

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

**Certain MISO Transmission Owners )**

**Docket No. ER18-783-000**

**NOTICE OF INTERVENTION AND COMMENTS IN SUPPORT OF EXPEDITED  
PETITION OF THE CERTAIN MISO TRANSMISSION OWNERS**

Pursuant to Rule 211 and 214(a)(2) of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. §385.211 and §385.214(a)(2), the Organization of MISO States (“OMS”) submits its Notice of Intervention and Comments in the above-captioned docket.

The Midcontinent Independent System Operator (“MISO”), on behalf of Certain MISO Transmission Owners (“Certain TOs”),<sup>1</sup> filed an Expedited Petition of the Certain MISO Transmission Owners for Waiver of Tariff Provisions and Shortened Answer Date (“Filing”) on February 1, 2018.<sup>2</sup> In short, the Certain TOs requested waiver of MISO tariff provisions<sup>3</sup> to revise the inputs to their 2018 Attachment O transmission rates to reflect the federal tax law changes that were implemented on January 1, 2018. Since the Certain TOs rates for 2018 were set in September and October of 2017, prior to the law changes, their rates currently reflect the thirty-five percent corporate tax rate that has now been reduced to twenty-one percent.

**I. Notice of Intervention**

The OMS files this Notice of Intervention in accordance with 18 C.F.R. §385.214(a)(2). The OMS is a not-for-profit, self-governing organization of representatives from each regulatory body with retail jurisdiction over entities participating in MISO and

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<sup>1</sup> FN 2 of the Filing.

<sup>2</sup> Cite filing.

<sup>3</sup> Cite.

serves as the regional state committee. The purpose of the OMS is to coordinate regulatory oversight among its members, to make recommendations to MISO, the MISO Board of Directors, the Commission, and other relevant government entities and state commissions as appropriate, and to intervene in proceedings before the Commission to express the positions of the OMS member agencies.

Service of communications should be made on:

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Marcus Hawkins, Director, Member Services and Advocacy  
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## **II. Comments**

The OMS supports the Certain TOs request to revise the inputs to their 2018 Attachment O formula rate templates to recognize the federal tax law changes, including the corporate tax rate reduction, implemented January 1, 2018. The request is in line with a letter the OMS sent to the Commission on January 19, 2018 asking that the Commission take prompt action to ensure that customers receive the value of lower costs to utilities from these tax reductions.<sup>4</sup> The OMS applauds the quick action by the Certain TOs to make the subject request to revise their transmission cost of service rates and pass the benefit of reduced tax expenses on to customers in the MISO region. Therefore, the OMS urges the Commission to provide expedited approval of the Certain TOs request in this docket and provide the authorization necessary to make the requested rate adjustments starting in March 2018 in the form of lower transmission rates and refunds.

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<sup>4</sup> See [http://misostates.org/images/stories/Filings/FERC/2018/Item\\_6\\_FERC\\_Letter\\_Draft\\_revised.pdf](http://misostates.org/images/stories/Filings/FERC/2018/Item_6_FERC_Letter_Draft_revised.pdf).

The OMS submits these comments because a majority of its members have agreed to generally support them.

Respectfully submitted,

*Tanya Paslawski*

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Dated: February 15, 2018

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated this 15th day of February 2018.

*Tanya Paslawski*