

# Interconnection Process Working Group (IPWG) Conference Call & Webex August 8, 2023

## 10:00 am to 12:45 pm ET / 9:00 to 11:45 am CT Dial in and Webex information available at <a href="https://www.misoenergy.org">www.misoenergy.org</a>

#### **Minutes**

#### 1. Administrative Items (D. Mindham)

#### a. Welcome and Roll Call

The meeting was called to order at 10:00am ET/9:00am CT.

Chair: David Mindham

Vice Chair: Angela Maiko (absent) MISO Liaison: Ryan Westphal Stakeholder Relations: Mandi McGirr

Participants:

A Karmakar, EE Plus Aaron Demuth, OTP Aaron Greenberg, Oriden Power Aaron Martin, CMS Aaron Stoll, Plus

Power

Abhilash Muthumani,

Tenaska

Abhishek Dinakar,

Savion

Adam Renfandt,

**NDSG** 

Adam Solomon, Steelhead/Vestas Ahmed Salloum, Swift

Current

Ajinkya Rohankar,

BayWa RE

Alan C, Triple Oak

Alan Neal,

Cooperative Energy Alan Urban, MISO Alex Huṭan, AES Alex Kloiber, CIPCO Alex Penney, Duke Amanda Fong, MISO Amanda Jones, MISO Amber Joyce, MDU Amin Abedi, EPE

Consulting Andrew Grieve, PG

Renewables

Andrew Kienitz, MN

Power

Andrew Redding, Heelstone Energy Andy Cotter, ATC Andy Kowalczyk, Senergy Solutions Andy Witmeier, MISO Aneta Godbole, MISO

Anita C, ACES Ankit Pahwa, Anne Giett. Burns &

McDonnel

Anteneh Workneh,

**GDS** 

Anthony A Alvarez, IA

OCA

Anusha Papasani, Hectate Energy Apoorva Bansal, Next

Era

April Phelps, Entergy Ash Panegal, Plus

Power

Austin Brier, Urban

Grid Co

Bakhtawar Khan,

Gabel

Ben Dayman, MEC Ben Kaldunski, NSPW Ben Scott, CMS

Bert Finzer, MISO Bil Donmez, Long Road Energy Bill Booth, Michael

Best

Bill Turnbull, MEC Brad Pierson, Walden

Renewables

Brad Wentz, Ameren Brent Taylor, MPPA

Brian Giggee, MDU Bridget A Sparks, AES Brinda Malladi, Arevon Brock Ondayko,

**AEPES** 

Bruce Froyum, MISO Caleb Gemperlein, Heelstone Energy Carolyn Wetterlin, Xcel Carrie Rowland, Scout

Clean Energy

Chad Craven, Savion

Chandana Bommareddy,

Charles Daniel, EPE

Consulting

Chase Lakowske, DPC Chengyue Guo, ATC Cho Wang, AES Chris Gordon, BayWa

RE

Chris Koty, Ameren Chris Mertz, Candela

Renewables

Chris Plante, WEC Chris Stolz, PG Renewables

Christopher Elie, Duke Christos Ghionis, Terna Energy Cindy Guillot, Cleco Clark Wallace,

Clayton W. Robinson,

Cordelio

Cody Anderson, OTP Craig Turner, Dakota

Electric

Cy McNeill, Alliant D Herrman, Solea

Energy

Dakota Parish, Husch Blackwell



Dan Alfred, CMS Dan Barr, ITC Dan Stroh, Ameren Daniel Fonseca, 1898 & Co Daniel Wang, Darius Monson, MISO Darrell Newcomer, CMS Darrin Lahr, MISO David Davis, Apex David Harlan, Veriquest David Johnston, IN URC David Leventhal, AES David M. CMPAS David Osterkamp, ITC David Savage, DOE/IURC David Ticknor, RES Group David Webb, Entery Dean Pawlowski, OTP Dennis Corn. Derek Kou, EDP Derek Snyder, OTP Derek Sunderman, Savion DeWayne Todd, Alcoa Dinemayer Silva, Next Donavan McGoldrick, Husch Blackwell Ed Achaab, AEP Elijah Feuerhelm, MÉC Emma Nix, Leeward Eric Thoms, Inveneray Erik Winsand, ATC Erin Murphy, Big Rivers Erin Peddicord, MISO Ethan Tellier, CIPCO Farah Neha, AdvantageCap Fei Fan, Recurrent Forrest Tingo, Light Source BP Forrest Ward, PGR Gala Disasa, MISO Gertrude Rivera, Entergy Ginger Hodge, CES Haley McElyea, 1898 & Co

Leaf **PUC** 

Huaitao Zhang, MISO Humberto Branco, Savion Hwikwon Ham, MN PUC Ignatius Peters, 1898 & Co Jacob Lampi, CIPCO Jake Weinberg, Gabel Jamal Khudai, ATC James Alexander Witter, Entergy Jared Brown, Earth Rise Energy Jared Vochoska, EPE Consulting Jason Goar. Cooperative Energy Jason Hastings, Vesper Jeff Chang, Urban Grid Co Jeff Gindling, Duke Jeremi Wofford, Ameren Jeremy Barlow, **MPUS** Jeremy Jones, Entergy Jess Kiddoo, Xcel Jess Miralda, New Jessica Banike, WEC Jessica Willey, Xcel Jim Kilgore, MISO Jim Waight, Siemens Jingyu Sullins, Ameren Joe Cottle, Novis John Wachtler, MN John Wilson, Energy Jon Langford, Orsted Jorge Martin, Abei Energy Josh Seibert, Ameren Josh Tellier, ATC Justin Salinas, ENEL Justin Stewart. Ameren Kalen Coleman, MISO Kalliah Bruce, Urban Grid Co Kara Smerud, MN Power Karthik Mekala, RWEA

Kat Cox-Arslan, New Leaf Kathryn Dial, Next Era Kathy Estrada, GDS Keith Cargill, AES Ken Gavin, DTE Ken Kagy, CFU Kenisha Webber, Entergy Kimberly Dunning, CenterPoint Konstantin Korolyov, DTE Kristina Grandquist, MEC Kurt Vanderlick, Cleco Kyle Jenkins, East Point Energy Kyle Talghader, MISO Kyle Trotter, MISO Kyle Watson, Entergy LaShel Marvig, Excel Liang Qi, MISO Liqin Jiang, Duke Lisa Silverwulf, HDRC Lisa Szot, Strata Clean Energy Liv Crowell. Ameren Luke Reynolds, Energy Madeleine Balchan, Xcel Madison Pitts, MISO Maggie McKenna, Maire Waight, MISO Margaret Miller, Engie Margarita Patria, Marlene Parsley, Big Rivers Marshall Courtney, PGR Maryclaire Peterson, Entergy Massamba Samb, Bright Night Power Matt Stobb, AES Matt Waldron, ATC Max Reitz, Ameren Steve Dowll, Alcoa Meera Shukla, MISO Megan Pamperin, MISO Meghan Castellano, Connect Gen LLC Michael Abettan, InnerGex Michael Saer, GRE Michaela Flagg, CES Mike Dantzler, Ranger Power Mike Fischette, LBWL Mike Gahimer, Arevon Mike Green, GRE Mike Johnson, Oriden Power

Heidi Lange, Next Era



Mike Mooney, HEPN Miles Larson, LSBP Mitchell Myhre, Alliant Nadeem Demian, Blue

Nathanael Martin-Nelson, MISO Nicholas Ford,

Hexagon

Nick Tenney, CMS Nitin Kushwaha, NGR Noah Markus, Savion Noel Darce, Stone

Pigman

Patrick Dalton, MISO Patrick Quinn, GRE Pavan Sajja, Linea

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Peg Abbadini, HE Peter Reese, ERM Phillip Jovanovski,

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Pradeep Gogineni,

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Preston Hart, OTP Raj Pudhota, TED Renewables Rajnish Chauhan,

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Rebecca Moore Darrah, WVPA Rebecca Turner. Regan Fink, PGR Renatta White, MISO Rhonda Peters,

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Ryan Scott, Rev Renewables Ryan Wernette,

WPSCI

Rylan Hanson, OTP Sam Gomberg, UCS

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Sam Hipple, MISO Sandeep Tadepally.

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Sarah Nieman, MISO

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Shaun Murphy, Urban Grid Co

Shawn Welch, Doral Shirley Schultz, AMP Shirsha Nandy, Hectate Energy Simon Cherucheril,

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Steve Winsett, Entergy Subhadarshi Sarkar.

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Vince Vandaveer,

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MN Power

Wendy Reed, Wright

and Tallisman

Werner Roth, PUCT Wes Pfaff, MRES Will Buchanan, Next

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Yaming Zhu, Siemens

Yarrow Etheredge,

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Yifan Li, Strata Clean

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Yonas Demissie,

MISO

Yoon Sung Kim,

Alliant Yulin Liana.

Cooperative Energy Yuri Smolanitsky,

Arevon

Zachary Callen, ICC

#### b. Review Agenda

The agenda was accepted as posted.



#### c. Review Meeting Minutes / Action Items

The minutes were accepted as posted.

Action Item	Owner	Date	Status
MISO requests feedback on <b>Proposed IBR Performance Requirements</b> by July 14, 2023.	Stakeholder Relations	06/20/2023	Closed
<ul> <li>Management Plan</li> <li>Replacement Request Proposed</li> <li>Tariff Changes – add to August</li> </ul>	Stakeholder Relations	06/20/2023	Closed

#### d. Review Management Plan

The management plan was reviewed.

#### 2. Liaison Report (R. Westphal)

- MISO Feedback Responses
  - <u>IPWG: Proposed IBR Performance Requirements (20230620)</u> MISO shared additional information on Original Equipment Manufacturer (OEM) readiness, continued the discussion on MISO's proposed implementation plan for DPP-2022 Cycle, and requested stakeholder feedback on the Reference Point of Reliability (RPA) at Point of Interconnection (POI) proposal at the August IPWG Meeting. Contact: Patrick Dalton
- GIAA Phase 2 Update First round of enhancements deployed on July 21, 2023, and additional updates are expected by end of 2023. Contact: Aneta Godbole
- Upcoming Events:
  - MTEP Planning Portal Workshop August 18
  - o System Reliability Attributes Analysis and Roadmap Workshop September 21
  - o Long Range Transmission Planning (LRTP) Workshop August 31
  - September BOD & AC Registration Registration and hotel information are now available on the MISO website. Hotel reservation deadline is extended to August 18.

#### 3. MISO Posted Items **⇒** (R. Westphal)

- a. FERC Status Report
- b. Definitive Planning Phase (DPP) Study Cycle Update

### 4. FERC Interconnection Notice of Proposed Rulemaking (NOPR) (C. Supino) Review FERC final rule

MISO provided an initial high-level overview of FERC's recently issued Order No. 2023. FERC released Order 2023 on July 28, 2023. The vast majority of adopted reforms initially appear to generally align with current MISO processes, but with numerous differences. MISO is still reviewing the 1,500 pages order to determine how to respond to these directives. The Compliance Filing is due 90 days after publication in the Federal Register. MISO comments can be found in the Improvements to Generator Interconnection Procedures and Agreements NOPR (RM22-14-000).

MISO explained that the purpose of Order 2023 is to address interconnection queue backlogs, improve certainty, and prevent undue discrimination for new technologies. MISO walked through the adopted reforms, which information access and cluster studies, allocating study cluster costs, financial commitments and commercial readiness, reasonable efforts and penalties, affected systems and optional study, flexibility and incorporating technological advancements, incorporating alternative transmission technologies, and modeling voltage and ride through requirements for nonsynchronous generators.



Regarding cluster studies, MISO intends to maintain 3-phase process and seek independent entity variations as needed. Relating to commercial readiness, the rule requires Interconnection Customers (ICs) to face increasing penalties for withdrawal based on study costs or Network Upgrade estimated costs depending on time of withdrawal. Order 2023 eliminated the Reasonable Efforts standard for study deadlines and added a penalty structure for failure to meet deadlines. MISO is in progress of working through what implementation of this change will look like.

Order 2023 included a requirement that transmission providers use Energy Resource Interconnection Service (ERIS) modelling standards when studying affected systems interconnection requests. MISO will require a valid EMT model upfront. MISO uses fuel-based dispatch assumptions, rendering the requirement of evaluation of generating facility additions inapplicable. Order 2023 declined to require annual reports on the list of alternative technologies considered. MISO already considers a lot of these alternatives to building new transmission and will work with Transmission Owners (TOs) for viable mitigation. The group also discussed demonstration of variations and reimbursement.

Next Steps for MISO include the following:

- Review the order in detail to determine what is needed for compliance and where independent entity variations are needed.
- Determine impact of Order 2023 compliance on other queue improvement efforts.
- Evaluate whether any clarifications, rehearing requests, or extensions are warranted.
- Current Compliance Filing deadline is early November 2023.

#### 5. Replacement Request Proposed Tariff Changes (H. Zhang) Discuss further Tariff and BPM-015 Clarifications

MISO provided additional information on the Generator Replacement Process improvements as requested in June IPWG. MISO highlighted the key submission timeline requirements for generator replacement requests, provided timeline charts for different scenarios, and clarified the replacement request submission process for units that share Generator Interconnection Agreements (GIAs) with other units. The proposed Tariff language (Attachment X, Appendix 1 and Module C section 38.2.7) will be provided at the August 30, 2023, Planning Advisory Committee (PAC) and stakeholder feedback will be requested. MISO anticipates the Tariff filing to occur in Q4 of 2023.

The generator replacement requests timing requirements include a maximum of thirty-six (36) cumulative months during any five (5) year period under any combination of suspended and SSRdesignated statuses. MISO emphasized that if there are material adverse impacts or reliability concerns, then the Interconnection Customer (IC) will need to go through the 3-phase DPP process for the replacement unit and Attachment Y process for the existing unit, or the IC can withdraw the replacement request. The group discussed requests to split Grandfather Arrangements (GFAs). MISO clarified that based on existing (and original) Tariff provisions, if a generator is not being fully replaced then the remaining portion must retire.



#### 6. FAC-002-4 (Facility Interconnection Studies)^ (M. Waight/R. Westphal) Discuss implementation plan

MISO reviewed BPM-015 and Tariff redlines for the NERC FAC-002-4 revision. MISO explained the purpose of the FAC-002 standards is to study the impact of interconnecting new or changed facilities on the Bulk Electric System (BES). The changes to FAC-002-4 include the new term Qualified Change (to replace material modification to avoid confusion) and the new R6 requirement for the Planning Coordinator to publicly define Qualified Change. BPM-015 section 6.7 redlines and Tariff redlines (Attachment X: Appendix 1 and GIP) reflecting the new Qualified Change term are posted with meeting IPWG materials. The Planning Subcommittee (PSC) will discuss BPM-020 revisions at their August 9, 2023, meeting.

MISO reviewed a proposed timeline for implementation of FAC-002-4 revisions.

Date	Task
June 20 IPWG	Introduce Topic and proposal to implement FAC-002-4
June 21 PSC	Introduce Topic and proposal to implement FAC-002-4
August 8 IPWG	Review proposed BPM redlines and Tariff for generation facilities
August 9 PSC	Review proposed BPM redlines for <u>transmission</u> and <u>electricity end-user</u>
September 26 IPWG	Final BPM redlines for generation facilities
September 27 PSC	Final BPM redlines for <u>transmission</u> and <u>electricity</u> <u>end-user</u>
Oct 11 PAC	Review BPM drafts from subcommittees
Nov 15 PAC	Finalize BPM
Nov 30	Publicly Post BPM

MISO requested feedback on **BPM-015** and **Tariff redlines for FAC-002-4 revision** to update Qualified Change term by August 30, 2023. Feedback requests and responses are managed through the Feedback Tool on the MISO website: <a href="https://www.misoenergy.org/stakeholder-engagement/stakeholder-feedback/">https://www.misoenergy.org/stakeholder-engagement/stakeholder-feedback/</a>.

### 7. Inverter-based resource performance requirements<sup>^</sup> (P. Dalton) Next steps on IEEE 2800 implementation

MISO discussed proposed Inverter-Based Resource (IBR) performance requirement implementation approach based on system reliability needs. MISO explained that industry has identified an immediate need to specify IBR performance that supports system reliability. Following a stepped approach to adopt IEEE 2800-2022, MISO incorporated many stakeholder feedback suggestions in the revised Tariff redlines specifying IBR performance requirements. MISO is proposing additional flexibility in the proposed tariff language to address implementation concerns raised by stakeholders in formal feedback. MISO is requesting additional stakeholder feedback from the IPWG before taking the proposal to the Planning Advisory Committee (PAC). Tariff redlines (Attachment X: Appendix 6 and G) are posting with IPWG meeting materials.



MISO is still reviewing FERC Order 2023, which in part modifies the pro forma agreements to incorporate ride through performance requirements. MISO's proposed redlines likely cover the ride through requirements in FERC's Order 2023. IEEE 2800 frequency disturbance ride-through capability requirements are performance-based and extend beyond the NERC PRC-024-3 "No Trip Zone" based on what the equipment is technically capable of. Specific IBR performance requirements are needed now as NERC standard development for IBR advances over the coming years.

MISO shared that its proposal takes a stepped approach, prioritizing only the highest priority performance for adoption now. MISO is not alone in adopting IEEE 2800 now to address potential IBR performance gaps. MISO reviewed a list from Electric Power Research Institute (EPRI) of approaches being taken by other entities.

MISO reviewed key themes that emerged from stakeholder feedback responses. MISO made several substantive draft redline Tariff changes based on stakeholder input. MISO proposes using the discussion in IEEE 2800 Annex C to conceptually define system strength and weak grid as a starting point for case-by-case consideration. MISO adopted stakeholder feedback for *enter service* criteria and performance as defined by IEEE 2800. MISO views the Reference Point of Reliability (RPA) at Point of Interconnection (POI) selection as the best reliability-supporting selection.

MISO views a degree of flexibility for DPP-2022 performance requirements as striking a balance between facilitating needed reliability attributes while managing pockets of equipment conformance uncertainties. Regarding DPP-2022, MISO proposed for exception requests to be documented from the equipment manufacturer based on a technical constraint. Exception requests for GIAs executed on or after January 1, 2025, to not be granted. For the DPP-2023-Cycle, based on feedback, MISO proposes full compliance with all MISO-adopted IEEE 2800 requirements.

MISO will continue to assess potential interactions between FERC Order 2023 and MISO's proposed tariff redlines. Stakeholders are invited to share feedback on MISO's revised tariff redlines, with particular focus on the new paragraph on conformance flexibility. MISO will respond to stakeholder feedback and adjust Tariff redline language as needed prior to presenting the proposed changes to PAC. As the Tariff redlines are finalized, MISO is continuing to evaluate whether BPM changes are needed. MISO requested feedback on **Proposed IBR Performance Requirements** by August 29, 2023. Feedback requests and responses are managed through the Feedback Tool on the MISO website: <a href="https://www.misoenergy.org/stakeholder-engagement/stakeholder-feedback/">https://www.misoenergy.org/stakeholder-engagement/stakeholder-feedback/</a>.

#### 8. New Business (All)

None



### 9. Action Items (M. McGirr)

Action Item	Owner	Date	Status
MISO requests feedback on <b>Proposed IBR Performance Requirements</b> by August 29, 2023.	Stakeholder Relations	08/08/2023	Closed
MISO requests feedback on <b>BPM and Tariff</b> redlines for FAC-002-4 revision to update Qualified Change term by August 30, 2023.	Stakeholder Relations	08/08/2023	Closed
<ul> <li>Item 03a FERC Status Report – include FERC 206 filing related to DFAX. Future FERC Status Reports will include 206 filings.</li> <li>Item 04, 06, &amp; 07 – update typos</li> </ul>	Stakeholder Relations	08/08/2023	Closed

**10. Adjourn**Meeting adjourned at 12:33 pm ET/11:33 am CT.

Next Meeting: September 26, 2023