

**Appendix X: Compliance Summary**

Order 890		Midwest ISO	
Paragraph(s)	Description	Compliance	Strawman Section
440	RTO's and ISO's to indicate how all participating transmission owners within their footprint will comply with the planning requirements of the Final Rule.	The Planning Framework of the Midwest ISO Transmission Owners Agreement provides that Owners shall develop expansion plans for their transmission facilities while taking into consideration the needs of (i) connected loads, including load growth, (ii) new customers and new generation sources within the Owner's system, and (iii) known transmission service requests.	5.1
451, 452, 454	The Commission adopts the Coordination principle. The transmission provider must meet with all of its transmission customers and interconnected neighbors to develop a transmission plan. Customers must be included at the early stages of the development of the transmission plan and not merely given an opportunity to comment on transmission plans that were developed in the first instance without their input.	Midwest ISO provides a framework for this process that is already on file with FERC in Appendix B - Planning Framework of the Midwest ISO Transmission Owners Agreement. Also, the requirements for development of expansion plans are details in Attachment FF - Transmission Planning Protocols of the Midwest ISO Tariff. Additionally, the Midwest ISO carries out these coordination requirements through the regular meetings of several stakeholder planning committees and working groups. Finally, the Midwest ISO has developed joint agreements with neighboring transmission entities including PJM, SPP, TVA, MAPP, and Ontario IESO (via Coordination Protocols).	4.1.2
460	The Commission adopts the Openness principle and will require that transmission planning meetings be open to all affected parties including, but not limited to, all transmission and interconnection customers, state commissions and other stakeholders.	Midwest ISO Planning Advisory Committee (PAC), Planning Subcommittee (PS), Organization of Midwest ISO States (OMS) and the Expansion Planning Group (EPG) are comprised of stakeholder sector representatives including Transmission Owners, Transmission Customers, and other industry participants and Stakeholders to advise, guide, and provide recommendations to the Midwest ISO. These groups meet on a regular basis to discuss planning policy issues and to provide input and review of Midwest ISO Transmission Expansion Plans. These groups also provide recommendations to the Midwest ISO staff with the goal of enabling the Midwest ISO to efficiently and timely execute its planning responsibilities, as set forth in the Midwest ISO Tariff, the Midwest ISO/Transmission Owner Agreement, FERC Order 2000 and other applicable documents.	4.2.2
460	Develop mechanisms to address confidentiality of planning-related information.	Midwest ISO has a Universal Non-Disclosure and Confidentiality Agreement to address sharing of transmission planning supporting study information (power flow models, preliminary results, planning reports drafts).	4.2.2
471	The Commission adopts the Transparency principle. The Commission will require Transmission Providers to disclose to all customers and other stakeholders the basic criteria, assumptions, and data that underlie their transmission system plans.	Midwest ISO criteria, planning assumptions, data, study methodologies, and processes are defined and described in the Transmission Owners Agreement, the Transmission Planning Protocols of Attachment FF to the tariff, and the Transmission Planning Business Practices. This planning documentation is maintained on the Midwest ISO website which has a specific webpage devoted to Expansion Planning information and issues.	4.3.2
472	The Commission requires that Transmission Providers make available information regarding the status of upgrades identified in their transmission plans in addition to the underlying plans and related studies.	Midwest ISO's MTEP provides listings of identified projects and their status and the Midwest ISO posts the MTEP on the Midwest ISO's website. The Midwest ISO tracks the progress of expansion projects identified in the MTEP and approved by the Midwest ISO Board of Directors, and reports to the Board on the progress of these plans on a quarterly basis.	4.3.2
486	The Commission adopts the Information Exchange principle. The Commission requires Transmission Providers, in consultation with their customers and other stakeholders, to develop guidelines and a schedule for the submittal of information.	Midwest ISO OATT/EMT specifies load and resource reporting requirements. In accordance with section 29.2 of the EMT, the Midwest ISO requires each Network Customer to annually submit load and resource forecasts for a 10 year horizon. This planning horizon is consistent with current ERO reliability planning compliance requirements. In addition, Transmission Service Request queue information is applied in the expansion planning process in order to factor firm transmission service commitments into the planning models.	4.4.2
494	The Commission adopts the Comparability principle and will require the transmission provider, after considering the data and comments supplied by customers and other stakeholders, to develop a transmission system plan that (1) meets the specific service requests of its transmission customers and (2) otherwise treats similarly-situated customers (e.g., network and retail native load) comparably in transmission system planning.	As an independent Transmission Provider, the Midwest ISO planning process treats all similarly situated customers in a non-discriminatory manner. In addition, as described above, the MTEP is developed to provide for efficient and reliable service to all transmission customers throughout the planning horizon by treating similarly situated customers comparably in transmission system planning activities.	4.5.2

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501	The Commission adopts the Dispute Resolution principle and requires Transmission Providers to develop a dispute resolution process to manage disputes that arise from the Final Rule's planning process.	Midwest ISO has a defined dispute resolution process provided for in Appendix D to the TOA. This dispute resolution process provides for resolution of any disputes arising under the TOA, and is documented as the means to address issues related to development of the regional expansion plan in the Planning Framework, Appendix B to the TOA. In addition, other disputes arising under other areas of the tariff are addressed under the dispute resolution process defined in the Midwest ISO EMT in Sections 11 and 12.	4.6.2
523	The Commission adopts the Regional Participation principle. In addition to preparing a system plan for its own control area on an open and nondiscriminatory basis, each transmission provider will be required to coordinate with interconnected systems	The Midwest ISO has joint operating agreements or seams agreements with neighboring transmission providers that provides for the sharing and coordination of planning information and transmission plans with neighboring systems.	4.7.2
542, 546, 551	The Commission adopts the Economic Planning Studies principle. The transmission planning process under the pro forma OATT must consider both reliability and economic considerations. The purpose of this principle is to ensure that the latter is considered adequately in the transmission planning process.	Midwest ISO MTEP Planning Framework outlined in the TOA requires the expansion planning process to address not only reliability needs but also the needs of the competitive bulk power market. In addition, the Transmission Planning Protocol of Attachment FF to the Tariff provides for the development of Regionally Beneficial Projects, which are to be included in the MTEP based on the economic planning criteria defined in Attachment FF. Midwest ISO continues to enhance the MTEP study process which addresses both identification and development of economic transmission projects and integration of aggregated resources.	4.8.2
557, 558	The Commission adopts the Cost Allocation Planning Principle. For a planning process to comply with the Final Rule, it must address the allocation of costs of new facilities.	Midwest ISO has already developed a comprehensive cost allocation provision for transmission expansion projects. The Midwest ISO has obtained Commission approval for stakeholder developed cost allocation policies for all new Baseline Reliability, and Regionally Beneficial (economic) Projects. These cost allocation policies (which are found in Attachment FF) apply to all new Network Upgrades regardless of whether they are regional or multistage in nature or local and apply to an existing pricing zone. In addition, the Midwest ISO has filed proposed cost allocation policies for cross-border projects, after working together with PJM, to address projects in one RTO that may also benefit the other RTO.	4.9.2
574	Coordinate transmission planning with state regulatory commissions.	The state regulatory commissions involved with the Midwest ISO have organized the Organization of Midwest ISO States (OMS), and are very active in enhancing the stakeholder process by participating in many Midwest ISO forums, including the planning forums, resource adequacy forums, and the Midwest ISO Advisory Committee.	5.3
586	Require transmission planning processes to provide a mechanism for recovery of costs.	Midwest ISO funds the cost of the OMS pursuant to an annual budget developed by the OMS and submitted to the Midwest ISO as part of the budgeting process. Although the Midwest ISO provides assistance with other stakeholders (e.g., by at times providing data and analysis), the Midwest ISO MTEP process does not subsidize parties participating in the planning process.	5.4