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Subject: Supplemented Response to Neighbor's Second Set of Data Requests
From: "Harden, Joshua K T" <joshua.harden@dentons.com>
Date: Mon, Jan 11, 2016 1:43 pm
To: "jennifer@hernandezlegal.com" <jennifer@hernandezlegal.com>
Attach: image001.png
 MISO Response to Neighbors Set 2 Final2Neighbors Supplemented.pdf scan.pdf

FILED
 February 04, 2016
 Data Center
 Missouri Public
 Service Commission

Jennifer,

Please see MISO's supplemented response to Neighbor's data request set 2.

Regards,

Josh



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NU Exhibit No. 81
 Date 1/27/16 Reporter JLB
 File No. EA-2015-0146

Company Name: Midcontinent Independent System Operator, Inc.

Case Description: Ameren Transmission Co. of Illinois Application for Certificate of Convenience and Necessity
No. EA-2015-0146 (Missouri P.S.C.)

Supplemental Response to Request by Neighbors United ("Neighbors"), Second Set

Date of Response: December 28, 2015

General Objection

Data requests ("DRs") propounded upon MISO on December 18, 2015 that seek additional answers regarding the MISO transmission planning process or reports generated as part of that process are the subject of this General Objection. On December 9, 2015, an order ("December 9 Order") was issued limiting additional discovery to "new information contained in surrebuttal testimony only." (Emphasis added.) Neighbors promulgated DRs that seek answers to questions and address issues that could have been sought much earlier in the case. The DRs are beyond the scope of any new information contained in surrebuttal testimony, and seek to expand the limited scope established in the December 9 Order to the entire MISO transmission planning process and corresponding reports. The direct testimony of ATXI's expert witness, Dennis Kramer, filed May 29, 2015 deals substantially with the MVP studies and RGOS analysis. On July 15, 2015 MISO was granted intervention in this case. On October 21, 2015 Michael L. Stahlman and Shawn E. Lange, with the Missouri Public Service Commission Staff, both filed rebuttal testimony that directly dealt with the MISO transmission planning process and corresponding reports. Neighbors had substantial time to submit the DRs involving the MISO transmission process and reports. The scope for additional discovery established by the December 9 Order does not permit discovery on issues that were a component of ATXI's initial application and the subject of substantial testimony prior to surrebuttal.

Data Request No. 2-8:

8. MO PSC witness Stahlman states in his rebuttal testimony (p. 4, lines 7-9): "*Staff's review of the MTEP14 MVP Triennial Review was unable to locate the costbenefit ratio of specific projects; it appears that the study was performed on the entire portfolio.*" (a) Does MISO agree that the cost-benefit ratios presented in the MTEP11 MVP study and the MTEP14 MVP Triennial Review, including those for Missouri, are based on the entire MVP portfolio and do not represent the cost-benefit ratio of specific projects like the Mark Twain line? Please explain. If no, please state so.

RESPONSE:

Objection: See General Objection. Pursuant to the December 9 Order, "additional discovery [is] "limited to discovery directed towards new information contained in surrebuttal testimony only." Neighbors has failed to link the data request to anything contained in the surrebuttal testimony. At this time in the proceeding, this data request is beyond the scope of discovery.

SUPPLEMENTAL RESPONSE:

Without waiving any objection, the following response is provided:

8. MISO calculated benefit/cost ratios that contained in the 2011 Multi Value Project Analysis Report and the MTEP 14 MVP Triennial Review Report, which are based upon construction of the entire MVP portfolio. The benefit/cost ratios are specific to Local Resource Zones (one of which is comprised entirely from MISO footprint located in Missouri), but are not based upon specific MVP projects (e.g. MVP 7 & 8 in Missouri).

Data Request No. 2-9:

9. Please explain whether MISO agrees that no cost-benefit ratio analysis was done by MISO as part of the MVP process that evaluates the cost-benefit ratio of the MVP portfolio with and without the Mark Twain line? If MISO disagrees, please state so.

RESPONSE:

Objection: See General Objection. Pursuant to the December 9 Order, "additional discovery [is] "limited to discovery directed towards new information contained in surrebuttal testimony only." Neighbors has failed to link the data request to anything contained in the surrebuttal testimony. At this time in the proceeding, this data request is beyond the scope of discovery.

SUPPLEMENTAL RESPONSE:

Without waiving any objection, the following response is provided from information previously provided:

9. MISO calculated benefit/cost ratios regarding the MVP portfolio, and all of those ratios are those stated in 2011 Multi Value Project Analysis Report and the MTEP 14 MVP Triennial Review Report. For a description of those benefit/cost ratios, see the response to Data Request No. 2-8.

Data Request No. 2-10:

10. Please explain: (a) what Missouri projects are included in the Missouri benefit to cost ratios of 2.0 to 2.9 in the MTEP 2011 and 2.3 to 3.3 in the Triennial Review; and (b) how both Missouri cost ratios were calculated and include any supporting documentation.

RESPONSE:

Objection: See General Objection. Pursuant to the December 9 Order, "additional discovery [is] "limited to discovery directed towards new information contained in surrebuttal testimony only." Neighbors has failed to link the data request to anything contained in the surrebuttal testimony. At this time in the proceeding, this data request is beyond the scope of discovery.

SUPPLEMENTAL RESPONSE:

Without waiving any objection, the following response is provided from information previously provided:

10. The MISO benefit/cost ratios in 2011 Multi Value Project Analysis Report and the MTEP 14 MVP Triennial Review Report are not based upon MVP projects, but upon Local Resource Zones. See the response to Data Request No. 2-8. The benefit/cost ratios for LRZ 5, which encompasses the MISO footprint located in Missouri, were calculated using the analysis described (along with full calculations) in the "MTEP14 MVP Triennial Review Detailed Business Case" at the following location:

<https://www.misoenergy.org/Planning/TransmissionExpansionPlanning/Pages/MVPAnalysis.aspx>
x.

Responses and Supplemental Responses to Data Requests 2-8 through 2-10 by: Joshua Harden, Counsel (objections) and Jameson T. Smith (other responses).

VERIFICATION OF RESPONSE

The supplemental response to this Data Request has been collected from various sources at Midcontinent Independent System Operator, Inc., and is true and accurate to the best of my knowledge and belief.

Signed: _____

Position: _____

Midcontinent Independent System Operator,
Inc.

Date: _____

VERIFICATION OF RESPONSE

The supplemental response to this Data Request has been collected from various sources at Midcontinent Independent System Operator, Inc., and is true and accurate to the best of my knowledge and belief.

Signed: _____

Position: _____

Midcontinent Independent System Operator,
Inc.

Date: _____

1-11-16