



MISO eTariff Filing Guidelines for MISO Transmission Owners

Background:

At the request of the MISO Transmission Owners (“TOs”) and pursuant to Appendix K of the Agreement of Transmission Facilities Owners To Organize The Midcontinent Independent System Operator, Inc. (“TOA”), as the Administrator of the MISO Tariff, MISO submits on behalf of the TOs, through MISO’s eTariff system, any FERC filings involving the MISO Tariff, TOA, Rate Schedule(s) and/or Service Agreement(s) (together referred to as “Tariff” or “Tariff filings”) for which the TOs have exclusive FPA Section 205 filing rights. These guidelines were adopted to coincide with the effective date of MISO’s electronic baseline filing in compliance with Order No. 714 (124 FERC ¶ 61,270) issued September 19, 2008.

In order to help ensure that MISO Legal has adequate time and resources available to administratively file Tariff revisions on behalf of the TOs using MISO’s eTariff software, MISO Legal requests that the following guidelines be followed:

Initial Notice of Anticipated Filing and Request for Current Tariff Sheets

- Pursuant to Appendix K of the TOA, the TOs will notify MISO Legal of a Tariff filing and request the Word version of the current section(s) in the MISO Tariff at least thirty (30) days prior to anticipated filing date, unless circumstances require shorter notice, in which case the requesting TO shall use reasonable efforts to provide as much notice before the filing as possible.
- The requesting TO will provide an eTariff Transmittal Form.
- For Tariff changes related to the formulaic templates (*i.e.* Attachment O, Attachment GG, and Attachment MM) and the associated Schedules, or new formulaic Attachments and Schedules, new and existing TOs are encouraged to provide notice at least sixty (60) to ninety (90) days prior to the anticipated filing date. At times, these filings can be complicated and MISO Tariff Pricing staff may need more time to review, understand the proposed filings, and provide feedback to the requesting TO(s). This will also ensure MISO can implement the proposed tariff changes consistent with its role as tariff administrator.
- If appropriate, MISO Legal will provide a Word version of the MISO Tariff documents to the requesting TO(s) within three (3) business days of the notice.
- Emails are to be sent to MISOParalegals@misoenergy.org. A Filing Coordinator will be assigned to assist you with the filing going forward.



- Please note that requests for service agreement filings are to be sent to Agreements@misoenergy.org. Refer to the section entitled “Service Agreement Filings” in this document for procedures regarding those specific filings.
- Please consider in your proposed filing timeline occasions when additional coordination may be required such as Federal holidays, FERC closures, January and June rate updates, and end of year.

Confirmation of Anticipated Filing Date & Effective Date

- The requesting TO(s) will confirm by e-mail to MISOParalegals@misoenergy.org or the assigned Filing Coordinator that the filing will take place and provide the date of such filing at least one (1) week prior to the actual filing date and proposed effective date. The TOs shall promptly notify MISO Legal of any schedule changes to the filing date.
- MISO Legal will advise the requesting TO(s) of any issues with the proposed effective date and filing date such as holidays, volume of anticipated filings that particular day, etc., and coordinate a mutually acceptable resolution of such issues to ensure TO filing deadlines are met.

Prefiling call with MISO Legal and TO

At the request of either party, a prefiling call may be held between MISO Legal and the TO(s) to assist in preparation of the filing.

Preparation Time Required by MISO

- **MISO Review of Draft Filing Package:** The TO(s) should provide a draft of the filing package for MISO review no later than forty-eight (48) hours prior to the filing date, or such time as reasonably requested by MISO. MISO will provide guidance and clarification on any outstanding questions and review the tariff section(s)/record(s) to ensure the section and redlines are prepared in accordance with Order 714 requirements. The TO(s) will be notified by MISO Legal of any suggested revisions to the filing documents. The TO(s) will review the suggested revisions and make any changes they deem necessary.
- **MISO Review of Complete Filing Package:** No later than 10:00 AM Eastern on the filing date, the TO(s) should submit to MISO Legal the final TO Tariff filing (transmittal letter and all attachments including, but not limited to, clean and redline Tariff sections). MISO Legal will not make **any** changes to the TO filings, including the transmittal letters. MISO Legal will only be responsible for uploading the filing into the eTariff software and converting, the filing into the required FERC XML format for filing via the eTariff portal. To increase filing accuracy, a complete PDF of the entire filing will be



provided to the TO(s) for review and sign-off prior to the filing provided time has been built in to the filing for this review.

- **MISO Receipt of Complete Filing Package from TO(s):** The complete filing package should be received by MISO Legal by 10:00 AM Eastern the day of the filing in order to provide MISO Legal staff with adequate time to prepare the filing for conversion and upload into the required filing format to ensure the filing to FERC is submitted in a timely manner. The 10:00 AM Eastern deadline will also offer MISO Legal and the TO(s) additional time needed to confirm that FERC has received the filing in proper format and time for the TO(s) to work with MISO Legal should FERC not appropriately receive or accept the TO filing for any reason.
- **eTariff Preparation Time and Notification:** MISO eTariff software requires a few hours to upload, test and confirm a TO FERC filing on the web site by the close of business on the date of filing. Preparation time takes into account the time necessary to upload the filing documents into the eTariff software, convert the filing to the required XML format, create the zip file, electronically file the document with the Commission via the eTariff portal, and receive confirmation of the filing from FERC that there are no errors in the submission and it is accepted for filing.
- **Notification of Acceptance for Filing:** FERC will send three email notifications. The first email notification advises that the XML has been received in the FERC eTariff portal. The second email notification advises whether the XML is readable and identifies whether there are any error codes. *It is important to note that if there is an error in the .XML and a correction must be made, the filing time may be past and the deadline may be missed or the date requested may then be incorrect on the tariff sheets.* The third email notification advises that the FERC Office of the Secretary has accepted the electronic submission for filing and provides the assigned docket number. Acceptance for filing does not constitute approval of any application. MISO Legal will forward this notification to the TO(s).
- **Receipt of Filing for Timely Service:** The 10:00 AM Eastern deadline for MISO Legal's receipt of the filing on the date of the filing allows MISO Legal the opportunity to upload the filing on MISO's website. MISO Legal cannot guarantee posting and service to the MISO Members and Stakeholders, nor will the TO(s) be able to provide service upon the FERC service list for filings with an existing docket until the following morning if filing documents are received after 3 PM Eastern.
- **Process for Resolving Filing Errors:** If there is an error in uploading the XML package to the eTariff site, both MISO Legal and the TO(s) will have prompt notification of the error by e-mail. If there are any errors and the Commission is unable to "read the XML Schema" in the filing, MISO Legal and the TO(s) will work cooperatively to correct and re-file the document on the same date, if possible.



- **Missed Filing Deadline:** Missing a filing deadline will be addressed on a case-by-case basis. MISO Legal anticipates that late filings to meet a FERC-imposed deadline may require the submission of a request for waiver by the TO(s) and, if the delay was caused by administrative or technical problems, MISO Legal will provide supporting information for such waiver request. However, MISO's liability in any case will be limited by the applicable limitation of liability and indemnity provisions of the MISO Tariff and TOA.
- **Short Notice Filings:** MISO Legal will make every effort to accommodate short filing needs, subject to the limitations described above.

TO Transmittal of Complete FERC Filing

- **Transmittal Letter:** The TO(s) is/are responsible for the preparation of the filing transmittal letter that will be presented on TO/TO counsel letterhead. The transmittal letter will be forwarded to MISO Legal in either Word format or PDF format. The TO will ensure the letter has been scrubbed to remove any metadata and track changes.
- **Transmittal Letter Footnote Requested:** MISO Legal requests that the TO(s) include a footnote in their transmittal letter with the following information pertaining to the Service Agreements or the MISO Tariff. The reason this language is needed is because of limitations in the FERC eTariff software that requires these filings to name MISO as the "Applicant" and the TO(s) as "Additional Applicant(s)". This footnote is intended to help clarify the actual roles of the parties when MISO is filing TO Section 205 Tariff revisions as the Administrator of the MISO Tariff:

Filings related to Service Agreements - As administrator of the MISO Tariff, MISO joins [COMPANY NAME] in this filing of a service agreement under the MISO Tariff, but takes no position on the substance of the filing.

Filings related to the MISO Tariff - MISO joins this filing as the administrator of its Tariff, but takes no position on the substance of the filing and reserves the right to comment or protest.

- **Service Language - Transmittal Letter for MISO Tariff Filings:** MISO Legal requests that the TO(s) include the following service paragraph in the transmittal letter when submitting Tariff revisions that require service to the MISO Members and Stakeholders in order to ensure compliance with Order No. 714 and the FERC's regulations governing service and to avoid technical and logistical complications. The use of the MISO website links for service exceeds FERC requirements.



MISO notes that it has served a copy of this filing electronically, including public attachments, upon all Tariff Customers, MISO Members, Member representatives of Transmission Owners and Non-Transmission Owners, as well as all state commissions within the Region, and the Organization of MISO States. In addition, the filing has been posted electronically on MISO's website at www.misoenergy.org under the heading "Filings to FERC" for other interested parties in this matter.

In addition, MISO has served a copy of this filing electronically on all parties to this agreement. (For Service Agreement filings only, if necessary)

- **Redline Sections a/k/a "Marked Tariff":** The TO(s) will produce the redline sections (a/k/a marked tariff) for any section(s) of the MISO Tariff in Word format. FERC will only accept Tariff sections in Word format, which are uploaded in the database and then converted to the ".RTF" format. The TO(s) will also ensure the sections have been scrubbed to remove any metadata and track changes.
- **Clean Sections:** MISO's eTariff software will accept the changes to the redline sections, a/k/a "marked tariff" (according to FERC's new terminology), and generate the "marked tariff" into the "clean tariff". MISO Legal will then convert the Word versions of the marked tariff and clean tariff into a .PDF format prior to uploading as attachments to the FERC website.

Important Formats:

- **Attachment Format and Size:** An attachment consists of supporting exhibits and attachments to a filing that are not tariff sections. FERC's size limit for attachments is 50 MB and may be provided in either ".pdf" or ".doc" extension.
- **Section Format and Size:** A section is the actual "tariff" language being filed. FERC uses the term "tariff" generically for any Tariff, Operating Agreement, Service Agreement, etc., that is being filed in eTariff. The sections being uploaded into the eTariff system must be in Microsoft Word format. The sections may not be larger than 10 MB per section. If a section is larger than 10 MB, the sections must be broken out into separate sections which FERC refers to as "child sections". The general explanation of sections is that when a section is filed in eTariff it is entered with a unique Record ID. When the sections are broken down, the sections become a Parent Record and a Child Record, which is similar to a Level 1 and Level 2 in Microsoft Word. Sections may be filed as Parent/Child Records.
- **Section Format Requirements:** Per FERC Order No. 714 and the FERC Technical Conference held on January 21, 2011, FERC clarified that Word sections being submitted in eTariff are to be submitted in simple styles as follows:



- No headers, footers, footnotes, or endnotes
 - No complicated formatting such as automatic generated styles including Table of Contents or Outlines
 - No automatic numbering formats, *i.e.*, no automatic paragraph numbering, no automatic page numbering
 - No text boxes
 - No links to websites, etc., URLs, OLEs, links to Websites
 - Images must be filed in .gif format.
- **New Service Agreements:** New Service Agreements (*e.g.* wires-to-wires interconnection agreements, etc.) must be submitted in Word format. The actual signature pages may be attached to the filing as an “attachment” in a scanned .PDF format and an electronic signature may be added to the signature page in the agreement.
 - **Naming Convention:** The naming convention for the TO filings should include the company name (abbreviated) and the filing date (*e.g.*, 2016-02-18-ENO Pricing Zone Filing.doc).
 - **Timeline:** The TO(s) should forward the final filing package to MISO Legal in the required formats of Word and/or PDF, as identified above, no later than 10:00 AM Eastern on the day the filing is to be made.

TO Documents for Posting to MISO Web Site

MISO Legal will post the following TO documents to the MISO Website:

1. A .PDF of the complete filing package (once the FERC Office of the Secretary has accepted the electronic submission for filing and provides the assigned docket number), which includes the Transmittal Letter and all Attachments. If there are public and non-public versions of the filing, MISO Legal will only post the public version of the filing package to the MISO Web Site.

TO Documents for Service on the FERC Service List, MISO Members, and Stakeholders:

Once the TO filing has been posted to the MISO Website, MISO Legal will send the final filing package to the TO(s) and service will be affected as follows:

1. MISO Legal will serve the parties listed on the FERC service list for existing dockets with an established service list; and
2. MISO Legal will serve the MISO Members and Stakeholders, which is the current practice and will be continued under the eTariff process.



Service Agreement Filings [to which MISO is not a party]

TOs should submit their requests for service agreement filings to Agreements@misoenergy.org. The filing of Service Agreements will be subject to the same procedures as tariff filings. MISO Legal will provide the Service Agreement numbers. However, there may be some differences between the regular Tariff filings and the Service Agreement filings due to timing constraints (*e.g.*, agreements that must be filed within ten (10) days after execution) or other Tariff requirements. Some examples of agreements to be filed by MISO Legal using the eTariff software are Construction Service Agreements (CSAs), Wholesale Distribution Service Agreements (WDSs), or Wires-to-Wires Agreements.¹

MISO Legal will need to know when TOs are filing amendments to existing Service Agreements filed prior to eTariff as those filings will now be performed under the eTariff provisions.

The cancellation of an existing Service Agreement filed prior to eTariff is to be cancelled by MISO Legal through e-File.

¹ The agreements noted here are only a few of the possible agreements to be filed via eTariff.
MISO TO eTariff Guidelines
Updated 8/21/2017



MISO Transmission Owner eTariff Transmittal Form

Please provide the following information with the filing:

1. Company name as registered with FERC:

2. The emails for the attorney submitting the filing. Ensure the attorney and/or TO representative has been registered at FERC. Following is the link to eRegister: <https://www.ferc.gov/docs-filing/eregistration.asp>.
3. The name of the TO attorney(s) that will be providing final sign-off for the filing.
4. Short title of filing with maximum of 70 characters, otherwise MISO Legal will create a short title from the Filing Summary.
5. Filing date: _____
6. Requested effective date:² _____
7. Type of Filing: Initial Section 205 tariff revisions filing, Compliance Filing, Amendment of Pending Tariff Filing (when filing with tariff sections), Data Response/Supplement the Record (if no tariff sections are being filed), Refund Report, or ALJ Settlement.
8. Transmittal letter, all sections for the filing, cover pages, and additional attachments as necessary.
9. Advise if any information in the filing is to be coded as CEII or privileged information. If there is CEII or privileged information, a form protective agreement must be submitted with the filing.
10. Filing summary (blurb) for use in posting the filing to the MISO website and serving the Members and Stakeholders when applicable. Should be two or three sentences.

² The Commission will ordinarily grant waiver of the sixty (60) day notice requirement as required by Section 35.3(a) of the Commission's regulations, 18 C.F.R. § 35.3(a), for a service agreement if the filing is submitted within 30 days of the service agreement's effective date. See *Prior Notice Filing Requirements Under Part II of the Federal Power Act*, 64 FERC ¶ 61,139 (1993). See also *International Transmission Company, et al.*, 139 FERC ¶ 61,022 (2012), P 14.



11. With regard to new Section 205 Service Agreement filings, confirm who will be providing service.

MISO will provide the required metadata as listed below with the filing:

- Company ID
- Tariff Title and Tariff ID
- Filing Title – Will appear in eLibrary and LegalEase. MISO Legal will create a short title from the Filing Summary for posting to MISOenergy.org
- Filing ID
- Parent Record ID
- Child Record ID
- Collation Value



CONVERSION PROCESS

Instructions for minimizing the size of maps, diagrams, charts and graphs to meet FERC's criteria for filing in eTariff and converting to rich text format (RTF).

FERC will only accept tariff sections/agreements uploaded in the eTariff system that are less than 10MB in file size. FERC has requirements with regard to the eTariff system that require re-sizing of maps, diagrams, charts, and graphs. FERC prefers all diagrams, images, etc., to be inserted in “.gif” format. When the images are not in “.gif” format, they enlarge dramatically when converted into rich text format ("RTF") for filing in the XML. At times the non .gif formats appear to be either redacted sections or blank sections when viewed in the FERC eTariff Viewer. The instructions below are a guideline to assist in compressing the maps, etc., from options provided within Microsoft Word if unable to use the .gif format. Please note, this is only one option and there are many others you may prefer to use.

Document Preparation

The first step is to review the document to ensure the document is a ".doc" or “.docx” extension. FERC accepts Microsoft Word with the ".doc" or “.docx” extension for uploading into the eTariff system. The smaller the size the better the chance FERC will accept the map, diagram, chart or graph.

The second step is to review the size of MB or KB of the document that contains the picture.

A screenshot of a Windows Explorer window. The address bar shows the path 'ETariff Technology'. The menu bar includes 'View', 'Tools', and 'Help'. Below the menu bar, there are icons for 'Views' and 'Burn'. The main area displays a table of files with the following columns: Name, Date modified, Type, Size, and Tags. One file is listed: 'Planning picture only.doc', with a date modified of '12/6/2010 12:07 PM', a type of 'Microsoft Office ...', and a size of '162 KB'. The file name and size are highlighted in yellow.

Name	Date modified	Type	Size	Tags
Planning picture only.doc	12/6/2010 12:07 PM	Microsoft Office ...	162 KB	

Conversion Steps

Step 1: Right click into the picture you are re-sizing.

Step 2: Chose the option "Format Picture". This step will not allow me to show a snip-it.

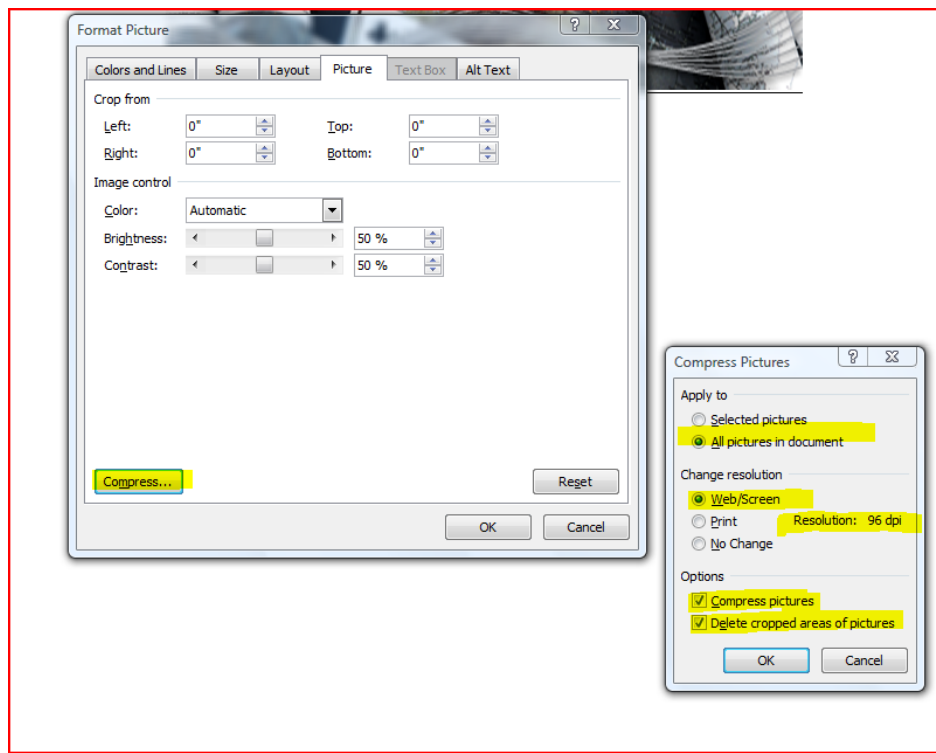
Step 3: Format Picture Options will now be showing in your view.

Step 4: Under Format Picture Options, choose Compress in the bottom left corner.

Step 5: Compress Picture Options will now pop up with more options.

Step 6: Select:

- a) All pictures in the document
- b) Web/Screen which will change the resolution from approximately "200 dpi" to "96 dpi" as an example.
- c) Compress Pictures and
- d) Delete Cropped areas of pictures
- e) Click on OK to save



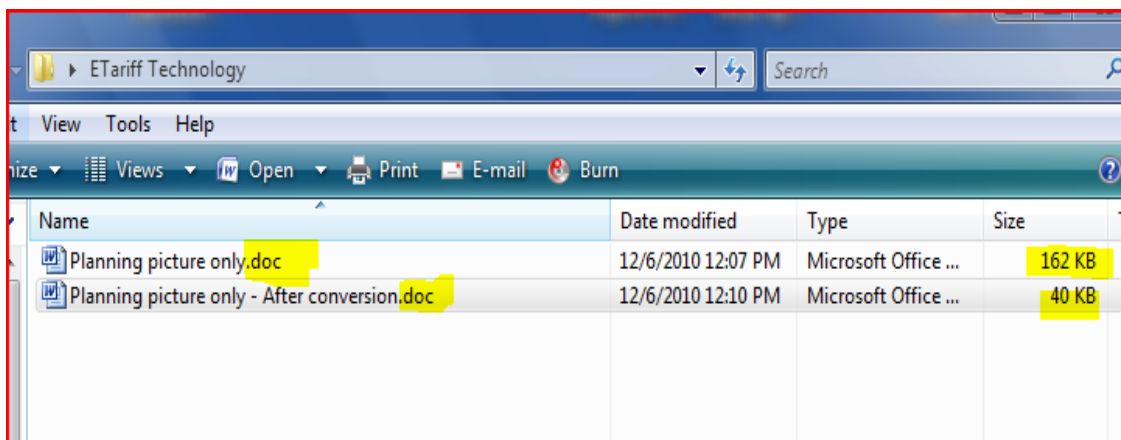


Compare the Document Size from Prior to and After the Conversion

The last step is to compare the document size from the prior version to the converted document to ensure the size is small enough for FERC to accept. A sample of the size comparison after conversion is below.

Size of document before conversion = 162KB

Size of document after conversion = 40KB

A screenshot of a Windows Explorer window showing a folder named "ETariff Technology". The window displays a table of files with columns for Name, Date modified, Type, and Size. Two files are listed: "Planning picture only.doc" with a size of 162 KB and "Planning picture only - After conversion.doc" with a size of 40 KB. The size values are highlighted in yellow.

Name	Date modified	Type	Size
Planning picture only.doc	12/6/2010 12:07 PM	Microsoft Office ...	162 KB
Planning picture only - After conversion.doc	12/6/2010 12:10 PM	Microsoft Office ...	40 KB

If there is any doubt with the size of your document not converting smaller than the 10MB limit FERC imposes, please save in .RTF format to confirm the size of the .RTF file.

If there are problems with converting the diagram, FERC's suggests using ".gifs" versus ".jpegs" to convert if possible for maps, diagrams, etc., for any images being filed. For additional FERC guidance, please review the FERC Implementation Guide or the FERC Discussion Questions at the following two links:

<http://www.ferc.gov/docs-filing/etariff/implementation-guide.pdf>

<http://www.ferc.gov/docs-filing/etariff/responses-discussion-questions.pdf>

Because the .RTF file size can vary significantly, and depends on the version of Microsoft Word being used, you should look at file sizes for both the .doc and the .rtf when checking if it is too large. The .doc and the .rtf combined should be well under 10MB in total file size, to allow for overhead associated with the .XML format required by FERC.