UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Midcontinent Independent System Operator, Inc., et al.	)	Docket No. EL26-70-000

ANSWER IN SUPPORT OF
THE MOTION TO HOLD PROCEEDING IN ABEYANCE OF
THE MIDCONTINENT INDEPENDENT SYSTEM OPERATOR, INC. AND
THE MISO TRANSMISSION OWNERS BY
THE ORGANIZATION OF MISO STATES, INC.

Pursuant to Rule 213[1] of the Federal Energy Regulatory Commission's ("Commission") Rules of Practice and Procedure and the Commission's Notice Establishing Answer Period, the Organization of MISO States, Inc.[2] ("OMS") respectfully submits this Answer in Support of the Motion to Hold Proceeding in Abeyance[3] of the Midcontinent Independent System Operator, Inc. ("MISO") and the MISO Transmission Owners ("MISO TOs") in the above-caption proceeding.[4]

OMS supports the Abeyance Request because the issues identified by the Commission's Show Cause Order are significant, highly interconnected, and best addressed through a coordinated stakeholder process followed by comprehensive filings under section 205 of the Federal Power Act. An abeyance period will provide the necessary opportunity for MISO, MISO TOs, states,

[1] 18 C.F.R. § 385.213.

[2] OMS filed a Motion to Intervene Out-of-Time on July 15, 2026. OMS is a non-profit, self-governing organization comprised of representatives from the seventeen regulatory bodies with jurisdiction over entities participating in MISO and serves as the regional state committee for the MISO region. OMS coordinates regulatory oversight among its members, makes recommendations to MISO, the MISO Board of Directors, the Commission, and other government entities, and intervenes in proceedings before the Commission to express the positions of OMS members.

[3] *Motion of the Midcontinent Independent System Operator, Inc. and the MISO Transmission Owners to Hold Proceeding in Abeyance and Request for Shortened Answer Period and Expedited Treatment*, Docket No. EL26-70-000 (Aug. 3, 2026) ("Abeyance Request").

[4] *Midcontinent Independent System Operator, Inc.*, Order Instituting Proceeding Under Section 206 of the Federal Power Act, 195 FERC ¶ 61,212, at P 37 (2026) ("Show Cause Order").

load-serving entities, consumer advocates, and other stakeholders to develop durable reforms that address the Commission's concerns in a holistic manner.

At the same time, OMS's support for the Abeyance Request is conditioned on the expectation that the stakeholder process and resulting filings will fully address the issues identified by the Commission. Granting abeyance should not narrow the scope of the Commission's inquiry or prejudge whether any particular issue has been adequately resolved when the Commission evaluates MISO's compliance filing in this proceeding made on or before November 16, 2026.

I. ANSWER

A. OMS Supports the Request to Hold this Proceeding in Abeyance.

OMS supports MISO's and the MISO TOs' Abeyance Request because the Commission has identified a broad set of complex and interrelated issues that require robust participation from all MISO stakeholders to develop durable, regionally tailored solutions. The Commission's Show Cause Order recognizes that the process for serving new large loads raises significant questions concerning transmission planning including increased transparency, meaningful consideration of alternative solutions, and the equitable assignment of costs and risks. MISO has made considerable progress on several of these issues to date, but more time is needed.

OMS's support is premised on the understanding that the abeyance period will be used to develop comprehensive reforms addressing all issues identified by the Commission. The purpose of the abeyance should not be simply to delay the proceeding, but rather to facilitate the development of a complete record and meaningful reforms that can be evaluated as an integrated package. To that end, OMS appreciates MISO and the MISO TOs' recognition of the critical role

states play in managing affordability and their commitment to continued collaboration with the states to develop and finalize solutions to the Show Cause Orders' directives.[5]

A coordinated stakeholder process, followed by successive section 205 filings, provides the best opportunity to produce reforms that are durable, regionally appropriate, and supported by a broad set of stakeholders. Such an approach also provides stakeholders with a meaningful opportunity to evaluate how proposed changes interact with one another before the Commission is asked to determine whether the overall package satisfies the concerns identified in this proceeding.

OMS also recognizes that the MISO region presents unique circumstances. While the Commission's inquiry was informed by developments occurring across multiple regions, including PJM, the MISO region has distinct planning processes, regulatory structures, and load growth patterns. Accordingly, reforms should be tailored to the operational and governance characteristics of the MISO region while still adhering to the Commission's objectives regarding the reliable, efficient, and equitable interconnection of large loads.

B. The Show Cause Order Appropriately Identifies the Core Issues Requiring Reform.

The Commission's Show Cause Order appropriately focuses attention on issues that states within the MISO region have increasingly observed as requests to interconnect and serve new large loads continue to accelerate. States have attempted to properly align the costs and risks presented by large loads using the regulatory tools available, but a comprehensive solution requires concerted coordination and partnership between state and federal regulators. These developments have significant implications not only for customers seeking service, but also for existing customers that

[5] Abeyance Request at p. 8.

may ultimately bear the costs and reliability risks associated with investments required to accommodate new large load customers.

OMS appreciates the Commission's focus on large load interconnection issues including:

- improving transparency regarding transmission costs associated with serving new large loads;
- addressing the potential for inappropriate cost shifting when anticipated load does not ultimately materialize or materializes at a different scale or schedule than expected;
- evaluating circumstances in which costs may shift among load-serving entities within a transmission pricing zone;
- ensuring that transmission-related reliability risks associated with delayed or uncertain load development are appropriately considered;
- improving transparency surrounding transmission service studies and study assumptions;
- enhancing transparency throughout the transmission study process generally;
- evaluating flexible transmission service options where appropriate;
- considering the role of Grid-Enhancing Technologies and other Alternative Transmission Technologies to efficiently address new load requests; and
- addressing any additional issues identified by the Commission relating to the equitable allocation of costs and the efficient integration of new large loads.

Several of these issues have been the subject of ongoing stakeholder discussions within MISO. OMS appreciates MISO's proactive leadership to develop workable solutions to these issues, but we note that workstreams prioritized by MISO and stakeholders to date have been limited to those issues supported by parties largely interested in developing and serving large loads. The Commission's Show Cause Order now provides an important opportunity to evaluate the additional issues necessary to ensure MISO's large load framework addresses the affordability, reliability, transparency, and cost allocation concerns that are important to states, consumers, and other stakeholders. OMS agrees that this broader review is both timely and appropriate, and we expect that MISO will work with states on how best to prioritize these issues.

As MISO continues to evaluate reforms intended to facilitate service for new large loads, it is equally important that the stakeholder process fully address the corresponding concerns of existing customers, state regulators, and consumer advocates regarding affordability, reliability, transparency, and equitable cost allocation. The Show Cause Order appropriately broadens the discussion, beyond simply facilitating new service requests, to ensure that the resulting framework fairly balances all affected interests.

C. OMS Intends to Participate in Developing Comprehensive Solutions.

OMS intends to participate throughout the MISO stakeholder process during the abeyance period. States have a significant interest in ensuring that reforms promote reliable electric service while protecting consumers from unreasonable costs and inappropriate cost shifting.

OMS expects that meaningful, long-term solutions will require a combination of wholesale reforms to MISO's Tariff and complementary actions by state regulators where retail issues or state-jurisdictional cost allocation considerations exist. A collaborative stakeholder process provides the appropriate forum for developing these solutions before they are presented to the Commission through section 205 filings.

OMS likewise intends to participate fully in reviewing and responding to any filings submitted by MISO and individual MISO TOs during the abeyance period and to assist in developing a complete record addressing the Commission's concerns as detailed in the Show Cause Order.

D. All Issues Identified in the Show Cause Order Should Remain Open Throughout the Abeyance Period.

While OMS supports granting the Abeyance Request, the Commission should make clear that all issues identified in the Show Cause Order remain open throughout the abeyance period. The Commission should evaluate the resulting section 205 filings as a comprehensive package

rather than treating individual issues as resolved based on isolated proposals developed in the stakeholder process and interim 205 filings.

OMS appreciates MISO and the MISO TOs' acknowledgement that reforms are needed to improve transparency and ensure that the costs of serving new large loads are assigned fairly. OMS intends to work constructively within the MISO stakeholder process to help achieve meaningful reforms and will remain engaged throughout the proceeding and thereafter.

Accordingly, the Commission should treat all issues relating to the interconnection of large loads including increased transparency in the planning process, equitable cost assignment, protection from cost shifting, and meaningful consideration of alternatives as unresolved until the record developed during the full abeyance period – including all filings submitted in response to MISO and the MISO TOs' ultimate response to the Show Cause Order – is complete. Only then will the Commission be positioned to determine whether the package of reforms adequately addresses the concerns identified in its Show Cause Order. Continued stakeholder engagement with FERC will be imperative at the end of the abeyance period to ensure a final check on the holistic set of reforms has been appropriately addressed.

II. CONCLUSION

For the foregoing reasons, OMS respectfully requests that the Commission grant MISO and the MISO TOs' Motion to Hold Proceeding in Abeyance. In doing so, the Commission should make clear that the purpose of the abeyance is to facilitate the development of comprehensive reforms addressing all issues identified in the Show Cause Order and that no issue should be deemed resolved until the Commission has had the opportunity to review the complete package of stakeholder-developed proposals, section 205 filings, MISO and the MISO TOs' final response to the Show Cause Order, and the responses of interested parties thereto.

OMS submits this Answer because a majority of OMS members support this filing.[6] This should not be construed to mean that all OMS members agree with all comments herein. Individual OMS members reserve the right to file separate comments. In recognition of such, the following members voted in support of this filing:

Arkansas Public Service Commission
Illinois Commerce Commission
Iowa Utilities Commission
Indiana Utility Regulatory Commission
Kentucky Public Service Commission
Michigan Public Service Commission
Minnesota Public Utilities Commission
Mississippi Public Service Commission
Missouri Public Service Commission
New Orleans City Council
North Dakota Public Service Commission
South Dakota Public Utilities Commission
Public Service Commission of Wisconsin
Public Utility Commission of Texas

The Louisiana Public Service Commission abstained from the vote on this filing. The Manitoba Public Utilities Board and the Montana Public Service Commission did not participate in the vote.

Respectfully submitted,

/s/ Brad J. Pope
Brad Pope
Legal and Regulatory Director
Organization of MISO States
811 E. Washington Ave., Suite 400
Madison, WI 53703
brad@misostates.org

/s/ Tricia DeBleeckere
Tricia DeBleeckere
Executive Director
Organization of MISO States
811 E. Washington Avenue, Ste. 400
Madison, WI 53703
tricia@misostates.org

Dated: August 7, 2026

[6] The Iowa Office of Consumer Counselor and the Minnesota Department of Commerce are Associate Members of OMS, and they support these Comments.

CERTIFICATE OF SERVICE

I certify that I have served the preceding document upon each person designated on the official service list prepared by the Secretary for this proceeding in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure. 18 C.F.R. § 385.2010.

/s/ Brad J. Pope

Brad Pope
Director of Legal & Regulatory Affairs
Organization of MISO States
811 E. Washington Avenue, Suite 400
Madison, WI 53703
brad@misostates.org

Dated: August 7, 2026