November 2, 2026

Laura Rauch, Executive Director
Midcontinent Independent System Operator
720 City Center Drive
Carmel, IN 46032

SUBJECT: MTEP27 Study Scope Feedback

Dear MISO Planning Staff:

Thank you for the opportunity to provide input on the scope of the MISO Transmission Expansion Plan for MTEP27. These comments reflect various OMS feedback and Board discussions that have occurred over the past year.

OMS continues to support MISO's efforts to advance reliable, economic, and cost-effective transmission planning throughout the region. With unprecedented load growth and increasing transmission investment, it is especially important that MISO's planning processes provide rigorous evaluation of project needs and alternatives, transparent cost attribution, and appropriate protections for existing customers. OMS encourages MISO to prioritize the following areas in MTEP27.

Large Load Planning, Cost Responsibility, and Consumer Protection

OMS believes MTEP27 should prioritize the integration of MISO's developing Large Load Project Review process with its existing transmission planning processes. As OMS has emphasized throughout the Large Load Working Group discussions, transmission upgrades attributable to new large loads must be appropriately identified and assigned to ensure that existing customers are protected from cost shifting.

FERC's June 2026 Large Load Show Cause Order underscores the need for transparent, consistent, and rigorous application and study processes, including the evaluation of alternative transmission technologies and appropriate cost responsibility for network upgrades. OMS encourages MISO to ensure that these principles are fully reflected in MTEP27 planning practices, including the identification of incremental transmission needs attributable to large loads, consideration of existing system needs, and transparent documentation of project costs.

The significant use of Expedited Project Review (EPR) in MTEP26, accounting for nearly $8 billion in project costs, further demonstrates the importance of ensuring that large-load-driven projects receive appropriate scrutiny and cost allocation. OMS supports returning EPR to its originally intended scope and ensuring that the dedicated Large Load Project Review process provides a consistent, transparent, and sufficiently rigorous framework for evaluating these investments.

Importantly, OMS encourages MISO to consider how these improvements apply to transmission projects already identified or approved under existing planning processes, recognizing that prospective reforms alone may not fully address potential cost-shifting concerns.

Local Planning, Age and Condition Project Review

OMS continues to emphasize the importance of independent evaluation in MISO's local transmission planning process, including traceable and visible project cost changes or increases, particularly for Age and Condition projects, which represent substantial investments ultimately borne by customers.

During MTEP26, projected Age and Condition project costs increased from $1.53 billion at SPM-1 to $2.49 billion in the Draft Report, an increase of nearly $1 billion. Such significant changes during the planning cycle reinforce the importance of understanding the timing, justification, and review of project additions and cost revisions. MISO's dashboard is a useful tool and OMS appreciates MISO's staff continued evolution of the dashboard to meet state regulatory needs.

OMS appreciates MISO's ongoing engagement with state regulators regarding its variance review process and encourages continued evaluation of that process in MTEP27. In particular, OMS seeks greater understanding of how MISO identifies and evaluates material project changes, assesses project need and alternatives, reflect cost changes back into cost estimation guides, and determines when additional scrutiny is warranted.

Recent developments in ISO New England (ISO-NE) further demonstrate the value of enhanced independent review. FERC's acceptance of ISO-NE's new Asset Condition framework, developed collaboratively with states and stakeholders, establishes an important and continuing precedent for increasing transparency and evaluation of transmission investments.

Continued State Engagement

As OMS has consistently emphasized in prior MTEP scope feedback, meaningful state regulatory engagement, transparent planning assumptions, and robust evaluation of project needs and costs are essential to ensuring that transmission investments remain justifiable and affordable for customers.

OMS looks forward to continuing its collaboration with MISO and its Transmission Owners on improvements to large load planning, local project review, and cost transparency throughout the MTEP27 cycle.

Sincerely,

Michael T. Carrigan

President, Organization of MISO States, Inc.

Cc: Aubrey Johnson, MISO; Eric Augustus, MISO; Chad Allen, MISO

811 E Washington Avenue, Suite 500 · Madison, WI 53703 · P (515) 243-0742 · F (515) 497-6390
www.misostates.org