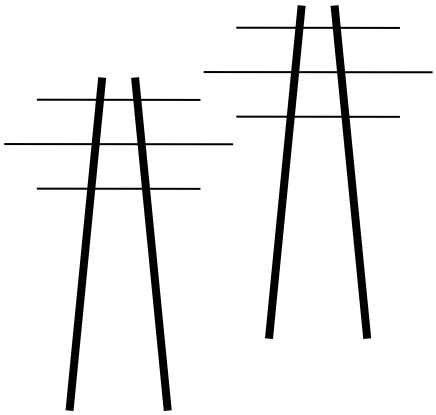
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PowerOn Midwest 765kV Transmission Project
MISO – Information Request #8

Docket Number: E002, ET2, ET6675/CN-25-117; CAH 28-2500-41617

Date of Request: October 25, 2026

Requested From: Lisa A. Crum, Crum Energy Law and Max W. Myer, MISO

Party Requesting Information: Carol A. Overland, North Route Group and NO765MN

Questions:

(a) Regarding MISO IMM Comments on LRTP Tranche 2 Benefit Metrics, May 29 2024 and MISO IMM Comments on LRTP Tranche 2 Benefit Analysis, October 30, 2024, please provide copies of any and all other IMM Comments on LRTP Tranche 2.

(b) What was MISO's response to IMM concerns and recommendations re: Tranche 2 benefits methodologies? Provide documentation, including but not limited to LRTP workshop materials with response to each of the 8 IMM recommendations.

(c) What changes were made to Tranche 2 in response to each of the IMM's specific concerns and recommendations?

(d) What changes were made to "PowerOn Midwest" LRTP 22, 23, 24, and 25 in response to each of IMM's specific concerns and recommendations?

(e) What changes were made to scope and role of IMM following MISO's Petition to FERC, EL-25-80-800?

(f) Was a consultant hired to examine IMM market monitoring performance?

Response:

(a) MISO's independent market monitor, Potomac Economics, maintains a document library on its website with previously issued reports, filings, affidavits/testimony, and other documents relating to MISO. Potomac referenced or addressed Tranche 2.1 in the following reports:

- Potomac Econ., *2024 State of the Market Report for the MISO Electricity Markets* xiv, 28–29 (June 2025), www.potomaceconomics.com/wp-content/uploads/2025/06/2024-MISO-SOM_Report_Body_Final.pdf.

- Potomac Econ., *2023 State of the Market Report for the MISO Electricity Markets* xiii-iv, 26–27 (June 2024), www.potomaceconomics.com/wp-content/uploads/2024/06/2023-MISO-SOM_Report_Body-Final.pdf.

- David Patton, Potomac Econ., IMM Quarterly Report: Fall 2023 at 9 (Dec. 5, 2023), www.potomaceconomics.com/wp-content/uploads/2023/12/IMM-Quarterly-Report_Fall-2023-Final.pdf.

- Carrie Milton, Potomac Econ., *IMM Quarterly Report: Spring 2024* at 13 (July 9, 2024), www.potomaceconomics.com/wp-content/uploads/2024/06/IMM-Quarterly-Report_Spring-2024_MSC.pdf.

- David Patton, Potomac Econ., IMM Quarterly Report: Summer 2023 at 13 (Sept. 18, 2023), www.potomaceconomics.com/wp-content/uploads/2023/09/IMM-Quarterly-Report_Summer-2023_Final.pdf.

Potomac also shared the following memorandums and presentations with MISO that address Tranche 2.1:

- David Patton, Potomac Econ., *IMM Discussion of MISO Futures and Long-Range Transmission Planning* (Aug. 31, 2023), https://cdn.misoenergy.org/20230831%20LRTP%20Workshop%20Item%2005%20IMM%20Presentation630042.pdf.

- David Patton, Potomac Econ., *Reconciling the IMM's Future 2A Scenario* (Dec. 1, 2023), https://cdn.misoenergy.org/20231201%20LRTP%20Workshop%20Item%2005%20IMM%20Presentation631085.pdf.

- David Patton, Potomac Econ., *IMM Comments on LRTP Tranche 2 Benefit Metrics* (May 29, 2024), https://cdn.misoenergy.org/20240529%20LRTP%20Workshop%20Item%2002%20IMM%20Presentation633033.pdf.

- David Patton, Potomac Econ., Memorandum to Midcontinent ISO, *Concerns and Recommendations for the Tranche 2 Benefit Methodologies* (July 15, 2024), https://cdn.misoenergy.org/IMM%20Memo%20re%20Tranche2%20Benefits%20Methodologies646681.pdf.

- David Patton, Potomac Econ., *IMM Comments on LRTP Tranche 2 Benefit Analysis* (Oct. 30, 2024), https://cdn.misoenergy.org/20241030%20System%20Planning%20Committee%20of%20the%20BOD%20Item%2003a%20IMM%20LRTP%20Feedback655623.pdf.

A copy of the following document which was filed by Potomac with FERC also is enclosed:

- *North Dakota Pub. Serv. Comm'n v. Midcontinent Indep. Sys. Operator, Inc.*, Motion to Intervene and Comments of the MISO Independent Market Monitor, Docket No. EL25-109-000 (Sept. 9, 2025).

(b) See the following enclosed documents:

- Midcontinent Independent System Operator, Inc., *MISO's Response to IMM's Concerns and Recommendations for the Tranche 2.1 Benefit Methodologies Presented at the Long-Range Transmission Planning Workshop* (Sept. 13, 2024).

- Jennifer Curran, Memorandum to the MISO Board of Directors, *Market Monitor Feedback on Long Range Transmission Planning* (Oct. 23, 2024).

- *North Dakota Pub. Serv. Comm'n v. Midcontinent Indep. Sys. Operator, Inc.*, Answer of the Midcontinent Independent System Operator, Inc., Docket No. EL25-109-000 (Sept. 9, 2025).

- *North Dakota Pub. Serv. Comm'n v. Midcontinent Indep. Sys. Operator, Inc.*, Direct Testimony of Jeremiah Doner, Exhibit MISO-001, Docket No. EL25-109-000 (Sept. 9, 2025).

- *North Dakota Pub. Serv. Comm'n v. Midcontinent Indep. Sys. Operator, Inc.*, Direct Testimony of Johannes P. Pfeifenberger and John Michael Hagerty, Exhibit MISO-002, Docket No. EL25-109-000 (Sept. 9, 2025).

(c) Although Potomac failed to produce analysis supporting its concerns, MISO nonetheless provided an eighteen-page memorandum, dated Sept. 13, 2025, responding to Potomac's recommendations, including instances where MISO agreed and incorporated such recommendations. MISO also responded to Potomac in various filings with FERC, during stakeholder processes, and in discussions with the MISO Board of Directors. Copies of

these documents are provided in response to subpart (b) above.

(d) MISO did not make changes to LRTP projects 22 through 25 in response to Potomac. Nor would any changes have been appropriate. Potomac's feedback was principally methodological and not project specific. As such, MISO responded directly to each of Potomac's concerns in its September 2024 LRTP workshop materials. (See subpart (b) above.)

(e) No changes were made. Potomac's responsibilities continue to be addressed in Module D of MISO's Open Access Transmission, Energy and Operating Reserve Markets Tariff. A copy of Module D can be downloaded from MISO's website: https://docs.misoenergy.org/miso12-legalcontent/Module_D_-_Market_Monitoring_and_Mitigation_Measures.pdf.

(f) In March 2026, the MISO Markets Committee of the Board of Directors directed MISO management to work with the Committee and the full MISO Board of Directors to hire an independent, third party to review the IMM functions at MISO. A copy of the committee presentation is available here: https://cdn.misoenergy.org/20260324%20Markets%20Committee%20of%20the%20BOD%20Item%2006%20Market%20Monitoring%20Best%20Practices746768.pdf. In June 2026, MISO retained EY-Parthenon, a division of Ernst & Young, to conduct this third-party evaluation.

Response by Jeanna Furnish, Senior Director Expansion Planning, Midcontinent Independent System Operator, Inc.
Date of Response November 3, 2026