OMS Board Comments to MISO on the Integrated Forward Assessment Proposal

OMS Board Vote: January 22, 2026

OMS cautiously supports moving forward with MISO's exploration of an integrated survey framework. OMS recognizes that efficiencies may be gained and confusion may be minimized with a streamlined data collection effort. However, as MISO explores an integrated assessment, the preservation of state jurisdiction and clear lines of coordination with OMS must be kept in mind for choices related to data inputs, scenario development, interpretation of results, and final messaging.

Continued discussion and buy-in from the OMS Board will be required as the process develops and on an ongoing basis in order to ensure effective and useful assessments; agreement on that process is a key component needed before entering this discussion.

As a priority, OMS believes the discussion about forward assessments should focus on the needs of both those with authority over resource adequacy (states) and long-term transmission planning requirements (MISO) first. Additional uses of the data and streamlined processes should be a secondary objective.

These comments provide: 1.) overall input; 2.) a summary of OMS themes heard through discussion; and 3.) specific input to MISO's seven questions to OMS.

OMS welcomes further partnership on these topics and a potential MOU or other agreement (Tariff or BPM revisions) with OMS.

1. Overall OMS Input and Background:

State Needs: Currently, OMS sees benefit in three specific uses and tools from forward assessments. These features should be prioritized regardless of efforts to streamline processes:

1. Robust Futures developed for the long-range transmission planning consistent with MISO's FERC-approved transmission planning responsibilities,
2. Out-year projections of class-level resource accreditation and PRMR values based on various resource mixes and anticipated load; and,
3. A footprint-wide RA snapshot, produced with OMS oversight and collaboration, on both the process and presentation of results (i.e., continued improvement of the joint OMS-MISO Survey).

2. OMS Input Themes:

Better Clarity on MISO's Needs and Current Problems: Many OMS members are still unclear about MISO's intended outcomes and needs for the integrated survey. Clear understanding, and likely agreement, on the 'terms of use' would help garner further OMS support. Consideration of a

Comments passed OMS with 13 in favor, 1 opposed (MS), 1 abstained (MN), 2 absent (Man, MT). Those in favor: AR, IL, IN, IA, KY, LA, MI, MO, CNO, ND, SD, TX, WI.

memorandum of understanding between MISO and OMS may provide sufficient clarity and certainty that OMS members are seeking.

Data Transparency and Proactive Plans: MISO has different legal requirements for the sharing and release of data that states and utilities maintain; data access, transparency, and accountability must be the foundation of this process rather than an afterthought. These process and transparency requirements must meet all stakeholder needs (and most importantly here, states' needs).

Assumptions that are not based on publicly available information or firewalled by NDA or CEII provisions will need to be understood in advance, or the effort runs the risk of becoming unusable for its intended purposes and therefore unsupportable by OMS. We are seeing this issue play out in several areas at MISO currently and want to make sure this is not exacerbated.

Benefit in Streamlined Processes and Collection: OMS does see a benefit in exploring the streamlining of surveys to the extent possible, *if* jurisdictional lines and authorities are not blurred or misconstrued in outputs and narrative. However, streamlining can't be prioritized over the usefulness of results or respecting of jurisdiction. It must be acknowledged that varied and independent surveys may better support and align with state needs.

State Role Preservation: Ensuring continued role in transmission planning and MISO should continue to acknowledge its limited tariff-defined roles in resource adequacy, constrained to conducting the annual Planning Resource Auction. All other RA work by MISO must be viewed through the lens of support for states on an as-needed basis.

Use of Utility, LSE, and Member-Backed Data: OMS requires that any standardization of this data include improved visibility and transparency into how MISO uses LSE data, non-LSE data, and the assumptions used to integrate both into forward assessments. Because utilities vary significantly from state to state, LSE and utility data must remain the baseline and any additional assumptions should be clearly identified as separate inputs, outputs, or scenarios.

Timing/Large Load Forecast: Currently OMS has little visibility in the long-term load forecast, long-term load forecast pilot, and data collection processes. We understand that data will be confidential and not shared with stakeholders or with others. Continued delays in the release of and details behind that data is causing questions among OMS members about whether we should walk before we run. In other words, would it be valuable to see the outcomes and the usefulness of the large load forecast and review other RTOs' experience in that area before we fold these processes into MISO realm and oversight when it might not be workable or beneficial.

Better visibility for OMS (and stakeholders) into the large load development process and data use would likely allow stronger positions and input on the integrated survey approach.

3. Combined Member Survey Responses to MISO's Specific Questions:

1. What is your feedback on the problem statement and guiding principles?

OMS generally agrees that MISO's multiple adequacy and planning assessments serve different use cases, but differences in data, assumptions, scenarios, and messaging can create confusion if not clearly explained.

OMS supports improving coordination across assessments, provided that state jurisdiction over resource adequacy and load forecasting is preserved and mechanisms exist during development or during use of the survey to 'stop work' if jurisdictional lines need clarification or refinement. Guiding principles should include meaningful state and OMS participation in the development of scenarios and sensitivities used in adequacy assessments, consistent with state jurisdiction over resource adequacy and load forecasting.

A single integrated process may be directionally useful, but only with state agreement, sufficient guardrails, full transparency, and flexibility to ensure that use cases for survey data are not blurred or used for purposes not legally intended.

- Guiding principles should explicitly include:
    - Transparency into data sources, assumptions, and methods and plans to execute that transparency, and explicit state agreement, depending on use case for both data input and survey outputs, without those agreements clear and agreed to in advance.
    - State and OMS ability to create scenarios and Futures.
    - Recognition of additional use cases (e.g., NERC LTRA/RSTC)

OMS Modifications and Input re: MISO Draft Guiding Principles

- Build on the long-standing collaboration between OMS and MISO in publishing resource adequacy outlooks, recognizing the states' primary role in resource adequacy.
    - States define what RA outlooks are needed to carry out planning responsibilities they share with regulated utilities.
    - OMS and MISO will continually work together to minimize unintended consequences and harms from RA outlooks, including joint plain language materials on the survey and results.
- Explore whether it is possible to operate with a single integrated process serving various use cases using the best available data.
- Focus on collecting high-quality data
- Clear terms and plans for transparency of data, inputs, overlays, scenarios, and outputs are necessary.
- Provide results on a predictable cadence, ~~using data-driven thresholds and triggers to determine the need for specific analytic steps.~~
- Use a broad range of scenarios to reflect the credible range of unknown variables and use sensitivities to explore additional possibilities.

2. Which elements of MISO' current planning assessments are most useful in supporting state-level planning and decision-making?

The mere existence of the current planning assessment is its most useful element.

In most cases the data and information in the assessment does not directly support or dictate state-level planning and decision making. Providing a sufficiently dependable source of regional information eliminates what would otherwise be an information void, and there is value in that.

The recognition that the OMS-MISO Survey's value strongly lies in the context and support the states provide, shared ownership of messaging is essential and ensure the integrity of state resource adequacy planning.

Analytical outputs and forward-looking results are valuable to states when they are transparent, validated, and interpretable. Assumptions, including zonal power flows and transfer capability assumptions, analysis (including risk assessments) and output are most important to staff.

Direct information sharing with states (and MISO's regional model and outreach) is beneficial since monitoring all MISO meetings is difficult.

3. What aspects of the existing process are not working well?

Concern with use of third-party data or MISO internal data that isn't substantiated or backed up by utilities. Magnitude matters. Small incremental third party/MISO-projected data changing outlooks that have minimal change is not as concerning as major incremental changes that have large effects on outcomes. At the state level, there is accountability behind forecasts as they have tangible cost impacts; we need to make sure that process is preserved (where otherwise not jurisdictionally required to be modified).

Inconsistent or unclear data sourcing across assessments, particularly for large load and data center forecasts; clear understanding and alignment on forecasts and alignment with utility forecast is needed.

Selective use of data, narrative interpretations not supported by OMS, and representation of results that are not comprehensive or fail to recognize the limitations of the assessments by MISO or third parties frequently cause unintended consequences and threaten future collaboration.

Excessive or confusing scenario sets without clear quantitative justification.

4. Are there specific aspects that MISO should prioritize maintaining or enhancing?

- MISO should prioritize enhancing the presentation and dependability of out-year projections of resource accreditation values, PRMR values, and other LOLE study outputs.
- Data access will need to be a forethought, not after thought, on available info to be released, dates by when it will be released, to whom, and under what protections. Further discussion

regarding the Attachment EE process for confidential information at the state level, and general data access restrictions, needs further discussion and work.

- Clear documentation of assumptions, methods, and scenario logic in both technical and plain-language formats and consistency and transparency in assumptions.
- Improved data collection processes with clear instructions, automated checks, and validation steps involving states.
- Continued inclusion of scenarios aligned with state policies, with opportunities for state review and confirmation.
- More robust treatment of large load and data center uncertainty.

5. How should MISO and OMS best continue collaboration on resource adequacy outlooks?

MISO should continue to acknowledge its limited tariff-defined roles in resource adequacy, constrained to conducting the annual Planning Resource Auction. All other RA work by MISO must be viewed through the lens of support for states on an as-needed basis.

OMS should have a clearly defined role in guiding data collection protocols, scenario development, assumptions, and interpretation of results.

- If MISO utilizes transmission planning scenarios for state-jurisdictional RA planning purposes, OMS will need an enhanced role for scenario development process.

States see value – and potential necessity – in formalizing the *OMS role* via a MOU, BPM, or Tariff. Some states still question what, if anything, should be included in the MISO Tariff regarding MISO's forward assessments.

Collaboration must prioritize state jurisdiction over planning and resource adequacy.

OMS involvement should extend to reviewing assumptions, validating state-level inputs, and aligning messaging.

6. What types of scenarios need to be included?

- Scenarios that reflect state policies and approved planning assumptions.
- High data center and large load growth scenarios.
- High electrification scenarios.
- Storage growth scenarios.
- Sensitivities with clear quantitative foundations.

7. Does the June–July timing of OMS–MISO Survey results align with state processes?

States have not raised specific concerns to date. OMS is open to further discussion if alternative timing or formats would better align with state IRP or siting processes. One state reflected that earlier in the year (April or earlier) would align better with state processes.

However, IRP cycles do not conform in any state to specific months or times of year across the MISO footprint. This is likely not a necessary consideration outside of a more known and planned to cadence (every two years, etc.).

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