

Case No.: EO-2008-0046

Schedule RJJ-6

Excerpts from Midwest ISO's Responses to Dogwood Energy, LLC Data Requests

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Application of Aquila,)	
Inc., d/b/a Aquila Networks - MPS and Aquila)	Case No. EO-2008-0046
Networks - L&P for Authority to Transfer)	
Operational Control of Certain Transmission)	
Assets to the Midwest Independent Transmission)	
System Operator, Inc.)	

**MIDWEST ISO'S RESPONSES TO
DOGWOOD ENERGY, LLC DATA REQUESTS TO MISO**

Midwest Independent Transmission System Operator, Inc. ("Midwest ISO"), provides the following responses to the Data Requests submitted to it by Dogwood Energy, LLC ("Dogwood") on or about December 18, 2007, all pursuant to 4 CSR 240-2.090:

The Midwest ISO incorporates, by reference the general objections to this series of Data Requests timely filed on December 28, 2007, and the following responses are being provided subject to, and without waiving any of those general objects, but they are being provided in the spirit of the cooperation in the Commission's discovery process.

Questions regarding testimony of MISO Witness Pfeifenberger

1. **Reference:** Exhibit JPP-1. Please identify any testimony Mr. Pfeifenberger has prepared on behalf of SPP members.

Response: Mr. Pfeifenberger has not previously prepared testimony on behalf of SPP members.

2. **Reference:** Exhibit JPP-1. Please provide copies of all previous studies, reports, and analysis Mr. Pfeifenberger has prepared with regard to SPP operations and SPP tariffs.

Response: Mr. Pfeifenberger has not previously prepared studies, reports and analysis with regard to SPP operations and SPP tariffs.

11. Please identify all market services currently provided by MISO that are not provided by SPP.

Response: Mr. Pfeifenberger does not possess the detailed knowledge of SPP operations or information to be able to respond to this request. Further, Mr. Pfeifenberger has not analyzed all market services currently provided by the Midwest ISO and those that are or are not provided by SPP. However, Mr. Pfeifenberger does have a general understanding of services provided by the Midwest ISO and that are not currently provide by SPP, which include firm network service for all RTO-internal transactions, full market-based congestion management, financial transmission rights, integrated locational day-ahead and real-time energy markets, and virtual bidding. See also page 24 of Mr. Pfeifenberger's rebuttal testimony discussing the lack of an SPP Day-2 market design.

12. **Reference:** Page 5, lines 12-14. Please explain why the displacement of utility-owned generation by purchase of power may not even be feasible and indicate whether Mr. Pfeifenberger's statement is based on existing and/or projected transmission system constraints that would prevent such purchases? If so, please identify all such transmission system constraints, by transmission bus, in the GE-MAPPS models.

Response: It is unclear what this particular Data Request is seeking and certain premises contained within the request relative to transmission constraints are unclear. The cited portion of the testimony is based on Mr. Pfeifenberger's experience and illustrates that: (1) this type of RTO cost-benefit analyses is unlikely to result in a finding that 15% to 25% of utility generation would be replaced with market purchases; and, (2) many utilities may not be able to displace 15% to 23% of utility-owned generation using market purchases. Mr. Pfeifenberger's referenced statement is founded on his experience with how much generation tends to be displaced due to simulated differences in RTO participation. It is not based on any specific existing and/or projected transmission constraints.

- a. Is Mr. Pfeifenberger or MSIO aware of actual uplift costs paid to generators within MISO during calendar year 2006 or in the first 11 months of 2007? If so, please provide a list of generators that received uplift payments, the hours when those generators were dispatched, and the uplift payments made.

Response: The statement on page 5, lines 12-14 of Mr. Pfeifenberger's testimony relates to the Aquila Study's finding of Aquila generation that is estimated to be displaced in the "Aquila in SPP" scenario. This statement relates to the uplift costs as calculated by Aquila's consultants as the