MISO Response to Feedback

Planning Advisory Committee

LRTP/JTIQ Integration Changes (20250416)

Posted May 16, 2025

Purpose & Key Takeaways

Purpose: Respond to April 16 PAC feedback on proposed earlier integration of LRTP 2.1 and JTIQ Integration

Key Takeaways:

- MISO received twelve (12) public and one (1) non-public feedback responses on the proposed earlier integration of LRTP and JTIQ into DPP 2023.
- Stakeholders generally agreed with the changes allowing LRTP 2.1 integration into base case for DPP2023. BPM-015 changes will be completed before DPP 2023 study kick.
- Stakeholders raised concerns that integrating JTIQ into DPP 2023 will cause increased risk and material financial harm to projects in DPP 2023 and had questions about possible risk of losing DOE funding.
- MISO view is that DPP cycles that have not yet started, must be able to take advantage of all approved transmission and reduce uncertainty for the next cycles.
- MISO will proceed with seeking FERC action on earlier JTIQ integration into DPP 2023 cycle and plans to make a filing in mid May

MISO Response to Stakeholder Comments on LRTP and JTIQ Integration into DPP 2023

Stakeholder Comments	MISO response
Fundamentally **Savion** strongly opposes this change for the following reasons: ICs entered applications into DPP-2023 not expecting to be allocated costs associated with JTIQ because of MISO's then effective Tariff language. All decisions to enter applications in this cycle were made without considering JTIQ. This is akin to retroactive ratemaking because DPP-2023 customers will potentially be assessed a JTIQ Generation Charge even though that was not part of the Tariff when they entered DPP-2023. MISO's response that ICs can still drop out of DPP-2023 because it hasn't kicked off yet is not an acceptable solution. GI customers have already invested significant time and costs based upon a different MISO Tariff construct that existed at the time of DPP-2023 application. For example: There have already been significant investments in obtaining site control and procurement of long lead time items. There is now a queue cap, and the East (ITC) cap has already been reached. By the time FERC acts on MISO's JTIQ proposal it is likely other regions will have reached their cap. If MISO's ERAS proposal is accepted, ICs will face greater cost and network upgrade uncertainty. ICs that entered applications into DPP-2023 as ERIS and that are along the MISO-SPP seam will be treated differently than ERIS customers elsewhere (i.e., they will be allocated the same network upgrade costs as NRIS customers) thus defeating the purpose of ERIS. JTIQ was originally supposed to be implemented across the MISO and SPP 2024 study cycles. SPP has already begun DISIS-2023 without considering JTIQ. If MISO integrates JTIQ into DPP-2023, it would be discriminatory towards MISO ICs. Adding JTIQ Screening to the DPP-2023 cycle introduces financial risks to the ICs which were not accounted for. Sudden changes in Tariff/GIP after DPP window closing should be prohibited to maintain fairness for all stakeholders/participants.	When the customers entered the DPP 2023 queue, they would have expected AFS Network Upgrades cost uncertainty during all three DPP Phases. MISO interconnection process is not a risk-free process. Customers may face the risk of significantly higher AFS costs in the later stages of the current DPP process compared to the JTIQ pro rata share. However, with JTIQ, MISO is providing DPP 2023 customers greater cost certainty since JTIQ portfolio is known upfront. Furthermore, with JTIQ, Interconnection Customers can use prescreening results to withdraw penalty free before the study starts rather than withdraw later and lose their milestones without JTIQ. First initial AFS costs would likely not be available until Decision Point 2 at which point a withdrawal due to high AFS costs would include an Automatic Withdrawal Penalty of 35%. Customers who submitted applications for DPP-2023 as ERIS anywhere within the MISO footprint will be treated the same, as no deliverability study will be conducted and no NRIS upgrades will be assigned. However, if a project is near the MISO-SPP seams and qualifies for the JTIQ participation group, it will be responsible for JTIQ upgrade costs, which will replace SPP Affected System upgrades. This study remains ERIS-only, as no deliverability study is performed. DISIS-2023 was kick-off on January 02, 2024, and JTIQ was approved by MISO and SPP BODs in December 2024, so there was no scope of adding JTIQ to DISIS-2023 base case. DISIS-2024 closed in Q1 2025, and JTIQ will apply to that cycle. Although, DPP 2023 closed its application window in 2024, it has not kick off. Post the approval of JTIQ, MISO and SPP are collaborating to provide the advantages of JTIQ to this upcoming cycle. In fact, it will be disadvantageous for DPP-2023 projects if they are not provided the opportunity to utilize JTIQ portfolio benefits such as faster streamlined DPP process and AFS costs with greater certainty.

MISO Response to Stakeholder Comments on LRTP and JTIQ Integration into DPP 2023

Stakeholder Comments	MISO response
Submitting a filing to FERC to allow MISO to integrate JTIQ into DPP-2023 will further delay the kickoff of DPP 2023, which has already been significantly delayed. MISO should not deliberately delay the July 7th kickoff of DPP 2023 in hopes that FERC will accept JTIQ integration Is MISO planning on providing a screening study to show cost implications on a project due to JTIQ network upgrades? Will MISO provide that assessment as part of the screening study for the DPP 2023 cycle prior to kick off so that ICs know if they are impacting any JTIQ network upgrades?	DPP 2023 study kick off will be slightly delayed awaiting FERC decision. However, the earlier integration of JTIQ will help shorten the study timeline by streamlining AFS coordination with SPP and eliminating the need for alternative mitigations for constraints that would have been addressed by JTIQ and LRTP 2.1 Yes, MISO will provide nonbinding JTIQ screening analysis at least 15 BD before the DPP 2023 study kick off.
Regarding the inclusion of expected transmission changes/upgrades in transmission system models, in this case DPP2023, **EDF** supports, prefers, and expects that transmission models should be as up to date as reasonably possible upon the start of a process or in this case the study period. It is inefficient to use obsolete or incomplete models to test effects of possible future changes. EDF would hope and expect that MISO would do its best to use as good as practical models in its various processes, it is appreciated that they do so. This being the case, EDF supports and appreciates MISO's efforts to do that for the generation interconnection process for DPP2023 by offering/making edits to BPM-015 to enable integration of expected transmission upgrades and additions into the base/bench (pre-project) case.	Thank you for you support and feedback.

MISO Response to Stakeholder Comments on LRTP and JTIQ Integration into DPP 2023

Stakeholder Comments	MISO response
National Grid Renewables (NG Renewables) has major concerns with integration of the Joint Targeted Interconnection Queue (JTIQ) portfolio into the 2023 DPP cycle. The current approved cost allocation for JTIQ assigns 100% of costs to generation and 0% to load, despite load deriving significant benefit from JTIQ lines. This lopsided cost allocation was originally approved because of the provision of grants by the Department of Energy (DOE) Grid Resilience and Innovation Partnerships (GRIP) Program to fund almost half the JTIQ portfolio. However, the certainty of this funding has come into question under the current presidential administration. Thus, it would be inappropriate to accelerate JTIQ until MISO can confidently assert that the funds provided by DOE for the JTIQ lines will not be rescinded. Without this assertion, generators could inappropriately be allocated more than double the costs that were originally estimated. Furthermore, the In-Service Date (ISD) of the JTIQ projects is not certain. Without secure funding mechanisms, construction of the JTIQ lines would likely be delayed or halted. If MISO includes the JTIQ lines in the 2023 DPP cycle, many generators will be contingent on those facilities for many years, in some cases potentially limiting their interconnection rights until those lines are built. NG Renewables is highly concerned with the logistical challenges- both in cost allocation and in construction timelines- that would occur if grant funding for JTIQ was withdrawn. Therefore, NG Renewables opposes pre-maturely integrating this portfolio into DPP 2023. Alternatively, if MISO would guarantee a cost cap for generators limited to the costs that would be incurred post- the original GRIP funding amount, and cost responsibility for the remaining costs, NG Renewables would be willing to consider the possibility of including JTIQ projects into the 2023 DPP cycle.	MISO is not aware of any changes to DOE JTIQ funding and is not expecting such changes to occur. DOE is evaluating all projects under GRIP before the funds can be disbursed. DOE has made no indications that funding is in jeopardy, and JTIQ is not contingent upon the receipt of GRIP funding. MISO will continue to work with its JTIQ partners and the DOE on implementation of the GRIP funding.

MISO Response to Stakeholder Comments on LRTP and JTIQ Integration into DPP 2023

Stakeholder Comments	MISO response
The MISO Transmission Owners (Owners) are supportive of the proposed edits to BPM-015 to enable integration of LRTP Tranche 2.1 into the DPP 2023 cycle and the proposed integration of JTIQ into the DPP 2023 cycle as presented at the April 16th PAC meeting.	Thank you for your support and feedback.

MISO Response to Stakeholder Comments on LRTP and JTIQ Integration into DPP 2023

Stakeholder Comments	MISO response
The Entergy Operating Companies (Entergy) appreciate the opportunity to provide feedback on MISO's proposals to revise BPM-015 for LRTP Tranche 2.1 integration and to seek FERC approval to modify Attachment X for JTIQ integration into the DPP 2023 cycle. While the proposals appear generally reasonable, Entergy offers the following comments and considerations for MISO's evaluation. **LRTP Tranche 2.1 Integration – BPM-015 Revisions** Entergy generally supports the proposed revisions to BPM-015 to allow inclusion of LRTP Tranche 2.1 projects in the DPP 2023 bench case. This adjustment aligns the study base case with more current transmission planning assumptions and reduces the likelihood of identifying redundant or unnecessary network upgrades. However, Entergy emphasizes the following considerations: **Risk of Premature Inclusion:** There is inherent risk in basing interconnection upgrades on projects not yet in service. If LRTP projects are later cancelled or modified through the Variance Analysis process, affected interconnection customers may face delayed or uncertain service, and interconnection costs may be unreasonably shifted from interconnection customers to load as noted below. **Contingency and Cost-shifting Concerns:** There are also concerns in cases where an MTEP project is listed as a Contingent Facility in a GIA, and is later terminated, that the TO must find an alternative transmission solution to mitigate the constraint that the MTEP project was mitigating in the interconnection study results. Because the costs of the replacement project would be borne by the load in the transmission pricing zone in which the transmission project is located, not by the interconnection customer, the result would be an unreasonable cost shift. **Dependency Identification and Conditional Service:** MISO should conduct a dependency analysis identifying which interconnection customers' ERIS/NRIS is contingent on which LRTP projects. This would ensure consistency with current conditional service practices and help mitigate interim congestion risks. **Equal Treatment in Study Process:** MISO should ensure that LRTP projects are subject to the same contingency and dependency review as other future upgrades, possibly through the A10 process or an equivalent evaluation.	Thank you for your support and feedback. By definition, any MTEP project—including LRTP and JTIQ projects—listed as a Contingent Facility in a GIA is one that has not yet been built. Consequently, any generator dependent on such a project is considered conditional. If that MTEP/LRTP/JTIQ project is later terminated, the TO must find an alternative transmission solution to mitigate the constraint the project was mitigating. If this occurs, then an alternative solution must be identified, and the costs would be borne by the transmission pricing zone in which the transmission project is located. This is not a cost shift as the original project that was cancelled was originally being funded by load. MISO can confirm that interconnection projects that will rely on specific LRTP, JTIQ, or MTEP project will have those transmission upgrades identified in the A10 contingent facilities list, as determined based on Section 3.8 of Att. X. In addition, if an interconnection project goes commercial before the LRTP projects are completed, their interconnection service will be on an "as available" basis, as determined by Section 6.6 of BPM-015.

MISO Response to Stakeholder Comments on LRTP and JTIQ Integration into DPP 2023

Stakeholder Comments	MISO response
JTIQ Integration into DPP 2023 – Tariff Revisions Entergy does not object to MISO pursuing a Section 205 filing to revise Attachment X of the tariff to permit inclusion of the JTIQ portfolio in DPP 2023. The feedback below addresses implementation considerations for how JTIQ project assumptions are handled in the DPP base case and how MISO should ensure proper treatment of dependencies between interconnection customers and JTIQ facilities. **Clarification of JTIQ Dependencies:** MISO should clarify how dependencies on JTIQ projects will be tracked and evaluated during the interconnection study process. For example, if a generator is assumed deliverable based on the presence of a JTIQ project in the base case, it should be clear how that dependency is documented and how conditional service is applied in cases where the JTIQ facility is delayed or incomplete. **Conclusion** **Entergy** supports MISO's efforts to update its processes to reflect recently approved transmission portfolios. However, these changes must be accompanied by robust implementation practices that ensure transparency, maintain system reliability, and minimize cost exposure and/or avoid unreasonable cost shifts due to potential JTIQ or LRTP project modifications or cancellations. Entergy encourages MISO to engage further with stakeholders on implementation specifics and perform detailed analysis on generator contingencies associated with this change to including LRTP and JTIQ portfolios for the 2023 DPP Cycle.	JTIQ dependencies will be tracked as any other LRTP or MTEP Network Upgrade and all interconnection projects that are relying on a specific JTIQ/LRTP/MTEP project will have all transmission upgrades identified in the A10 contingent facilities list, as determined based on Section 3.8 of Att. X. If JTIQ facility is delayed but project is ready to go commercial, then the interconnection service will be on an "as available" basis, as determined by Section 6.6 of BPM-015.

MISO Response to Stakeholder Comments on LRTP and JTIQ Integration into DPP 2023

Stakeholder Comments	MISO response
Pine Gate Renewables appreciates the opportunity to provide feedback on MISO's proposed LRTP/JTIQ Integration Changes presented at the April 16 PAC meeting. We understand that planning updates have occurred since the DPP 2023 requests were initially submitted, and that it is prudent for MISO to incorporate these changes before DPP 2023 studies begin. As MISO continues to clear the interconnection backlog and shorten study timelines, we hope that such policy changes to active interconnection requests will rarely occur. Since DPP 2023 Phase 1 study begins in three months, additional information on the JTIQ per-MW generator charge is warranted. Is MISO going to use the JTIQ portfolio cost filed in the FERC proceeding (~$1.7 billion) to calculate the final per-MW JTIQ charge for the DPP 2023 cycle? If not, can MISO confirm when it plans to update the cost of the upgrades? It will be helpful for customers to have upgrade cost estimates prior to the start of Phase 1, or at the latest, when customers are notified that they are likely assigned JTIQ upgrades before the start of Decision Point 1. Additionally, prior to posting the pre-screening results, MISO should organize an educational presentation or workshop to refresh customers on how the generator charge is calculated. Understanding the certainty around the assumptions MISO and SPP use in the calculation will be critical in informing customers what the estimate will be and how it may change over time. Pine Gate shares the concern with other stakeholders that DPP 2023 cycle projects were not planned to participate in JTIQ, and that such a significant shift in assumptions can change the outlook of these projects. To provide customers with time to assess their projects under this new paradigm, we recommend that MISO provides the screening analysis with JTIQ upgrades more than 15 calendar days prior to the kickoff of Phase 1. Additional time will allow customers to run the appropriate internal analysis and allow ready projects to move forward. We also share the concern that any cost increases from a loss in GRIP funding would be automatically passed along to interconnection customers. As outlined in the JOA and Tariff, the current cost allocation only applies to upgrades that receive GRIP funding. Can MISO confirm that any loss in GRIP funding would trigger a new stakeholder review for an appropriate cost allocation? Lastly, we believe that JTIQ integration into DPP 2023 and JTIQ integration into ERAS are two different topics – additionally, ERAS is still contingent on FERC approval. Therefore, MISO should either submit two different filings or the filing should be made severable.	MISO will provide nonbinding pre -screening analysis at least 15 BD before the DPP 2023 study kick off that will include and an estimated per –MW Generator charge, for the projects identified as prospective JTIQ participants. The JTIQ Generator Charge for prescreening purposes will be calculated based on the indicative rate where the portfolio estimated cost is $1.6 billion. Any revised rates with updated Portfolio costs will be available in Phase 1. MISO is not aware of any changes to DOE JTIQ funding and is not expecting such changes to occur. DOE is evaluating all projects under GRIP before the funds can be disbursed. DOE has made no indications that funding is in jeopardy, and JTIQ is not contingent upon the receipt of GRIP funding. MISO will continue to work with its JTIQ partners and the DOE on implementation of the GRIP funding. MISO is planning to submit two filings: 1) to allow JTIQ integration into ERAS and the other 2) to allow integration into DPP 2023. The filings will be made in May.

MISO Response to Stakeholder Comments on LRTP Integration BPM Changes.

Stakeholder Comments	MISO response
Cordelio appreciates the opportunity to provide feedback on PAC: LRTP/JTIQ Integration Changes as presented at the PAC on April 16. Cordelio opposes integrating JTIQ into DPP 2023 cycle. When DPP 2023 Interconnection Customers submitted projects, it was months before FERC approved JTIQ. At that time, DPP 2023 was planned to start in July 2024, again months before FERC approved JTIQ. Interconnection Customers acted reasonably when assuming DPP 2023 would not have JTIQ integrated. At this point in the process, it is unreasonable to increase risks and costs being imposed on DPP 2023 by adding JTIQ projects. Cordelio supports integrating JTIQ into cycles following DPP 2023, so that Interconnection Customers are given the opportunity to consider JTIQ impacts when they submit projects.	MISO is convinced that it is reasonable to integrate approved and available transmission into DPP 2023. JTIQ integration into DPP 2023 will help to speed up the queue process and will optimize needed AFS Network Upgrades. If DPP 2023 has been kicked off as originally thought, it would have used a base case with MTEP projects approved through MTEP23. Now that the kickoff date is scheduled for July 2025, the base case will include MTEP projects approved through MTEP24. Applying LRTP 2.1 and JTIQ is consistent with how other approved transmission upgrades through MTEP are utilized within the DPP process. When the customers entered the DPP 2023 queue, they would have expected AFS Network Upgrades cost uncertainty during all three DPP Phases. MISO interconnection process is not a risk-free process. Customers may face the risk of significantly higher AFS costs in the later stages of the current DPP process compared to the JTIQ pro rata share. However, with JTIQ, MISO is providing DPP 2023 customers greater cost certainty since JTIQ portfolio is known upfront. Furthermore, with JTIQ, Interconnection Customers can use prescreening results to withdraw penalty free before the study starts rather than withdraw later and lose their milestones without JTIQ. First initial AFS costs would likely not be available until Decision Point 2 at which point a withdrawal due to high AFS costs would include an Automatic Withdrawal Penalty of 35%.

MISO Response to Stakeholder Comments on LRTP and JTIQ Integration into DPP 2023

Stakeholder Comments	MISO response
The Environmental Sector supports inclusion of LRTP Tranche 2.1 but opposes the inclusion of JTIQ projects into the 2023 DPP cycle. While we appreciate MISO's position that both portfolios of projects have been approved by the MISO Board of Directors and, therefore, should be included as mitigating projects in the upcoming DPP cycle, the critical distinction is that including JTIQ projects in the 2023 DPP cycle will likely create a material harm for DPP 2023 cycle interconnection customers through the application of JTIQ charges to projects that entered the 2023 cycle with an expectation that they would not be exposed to such charges. MISO's proposal to include LRTP Tranche 2.2 in the 2023 DPP cycle does not carry such risk and, in fact, will likely lower interconnection upgrade costs for interconnection customers in that cycle. We agree with feedback received at the IPWG from Alliant Energy and the Transmission Owners to that effect. While we don't oppose JTIQ charges in principle, including such a risk in the 2023 DPP cycle ex post facto changes the rules of the game – and the expectations for financial risk – of customers who entered the 2023 DPP cycle expecting potential JTIQ charges to not apply. This is a poor precedent for MISO to set, will likely lead to unexpected charges for customers, and could lead to a significant number of projects dropping out of the 2023 cycle – an occurrence that MISO itself has identified as an issue it seeks to avoid. And this is at the heart of why we support incorporating LRTP Tranche 2.1 but not JTIQ in the 2023 DPP cycle: while both change the analysis conducted by interconnecting parties prior to this late change, the former can be considered neutral or net beneficial, while the latter introduces material financial harm to a substantial number of interconnecting customers. Looking at ex post facto principles generally, such changes are generally accepted when they result in no material harm, but their acceptance falls under much greater scrutiny and is often rejected when a material harm is the result. Unfortunately, provisions to allow a penalty-free withdrawal for projects seeking to avoid JTIQ charges is a suboptimal remedy because having to withdraw and reenter the queue at a later cycle is, itself, a material harm and may cause some projects to lose their financing. And we are unconvinced that MISO's process for penalty-free withdrawal is even workable because it does not provide sufficient time for interconnection customers to fully evaluate their risks of remaining in that cycle or withdrawing.	The logic behind integration of JTIQ and LRTP is the same. The point is to enable generation interconnection, speed us the queue and provide more cost certainty upfront. Selecting one over the other is counterintuitive. When the customers entered the DPP 2023 queue, they would have expected AFS Network Upgrades cost uncertainty during all three DPP Phases. MISO interconnection process is not a risk-free process. Customers may face the risk of significantly higher AFS costs in the later stages of the current DPP process compared to the JTIQ pro rata share. However, with JTIQ, MISO is providing DPP 2023 customers greater cost certainty since JTIQ portfolio is known upfront. Furthermore, with JTIQ, Interconnection Customers can use prescreening results to withdraw penalty free before the study starts rather than withdraw later and lose their milestones without JTIQ. First initial AFS costs would likely not be available until Decision Point 2 at which point a withdrawal due to high AFS costs would include an Automatic Withdrawal Penalty of 35%. Projects that exit early in the queue process generate less uncertainty than those withdrawing at later study phases, especially for projects queued afterward. All MISO queue reforms are designed to have projects drop out earlier in the process instead of later. If the certainty of the JTIQ costs are considered too high for a project to continue, then they should withdraw before cycle kick off. This is a better position for the queue rather than those projects dropping out at Decision Point 2 or during Phase 3 once initial AFS costs are determined through traditional study methods. MISO is committed to posting the JTIQ pre-screening analysis as soon as possible following FERC acceptance, ensuring customers have ample time to determine whether they wish to proceed to Phase 1.

MISO Response to Stakeholder Comments on LRTP and JTIQ Integration into DPP 2023

Stakeholder Comments	MISO response
Southern Renewable Energy Association (SREA) appreciates the opportunity to provide feedback on MISO's proposal to integrate LRTP Tranche 2.1 and the JTIQ portfolio of projects in recent DPP Cycles. The presentation offered by MISO provided details on the approach to integration for JTIQ through a Tariff Amendment to be filed with FERC in the very near term for a targeted implementation before kick off of DPP2023 in July '25. In a separate presentation MISO outlined integration of LRTP Tranche 2.1 lines, which detailed their incorporation into DPP2022 and 2023 models to be utilized for mitigations in these cluster study cycles. We are supportive of the latter proposal, but have concerns about the incorporation of JTIQ screening in DPP23, given that discussions about cost allocation, screening process, $/MW charges for IC's and the status of federal grant funding for the majority of cost recovery for JTIQ were still under consideration when IC's submitted projects to that cycle. While at face value there is benefit to JTIQ integration we have an overarching concern that the benefits that developers understood while entering the queue will fall short of the commensurate costs assigned to them. Currently, the language in MISO's tariff as it relates to JTIQ assigns 100% of costs to generators, which could further complicate cost recovery if DOE funding were not to materialize. This would raise costs even further for DPP2023 participants that agreed to one set of assumptions around cost allocation but would be presented with a potentially much more concerning picture. However, we do recognize that benefits of JTIQ *may* in fact be a net, and maybe even a significant net benefit for IC's. For that reason we believe that IC's should be given more than the allotted ten business days outlined in MISO's presentation to carry out their analysis at DP1. Twenty business days would be a meaningful improvement to the current proposal to ensure IC's that they can confidently move ahead with a project, or withdraw from the queue without penalty. We also urge MISO to provide more than fifteen calendar days between the Screening Analysis and Phase 1 kick-off. Twenty calendar days would be more appropriate for IC's to make the decision to participate in the queue. Ultimately, this extra time ensures that IC's in the queue have a higher level of confidence in committing to a cycle and are less likely to drop out later - causing restudies and delays.	Thank you for your feedback. MISO is not aware of any changes to DOE JTIQ funding and is not expecting such changes to occur. DOE is evaluating all projects under GRIP before the funds can be disbursed. DOE has made no indications that funding is in jeopardy, and JTIQ is not contingent upon the receipt of GRIP funding. MISO will continue to work with its JTIQ partners and the DOE on implementation of the GRIP funding. MISO understands that the customers will need sufficient time to determine whether they want to processed to Phase 1 after screening results are available. MISO will strive to provide JTIQ screening analysis as soon as possible after FERC ruling, and the tariff already provides 15 business days between pre-screening results and eventual kick off to allow for penalty free withdrawal.

MISO Response to Stakeholder Comments on LRTP and JTIQ Integration into DPP 2023

Stakeholder Comments	MISO response
Additionally on the topic of expected costs and benefits related to JTIQ, can MISO confirm if the cycle's JTIQ charge will be based on the portfolio's cost estimates shared in the FERC filing ($1.7 billion)? If MISO plans on updating the JTIQ charge to reflect more recent costs, having a cost refresh would be very helpful for developers in making decisions at DP1. The tariff says that an estimated pre-MW charge will be provided to customers before the beginning of DP1. Ideally MISO would do a JTIQ cost refresh so IC's have an updated expected rate, if not before Phase 1 starts, then prior to DP1 as part of the notification. On a separate topic, we do not think that edits to incorporate ERAS into JTIQ are appropriate in this filing. ERAS is a separate topic and should either be in a separate filing or severable.	MISO will provide nonbinding pre -screening analysis at least 15 BD before the DPP 2023 study kick off that will include and an estimated per –MW Generator charge, for the projects identified as prospective JTIQ participants. The JTIQ Generator Charge for prescreening purposes will be calculated based on the indicative rate where the portfolio estimated cost is $1.6 billion. Any revised rates with updated Portfolio costs will be available in Phase 1. MISO will deliver the JTIQ prescreening analysis at least 15 business days before the DPP 2023 study begins, including the estimated JTIQ generator charge in $/MW. MISO is planning to submit two filings: 1) to allow JTIQ integration into ERAS and the other 2) to allow integration into DPP 2023. The filings will be made in May.

MISO Response to Stakeholder Comments on LRTP and JTIQ Integration into DPP 2023

Stakeholder Comments	MISO response
Steelhead Americas is against inclusion of the JTIQ Portfolio in the DPP-2023 Cycle. The additional cost to be borne by generators is a major deviation from the known assumptions when DPP-2023 Cycle generators submitted their applications. We continue to maintain that the benefits for many generators distant from the portfolio will not outweigh the costs, so adding these unexpected costs will throw off the business case for numerous generators in this cycle. Adding to the uncertainty, we have not seen any preliminary JTIQ cost adders. It is critical to receive these numbers with sufficient time to evaluate applicable queue positions prior to the start of that study and before the end of the penalty free withdrawal window.	MISO will provide JTIQ prescreening analysis at least 15 business days before the DPP 2023 study kick off, as required by the tariff, that will include an estimated generator charge. The information provided before the kickoff will allow interconnection customers to assess project's feasibility and withdraw penalty free.

MISO Response to Stakeholder Comments on LRTP and JTIQ Integration into DPP 2023

Stakeholder Comments	MISO response
Clean Grid Alliance appreciates the opportunity to comment on the proposed integration of JTIQ and LRTP Tranche 2.1 into the DPP 2023 Cycle While CGA generally supports the proposed BPM-015 edits to for timing of MTEP MVP/LRTP project inclusion into DPP models, we take a neutral stance on integration of LRTP 2.1 into DPP 2023. We fully support the BPM 15 change for application to future DPP cycles, as interconnection customers will be aware of the BPM inclusion provision in advance. In regard to JTIQ, Clean Grid Alliance is strongly opposed to JTIQ inclusion in the DPP 2023 cycle for the following reasons: • **Mid-Cycle Rule Changes**: Including JTIQ into DPP 2023 alters the rules after developers made commercial decisions to enter the queue based on existing tariff language. This introduces significant uncertainty and cost increases to projects which undermines the predictability necessary for project financing and development. DPP 2023 projects entered the queue having specifically modeled the transmission system without the unpredictable cost exposure JTIQ creates, and do not want the process changed at this point. If it is a matter of either including both or omitting both, then we request that MISO omit both given the significant negative impact JTIQ will have on projects. • **Cost Uncertainty to the JTIQ Expanded Scope Study**: Developers oppose JTIQ due to its additive costs alongside the JTIQ Expanded Scope Study (ESS), which is basically the same Affected System Study as prior to the JTIQ portfolio, introducing the potential for "lumpy" upgrades to be assigned to projects, all the way up to 345KV level. MISO had claimed early in the JTIQ process that JTIQ would replace the AFS, but later added in the ESS, which although the name is different, the function is the same. Lower DFAX thresholds on the ESS over the old AFS significantly increase cost exposure for projects and add uncertainty since the SPP system was bult to a 20% DFAX while MISO generators will be held to a 10% DFAX standard on the SPP system, requiring them to build transmission in SPP at a higher standard.	When the customers entered the DPP 2023 queue, they would have expected AFS Network Upgrades cost uncertainty during all three DPP Phases. MISO interconnection process is not a risk-free process. Customers may face the risk of significantly higher AFS costs in the later stages of the current DPP process compared to the JTIQ pro rata share. However, with JTIQ, MISO is providing DPP 2023 customers greater cost certainty since JTIQ portfolio is known upfront. Furthermore, with JTIQ, Interconnection Customers can use prescreening results to withdraw penalty free before the study starts rather than withdraw later and lose their milestones without JTIQ. First initial AFS costs would likely not be available until Decision Point 2 at which point a withdrawal due to high AFS costs would include an Automatic Withdrawal Penalty of 35%. The expanded scope study is not the same as an AFS study based on previous methodology. As extensively discussed in the development of the JTIQ study framework and approved by FERC, the expanded scope is only a portion of the JTIQ framework designed to identify constraints on the neighboring system that are only a few buses away and driven directly by the POI location of the interconnection request. The constraints within this study are not captured by the constraints identified and mitigated by the JTIQ study and portfolio. Any upgrades identified through the expanded scope is done through the DPP process and not through any study performed by SPP.

MISO Response to Stakeholder Comments on LRTP and JTIQ Integration into DPP 2023

Stakeholder Comments	MISO response
• **Cost Uncertainty due Un-Capped Costs of JTIQ lines**: JTIQ does not have a cost cap for the lines – prices can increase significantly and the only oversight of cost increases (10% cost allocation to states would have afforded some oversight) was removed very late in the process, contrary to representations MISO had made earlier in the JTIQ process, and without consideration of the impact and consequences on cost increases. • **Unpredictable Risk Due to Lack of Cost Causation:** JTIQ cost allocation is contrary to "but for" principles as the 5% DFAX applies to power flows from new projects on the new lines, and has nothing do with a project actually needing JTIQ or not or having any constraints—projects will get pulled into JTIQ costs simply because of power flows in the path of least resistance and projects could far away from the seams that would have never needed JTIQ lines can be allocated JTIQ costs. It is also unknown if the JTIQ portfolio actually solves the right constraints today, as the system had changed significantly by the time it was filed and even more so today. Without cost causation, generators could be paying for lines that don't even benefit them at all. • **Withdrawal Window**: The penalty-free withdrawal window (before the DPP 2023 study kickoff) is insufficient for developers to assess JTIQ's cost impacts. Screening studies, which provide initial thermal overloads and cost estimates, often lack detailed information on specific upgrades (e.g., 345 kV lines), which typically emerge later in Phase 1 and Phase 2 studies. This lack of early clarity prevents developers from making informed decisions prior to the point where they can withdraw without financial penalties. Furthermore, it's not clear if MISO will actually perform the Extended System Study that can assign full line upgrades to projects, prior to Study Kick off for interconnection customers to see the full cost of JITQ upgrades.	Thank you for you feedback regarding the cost allocation methodology. MISO already held multiple JTIQ workshops and discussions regarding this topic. FERC approved MISO and SPP joint JTIQ filing accepting the cost allocation methodology as well as the process for determining screening group, participation group, commitment group along with the appropriate study thresholds were described.

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• **DOE Funding Stability**: A significant portion of JTIQ's costs rely on Department of Energy (DOE) grid funding, which faces risks of reduction or reallocation, as seen in recent federal funding reviews. If DOE funding is reduced or removed, developers could face significantly higher costs, potentially doubling their financial exposure and/or causing projects to withdraw that would not otherwise have needed to. While we do not support JTIQ integration into DPP 2023 for the reasons noted above, we are especially opposed to it occurring without language causing load to be responsible for the DOE funds, should those funds not show up (or another mechanism that ensures the anticipated DOE funding is not cost allocated to generators). **Clean Grid Alliance** is strongly against JTIQ inclusion in the DPP 2023 cycle and requests that MISO begin the process of Tariff and JOA changes to JTIQ to address the issues noted above that are responsible for high cost variability when projects are subjected to JTIQ. Additionally, we refer MISO to our JTIQ comments from December 2023 where many of these concerns were raised prior to also being raised in protests to the filing, including the lack of cost predictability due to inclusion of the Extended System Study which introduces "lumpy" transmission upgrades into the JTIQ process, similar to the earlier MISO-SPP Affected System Study, but is now "additional" to the uncapped JTIQ portfolio charges. JTIQ transmission lines lack a cost containment mechanism that other 345kV lines assigned to generators would automatically have as a result of state oversight for the 10% direct cost to load, while the entire portfolio cost is pro-rata allocated to generator interconnection projects based on a 5% power flow on any single JTIQ line, rather than due to a generation project actually causing or contributing to any constraint, which also unexpectedly increases and cost and risk to DPP 2023 projects that had not been modeled, planned for, or anticipated prior to DPP 2023 entry.	MISO is not aware of any changes to DOE JTIQ funding and is not expecting such changes to occur. DOE is evaluating all projects under GRIP before the funds can be disbursed. DOE has made no indications that funding is in jeopardy, and JTIQ is not contingent upon the receipt of GRIP funding. MISO will continue to work with its JTIQ partners and the DOE on implementation of the GRIP funding.

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Stakeholder Comments	MISO response
NextEra does not support the proposed changes to BPM-015 that would integrate the transmission investments identified in LRTP 2.1 into DPP 2023 bench case models. Such a move is a significant departure from the existing business practices that developers have relied on to develop and implement multi-year investment strategies. MISO has not provided any analysis supporting this proposal or the benefits it could provide, whereas the adverse commercial impact to developers is real. The window for submitting projects to DPP 2023 has long been closed, so developers have no ability to revise or add projects to that cycle commensurate with the acceleration of LRTP 2.1 into the DPP 2023 bench case. Moreover, developers currently are submitting projects into the DPP 2025 cycle, anticipating LRTP 2.1 would be integrated in that cycle. The inability to add projects to DPP 2023 and commercial implications to projects either submitted or planned to be submitted for 2025, along with the significant DPP delays across all cycles makes accelerating LRTP 2.1 commercially harmful to developers. As one stakeholder described during the April 16 PAC, this proposal is like changing the rules of the game while the game is being played. This proposal upsets commercial expectations and increases costs for customers. NextEra strongly urges MISO not to move forward with the proposed BPM amendments that would accelerate LRTP 2.1 into the DPP 2023 bench case.	Earlier LRTP adoption provides more certainty to necessary upgrades to integrate the resource to the grid and is consistent with the original BPM language with including an approved LRTP portfolio into the DPP process. The initial language did not contemplate and extended period between cycle close and kick off. The original language assumed that kickoff would occur 90 days after cycle close and therefore needed LRTP approval 30 days before cycle close to allow for ample time to implement the projects into the model. The currently scheduled July kickoff for DPP 2023, and the December 2024 approval of LRTP 2.1 gives ample time to include the portfolio into the cycle. MISO shouldn't withhold transmission capacity when it is approved and available, as it must provide an open transmission access to all interconnection customers as available. LRTP integration will provide benefits to the Interconnection Customers **cost free** and will ensure the latest transmission data is used for planning. Ignoring available transmission will provide uncertainty. The customers will have to pay for Network Upgrades that could be duplicative to approved LRTP transmission capacity and will lead to study delays to try and determine upgrades to fix constraints that would be mitigated with LRTP. MISO provided information on benefits that LRTP 2.1 will provide to the customers LRTP Tranche 2.1 Fact Sheet Website666573.pdf

Contact Information

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Appendix

JTIQ Tariff language doesn't allow MISO to integrate JTIQ into DPP 2023 Cycle, even though the cycle has not kicked off yet

- The JTIQ Tariff language allows the integration of JTIQ portfolio into cycles where the application deadline occurs after the BOD approval
  - DPP 2023 cycle application deadline was in April 2024, before the JTIQ approval in December 2024
  - When JTIQ was originally filed at FERC in September 2024, MISO did not want the kickoff of the 2023 cycle to be dependent on the outcome of the filing or be held up by any potential refiling
- Due to cascading delays caused by the unprecedented volume of projects in the 2022 cycle, and the recently announced use of automation to speed up Phase 1 studies, the kickoff of the 2023 cycle has been pushed to July 2025
- Allowing the 2023 cycle to utilize the new transmission capacity from JTIQ, can provide better cost and timing certainty for that cycle instead of only allowing its use in the 2025 cycle which is scheduled to close in September 2025
- The proposed updates to the definition of "the Screening Group" would allow JTIQ integration to be based on the cycle kickoff rather than the application deadline (see Appendix)

Without JTIQ, DPP 2023 will face uncertainty regarding Network Upgrades for SPP affected system studies

Challenges without JTIQ

- To prevent free riders, JTIQ projects will have to be removed from the DPP 2023 model
- SPP will have to run an individual affected systems study (AFS) for 2023 cycle potentially delaying study completion
- Mitigations must be developed in the absence of available transmission
- There is a risk of duplicative Network Upgrades in conflict with existing JTIQ projects
- The costs of AFS Network Upgrades will be unknown and not determined until late in the process (Phase 2 and Phase 3)
- Late withdrawals, subject to Automatic Withdrawal Penalties, due to unexpected high Network Upgrade costs lead to study delays and contribute to uncertainty for other queued projects

How JTIQ can solve the problem ?

No SPP AFS Coordination

NU cost certainty upfront

Improved engineering analysis

Faster study timelines

JTIQ will provide benefits to DPP2023 and subsequent cycles

- Streamlined GI queue process to help ensure the timely build of projects and system reliability
- Optimized Network Upgrades that enable more customers and reduce overall affected system costs
- Greater cost certainty as the JTIQ Portfolio and the amount of enablement (28GW) is known, and customers will pay their pro rata share of the JTIQ Portfolio
- Greater timing certainty of projects as the unknown Network Upgrades, study costs and timing delays that are prevalent in the standard affected system study process are mitigated or are eliminated
- Fewer delays because transmission construction can start before the portfolio is fully subscribed

Proposed Tariff language

JTIQ Screening Group shall mean a group of MISO Interconnection Customers and SPP interconnection customers whose Interconnection Requests will be screened for inclusion in a JTIQ Participation Group. The JTIQ Screening Group shall consist of all interconnection customers who have submitted interconnection requests into a DPP study cluster, or SPP DISIS study cluster that: (1) has a study commencement or kick off date ~~an application deadline~~ that is after the date that the Parties' respective Boards of Directors have approved a JTIQ Portfolio; and (2) has not commenced DPP Phase I or DISIS Phase One studies pursuant to each party's OATT as of the date that the Parties have declared the JTIQ Portfolio fully subscribed.