**Formal Comments**

**Quadrant:** Wholesale Electric Quadrant

**Recommendations:** 2015 WEQ Annual Plan Item 2(a)(i)(2) – Long-Term Firm Rollover Rights Competition

**Submitted By:** MISO

**Date:** March 25, 2016

MISO appreciates the work the OASIS Subcommittee performed in addressing the five areas of concern that resulted in the February 23, 2016, remand of the recommendation by the Executive Committee. After reviewing the revised proposed standards, we believe four of the five areas were fully addressed. The one area, which has not been fully addressed, is the consistent use of “day”, “calendar day”, and “business day.” We are also seeking clarification on the reasoning behind changing some of the number of days in table found in “xx001 Appendix – xx Timeline for Competition for Rollover Rights.”

1. Section xx001-20.5.3 and xx001-20.8.3 references business days. Other references to day throughout the recommendation use calendar day. It is unclear why these sections were not changed to calendar day.
2. For the table in “xx001 Appendix – xx Timeline for Competition for Rollover Rights”, we are seeking clarification as to what drove the changes to some of the number of days. If the days were in business days and converted to calendar days, the conversion seems flawed using five business days in a work week. If the days were in already in calendar days, it is unclear why the number of days changed. Specifically:
   1. Data row three has the number of days changed from 68 to 70
   2. Data row five has the number of days changed from 68 to 70
   3. Data row six has the number of days changed from 83 to 85

It would be beneficial to the Executive Committee if they were provided with the reasoning behind these date changes.