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October 24, 2023

**VIA E-FILING**

The Honorable Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington DC 20426

**Re: Informational Compliance Filing of the Midcontinent Independent System Operator, Inc.  
FERC Docket Nos. ER04-691-000, ER04-106-000, EL04-104-000 and ER07-532-000, Regarding Grandfathered Agreements**

Dear Ms. Bose:

The Midcontinent Independent System Operator, Inc. (“MISO”) hereby submits, on an informational basis,<sup>1</sup> this quarterly report for the third quarter of 2023 in compliance with the orders issued by the Commission in the above-referenced proceedings, regarding Carved-Out Grandfathered Agreements (“GFAs”).<sup>2</sup>

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<sup>1</sup> This filing is being made pursuant to Section 205 of the Federal Power Act (FPA), 16 U.S.C. § 824d, and Part 35 of the regulations of the Federal Energy Regulatory Commission (FERC or “Commission”), 18 C.F.R. § 35, *et seq.*

<sup>2</sup> *Midwest Indep. Transmission Sys. Operator, Inc.*, 108 FERC ¶ 61,236 at PP 144, 149, 150 (2004) (“September 16, 2004 Order”), *order on reh’g*, 111 FERC ¶ 61,042 at PP 99, 133, 189 (2005) (“April 15, 2005 Rehearing Order”), *order on reh’g*, 112 FERC ¶ 61,311 (2005) (“September 19, 2005 Rehearing Order”); *Midwest Indep. Transmission Sys. Operator, Inc.*, 121 FERC ¶ 61,166 at P 70 (2007) (“November 15, 2007 Order”).

## I. BACKGROUND

On March 31, 2004, MISO filed its Open Access Transmission and Energy Markets Tariff,<sup>3</sup> providing for a market-based congestion management program and energy markets in the MISO Region, including Day-Ahead and Real-Time Energy Markets, locational marginal pricing (“LMP”) and a market for Financial Transmission Rights (“FTRs”).

On May 26, 2004, the Commission issued an order that, among other things, required further fact-finding and hearings to obtain information that would assist the Commission in evaluating the propriety of “carving out” GFAs from the Day 2 Market.<sup>4</sup> On August 6, 2004, the Commission issued an order accepting and suspending certain Tariff sheets, subject to conditions and further orders regarding the GFAs.<sup>5</sup> MISO’s Energy Markets commenced successfully on April 1, 2005.<sup>6</sup>

Prior to market start, and after completion of the GFA fact-finding process, on September 16, 2004, the Commission issued an Order that, among other things, required the carve-out of specified GFAs (“Carved-Out GFAs”), and required MISO to file on an informational basis after the end of each calendar quarter, a report on the accuracy of the Day-Ahead Schedules submitted for such GFAs (“quarterly report”).<sup>7</sup> On April 15, 2005, in affirming the September 16 Order, the Commission further required MISO’s quarterly report to include additional information regarding GFAs.<sup>8</sup> MISO has since been filing such GFA quarterly reports.

On February 1, 2007, MISO submitted in Docket No. ER07-532-000 a proposal to largely continue the GFA treatments after the Transition Period, subject to certain changes MISO had been considering with regard to the handling of congestion costs and losses pertaining to Carved-Out and Option B GFAs. On November 15, 2007, the Commission issued an order essentially approving MISO’s February 1 proposal regarding the post-Transition Period

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<sup>3</sup> As used in this report the term “Tariff” includes any ensuing replacement or revisions. Unless otherwise defined herein, all capitalized terms shall be as set forth in the Tariff.

<sup>4</sup> *Midwest Indep. Transmission Sys. Operator, Inc.*, 107 FERC ¶ 61,191 (2004) (“May 26, 2004 Order”).

<sup>5</sup> *Midwest Indep. Transmission Sys. Operator, Inc.*, 108 FERC ¶ 61,163 (2004), *order on reh’g*, 109 FERC ¶ 61,157 (2004), *order on reh’g*, 111 FERC ¶ 61,043 (2005).

<sup>6</sup> *See, e.g., Midwest Indep. Transmission Sys. Operator, Inc., et al.*, 111 FERC ¶ 61,176 at P 23 (2005).

<sup>7</sup> September 16, 2004 Order at PP 144, 149, 150.

<sup>8</sup> April 15, 2005 Rehearing Order at P 99 (inefficient market prices resulting from inaccurate schedules associated with carved-out GFAs), P 133 (any significant impact of specific carved-out GFAs on a pro rata reduction of FTRs), P 189 (GFA parties’ requests for increases in MWs and actual service taken pursuant to such increases).

treatment of GFAs.<sup>9</sup> The November 15, 2007 Order directed MISO to continue filing the previously ordered quarterly reports beyond the Transition Period.<sup>10</sup> In addition, the Commission required MISO to provide in the next GFA quarterly report a table similar to Attachment P of the Tariff that includes the expiration dates and megawatt quantities associated with each GFA, and to report any changes to such table in the subsequent quarterly reports.<sup>11</sup>

On April 30, 2008, MISO submitted in Docket No. ER08-925-000 proposed Tariff revisions regarding the continuation of GFA treatment options after February 1, 2008, and the modification of the loss treatment of Option B and Carved-Out GFAs. On July 29, 2015, the Commission rejected MISO's proposed Tariff changes.<sup>12</sup>

On January 6, 2009, MISO's Ancillary Services Markets commenced,<sup>13</sup> pursuant to a series of orders that conditionally accepted MISO's Open Access Transmission, Energy and Operating Reserve Market Tariff ("Tariff"),<sup>14</sup> which essentially continued the predecessor Tariff's treatment of GFAs.

On October 16, 2009, MISO filed in Docket No. ER10-73-000, proposed revisions to Section 38.8.3(A) of the Tariff to make Carved-Out GFA treatment unavailable to new Transmission Owners in regard to any GFA where the counterparties are Affiliates or owner-member companies of such Transmission Owners, or another transmission-owning member of MISO, to the extent that the GFA is added to Attachment P of the Tariff effective on or after November 1, 2009. On December 15, 2009, the Commission accepted MISO's proposal to preclude carved-out treatment of new Transmission Owners' GFAs when the counterparties are their Affiliates or owner-member companies.<sup>15</sup> The December 15, 2009 Order rejected the proposal to deny such carved-out treatment where the counterparties are existing Transmission Owners, without prejudice to MISO's re-submission of that proposal with appropriate supporting reasons.

On January 28, 2010, the Commission accepted in Docket No. ER10-316-000 MISO's proposal for a new version of Attachment P that lists the grandfathered agreements sequentially

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<sup>9</sup> *Midwest Indep. Transmission Sys. Operator, Inc.*, 121 FERC ¶ 61,166 (2007) ("November 15, 2007 Order").

<sup>10</sup> *Id.* at P 70.

<sup>11</sup> *Id.*

<sup>12</sup> *Midwest Indep. Transmission Sys. Operator, Inc.*, 152 FERC ¶ 61,084 (2015).

<sup>13</sup> MISO uses the term "Ancillary Services Markets" or "ASM" to refer collectively to the markets for Energy and Operating Reserves established in the Tariff.

<sup>14</sup> *Midwest Indep. Transmission Sys. Operator, Inc.*, 122 FERC ¶ 61,172 (2008) ("ASM Order"), *order on reh'g*, 123 FERC ¶ 61,297; *Midwest Indep. Transmission Sys. Operator, Inc.*, 125 FERC ¶ 61,318 (2008) ("ASM start-up").

<sup>15</sup> *Midwest Indep. Transmission Sys. Operator, Inc.*, 129 FERC ¶ 61,221 (2009) ("December 15, 2009 Order").

by contract number as opposed to the previous method of listing contracts for each of MISO's Transmission Owners, which, in turn, are listed alphabetically.<sup>16</sup>

The present informational filing is MISO's quarterly report for the third quarter of calendar year 2023.

## II. DISCUSSION

As required by the above-mentioned Commission orders, MISO hereby submits the following information regarding Carved-Out GFAs for the period July, August, and September of 2023.

As observed in the previous quarterly reports, Carved-Out GFAs are financially rather than "physically" carved-out of MISO's markets, in accordance with Section 38.8.4 of the Tariff. The Commission has recognized that such GFAs cannot be physically carved out of the market as if they were operating wholly "outside" the market.<sup>17</sup> Carved-Out GFAs are financially exempt from congestion, losses and certain other charges directly linked to MISO's markets, but bear responsibilities concerning reliability-related coordination, scheduling and real-time energy imbalances,<sup>18</sup> and share in charges based on the system-wide reliability and efficiency benefits they receive from the existence and operation of the market.<sup>19</sup>

As also noted in the previous quarterly reports, Carved-Out GFAs can participate in certain benefits offered by MISO's markets. For example, parties to Carved-Out GFAs may use spot purchases and sales in the Energy Market,<sup>20</sup> rather than scheduling under the Carved-Out GFAs, to readily obtain replacement power in case of outages, or to more economically meet load requirements. Both Carved-Out GFA parties and other Market Participants benefit from such flexibility, which results in market participation and more efficient commitment and dispatch of the generation that may be used to serve Carved-Out GFA Load.

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<sup>16</sup> *Midwest Indep. Transmission Sys. Operator, Inc.*, 130 FERC ¶ 61,069 at P 6 (2010).

<sup>17</sup> *See* September 16, 2004 Order at P 90; *see also* April 15, 2005 Rehearing Order at PP 406, 415.

<sup>18</sup> September 16, 2004 Order at PP 90, 144 (scheduling); April 15, 2005 Rehearing Order at PP 358-60 (scheduling), 373-74 (real-time imbalances), 415 (coordination and scheduling); September 19, 2005 Rehearing Order at P 38 (scheduling and cooperation).

<sup>19</sup> September 16, 2004 Order at PP 6,297-98 (Schedule 17 charges); April 15, 2005 Rehearing Order at PP 174-181 (Schedule 10 and 17 charges), 419 (Schedule 18 charges); September 19, 2005 Rehearing Order at P 21 (Schedule 17 charges).

<sup>20</sup> April 15, 2005 Rehearing Order at P 179; September 16, 2004 Order at PP 101, 191 (Commission expressed its expectation that one party to GFA No. 308 "will register with the Midwest ISO as a market participant so that if it ever needs to purchase energy in the Midwest ISO market, for an emergency or otherwise, it will be subject to the TEMT for those transactions").

**A. Schedule Accuracy and Market Price Efficiency**

Tables 1 and 2 below demonstrate a continuing, generally high level of Day-Ahead Schedule accuracy relating to Carved-Out GFAs in MISO’s region. Day-ahead scheduled MWs are within eight point nine percent (8.9%) of real-time scheduled MWs across all Market Participants and days in the third quarter. Previous quarterly reports have indicated the dynamic nature of the scheduling requirements of the Carved-Out GFAs involving the Ludington Pumped Storage facility (*i.e.*, GFA Nos. 267-269), affecting the overall average. Table 2 below shows that there is also a zero point seven percent (0.7%) real-time scheduled MW deviation from day-ahead scheduled MWs across all Market Participants and days in the third quarter after removing the effect of Ludington scheduling data. As previously reported, Ludington’s relatively lower day-ahead to real-time scheduling accuracy may, in part, be due to the fact that at the time the Day-Ahead Market’s bid/offer window closes, there is uncertainty about the expected real-time operations of this dynamic resource. Ludington’s operational flexibility allows for rapid schedule adjustments in real-time in response to quickly changing system conditions and provides both reliability and market efficiency benefits.

**Table 1: Overall Accuracy of Day-Ahead Schedules of Carved Out GFAs  
(July – September 2023)**

<b>MONTH</b>	<b>Scheduled Day-Ahead (MWh)</b>	<b>Scheduled Real-Time (MWh)</b>	<b>Schedule Error<sup>21</sup> (MWh)</b>	<b>Percent Schedule Error</b>
July	2,334,753	2,576,695	241,942	10.4%
August	2,458,728	2,610,524	151,796	6.2%
September	1,995,867	2,206,076	210,209	10.5%
<b>Total<sup>22</sup></b>	<b>6,789,348</b>	<b>7,393,295</b>	<b>603,947</b>	<b>8.9%</b>

<sup>21</sup> Schedule Error (MWh) is the absolute deviation of the amount of real-time MWs from the amount of MWs specified in the Day-Ahead Schedules.

<sup>22</sup> In Table 1 and Table 2, the last row calculates the total scheduling error percentage each quarter by using the absolute value of the MWh amount of schedule deviations over the amount of MWs specified in Day-Ahead Schedules.

**Table 2: Overall Accuracy of Day-Ahead Schedules of Carved Out GFAs – Excluding Ludington Pumped Storage Unit (July – September 2023)**

Month	Scheduled Day-Ahead (MWh)	Scheduled Real-Time (MWh)	Schedule Error <sup>21</sup> (MWh)	Percent Schedule Error
July	1,691,024	1,732,760	41,736	2.5%
August	1,639,554	1,652,590	13,036	0.8%
September	1,580,774	1,593,338	12,564	0.5%
<b>Total</b>	<b>4,911,352</b>	<b>4,978,688</b>	<b>67,336</b>	<b>0.7%</b>

MISO also provides the following Table 3, showing high Day-Ahead Schedule accuracy at the Market Participant level. Where there are significant schedule deviations, MISO works with the Carved-Out GFA parties to suggest ways to improve their adherence to Carved-Out GFA scheduling obligations. Market Participant number 1 had a 100% difference from Day-Ahead Schedule. This Market Participant did not submit Day Ahead Schedules during the third quarter.

**Table 3: Market Participant Level Detail on Accuracy of Day-Ahead Schedules of Carved Out GFAs<sup>23</sup> (July – September 2023)**

Market Participant	Real-Time Average Schedule (MWh) <sup>24</sup>	Average Difference from Day-Ahead Schedule	MWh Weighted Average Difference from Day-Ahead Schedule
1	2	100%	
2	3.8	5%	5%
3	762.9	54%	4%

<sup>23</sup> Some Market Participants represent more than one Asset Owner. MISO has determined that one Market Participant did not submit Day-Ahead Schedules for its Carved-Out GFAs in the months of July, August, and September of 2023.

<sup>24</sup> MISO has enhanced the Real-Time Average Schedule (MWh) calculation methodology by using the real-time *hourly* average instead of the *daily* average because the hourly average is a better representation of the MW of Carved-Out GFAs in the MISO total peak load.

Market Participant	Real-Time Average Schedule (MWh) <sup>24</sup>	Average Difference from Day-Ahead Schedule	MWh Weighted Average Difference from Day-Ahead Schedule
4	871.9	17%	2%
5	14.6	3%	2%
6	66.5	46%	0%
7	614.8	0%	0%
8	557.5	0%	0%
9	367.5	0%	0%
10	200.5	0%	0%
11	174.2	0%	0%
12	146	0%	0%
13	130	0%	0%
14	72	0%	0%
15	27.7	0%	0%
16	6.4	0%	0%
17	5.4	0%	0%
18	3.9	0%	0%
19	2.5	0%	0%
20	2	0%	0%
21	1.2	0%	0%

**B. Impact on Pro Rata Reductions of FTRs**

MISO closely analyzed the impacts of Carved-Out GFAs on the 2023-2024 Annual ARR Allocation. MISO did not find any *pro rata* reductions of FTRs significantly affected by Carved-Out GFAs. Instead, the data indicated that Carved-Out GFA curtailments were closely proportional to the FTR curtailments. Carved-Out GFAs are treated as functionally equivalent to ARRs during MISO’s simultaneous feasibility analysis, and the resulting Annual ARR Allocations. Thus, while a Carved-Out GFA may compete for the same transmission capacity as one or more FTRs, all are evaluated equally and Carved-Out GFAs are given no higher status or priority than other Transmission Service.

### **C. Table of GFAs with MW Amounts and Expiration Dates**

The table of GFAs has been updated to reflect that:

- GFA No. 331 termination date changed from 01/01/2034 to 03/01/2058
- GFA No. 360 termination date changed from 12/31/2024 to 12/31/2036
- GFA No. 471 termination date changed from 12/31/1987 to 12/31/2027
- GFA No. 472 termination date changed from 11/26/2001 to 8/31/2026
- GFA No. 527 termination date changed from 09/30/2016 to 12/01/2050

### **III. NOTICE AND SERVICE**

MISO has served a copy of this filing electronically, including attachments, upon all parties listed on the Commission's eService list, as well as Tariff Customers under the Tariff, MISO Members, Member representatives of Transmission Owners and Non-Transmission Owners as well as state commissions within the Region.

In addition, the filing has been posted electronically on MISO's website at <https://www.misoenergy.org/legal/ferc-filings/> for other interested parties in this matter.

MISO submits that the requirements of Section 35.13 of the Commission's regulations, 18 C.F.R. § 35.13, that have not been specifically addressed herein are inapplicable to this filing. To the extent that the Commission determines any of those sections to be applicable to this filing, MISO requests waiver of the requirements of such sections.

### **IV. CONCLUSION**

WHEREFORE, for all the reasons stated above, MISO requests that the Commission accept this informational filing in compliance with the orders dated September 16, 2004, April 15, 2005, and November 15, 2007, as set forth herein.

Respectfully submitted,

/s/ Daniel M. Malabonga

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Table of GFAs

<b>GFA ID</b>	<b>Original Treatment (FERC Order/Appendix B or On New MP Integration)</b>	<b>Transmission Owner (FERC Order/Appendix B)</b>	<b>Original Maximum MW Transmitted under the GFA (FERC Order/Appendix B or on New MP Integration)</b>	<b>Maximum MW Transmitted under the GFA (Current)</b>	<b>GFA Expiration Date</b>	<b>Market Participant</b>	<b>Current Treatment</b>
14	Carve Out	Alliant Energy – IPL	30	12.9	9/1/2024	APM	Carve Out
16	Carve Out	Alliant Energy – IPL	591	615	1/1/2036	ALTM	Carve Out
17	Carve Out	Alliant Energy – IPL	24.07	N/A	12/31/2035	N/A	N/A
19	Carve Out	Alliant Energy – IPL	37	37	12/31/2024	AMUE	Carve Out
34	Option B	Alliant Energy – IPL	97.53	N/A	1/1/2036	N/A	N/A
41	Carve Out	Alliant Energy – IPL	44.2	N/A	12/31/2027 (automatically renewed)	N/A	N/A
100	Option A	American Tx Co. - Edison Sault	43	N/A	12/31/2011 (automatically renewed)	N/A	N/A
101	Option A	American Tx Co. – Upper Peninsula Pwr	5.2	N/A	1/1/2011 (automatically renewed)	N/A	N/A
107	Carve Out	American Tx Co. – Upper Peninsula Pwr	5.6	N/A	4/22/2013 (automatically renewed)	N/A	N/A
108	J & R (Option A or C)	American Tx Co. – WPS	0.5	1.0	9/30/2014 (automatically renewed)	WPSM	A
109	J & R (Option A or C)	American Tx Co. – WPS	1.4	2.0	9/30/2014 (automatically renewed)	WPSM	A
142	Option B	Cinergy – PSI	326	156	6/01/2026 (automatically renewed)	WVPA	A
161	Carve Out	Hoosier	1101	677	1/1/2050 (automatically renewed)	HEPM	Carve Out
162	Carve Out	Hoosier			1/1/2050 (automatically renewed)	HEPM	Carve Out
163	Carve Out	Hoosier			1/1/2050 (automatically renewed)	HEPM	Carve Out

<b>GFA ID</b>	<b>Original Treatment (FERC Order/Appendix B or On New MP Integration)</b>	<b>Transmission Owner (FERC Order/Appendix B)</b>	<b>Original Maximum MW Transmitted under the GFA (FERC Order/Appendix B or on New MP Integration)</b>	<b>Maximum MW Transmitted under the GFA (Current)</b>	<b>GFA Expiration Date</b>	<b>Market Participant</b>	<b>Current Treatment</b>
164	Carve Out	Hoosier			1/1/2050 (automatically renewed)	HEPM	Carve Out
165	Carve Out	Hoosier			1/1/2050 (automatically renewed)	HEPM	Carve Out
166	Carve Out	Hoosier			1/1/2050 (automatically renewed)	HEPM	Carve Out
167	Carve Out	Hoosier			1/1/2050 (automatically renewed)	HEPM	Carve Out
168	Carve Out	Hoosier			1/1/2050 (automatically renewed)	HEPM	Carve Out
169	Carve Out	Hoosier			1/1/2050 (automatically renewed)	HEPM	Carve Out
170	Carve Out	Hoosier			1/1/2050 (automatically renewed)	HEPM	Carve Out
171	Carve Out	Hoosier			1/1/2050 (automatically renewed)	HEPM	Carve Out
172	Carve Out	Hoosier			1/1/2050 (automatically renewed)	HEPM	Carve Out
173	Carve Out	Hoosier			1/1/2050 (automatically renewed)	HEPM	Carve Out
174	Carve Out	Hoosier			1/1/2050 (automatically renewed)	HEPM	Carve Out
175	Carve Out	Hoosier			1/1/2050 (automatically renewed)	HEPM	Carve Out
176	Carve Out	Hoosier			1/1/2050 (automatically renewed)	HEPM	Carve Out
177	Carve Out	Hoosier			1/1/2050 (automatically renewed)	HEPM	Carve Out

<b>GFA ID</b>	<b>Original Treatment (FERC Order/Appendix B or On New MP Integration)</b>	<b>Transmission Owner (FERC Order/Appendix B)</b>	<b>Original Maximum MW Transmitted under the GFA (FERC Order/Appendix B or on New MP Integration)</b>	<b>Maximum MW Transmitted under the GFA (Current)</b>	<b>GFA Expiration Date</b>	<b>Market Participant</b>	<b>Current Treatment</b>
178	Carve Out	Hoosier	2	N/A	12/20/2006 (automatically renewed)	N/A	N/A
185	Carve Out	Hoosier	232	N/A	12/31/2017 (automatically renewed)	N/A	Carve Out
186	Carve Out	Hoosier	40	N/A	12/1/2015 (automatically renewed)	N/A	N/A
205	Carve Out	International Transmission Co	1949	2089	12/31/2031	DEMO	Carve Out
209	Carve Out	International Transmission Co	234.49	232	12/31/2036	MPPA	Carve Out
211	Carve Out	International Transmission Co	5.9	N/A	12/31/2035	MSCP	N/A
212	Carve Out	International Transmission Co	37.13	N/A	1/1/2036	N/A	N/A
254	Carve Out	METC	15.5	15	12/31/2036	WPSC	Carve Out
255	Carve Out	METC	105	N/A	12/31/2036	N/A	N/A
256	Carve Out	METC	39.36	43	12/31/2036	MPPA	Carve Out
					Conditionally terminated pursuant to the orders, and subject to the outcome of hearing and settlement judge proceedings, in Docket Nos. EL16-77-001 and EL16-1986-001		
267	Carve Out	METC	See GFA 205	2096	12/31/2031	CETR	Carve Out
273	Option A, B or C	Montana-Dakota Utilities	182.7	108.8	12/31/2035	MDUM	A
273	Option A, B or C	Montana-Dakota Utilities	182.7	N/A	12/31/2035	NWPS	Carve Out
274	Option A, B or C	Montana-Dakota Utilities	115.7	106.3	1/1/2036	MDUM	A

<b>GFA ID</b>	<b>Original Treatment (FERC Order/Appendix B or On New MP Integration)</b>	<b>Transmission Owner (FERC Order/Appendix B)</b>	<b>Original Maximum MW Transmitted under the GFA (FERC Order/Appendix B or on New MP Integration)</b>	<b>Maximum MW Transmitted under the GFA (Current)</b>	<b>GFA Expiration Date</b>	<b>Market Participant</b>	<b>Current Treatment</b>
274	Option A, B or C	Montana-Dakota Utilities	115.7	3	1/1/2036	NWPS	Carve Out
284	Out of the MISO energy market	Minnesota Power	220	412	12/31/2026	MPC	Carve Out
285	Option B	Minnesota Power	108	46	1/1/2036	WPPI	B
289	Option B	Minnesota Power	12.00 for Wadena, Minnesota and 4.00 for Staples, Minnesota	19	12/31/2020 (automatically renewed)	MRES	B
291	Carve Out	Minnesota Power	85	N/A	1/1/2036	N/A	N/A
300	J & R (Option A or C)	Otter Tail Power Company	1.16	1.1	12/31/2035	OTPW	A
302	J & R (Option A or C)	Otter Tail Power Company	0.23	0.2	1/1/2036	OTPW	A
304	J & R (Option A or C)	Otter Tail Power Company	0.57	0.5	1/1/2036	OTPW	A
311	Option A, B or C	Otter Tail Power Company	See GFA 273	149.5	1/31/2036	OTPW	A
317	Carve Out	Otter Tail Power Company	250	493	12/31/2035	MPC	Carve Out
320	Option A, B or C	Otter Tail Power Company	See GFA 274	256	1/1/2036	OTPW	A
321	Carve Out	Otter Tail Power Company	2.5	N/A	1/1/2036	OTPW	N/A
331	Carve Out	SIPC	423	423	<del>13/1/2034</del> 2058 (automatically renewed)	SIPC	Carve Out
332	Carve Out	SIPC – BREC	423	100	3/1/2058 (automatically renewed)	SIPC	Carve Out
333	Carve Out	SIPC	423	423	3/1/2058 (automatically renewed)	SIPC	Carve Out
334	Carve Out	SIPC	423	423	3/1/2058 (automatically renewed)	SIPC	Carve Out

<b>GFA ID</b>	<b>Original Treatment (FERC Order/Appendix B or On New MP Integration)</b>	<b>Transmission Owner (FERC Order/Appendix B)</b>	<b>Original Maximum MW Transmitted under the GFA (FERC Order/Appendix B or on New MP Integration)</b>	<b>Maximum MW Transmitted under the GFA (Current)</b>	<b>GFA Expiration Date</b>	<b>Market Participant</b>	<b>Current Treatment</b>
335	Carve Out	SIPC	423	423	3/1/2058 (automatically renewed)	SIPC	Carve Out
336	Carve Out	SIPC	423	423	3/1/2058 (automatically renewed)	SIPC	Carve Out
337	Carve Out	SIPC	423	423	12/31/2040 (automatically renewed)	SIPC	Carve Out
341	Carve Out	SIPC – BREC	See GFA 331	380	1/1/2034	SIPC	Carve Out
343	Option B	Southern Indiana Gas & Electric Co.	559	125	4/30/2004 (automatically renewed)	SIGW	B
344	Carve Out	Wabash Valley Power Association, Inc.	See GFA 185	N/A	In relation to GFA 185: 12/31/2017 (automatically renewed)	WVPA	N/A
356	Out of the MISO energy market	Xcel - NSP	90	55	1/1/1995 (automatically renewed)	MRES	A
360	Carve Out	Xcel – NSP	8.62	19	12/31/ <del>2024</del> <a href="#">2036</a>	HCPD	A
363	Option B	Xcel - NSP	1.97	1.9	10/21/1987 (automatically renewed)	NSPG	B
364	Carve Out	Xcel - NSP	8.07	6	6/23/1994 (automatically renewed)	NSPG	Carve Out
365	Carve Out	Xcel - NSP	1.93	1	12/31/2000 (automatically renewed)	NSPG	Carve Out
372	Option B	Xcel - NSP	62	62	11/1/2026	WPPI	B
373	Option B	Xcel - NSP	123	N/A	7/11/1996 (automatically renewed)	WPPI	N/A
403	J & R (Option A or C)	GridAmerica - Ameren	62	62	12/31/2024 (Agreement may be terminated on 3 years notice)	APM and AMUE	A

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426	Option B	Southern Indiana Gas & Electric	34	34	3/13/2026	SIGW	B
432	J & R (Option A or C)	Otter Tail Power Company	0.86	0.8	12/22/1980 (automatically renewed)	OTPW	A
433	J & R (Option A or C)	Otter Tail Power Company	1.26	1.2	7/1/1983 (automatically renewed)	OTPW	A
434	J & R (Option A or C)	Otter Tail Power Company	0.37	0.3	7/1/1983 (automatically renewed)	OTPW	A
435	J & R (Option A or C)	Otter Tail Power Company	2.62	2.6	7/1/1983 (automatically renewed)	OTPW	A
436	J & R (Option A or C)	Otter Tail Power Company	0.13	0.1	7/1/1983 (automatically renewed)	OTPW	A
439	J & R (Option A or C)	Otter Tail Power Company	0.04	0	1/1/2036	OTPW	A
440	J & R (Option A or C)	Otter Tail Power Company	0.43	0.4	6/1/1981 (automatically renewed)	OTPW	A
441	Option B	City of Columbia, Water & Light Department (Columbia, MO)	8	8	12/31/2024 (Agreement may be terminated on 3 years notice)	APM	A
443	Option B	City of Columbia, Water & Light Department (Columbia, MO)	50	50	2/1/2010 (automatically renewed)	TEA	B
449	Option B	Illinois Power Co	40	N/A	3/1/1989 (automatically renewed)	N/A	N/A
451	Carve Out	Great River	116	2	11/1/2017 (automatically renewed)	HUC	Carve Out
461	Carve Out	Great River	7	6	4/11/2024 (automatically renewed)	MRES	Carve Out

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467	Carve Out	Southern Minnesota Municipal Power Agency	N/A	154	5/1/2032 (automatically renewed)	DPCM	Carve Out
471	Carve Out	Central Iowa Power Cooperative	N/A	36	<del>12/31/1987</del> <a href="#">2027</a> (automatically renewed)	CIPCO	Carve Out
472	Carve Out	Central Iowa Power Cooperative	N/A	42	<del>11/08/2631/2004</del> <a href="#">2026</a> (automatically renewed)	CIPCO	Carve Out
473	Carve Out	Corn Belt Power Cooperative	N/A	0	11/1/1985 (automatically renewed)	CBPC	Carve Out
474	Carve Out	Harlan Municipal Utilities	N/A	0	9/10/1987 (automatically renewed)	HMMU	Carve Out
475	Carve Out	Harlan Municipal Utilities	N/A	4	6/13/1993 (automatically renewed)	HMMU	Carve Out
476	Carve Out	City of Tipton, IA	N/A	6	12/31/2028 (automatically renewed)	RPGI	Carve Out
477	Carve Out	MidAmerican	N/A	17	10/31/2000 (automatically renewed)	MECB	Carve Out
478	Carve Out	MidAmerican	N/A	0	10/29/1976 (automatically renewed)	MECB	Carve Out
479	Carve Out	MidAmerican	N/A	74	11/1/1995 (automatically renewed)	MECB	Carve Out
480	Carve Out	MidAmerican	N/A	0	2/2/2004 (automatically renewed)	MECB	Carve Out
481	Carve Out	MidAmerican	N/A	9	6/24/1980 (automatically renewed)	MECB	Carve Out
484	Carve Out	Dairyland Power Cooperative	N/A	88	4/8/2035 (automatically renewed)	DPCM	Carve Out

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485	Option A	Dairyland Power Cooperative	N/A	690 (sum of MW for 485 – 509)	12/31/2035 (automatically renewed)	DPCM	Option A
486	Option A	Dairyland Power Cooperative	N/A	See GFA 485	12/31/2035 (automatically renewed)	DPCM	Option A
487	Option A	Dairyland Power Cooperative	N/A	See GFA 485	12/31/2035 (automatically renewed)	DPCM	Option A
488	Option A	Dairyland Power Cooperative	N/A	See GFA 485	12/31/2035 (automatically renewed)	DPCM	Option A
489	Option A	Dairyland Power Cooperative	N/A	See GFA 485	12/31/2035 (automatically renewed)	DPCM	Option A
490	Option A	Dairyland Power Cooperative	N/A	See GFA 485	12/31/2035 (automatically renewed)	DPCM	Option A
491	Option A	Dairyland Power Cooperative	N/A	See GFA 485	12/31/2035 (automatically renewed)	DPCM	Option A
492	Option A	Dairyland Power Cooperative	N/A	See GFA 485	12/31/2035 (automatically renewed)	DPCM	Option A
493	Option A	Dairyland Power Cooperative	N/A	See GFA 485	12/31/2035 (automatically renewed)	DPCM	Option A
494	Option A	Dairyland Power Cooperative	N/A	See GFA 485	12/31/2035 (automatically renewed)	DPCM	Option A
495	Option A	Dairyland Power Cooperative	N/A	See GFA 485	12/31/2035 (automatically renewed)	DPCM	Option A
496	Option A	Dairyland Power Cooperative	N/A	See GFA 485	12/31/2035 (automatically renewed)	DPCM	Option A
497	Option A	Dairyland Power Cooperative	N/A	See GFA 485	12/31/2035 (automatically renewed)	DPCM	Option A
498	Option A	Dairyland Power Cooperative	N/A	See GFA 485	12/31/2035 (automatically renewed)	DPCM	Option A



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499	Option A	Dairyland Power Cooperative	N/A	See GFA 485	12/31/2035 (automatically renewed)	DPCM	Option A
500	Option A	Dairyland Power Cooperative	N/A	See GFA 485	12/31/2035 (automatically renewed)	DPCM	Option A
501	Option A	Dairyland Power Cooperative	N/A	See GFA 485	12/31/2035 (automatically renewed)	DPCM	Option A
502	Option A	Dairyland Power Cooperative	N/A	See GFA 485	12/31/2035 (automatically renewed)	DPCM	Option A
503	Option A	Dairyland Power Cooperative	N/A	See GFA 485	12/31/2035 (automatically renewed)	DPCM	Option A
504	Option A	Dairyland Power Cooperative	N/A	See GFA 485	12/31/2035 (automatically renewed)	DPCM	Option A
505	Option A	Dairyland Power Cooperative	N/A	See GFA 485	12/31/2035 (automatically renewed)	DPCM	Option A
506	Option A	Dairyland Power Cooperative	N/A	See GFA 485	12/31/2035 (automatically renewed)	DPCM	Option A
507	Option A	Dairyland Power Cooperative	N/A	See GFA 485	12/31/2035 (automatically renewed)	DPCM	Option A
508	Option A	Dairyland Power Cooperative	N/A	See GFA 485	12/31/2035 (automatically renewed)	DPCM	Option A
509	Option A	Dairyland Power Cooperative	N/A	See GFA 485	12/31/2035 (automatically renewed)	DPCM	Option A
511	Carve Out	Big Rivers Electric Corporation	N/A	12	6/1/2027 (automatically renewed)	BREC	Carve Out
512	Carve Out	Big Rivers Electric Corporation	N/A	178	7/1/2017 (automatically renewed)	BREC	Option A
513	Carve Out	Big Rivers Electric Corporation	N/A	323	1/1/2025 (automatically renewed)	BREC	Carve Out

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514	Carve Out	Big Rivers Electric Corporation	N/A	186 MW starting 6/1/2019	12/31/2011 (automatically renewed)	BREC	Carve Out
515	Option A	Big Rivers Electric Corporation	N/A	181 starting 6/1/2022	1/1/2044 (automatically renewed)	BREC	Option A
516	Option A	Big Rivers Electric Corporation	N/A	303 starting 11/1/2022	1/1/2044 (automatically renewed)	BREC	Option A
517	Option A	Big Rivers Electric Corporation	N/A	367	1/1/2044 (automatically renewed)	BREC	Option A
518	Option A	Big Rivers Electric Corporation	N/A	N/A	1/1/2044 (automatically renewed)	BREC	Option A
524	Option A	Cleco Power LLC	N/A	50	1/1/2016 (automatically renewed)	NRG	Option A
525	Option A	Cleco Power LLC	N/A	3	Automatically renewed	NRG	Option A
525	Option A	Cleco Power LLC	N/A	81	Automatically renewed	TEA	Option A
526	Option A	Cleco Power LLC	N/A	35	12/1/2022 (automatically renewed)	CPWR	Option A
527	Option A	South Mississippi Electric Power Association	N/A	68	<del>9/12/2001/2016</del> 650 (automatically renewed)	SMEP	Option A