

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Midcontinent Independent System
Operator, Inc.

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Docket No. ER20-588-000

PROTEST OF THE MICHIGAN PUBLIC SERVICE COMMISSION

The Midcontinent Independent System Operator, Inc. (MISO) proposes to revise its tariffs to allow storage facilities owned by transmission owners to be selected as transmission-only assets in the MISO Transmission Expansion Plan (MTEP) process. The Michigan Public Service Commission (MPSC) shares MISO's desire to streamline the MTEP process and other processes to allow storage facilities to be used as transmission assets. But MISO's proposed solution, in its current form, does not treat all market participants equally. Nowhere is this more evident than in Michigan where the State's largest regulated utilities have divested most or all of their transmission assets. Thus, unlike utilities in other states that are vertically integrated and own transmission assets, most of Michigan's utilities are not transmission owners and cannot take advantage of MISO's proposed tariff revisions to allow a storage facility owned by a transmission owner to be selected as a transmission-only asset (SATO). Because the SATOA proposal does not treat transmission owners' (TOs') and non-TOs' storage projects equally, the MPSC is compelled to oppose it in its current form.

While the MPSC does not support the SATOA proposal, the MPSC would support a nondiscriminatory proposal that advances the Commission's objective to remove barriers to energy storage's use in wholesale electricity operations, energy markets, and planning. To accomplish this objective, a viable proposal should unlock and monetize the different value streams that energy storage applications can provide. Although an incremental approach to the full integration of energy storage may be necessary given the complexity of the issue and the necessary changes to various processes, the Commission and MISO should ensure that similar storage assets are treated equitably at each incremental step and that asset-ownership models are fair.

To guard against discrimination and the unintended consequences of discrimination, no storage project should have an unfair advantage over any other project. Since the SATOA proposal discriminates against non-TO storage projects in favor of TO projects, the MPSC urges the Commission to reject the proposal and direct MISO to collaborate with interested stakeholders to prepare a truly nondiscriminatory proposal.¹

¹ Consistent with Rule 211 of the Federal Energy Regulatory Commission's Rules of Practice and Procedure, 18 C.F.R. §§ 385.211 (2019), the MPSC files this Protest. The MPSC filed a notice of intervention in this docket on December 23, 2019.

I. BACKGROUND

In 2017, MISO formed the Energy Storage Task Force, which was charged with engaging subject-matter experts to advise MISO on storage-related issues, identifying obstacles to integrating energy storage resources (ESRs) into the grid, and considering the risks and benefits of integration. The Task Force first recommended storage as a transmission solution on June 13, 2018 to the Planning Advisory Committee (PAC) as part of the MTEP reliability planning process. The Task Force prepared an issue paper and presentation in which it recognized that MISO's Generation Interconnection Queue (GIQ) process may cause timing challenges for some proposed transmission projects.²

As a possible solution, the Task Force suggested allowing ESRs to bypass the GIQ process for ESRs used exclusively to provide transmission service. MISO initially favored this option to another option that would have largely maintained the status quo, and MISO's favored approach began to take shape as the Storage as a Transmission Asset (SATA) proposal. By September 26, 2018, MISO presented the

² Electric Storage as a Transmission Solution in the MTEP Reliability Planning Process Issue Paper (June 13, 2018) (Issue Paper), at <https://cdn.misoenergy.org/20180613%20PAC%20Item%2003c%20ESF%20as%20Transmission%20Reliability%20Assets219728.pdf>; MISO, Presentation to the PAC on Electric Storage as a Transmission Solution in the MTEP Reliability Planning Process (June 13, 2018), at <https://cdn.misoenergy.org/20180613%20PAC%20Item%2003c%20Energy%20Storage%20as%20Transmission%20Reliability%20Asset219727.pdf>.

SATA proposal to the PAC as a strawman proposal,³ which continued to evolve through a SATA workshop.⁴ SATA initially would have applied to both TO and non-TO projects, allowing them to be used as transmission assets and generation assets in the energy markets consistent with Commission precedent.⁵

A transmission-neutral storage proposal was not to be, however, because the MISO TOs pressed MISO for a transmission-only storage proposal after the September 2018 PAC meeting. As a result, MISO developed the Storage as a Transmission Only Asset (SATO) proposal, which was based on the TOs' proposal offered at the November 14, 2018 PAC meeting.⁶ This proposal exempted TO projects, and TO projects alone, from the GIQ process and provided that the transmission-only "SATA would not be dispatched unless needed to address a reliability issue."⁷

³ MISO, Presentation to the PAC on Electric Storage as a Transmission Solution in the MTEP Reliability Planning Process (Sept. 26, 2018), available at <https://cdn.misoenergy.org/20180926%20PAC%20Item%2004e%20Energy%20Storage%20as%20Transmission%20Reliability%20Asset277718.pdf>.

⁴ MISO hosted the workshop on October 31, 2018 that delved deeper into SATA threshold questions. Meeting materials from the workshop are available at <https://www.misoenergy.org/events/storage-as-a-transmission-asset-sata-workshop---october-31-2018/> (last visited Jan. 16, 2020).

⁵ See, e.g., *Utilization of Electric Storage Resources for Multiple Services When Receiving Cost-Based Rate Recovery*, 158 FERC ¶ 61,051, at P 2 (2017) ("[E]lectric storage resources may fit into one or more of the traditional asset functions of generation, transmission, and distribution."); see also *Electric Storage Participation in Markets Operated by Regional Transmission Organizations and Independent System Operators*, 162 FERC ¶ 61,127 (2018) (Order 841).

⁶ MISO, Presentation to the PAC on Electric Storage as a Transmission Asset (SATA) (Nov. 14, 2018), p. 3, at <https://cdn.misoenergy.org/20181114%20PAC%20Item%2004c%20Electric%20Storage%20as%20a%20Transmission%20Asset%20SATA%20Presentation292116.pdf>.

⁷ *Id.*

Several parties responded to MISO's SATOA proposal that it discriminates against non-TOs by permitting only TOs to propose ESRs for transmission.⁸ Non-TO ESRs would be disadvantaged because they would have to go through the lengthy GIQ process that TO projects could bypass.⁹ Despite these concerns, MISO filed its SATOA proposal at FERC. It acknowledged the concerns raised by stakeholders but dismissed them arguing that the SATOA process will not disadvantage or negatively impact non-TO projects because MISO's "proposal includes provisions for evaluating and addressing any such impacts."¹⁰

Despite MISO's efforts to mitigate the discriminatory impact of its proposal, its efforts fall short. While well intentioned, MISO's proposal erects a barrier to the development of non-TO ESRs by discriminating against these resources in favor of TO resources. This is contrary to Commission Order 841, which was intended to "remove barriers to the participation of electric storage resources in the RTO/ISO markets."¹¹ Further, by classifying ESRs as transmission-only assets, MISO's SATOA proposal

⁸ MISO, Presentation to the PAC on Electric Storage as a Transmission-Only Asset (SATOA), Phase 1 Policy Proposal, Draft Tariff / BPM (April 17, 2019), at [https://cdn.misoenergy.org/20190417%20PAC%20Item%2004a%20Energy%20Storage%20as%20Transmission%20Asset%20\(SATOA\)%20\(PAC004\)336270.pdf](https://cdn.misoenergy.org/20190417%20PAC%20Item%2004a%20Energy%20Storage%20as%20Transmission%20Asset%20(SATOA)%20(PAC004)336270.pdf).

⁹ See Docket No. ER20-588-000, MISO's Transmittal Letter (Dec. 12, 2019), at 12.

¹⁰ *Id.* at 13.

¹¹ Order 841, P 20.

limits the services that ESRs can provide in conflict with the Commission’s policy statement on ESR cost-based recovery.¹²

II. COMMENTS

A. MISO’s SATOA proposal will have an amplified impact on the state.

Michigan’s history and regulatory structure set it apart from other states in MISO’s footprint. Michigan has few fully vertically integrated utilities, and it has both rate-regulated electric utilities and choice suppliers whose rates are not regulated. Under 2000 Mich. Pub. Act 141, Michigan’s regulated electric utilities were given two options to “either join a FERC approved multistate regional transmission system organization or other FERC approved multistate independent transmission organization or divest its interest in its transmission facilities to an independent transmission owner.”¹³ Also, amendments to Act 141 included in 2008 Mich. Pub. Act 286 and 2016 Mich. Pub. Act 341 have resulted in a hybrid, retail-choice market (part regulated and part retail choice) in which choice providers (non-TO load serving entities and market participants) may serve up to 10% of Michigan’s

¹² *Utilization of Electric Storage Resources for Multiple Services When Receiving Cost-Based Rate Recovery*, 158 FERC ¶ 61,051, at P 2 (2017) (*Policy Statement*) (“Enabling electric storage resources to provide multiple services (including both cost-based and market-based services) ensures that the full capabilities of these resources can be realized, thereby maximizing their efficiency and value for the system and to consumers.”).

¹³ MICH. COMP. LAWS § 460.10w(1).

electric market.¹⁴ As a result of these statutes, system planning proposals like SATOA that single out non-TO market participants affect Michigan more than other states in the MISO footprint.

Unlike states with more vertically integrated utilities and without retail wheeling, the MPSC depends largely on FERC and MISO to oversee transmission owners and projects. In Michigan we have only two vertically integrated utilities that are both multistate utilities: NSP-Wisconsin¹⁵ and Indiana Michigan Power Company, which is part of American Electric Power. Michigan's other utilities have divested most or all of their transmission assets.¹⁶ By contrast, most other states in MISO have vertically integrated utilities that own generation, distribution, and transmission. These utilities are presumably less concerned about whether an ESR is classified as transmission or non-transmission because they can still earn a return on and of their capital investments regardless of how they are classified. It is, however, a larger concern for Michigan's utilities who do not own transmission assets or own few of these assets.

Since Michigan's largest utilities have spun off their transmission assets, and Michigan's transmission owners are not under MPSC jurisdiction except for limited

¹⁴ MICH. COMP. LAWS § 460.10a(1)(a).

¹⁵ NSP-Wisconsin is a subsidiary of Northern States Power Company, a Minnesota Corporation.

¹⁶ Although the Consumer Energy Company owns some transmission assets that were recently reclassified as such, *Consumers Energy Co*, 151 FERC ¶ 61,033 (2015), the assets it owns are small in comparison to the total independently owned transmission assets in its service territory.

siting authority,¹⁷ it is not surprising that the MPSC has had only four contested cases involving MTEP projects: MPSC Case Nos. U-14861,¹⁸ U-14933,¹⁹ U-16200,²⁰ and U-17041.²¹ Out of these four projects, the MPSC approved certificates of public convenience and necessity for only three. MISO's Board of Directors, by comparison, has approved over \$6 billion of transmission projects in Michigan since 2009 alone.²²

Although the MPSC depends largely on MISO and FERC to regulate transmission owners and approve their projects, MISO fortunately has robust MTEP sub-regional planning meetings and technical study task force meetings where the state commissions and other MISO stakeholders can ask questions and make suggestions about transmission projects and non-transmission alternatives (NTAs).

¹⁷ MICH. COMP. LAWS § 460.565 (“[A] certificate of public convenience and necessity under this act is not required for constructing a new transmission line other than a major transmission line.”); MICH. COMP. LAWS § 460.562(g) (defining major transmission line as a “line of 5 miles or more in length . . . through which electricity is transferred at system bulk supply voltage of 345 kilovolts or more).

¹⁸ *In re International Transmission Co*, MPSC Case No. U-14861, 5/31/2007 Order Granting a Certificate of Public Convenience and Necessity, at https://www.michigan.gov/documents/mpsc/u-14861_05-31-2007_567395_7.pdf.

¹⁹ *In re International Transmission Co*, MPSC Case No. U-14861, 2/22/2008 Findings of Fact, at <https://mi-psc.force.com/sfc/servlet.shepherd/version/download/068t0000000wE3DAAU>.

²⁰ *In re International Transmission Co*, MPSC Case No. U-16200, 2/25/2011 Order, at <https://mi-psc.force.com/sfc/servlet.shepherd/version/download/068t0000000wT8VAAU>.

²¹ *In re Michigan Electric Transmission Co, LLC*, MPSC Case No. U-17041, 7/29/2013 Order, at <https://mi-psc.force.com/sfc/servlet.shepherd/version/download/068t0000000we2zAAA>.

²² This \$6 billion figure is the sum of Michigan projects in the new projects list in Appendix A to MISO's annual MTEP reports dating back to 2009.

But if a TO storage project is given priority over a non-TO storage project before either is even proposed, no amount of robust discussion can remedy the imbalance. Only the Commission can prevent this inequitable outcome by rejecting the discriminatory SATOA proposal.

B. Non-TO storage projects should be considered an alternative solution to transmission issues.

“Electric storage resources have unique physical and operational characteristics, namely their ability to both inject energy into the grid and receive energy from it.”²³ Given these resources’ many uses, they “may fit into one or more of the traditional asset functions of generation, transmission and distribution.”²⁴ Thus, an electric storage asset owned by a TO can serve the same function as an electric storage asset owned by a non-TO. And if TO and non-TO storage resources are the same, they should not be treated differently by regulatory authorities regardless of who owns them.

Under MISO’s Open Access Tariff and Business Practice Manual (BPM), both transmission and NTAs can be proposed to resolve transmission issues and should be considered on a comparable basis. As the BPM describes MISO’s Transmission Expansion Planning Protocol (Attachment FF to its Tariff), “both transmission and Non-Transmission Alternatives (NTA) to resolve Transmission Issues will be considered ***on a comparable basis*** within the MISO transmission planning

²³ Order 841, P 7.

²⁴ Policy Statement, at P 2.

process.”²⁵ If this were not clear enough, the BPM clarifies that NTAs “include contracted demand response, new or upgraded generators with executed interconnection agreements, ***and other non-transmission assets (e.g., energy storage not classified as a transmission asset***, etc.).”²⁶ The BPM also provides guidance to MISO should it pursue an NTA:

[I]n order to provide for the consideration of both transmission and non-transmission alternatives within the overall transmission planning process in accordance with Order 890 and Order 1000, MISO will provide, upon request, information regarding the minimum requirements that must be satisfied for the entire planning horizon by non-transmission alternatives in order to address identified Transmission Issues, and to the extent that a non-transmission alternative is pursued in accordance with the requirements outlined in Attachment FF of the Tariff and this BPM, MISO working with the responsible Transmission Owner will defer, de-scope, or withdraw the transmission project previously proposed to address the Transmission Issue. This process facilitates MISO compliance with FERC Order 890 in a manner that is consistent with MISO’s authorities and responsibilities as outlined in the Tariff and the Transmission Owners Agreement.²⁷

Consistent with MISO’s Transmission Expansion Planning Protocol, the MPSC supports a fair, open, and transparent process to expedite the review process for both TO and non-TO storage projects. This means that any expedited process that is advanced should be available to *any* market participant who proposes a storage

²⁵ MISO Business Practice Manual, Transmission Planning, BPM-20-r21 § 4.3.1.2 (effective Jan. 1, 2020) (emphasis added); accord BPM-20-r21 § 4.3.1.2.1.3 (“The process of developing transmission projects will include, when appropriate, evaluation of alternative transmission projects to address a specific Transmission Issue or Transmission Issue set.”).

²⁶ BPM-20-r21 § 4.3.1.2 (emphasis added).

²⁷ *Id.*

project, not just transmission providers or regulated utilities (the process should also be open to independent power producers and other market participants).

C. There are alternatives to the SATOA proposal that do not discriminate against non-TO projects.

One option for expediting the review process for non-TO storage projects is to allow them to bypass the lengthy GIQ process and connect to the transmission system via storage interconnection agreements. Another option worth exploring is revising the MTEP process to add a more robust review of non-TO storage projects as NTAs. That is, storage solutions proposed by distribution utilities and merchant entities should be considered in a fair and non-discriminatory fashion as an alternative to proposals for new transmission or TO-owned storage. As discussed above, Attachment FF to MISO's Tariffs and the MISO Business Practice Manual for transmission planning include provisions that require MISO to evaluate NTAs and transmission solutions on a comparable basis within the MTEP process.²⁸ MISO's NTA process needs to be more robust in practice and may warrant updates to MISO's Tariff and BPM to better accommodate review criteria for non-TO storage.

The MPSC's proposals are akin to proposals offered by DTE Electric, Clean Grid Alliance, and other stakeholders. For example, DTE Electric, CGA Energy,

²⁸ The Manual says, "Once [transmission] issues are identified, the planning process will explore alternative solutions to those issues with the objective of recommending the best overall solutions." Non-TO storage projects proposed as alternatives to TO storage projects in the MTEP process, therefore, should receive the same robust scrutiny that TO projects receive with the goal of choosing the best overall solution. BPM-20-r21 § 4.3.1.2.

Invenergy, and the Southern Power Company proposed to add provisions to the SATOA proposal to allow NTA storage projects to bypass the GIQ process and connect to the transmission system via storage interconnection agreements.²⁹ Although the MISO PAC membership approved this proposal by a two-thirds majority, MISO rejected it. Likewise, MISO rejected two proposals presented by the Clean Grid Alliance at a PAC meeting, which also would have ensured that TO and non-TO projects were treated equally.³⁰

MISO dismissed these proposals then and is not likely to support them now unless FERC first rejects MISO's discriminatory SATOA proposal. For this reason, the MPSC urges the Commission to reject the SATOA proposal and direct MISO and interested stakeholders to return to the drawing board to craft a truly nondiscriminatory proposal.

²⁹ MISO, DTE Motion for Storage as NTA by DTE Energy Company to the PAC (April 17, 2019), at <https://cdn.misoenergy.org/20190417%20PAC%20Item%2003%20DTE%20Motion%20for%20Storage%20as%20NTA335516.pdf>.

³⁰ One of Clean Grid's proposal would have "mirror[ed] MISO's SATOA concept, but allow[ed] equivalent evaluation of transmission service-providing storage projects proposed by non-TOs." Clean Grid Alliance, Presentation on Equivalent Treatment of Storage, at 6 (March 12, 2019) (on file with authors). Its second proposal would have allowed non-TO storage projects "to receive equivalent consideration while participating as a generation asset and receiving market revenues." *Id.* at 7.

D. The current SATOA proposal discriminates against and disadvantages non-TO storage projects that serve the same function as TO storage projects.

In its current form, the SATOA proposal discriminates against non-TO storage projects (projects advanced by utilities, independent power producers, market participants, or competitive transmission owners) that serve the same purpose as TO storage projects. The SATOA proposal gives TO storage projects an advantage over non-TO projects by 1) allowing TO projects to interconnect to the transmission system more quickly than non-TO projects through an expedited MTEP process; 2) allowing TO projects to bypass the lengthy GIQ process that non-TO projects must follow; and 3) allowing transmission owners to recover a rate of return on their TO storage investments while other market participants (non-TOs and non-utilities) with similar non-TO storage projects rely exclusively on market revenues and are charged transmission costs that are not charged to TO projects.

The cumulative effect of the SATOA proposal's discriminatory features is to give transmission owners a competitive advantage over other market participants. If adopted, the SATOA proposal will create two different and uneven competing timelines—one through MISO's GIQ process and the other through the MTEP process. If a market participant proposes a non-TO storage project in the MISO GIQ process and a transmission owner later proposes the same project as TO storage in the MTEP process, the MISO Board of Directors could approve the TO project before the Commission has a chance to review a non-TO generator interconnection agreement (GIA) between MISO and the competing TO. In a worst-case scenario, a TO could

even review storage proposals submitted by non-TOs for interconnection and then take advantage of the competitive edge bestowed by their accelerated timeline to cherry pick the best projects to develop itself. The prospect of such an outcome would undoubtedly create a chilling effect, reducing the willingness of non-TOs to propose storage projects—the very opposite of the result envisioned by the Commission in Order 841.

In short, the SATOA Proposal would create two divergent and inequitable paths to interconnection for ESRs capable of providing identical services. Each path is mapped out in advance based exclusively and arbitrarily on whether or not a proposed resource would be developed and owned by a TO. Storage projects proposed by non-TO market participants would be acutely disadvantaged because they are not permitted to take the quicker and easier path through the MTEP process. TO projects could bypass the GIQ process,³¹ while identical non-TO projects designed to resolve the same transmission reliability issue would have to register their project in the MISO GIQ and wait up to three years or more to obtain an executed GIA before being considered in the MTEP process.³²

In a perfect world, project reviews for facilities in MISO's GIQ should be completed in about 500 days, which would be similar to the average time (505 days)

³¹ MISO's Transmittal Letter, at 23.

³² See Tab A, Proposed Attachment FF, Section G.1a. ("Storage as Non-Transmission Alternatives ... storage facilities that are not proposed as SATOA may be considered as alternatives to transmission assets to address system needs ***when participating as generation or demand-side resources*** [requiring them to go through the GIQ process and execute a GIA].") (emphasis added).

that projects spend in the MTEP process. But the MISO GIQ is nowhere near perfect, often with long delays. Several projects currently in the queue still have no signed GIA after 1,000 days lingering in the queue,³³ nearly double the MTEP timeline.³⁴ MISO recognized during the stakeholder process that the GIQ process would act as a barrier to non-TO Projects, noting that “[d]elays in the queue process could eliminate SATA usefulness as reliability solutions to an issue in any MTEP.”³⁵

In an attempt to address concerns about the lengthy GIQ process, MISO proposes to revise Attachment FF, to allow non-TO storage facilities to “be considered as alternatives to transmission assets to address system needs *when participating as generation or demand-side resources*.”³⁶ But these non-TO storage facilities cannot be considered in a non-discriminatory fashion if the SATOA proposal is approved because MISO’s proposal still does not allow non-TO facilities to avoid the lengthy GIQ process like it does for TO facilities.

Besides the inequitable timelines for TO and non-TO projects, non-TO projects would have to make payments in the GIQ process (e.g., fees for engineering reviews

³³ This estimate was calculated based on Definitive Planning Phase Study Schedule Updates. See, e.g., MISO, Study Schedule Updates to the Interconnection Process Working Group (Jan. 14, 2020), at <https://cdn.misoenergy.org/20200114%20IPWG%20Item%2007%20DPP%20Study%20Schedule%20Update418634.pdf>.

³⁴ Current DPP Phase Schedule (Jan. 1, 2020), at <https://cdn.misoenergy.org/Definitive%20Planning%20Phase%20Estimated%20Schedule106547.pdf>.

³⁵ MISO, Presentation to the PAC on Electric Storage as a Transmission Asset (SATA) (Nov. 14, 2018), p. 3, at [https://cdn.misoenergy.org/20181114%20PAC%20Item%2004c%20Electric%20Storage%20as%20a%20Transmission%20Asset%20SATA%20Presenta](https://cdn.misoenergy.org/20181114%20PAC%20Item%2004c%20Electric%20Storage%20as%20a%20Transmission%20Asset%20SATA%20Presentation292116.pdf)tion292116.pdf.

³⁶ Tab A, Proposed Attachment FF, Section II.G.3 (emphasis added).

and distribution studies) that TO projects would not pay under the SATOA proposal. Also, if a TO decides not to pursue a project after completing the MTEP process, it is not penalized under the SATOA proposal, but if a non-TO market participant goes through the GIQ process and then decides not to pursue the project, 50% of the non-TO's M2 milestone payment is "at risk" unless it withdraws the project before the start of Definitive Planning Phase I.³⁷

The SATOA proposal discriminates against non-TO projects by requiring them to go through the GIQ process that TO projects can bypass.

E. TO projects may be used for non-TO purposes in the future.

MISO has announced its intent, in early 2020, to "begin the process of addressing the issues related to using storage as both transmission assets and to provide market services."³⁸ This potential future repurposing creates challenges for a preliminary SATOA designation. If a transmission-only storage project is later repurposed (either exclusively or in part) for use as a market resource or another non-transmission purpose like providing ancillary services, it is no longer a transmission-only asset.

While there may be value in potentially using a SATOA asset as a market resource in the future in order to unlock additional system benefits provided by the storage asset, it illustrates that the SATOA designation is fleeting and perhaps even

³⁷ *Midcontinent Independent System Operator, Inc.*, 169 FERC ¶ 61,173, at P 72, available at <https://www.ferc.gov/CalendarFiles/20191203151524-ER20-41-000.pdf>.

³⁸ MISO's Transmittal Letter, at 3.

illusory. Yet, despite the uncertainty surrounding the SATOA designation, the designation will provide long-term benefits to transmission owners that are not available to other market participants, if MISO's SATOA proposal is not changed, by allowing TOs to bypass the GIQ process and interconnect their projects sooner than other market participants.

If MISO allows TO projects to be used for non-TO purposes in the future, MISO should consider a process that allows projects to be reevaluated. This evaluation should include, at a minimum, ensuring that market revenue or any other new revenue stream is used to offset the transmission rate. Also, while it may not be necessary for existing transmission-only assets to go through the interconnection process again, further modeling may be needed if the asset's new use alters system operations compared to the asset's initial evaluation when it was first studied in the MTEP process.

III. CONCLUSION AND RELIEF REQUESTED

The MPSC urges the Commission to reject the SATOA proposal and direct MISO to collaborate with interested stakeholders to prepare a nondiscriminatory proposal that removes barriers for energy storage's use in wholesale electricity operations, energy markets, and planning.

Respectfully submitted,

**THE MICHIGAN PUBLIC SERVICE
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Dated: January 21, 2020