

Power Act (“FPA”). *See Nat’l Ass’n of Regul. Util. Commissioners v. Fed. Energy Regul. Comm’n*, 964 F.3d 1177, 1186 (D.C. Cir. 2020). Attempting to achieve ESR implementation in June of 2022 in addition to implementation of other Commission directives, such as distributed energy resources, will further strain already-taxed resources and jeopardize the realization of the benefits associated with MSE in the 2024/2025 timeframe. MISO respectfully submits that the Commission’s reasoning for denying the requested deferral failed to consider key elements of the information provided in the initial deferral request and related answer in this docket.

As a general matter, MISO also notes that the obligations of ESR deployment fall solely on Regional Transmission Organizations (“RTO”) and Independent System Operators (“ISO”). Policies such as those in Order No. 841 that focus solely on RTO/ISO regions create an unnecessary burden on RTO transmission providers, limiting their flexibility to prioritize regional needs to meet emerging challenges.

Thus, the May 17 Order’s compliance directives are arbitrary and capricious, and should accordingly be set aside.

I. BACKGROUND⁴

A. The Commission granted MISO’s earlier request to defer the effective date of its Tariff revisions in compliance with Order No. 841.

Order No. 841 required each RTO and ISO to revise its tariff to establish a participation model for ESRs consisting of market rules that will help facilitate the participation of ESRs in the RTO/ISO markets by recognizing their physical and operational characteristics, among other requirements.⁵

⁴ The relevant background is set forth in detail in the record in this Docket. In the interest of brevity, MISO has set forth only the most recent developments in this Request for Rehearing.

⁵ *Midcontinent Indep. Sys. Operator, Inc.*, 169 FERC ¶ 61,137 (2019).

On December 3, 2018, in response to Order No. 841, MISO submitted its compliance filing proposing Tariff revisions to establish a market participation model for ESRs.⁶ On April 1, 2019, the Commission issued a letter seeking additional information from MISO about the proposed Tariff revisions.⁷ MISO responded to the April 1 letter on May 1, 2019.⁸

On November 1, 2019, MISO filed a request to defer the effective date of its Order No. 841-related Tariff revisions – from December 3, 2019, to June 6, 2022.⁹ MISO explained that: (1) it was not feasible for MISO to develop and implement the ESR-related systems and software concurrently with its implementation of a separate Short Term Reserve product; and (2) the software necessary to implement the ESR participation model should be consistent with software changes related to its ongoing Market System Enhancement (“MSE”) software upgrade, because the ESR-related Tariff revisions and software design must be built on top of the MSE upgrades.¹⁰

On November 21, 2019, the Commission issued an order accepting MISO’s compliance filing, as amended, subject to a further compliance filing, to be effective June 6, 2022.¹¹ The Commission also required MISO to file annual reports on its progress in implementing the ESR-related Tariff revisions.¹²

⁶ Dec. 3, 2018 MISO Letter, filed in Docket No. ER19-465-000.

⁷ Apr. 1, 2019 FERC Letter, filed in Docket No. ER19-465-000.

⁸ May 1, 2019 MISO Letter, filed in Docket No. ER19-465-000.

⁹ Nov. 1, 2019 MISO Letter, P 1, filed in Docket No. ER19-465-000.

¹⁰ *See generally id.*

¹¹ Nov. 19, 2019 FERC Order on Compliance Filing, issued in Docket Nos. ER19-465-000 and ER19-465-001.

¹² *Id.* at P 268.

B. MISO requested to further extend the effective date of the previously-accepted ESR-related Tariff revisions.

On March 4, 2021, MISO requested that FERC further extend - from June 6, 2022, to March 1, 2025 - the effective date of the previously-accepted revisions to MISO's Tariff regarding the market participation of ESRs.¹³ MISO explained that its current market system platform is scheduled to be replaced by the MSE software platform in 2025 and that the requested deferral will enable MISO to accelerate the completion of the MSE in 2024.¹⁴ By completing the MSE earlier, MISO can more quickly and cost-effectively prepare for and meet its emergent and future reliability needs, particularly those arising from the reliability impacts of greater and rapid penetration of wind and solar resources, which may reach or exceed a critical threshold of 30 percent of MISO's load as early as 2026.¹⁵ Otherwise, the limitations of MISO's existing market platform could hinder MISO's ability to most effectively address the reliability challenges arising from fast renewable growth.¹⁶

MISO explained that through the requested modified implementation sequence (*i.e.*, to complete the MSE before implementing ESRs), the MSE's acceleration will expedite MISO's transition to a more secure and robust market platform, which also has vastly greater capabilities to address the operational complexity and reliability impacts of other ongoing changes to the resource mix in the MISO region, optimize the economics and efficiencies of using particular types of resources, and adopt additional market enhancements going forward.¹⁷ MISO also observed

¹³ Mar. 4, 2021 MISO Letter, P 1, filed in Docket Nos. ER19-465-000 and ER19-465-001 ("Deferral Request").

¹⁴ *Id.*

¹⁵ *Id.*

¹⁶ *Id.*

¹⁷ *Id.* at P 2.

that the Commission has granted a similar extension to an ISO or RTO where the deferral of some Order No. 841-related tariff requirements was necessary to accommodate the replacement of market software.¹⁸

On May 10, 2021, MISO’s Chief Executive Officer, John R. Bear, wrote to the Commission in support of MISO’s request to defer the requirements of Order No. 841.¹⁹ Mr. Bear explained that MISO remains committed to optimizing the market participation of ESRs as directed in Order No. 841 but that, without the Commission’s support of MISO’s deferral request, “MISO’s efforts to address growing reliability and resilience concerns and [to] meet [its] members’ carbon reduction goals will be delayed and severely compromised.”²⁰ Mr. Bear further stated that MISO’s extension request is required to align with MISO’s plan for building, testing, and implementing its MSE platform, which will ensure that MISO is prepared to address growing complexity in meeting reliability and resilience demands.²¹ Mr. Bear also noted that “attempting to implement the requirements of ESRs under Order No. 841 while also working to support [MISO’s] members’ carbon reduction goals has placed MISO in an unenviable position of choosing a path between conflicting goals that could jeopardize [MISO’s] capability to operate our 15-state wholesale grid reliably, efficiently and securely.”²²

C. Other stakeholders support MISO’s deferral request because the benefits of the MSE implementation outweigh the costs of a second deferral.

¹⁸ *Id.* (citing *ISO New England, Inc.*, Order on Compliance, 172 FERC ¶ 61,125 (2020) at PP 72 – 73).

¹⁹ May 10, 2021 MISO Letter, P 1, filed in Docket No. ER19-465-000.

²⁰ *Id.*

²¹ *Id.* at P 2.

²² *Id.*

MISO’s request for a subsequent deferral was supported by other stakeholders. For example, on May 14, 2021, the OMS filed a letter stating that it “does not oppose this request because the benefits of granting this extension outweigh the eventual costs to consumers.”²³ The OMS observed that MISO was in the process of replacing its current market system with the MSE software platform, which the OMS recognized will bring “significant benefits” to customers in the MISO footprint.²⁴ The OMS explained that, “[w]hile storage resources may not be able to fully participate in MISO’s current market system, they do have a meaningful avenue for participation through MISO’s Stored Energy Resource – Type II category,” and that, “[w]hile requiring storage resources to participate through this market participation model of the next 3 years is not optimal, it is less harmful than further deferring the completion of MISO’s MSE and its attendant benefits for electric customers.”²⁵ For these reasons and others, the OMS did not oppose MISO’s extension request.²⁶

Similarly, the MISO Transmission Owners²⁷ supported MISO’s deferral request because it is necessary to accommodate an accelerated implementation of MISO’s new MSE platform, which

²³ May 14, 2021 OMS Letter, P 1, filed in Docket No. ER19-465-000.

²⁴ *Id.*

²⁵ *Id.*

²⁶ *Id.* at P 3.

²⁷ The MISO Transmission Owners for that filing consisted of: American Transmission Company LLC; Big Rivers Electric Corporation; Central Minnesota Municipal Power Agency; City Water, Light & Power (Springfield, IL); Cleco Power LLC; Cooperative Energy; Dairyland Power Cooperative; Duke Energy Business Services, LLC for Duke Energy Indiana, LLC; East Texas Electric Cooperative; Entergy Arkansas, LLC; Entergy Louisiana, LLC; Entergy Mississippi, LLC; Entergy New Orleans, LLC; Entergy Texas, Inc.; Great River Energy; Hoosier Energy Rural Electric Cooperative, Inc.; Indiana Municipal Power Agency; Indianapolis Power & Light Company; International Transmission Company d/b/a ITC Transmission; ITC Midwest LLC; Lafayette Utilities System; Michigan Electric Transmission Company, LLC; MidAmerican Energy Company; Minnesota Power (and its subsidiary Superior Water, L&P); Missouri River Energy Services; Montana-Dakota Utilities Co.; Northern Indiana Public Service Company LLC; Northwestern Wisconsin Electric

is designed to effectively meet MISO’s future reliability needs and to avoid unduly burdensome efforts to update MISO’s current market system platform.²⁸ Like the OMS, the MISO Transmission Owners stated that “reliability and resource adequacy benefits from accelerated implementation of the MSE far outweigh the burdens” because wind and solar penetration is expected to reach 30 percent of MISO’s total load and significantly strain MISO’s system as early as 2026.²⁹ The MISO Transmission Owners urged the Commission to grant MISO’s requested deferral, stating that “time is of the essence to implement the MSE to ensure that MISO’s systems are fully enabled and prepared to manage the imminent reliability impacts of increased renewable penetration.”³⁰ The MISO Transmission Owners also commented on the efficiencies of MISO’s requested deferral, stating that allowing MISO to focus on the implementation of the MSE avoids costly, duplicative efforts to develop ESR software for old and new market systems.³¹

D. The Commission’s May 17 Order denied MISO’s ESR deferral request, with Commissioner Christie dissenting.

The May 17 Order denied MISO’s request to further extend MISO’s ESR implementation date. In support of its denial, the May 17 Order made three primary findings, *i.e.*, the Commission: (1) concluded that potential reliability impacts do not warrant further delay; (2) found that the existing SER – Type II (“SER-II”) model has significant limitations; and (3) distinguished MISO’s deferral request from a similar request issued by ISO New England (“ISO-NE”).

Company; Otter Tail Power Company; Prairie Power, Inc.; Southern Illinois Power Cooperative; Southern Indiana Gas & Electric Company (d/b/a Vectren Energy Delivery of Indiana); Southern Minnesota Municipal Power Agency; Wabash Valley Power Association, Inc.; and Wolverine Power Supply Cooperative, Inc.

²⁸ Apr. 5, 2021 MISO Transmission Owners 5 Answer, P 2-4.

²⁹ *Id.* at P 4.

³⁰ *Id.*

³¹ *Id.*

First, the Commission found that MISO has not demonstrated potential reliability impacts that warrant further delay of ESR implementation. Specifically, the Commission stated that MISO has not demonstrated that accelerating the MSEs completion from 2025 to late 2024 is needed for reliability, citing the expectation that the threshold of 30 percent renewables penetration will not occur until 2026.³² In addition, the Commission asserted that MISO has not identified specific MSE upgrades and corresponding reliability issues those upgrades would address and has also failed to identify specific reliability violations that may occur if the MSE were completed in 2025 instead of late 2024.³³

Second, the Commission found that the existing SER-II model has significant limitations that curtail the ability of storage resources to participate in MISO's markets (such as unavailability of ESR-type offer parameters, and ineligibility for make-whole payments).³⁴ The Commission noted that it only accepted MISO's SER-II category as a temporary measure to facilitate participation of ESRs while MISO's Order No. 841 compliance filing was pending.³⁵

Finally, the Commission also distinguished ISO-NE's approved deferred implementation of certain aspects of Order No. 841 compliance, stating that MISO seeks to defer its entire ESR implementation whereas ISO-NE requested to defer a limited aspect of its ESR participation model (*i.e.*, state of charge and duration characteristics in the day ahead market).³⁶

³² May 17 Order at P 27-28.

³³ *Id.*

³⁴ *Id.* at P 28.

³⁵ *Id.* This reason is beside the point because MISO acknowledged that SER-II is not an optimal participation model, whereas the May 17 Order virtually required that an SER-II's features be identical to those of an ESR.

³⁶ *Id.* at P 29. This reason likewise misses the point, because MISO acknowledged that ISO-NE's deferral request pertained to only the state of charge aspect, and MISO cited that

Commissioner Christie dissented, stating that he is disposed to trust MISO's sound judgment that replacing the market system platform should take precedence over implementation of ESR Tariff provisions at this time.³⁷ Commissioner Christie further stated that, if the reliability risks and costs identified in MISO's deferral request can be reduced or avoided, they should be.³⁸

II. STATEMENT OF ISSUES AND SPECIFICATION OF ERRORS

Consistent with Order Nos. 663 and 663-A³⁹ and Rule 713(c),⁴⁰ MISO provides the following statement of issues:

1. The Commission erred in:

- A. Failing to recognize the information MISO's Deferral Request provided to the Commission when it supported its denial by stating that MISO has not identified specific MSE upgrades and corresponding reliability issues those upgrades would address, and has also failed to identify specific reliability violations that may occur if the MSE were completed in 2025 instead of late 2024.

III. ARGUMENT

A. **Delaying the Reliability Benefits Associated with MSE, Even for a Short Period, is Contrary to Commission Precedent and the FPA.**

The Commission should grant rehearing of its decision to deny MISO's request to defer the effective date of the revisions to MISO's Tariff regarding the market participation of ESRs. The Commission's May 17 Order fails to recognize and consider information provided in the Deferral Request and related submissions identifying the reliability issues MISO's MSE upgrades

deferment only to underscore the relevance of software considerations to the timing of ESR compliance.

³⁷ May 17 Order, Dissent of Commissioner Christie at P 3.

³⁸ *Id.* at P 4.

³⁹ *Revision of Rules of Practice and Procedure Regarding Issue Identification*, Order No. 663, III FERC Stats. & Regs., Regs. Preambles ¶ 31,193 (2005); *order on reh'g*, 114 FERC ¶ 61,284 (2006).

⁴⁰ 18 C.F.R. § 385.713(c).

will address, and reliability problems that may occur if MSE implementation is deferred further. In light of the Commission’s directives on other matters, such as the implementation of Distributed Energy Resources (“DERs”)⁴¹ and hybrid resources,⁴² requiring the implementation of ESRs in June of 2022 will further exacerbate the constraints on MISO vendors, employees and other resources attempting to implement MSE in addition to ESRs, DERs and hybrids (among other Commission initiatives). As such, the Commission’s May 17 Order is arbitrary and capricious and inconsistent with the FPA.

1. MISO adequately demonstrated that accelerating the MSE’s completion from 2025 to late 2024 is necessary for reliability.

The May 17 Order states that MISO has not demonstrated that accelerating the MSE’s completion from 2025 to late 2024 is needed for reliability, citing the expectation that the threshold of 30 percent renewables penetration will not occur until 2026.⁴³

The Commission’s reasoning fails to consider that the MSE’s acceleration will solve an imminent reliability problem that has already started impacting some portions of MISO’s footprint. Proactively addressing an anticipated reliability problem is consistent with the core purposes of the FPA. *See Nat’l Ass’n of Regul. Util. Commissioners, supra*, 964 F.3d at 1186 (referring to “enhan[ing] reliability in the wholesale electricity market” as one “core purpose[.]” of the FPA); *F.E.R.C. v. Elec. Power Supply Ass’n*, 577 U.S. 260, 136 S. Ct. 760, 764, 193 L. Ed. 2d 661 (2016) (referring to “ensuring effective transmission of electric power” as a “core purpose[.]” of the FPA).

⁴¹ *Participation of Distributed Energy Resource Aggregations in Markets Operated by Regional Transmission Organizations and Independent System Operators*, Order No. 2222, 172 FERC ¶ 61,247, P 1 (2020).

⁴² *Hybrid Resources, Order Directing Reports*, 174 FERC ¶ 61,034 (2021).

⁴³ May 17 Order at P 12.

The Commission appears to have focused on MISO’s representation that “[t]he MISO Futures show that 30% threshold is expected to be within reach as early as 2026.”⁴⁴ However, while the 2026 projection applies to *system-wide* renewable penetration, the May 17 Order failed to consider MISO’s statement that “*renewables have already reached or exceeded the 30 percent threshold in some portions of the MISO Region*, which in MISO’s experience has resulted in operational complexities associated with the threshold.”⁴⁵ Hence, while MISO has not yet experienced system-wide renewable penetration at the 30 percent threshold, that threshold has already been reached or breached in certain areas with higher renewable energy densities, resulting in present operational complexities. MISO should not have to wait until all, or most, portions of its footprint are beset by such a reliability predicament.

MISO assessed the reliability issues posed by rapid renewal integration in further detail through its Renewal Integration Impact Assessment (“RIIA”) Summary Report, which was appended to MISO’s March 4, 2021 deferral request at Tab A. The RIIA Summary Report observed that “[a]bove the 30% level, significant system-wide complications arise, driven by the increased variability of wind and solar, changes in resource availability, and an overall lack of transmission capacity provided by the existing EI transmission system.”⁴⁶ The report further pointed out that, within the MISO Region, “some local areas with high concentrations of renewables are experiencing some of these challenges today.”⁴⁷ MISO explained that deferring ESR implementation will expedite MISO’s transition to a more secure and robust market platform,

⁴⁴ Mar. 4, 2021 MISO Letter, P 7.

⁴⁵ *Id.* at P 27 FN 23 (emphasis added).

⁴⁶ RIIA Summary Report at P 13, *available at* <https://cdn.misoenergy.org/RIIA%20Summary%20Report520051.pdf>.

⁴⁷ *Id.*

which also has vastly greater capabilities to address the operational complexities and reliability impacts of other ongoing changes to the resource mix in the MISO Region, optimize the economics and efficiencies of using particular types of resources, and adopt additional market enhancements going forward.⁴⁸

In short, the May 17 Order fails to consider that, due to high renewable penetration in certain areas, MISO is already experiencing operational complexities in those areas that have a high concentration of renewables. Moreover, the May 17 Order adopts an overly simplistic notion of the timing of renewable growth, wholly ignoring the fact that renewable penetration will not suddenly jump to the 30 percent threshold system-wide in 2026, but rather incrementally grow in various areas of the footprint, increasingly impacting reliability even before 2026. It is reasonable and prudent for MISO to proactively remedy these growing reliability impacts by accelerating completion of the MSE and other dependent improvements in parallel to increasing renewable penetration, and about one year ahead of such penetration reaching or breaching the 30 percent threshold system-wide, with ESR implementation put in place by March 2025 and available to help enhance the management of renewables.

MISO accordingly requests rehearing of the Commission's order finding that there is no basis to accelerate MSE's completion by late 2024 to prepare for renewable penetration's reaching or exceeding the 30 percent threshold system-wide in 2026.

⁴⁸ Mar. 4, 2021 MISO Letter, P 2.

2. MISO identified specific MSE upgrades and corresponding reliability issues that those upgrades would address.

The May 17 Order also asserts that MISO has not identified specific MSE upgrades and corresponding reliability issues those upgrades would address and has also failed to identify specific reliability violations that may occur if the MSE were completed in 2025 instead of late 2024.⁴⁹ The Commission is mistaken. MISO's filings provide the requested information, and explain the numerous benefits associated with accelerated MSE implementation.

As an initial matter, deferral of reliability benefits associated with MSE for even one day exposes the grid to unnecessary risk, which can be alleviated by prioritizing MSE implementation and granting MISO's requested ESR deferral. The increasing incidence of extreme weather events such as the arctic event experienced in Texas during February of this year and the far reaching impacts they can have on the MISO system further highlight the need for the improved systems and software that will be realized upon MSE implementation. Implicitly recognizing the benefits associated with accelerated MSE implementation, the OMS concluded that "the benefits of granting this extension outweigh the eventual costs to consumers."⁵⁰ The OMS cited the "significant benefits" to customers in the MISO footprint and explained that "[w]hile requiring storage resources to participate through this [*i.e.*, SER-II] market participation model of the next 3 years is not optimal, it is less harmful than further deferring the completion of MISO's MSE and its attendant benefits for electric customers."⁵¹

The MISO Transmission Owners likewise supported MISO's ESR deferral request, concluding that "reliability and resource adequacy benefits from accelerated implementation of

⁴⁹ *Id.*

⁵⁰ May 14, 2021 OMS Letter, P 1, filed in Docket No. ER19-465-000.

⁵¹ *Id.*

the MSE far outweigh the burdens” because wind and solar penetration is expected to reach 30 percent of MISO’s total load and significantly strain MISO’s system as early as 2026.⁵² The MISO Transmission Owners urged the Commission to grant MISO’s requested deferral, stating that “time is of the essence to implement the MSE to ensure that MISO’s systems are fully enabled and prepared to manage the imminent reliability impacts of increased renewable penetration.”⁵³

Further, as MISO has previously noted in its response to the Motion for Leave to Answer and Answer of the Clean Energy Coalition in this Docket, MSE acceleration will also expedite MSE’s projected \$300 million benefit to the entire MISO footprint in addition to addressing the reliability impacts of rapid wind and solar penetration.⁵⁴ MSE’s benefits include the following:

- Faster market clearing eliminates barriers to offering computation-intensive value-added products for participants;
- Flexible modeling facilitates process efficiency and reduces administrative costs for MISO and participants;
- Modern monitoring tools improve system availability; and
- Ease and speed of upgrade allows faster turnaround on introducing new products and maturing existing products.⁵⁵

Accelerating MSE implementation will also ultimately facilitate the delivery of one-off beneficial projects like Multiple Configuration Resources (“MCR”), hybrid resource participation modeling; and price formation related to emergency and scarcity pricing and the enhancement of long-lead time Resources and self-commitments.⁵⁶ These projects are awaiting MSE’s

⁵² *Id.* at P 4.

⁵³ *Id.*

⁵⁴ Motion for Leave to Answer and Answer of MISO, Filed Apr. 23, 2021 in Docket No. ER19-465-004, P 4.

⁵⁵ *Id.* at P 4 (citing Footnote 18 to MISO’s Answer dated April 5, 2021).

⁵⁶ MISO’s Answer dated April 5, 2021, P 10.

completion, and will bring various reliability and market benefits to MISO's markets and Transmission System.⁵⁷

MISO also detailed the limitations of its existing system, which the MSE acceleration is intended to address. The existing system has nearly reached its technical limitations, and is inadequate for MISO's continued growth, particularly in the renewable area.⁵⁸ MISO explained that the existing system has limited ability to efficiently process, clear, price, commit and dispatch numerous renewable resources, in coordination with other types of resources.⁵⁹ Above significant renewable penetration thresholds, which has already occurred in portions of MISO, the current software platform will have difficulty maintaining sufficient situational awareness of data regarding renewables (including associated scarcity or emergency conditions), and properly accounting for the unique characteristics of significant numbers of wind and solar resources.⁶⁰ These are specific and concrete reliability-related market impacts that MISO has identified as risks due to the legacy system's limitations.

Indeed, MISO pointed out that the existing system has already experienced occasional technical problems and malfunctions (such as crashed servers, or delayed data transfers between servers) from some new software patches. MISO noted that while these glitches have so far been minor, they evidence the need to accelerate the development of better market software and systems with the MSE.⁶¹

⁵⁷ *Id.*

⁵⁸ Mar. 4, 2021 MISO Letter, P 22.

⁵⁹ *Id.*

⁶⁰ *Id.*

⁶¹ *Id.*

MISO submits that the above-described MSE upgrades and benefits, along with corresponding reliability issues they are intended to address, were not properly considered by the Commission's May 17 Order. Accordingly, MISO requests rehearing of the Commission's finding that MISO did not identify MSE upgrades that will address the reliability impacts of increased renewable penetration.

IV. CONCLUSION

For the foregoing reasons, MISO requests that the Commission grant rehearing of the May 17 Order as set forth above.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have this day e-served a copy of this document upon all parties listed on the official service list compiled by the Secretary in the above-captioned proceeding, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2012).

Dated this 16th day of June, 2021 in Carmel, Indiana.

/s/ Julie Bunn
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