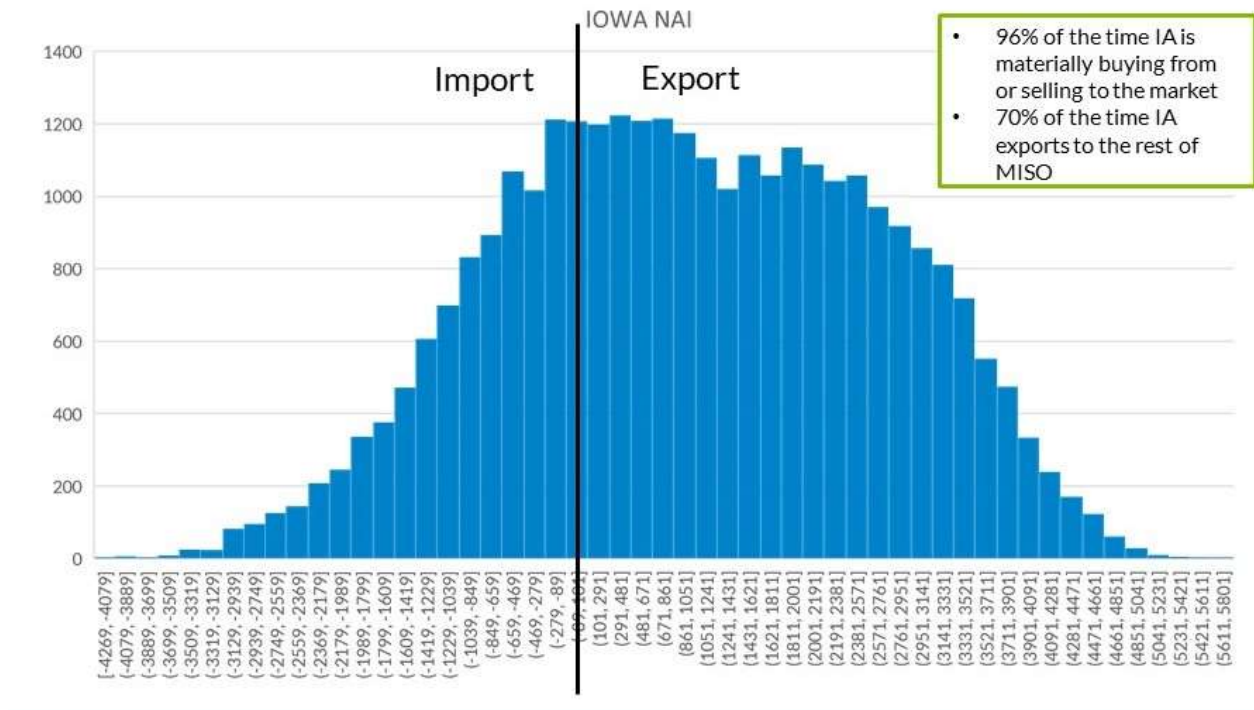
Like other MISO states, Iowa and its consumers are beneficiaries of MISO's infrastructure and market platform. Although Iowa has an abundance of wind generation, that generation does not produce energy every hour and Iowa must depend on the MISO market to absorb its excess power production and to provide resources when the wind generation is not operating. The fluctuating profile of Iowa's generation is illustrated on the following charts:



¹⁹ MISO and its members depend on the states in the MISO footprint to site and approve the transmission infrastructure included in the MTEP. While each state has its own transmission siting procedures and requirements, the MTEP relies on state regulator's determinations to support the ability of that grid to function efficiently and consistent with applicable federal and state mandates and policy requirements.



As a result of this fluctuating profile, Iowa's resources must actively participate in the MISO markets to economically balance dependence on intermittent wind resources. The chart below illustrates the Net Actual Interchange ("NAI").



C. MISO's Transmission Planning and Generator Interconnection Framework

The MISO transmission expansion planning and generator interconnection protocols in the Tariff are separate, but coordinated. MISO's transmission expansion planning protocol is set forth in Attachment FF of the Tariff and is based on the planning framework of Appendix B to the Transmission Owners Agreement. The protocol is fully compliant with FERC Order Nos. 890 and 1000 and includes many improvements developed by MISO and its stakeholders. The generator interconnection process is set forth in Attachment X of the Tariff and reflects the requirements of

FERC Order No. 2003,²⁰ including FERC-approved improvements and regional variances. In addition, MISO maintains detailed business practice manuals (“BPM”), which provide further information on the specifics of the transmission expansion planning process (BPM-020) and the generator interconnection process (BPM-015).²¹

1. Transmission Expansion Planning Process

MISO’s transmission planning role is centered around the MTEP process. MISO develops the MTEP based on expected use patterns and analysis of the performance of the MISO Transmission System in meeting both reliability needs and the needs of the competitive bulk power market, under a wide variety of contingency conditions.²² The MTEP process integrates into the development of the regional plan many factors, including: (i) the transmission needs identified by the Transmission Owners in connection with their planning analyses in accordance with local planning processes to provide reliable power supply to their connected load customers and to expand trading opportunities, and to better integrate the grid and alleviate congestion; (ii) the transmission planning obligations of a Transmission Owner, imposed by federal or state laws or regulatory authorities; (iii) plans and analyses developed by MISO to provide for a reliable transmission system and to expand trading opportunities, and to better integrate the grid and alleviate congestion; (iv) the inputs provided by the Planning Advisory Committee; and (v) the

²⁰ *Standardization of Generator Interconnection Agreements and Procedures*, Order No. 2003, FERC Stats. & Regs. ¶ 31,146 (2003), *order on reh’g*, Order No. 2003-A, FERC Stats. & Regs. ¶ 31,160, *order on reh’g*, Order No. 2003-B, FERC Stats. & Regs. ¶ 31,171 (2004), *order on reh’g*, Order No. 2003-C, FERC Stats. & Regs. ¶ 31,190 (2005), *aff’d sub nom. Nat’l Ass’n of Regulatory Util. Comm’rs v. FERC*, 475 F.3d 1277 (D.C. Cir. 2007), *cert. denied*, 552 U.S. 1230 (2008).

²¹ The BPMs are available on MISO’s website, <https://www.misoenergy.org/legal/business-practice-manuals/>.

²² Tariff, Attach. FF, Section I.C.

inputs, if any, provided by state regulatory authorities having jurisdiction over any of the Transmission Owners and by the Organization of MISO States.²³

To guide the development of the MTEP, MISO applies certain planning principles. These principles are spelled out in the BPM and direct MISO to:

- make the benefits of an economically efficient electricity market available to customers by identifying transmission projects which provide access to electricity at the lowest total electric system cost;
- develop a transmission plan that meets all applicable NERC and Transmission Owner planning criteria and safeguards local and regional reliability through identification of transmission projects to meet those needs;
- support state and federal energy policy requirements by planning for access to a changing resource mix;
- provide an appropriate cost allocation mechanism that ensures that costs of transmission projects are allocated in a manner roughly commensurate with the projected benefits of those projects;
- analyze system scenarios and make the results available to state and federal energy policy makers and other stakeholders to provide context and to inform choices and coordinate planning processes with neighbors and work to eliminate barriers to reliable and efficient operations.²⁴

As previously noted, stakeholder participation in the MTEP process is expressly provided for, both for individual states and collectively through the OMS. Through these processes, state regulators have an effective communication channel with MISO, which allows them to bring issues of concern directly to MISO's attention, including issues related to transmission planning. While MISO's activities and the Tariff are subject to the exclusive jurisdiction of the FERC,²⁵ MISO is mindful of the principles of cooperative federalism and works closely with the state regulators in

²³ *Id.*

²⁴ BPM-020, Section 2.1.

²⁵ MISO is a FERC-jurisdictional "public utility" under the Federal Power Act ("FPA"). *See* 16 U.S.C. §§ 824(b)(1) and (e).

its footprint to ensure that the benefits of MISO’s markets and operations are broadly available to all customers in the entire MISO region, without undue discrimination or preference.

The MTEP protocol includes detailed FERC-approved transmission project categories, which address different types of transmission needs: reliability, economic, generator interconnection or a portfolio serving multiple needs. The main MTEP project categories are: Baseline Reliability Projects,²⁶ New Transmission Access Projects (which include transmission service delivery and generator interconnection projects),²⁷ Market Efficiency Projects,²⁸ and Multi-Value Projects.²⁹ Each project is defined by certain criteria as outlined in the Tariff. The MTEP protocol also provides for detailed cost allocation rules for each project category.

In developing the MTEP, MISO uses a “bottom-up, top down” approach, which means that individual Transmission Owners continuously review and plan to reliably and efficiently meet the needs of their local systems. The development of the MTEP is a multi-step, multi-stage process.³⁰ The extensive stakeholder process includes meetings of the Planning Advisory Committee, Planning Subcommittee, and Subregional Planning meetings.³¹ MISO then reviews these local planning activities with stakeholders and performs a top-down review of the adequacy and appropriateness of the local plans in a coordinated fashion with all other local plans to most efficiently ensure that all of the needs are cost effectively met. In addition, MISO considers, together with its stakeholders, opportunities for improvements and expansions that would reduce consumer costs by providing access to new low-cost resources that are consistent with, and

²⁶ Tariff, Attach. FF, Section II.A.1.

²⁷ *Id.*, Section II.A.2.

²⁸ *Id.*, Section II.B.

²⁹ *Id.*, Section II.C.

³⁰ *Id.*, Section I.C.

³¹ *Id.*, Section I.C.2.

required by, evolving legislative energy policies. At the end of the MISO process, the MISO Staff recommend selected projects to the MISO Board. Once the MISO Board has approved an MTEP, Transmission Owners³² are required make a good faith effort to construct the projects listed in MTEP Appendix A, subject to any required approvals by federal and/or state regulatory authorities, such as transmission siting approvals and other permits and authorizations.

The MISO planning framework, including the projects approved for inclusion in the MTEP, has provided significant benefits to customers in the footprint. For example, the Multi-Value Projects are often identified as a significant success for large-scale system planning and the benefits such investments provide. After a robust stakeholder process and extensive system modeling, MISO moved forward with a slate of 17 Multi-Value Projects in 2011. All but one of those projects is in service today. The Multi-Value Projects are viewed as an industry-leading effort to provide robust solutions to multiple system needs: reliability, economic efficiency and public policy. MISO also has been able to promptly respond to emerging reliability and economic issues in various areas of its footprint by approving hundreds of transmission projects in each MTEP cycle across different transmission project type categories. These approved (and constructed) transmission projects convincingly demonstrate that the MTEP process works and delivers substantial benefits to customers in the MISO region.

2. MISO's Generator Interconnection Process

In accordance with the requirements of FERC Order No. 2003, MISO's generator interconnection process extends from the application stage to the execution of a Generator Interconnection Agreement ("GIA") and is driven by interconnection requests submitted by

³² Note that Market Efficiency Projects and Multi-Value Projects are subject to the Competitive Developer Selection Process, as set forth in Tariff Attachment FF, Section VIII (unless the facilities are located in a state with a right-of-first-refusal statute that allows an incumbent utility to construct if it elects to do so).

generators. MISO's principal role in this process is to administer the generator interconnection queue in a non-discriminatory fashion, in accordance with the Tariff and applicable FERC requirements. Attachment X of the MISO Tariff and its related Appendices incorporate these requirements.

The heart of MISO's generator interconnection process is the three-phase Definitive Planning Phase ("DPP"), which includes iterative system impact studies and facilities studies to determine required Network Upgrades on the MISO Transmission System and, if necessary, on the transmission systems of neighboring transmission providers in order to effectuate a proposed interconnection. The procedures also include FERC-approved rules for funding required Network Upgrades, including Shared Network Upgrades, which ensure that the cost of these facilities is allocated in accordance with FERC requirements.

MISO studies interconnection requests on a group basis, and each year the DPP has one or two cycles. In addition, MISO maintains subregional generator DPP queues. Network Upgrades necessary to support the reliable integration of the proposed generator are reviewed in the Generator Interconnection Process and thereafter incorporated in the overall transmission plan. Currently, the DPP includes active interconnection requests for 79,328 MW of proposed generation for the entire MISO footprint, with 4,630 MW in Iowa. Additionally, MISO's DPP 2021 Cycle Application Deadline was on July 22, 2021. If all of the projects submitted are accepted, by the end of August, the MISO Queue will swell to 152,549 MW of proposed generation with a total of 8,882 MW in Iowa.

3. Ongoing Transmission Planning Reform Efforts

Currently, MISO has identified evolving system needs related to the changing resource mix in the footprint—referred to as the Reliability Imperative. The industry's longtime reliance on conventional baseload power plants is declining sharply, driven by economic factors and consumer

preferences for clean energy, as well as other factors. Meanwhile, the grid is becoming increasingly reliant on wind and solar resources that are available only when the wind is blowing, or the sun is shining. While there are upsides and opportunities associated with these trends, these changes also pose a host of complex and urgent challenges to electric system reliability in the MISO region. Utilities, states, and MISO all have roles to play to address these challenges. MISO calls this shared responsibility the Reliability Imperative.

The word “imperative” is appropriate for several reasons. First, the work MISO is doing is not optional—to maintain system reliability, MISO must respond to this unprecedented change. Second, this work cannot be put off for months or years—much of it has long lead times, so MISO is taking action today to address these needs. And third, MISO stakeholders are looking to MISO to identify problems and find solutions. MISO’s response to the Reliability Imperative includes Market System Enhancements, Market Redefinition, Operations, and Long Term Transmission Planning (“LRTP”).

The LRTP effort addresses the long-term regional transmission needs of the MISO footprint. MISO launched the LRTP effort in August 2020 and since that time has engaged in a robust stakeholder process to address the needs identified and the path forward to plan and pay for the facilities needed to support long-term reliability, and potentially provide economic benefits. The reliability need cannot be met piecemeal but must be a holistic view of the needs of the system over the long-term. MISO expects to finalize its proposed LRTP framework in the near term, with initial projects presented for inclusion in the current planning cycle. State regulators actively participate in the LRTP process.

Finally, the FERC recently issued its Advanced Notice of Proposed Rulemaking reviewing transmission planning, cost allocation and generator interconnection issues on July 15, 2021.³³ The ANOPR addresses many of the same issues MISO is investigating as part of the LRTP effort. MISO intends to participate in the ANOPR process to address systematic improvements that may be needed to meet the needs of the evolving resource mix, and the ANOPR process also provides an opportunity for the Board to present its transmission planning views directly to the FERC.

D. Exclusive Federal Mandates Governing MISO’s Transmission Planning and Generator Interconnection Activities

The FPA reflects the principles of cooperative federalism. Under the FPA, the FERC has exclusive jurisdiction over the transmission of electricity and sale of energy at wholesale in interstate commerce³⁴ while state regulators have jurisdiction over matters not specifically reserved to the FERC, including, generally, the siting and construction of transmission and generating facilities. These statutory mandates are complementary and must be exercised in a coordinated and cooperative fashion.

In the FPA, Congress drew a “bright line easily ascertained[] between state and federal jurisdiction . . . by making [FERC’s] jurisdiction plenary.”³⁵ As part of this plenary authority, the FERC has exclusive jurisdiction over the planning of the interstate transmission grid. The FERC’s principal rulemaking issued under this authority, Order No. 1000, was upheld by the courts.³⁶ Order No. 1000 directed RTOs, such as MISO, to establish a regional transmission planning process that produces a regional transmission plan, subject to detailed regulatory requirements.

³³ *Building for the Future Through Electric Regional Transmission Planning and Cost Allocation and Generator Interconnection*, 176 FERC ¶ 61,024 (2021) (“ANOPR”).

³⁴ 16 U.S.C. §§ 824(b).

³⁵ *Fed. Power Comm’n v. S. Cal. Edison Co.*, 376 U.S. 205, 215-16 (1964).

³⁶ *S.C. Pub. Serv. Auth. v. FERC*, 762 F.3d 41 (D.C. Cir. 2014).

The MTEP is the Order No. 1000-compliant regional plan for the MISO region. Under Order No. 1000, MISO's transmission-owning members and other entities are required to participate in the MTEP process as detailed in the MISO Tariff.

The interconnection of generating facilities to the transmission grid is also FERC-jurisdictional. Under this authority, FERC standardized generator interconnection rules and agreements in Order No. 2003, and each transmission provider, including RTOs, has FERC-approved generator interconnection rules. The MISO Tariff includes a single set of generator interconnection rules that are designed to ensure non-discriminatory and uniform access for generating facilities to MISO's interstate transmission grid.

The FERC's continuing active involvement in transmission planning and generator interconnection issues is illustrated by various on-going initiatives. In addition to the ANOPR, FERC recently issued a policy statement addressing state efforts to develop transmission facilities through voluntary agreements to plan and pay for those facilities,³⁷ and established a joint task force including state commissioners.³⁸ The FERC clearly recognizes the importance of state involvement even where transmission planning itself is within the FERC's jurisdiction. Given the well-established FERC authority over the interstate transmission of electricity, including transmission planning and generator interconnection, MISO is concerned that imposing artificial constraints on the siting of MTEP transmission projects facilitating renewable energy development could be construed as interfering with the FERC's jurisdiction and policy.

Accordingly, MISO requests that, in discharging its responsibilities under the Iowa Code, the Board give proper weight and consideration to the existing federal transmission planning and

³⁷ *State Voluntary Agreements to Plan and Pay for Transmission Facilities*, Policy Statement, 175 FERC ¶ 61,225 (2021).

³⁸ *Joint Federal-State Task Force on Electric Transmission*, 175 FERC ¶ 61,224 (2021).

generator interconnection structures, requirements and processes established in the MISO footprint. Unilateral or uncoordinated actions in this important and sensitive area at the intersection of federal and state regulatory authorities could disrupt the existing transmission planning mechanisms, undermine the certainty and efficiency of MISO's FERC-jurisdictional markets, and potentially result in protracted litigation and regulatory uncertainty.

III. NOTICE AND COMMUNICATIONS

All correspondence and communications in this matter should be addressed to:

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IV. CONCLUSION

WHEREFORE, the Midcontinent Independent System Operator, Inc., respectfully requests that the Iowa Utilities Board consider these Comments in its review in the above-captioned docket.

Respectfully submitted,

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