UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Midcontinent Independent System Operator, Inc.	)	Docket No. ER26-3650-000

NOTICE OF INTERVENTION AND COMMENTS OF THE ORGANIZATION OF MISO STATES, INC.

The Organization of MISO States, Inc. ("OMS") submits this Notice of Intervention and Comments regarding proposed tariff revisions filed by the Midcontinent Independent System Operator, Inc. ("MISO") with the Federal Energy Regulatory Commission ("Commission") in the above-captioned proceeding.[1] On August 28, 2026, MISO filed proposed revisions to its Open Access Transmission, Energy, and Operating Reserves Markets Tariff ("Tariff") to establish certain Interconnection Reliability Requirements for Large Loads ("IRR Filing"). As noted in its transmittal letter, MISO's IRR Filing includes a new Section 37A of the Tariff and proposes requirements that directly address several aspects of the Commission's directives in its Show Cause Order issued on June 18, 2026.[2] Specifically, MISO proposes visibility, ramp rate, and disturbance ride-through requirements for Large Loads, as well as transition provisions designed to minimize disruption to existing commercial arrangements.

I. NOTICE OF INTERVENTION

OMS is a non-profit, self-governing organization comprising representatives from the seventeen regulatory bodies with jurisdiction over entities participating in MISO and serves as the

[1] *Midcontinent Indep. System Operator, Inc.*, Interconnection Reliability Requirements for Large Loads, Docket No. ER26-3650 (August 28, 2026) ("IRR Filing").

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

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 relevant government entities and intervenes in proceedings before the Commission to express the positions of OMS members. OMS has an interest in this proceeding given the potential impact to Bulk Electric System reliability, interconnection of Large Loads overseen by state and local processes, and eventual cost impacts to customers. As such, OMS files its Notice of Intervention in this proceeding under Rule 214(a)(2) of the Commission's Rules of Practice and Procedure.[3]

Service of pleadings, documents, and communications in this proceeding should be made on the following:

Tricia DeBleeckere
Executive Director
Organization of MISO States, Inc.
811 E. Washington Ave., Suite 400
Madison, WI 53703
tricia@misostates.org

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

II. COMMENTS

OMS supports stringent and clear Tariff requirements needed to address interconnection reliability and data transparency concerns associated with Large Loads. MISO's IRR Filing establishes guidelines and requirements for the integration of Large Loads that will be increasingly important to the future reliability of the Bulk Electric System ("BES"). With Large Loads becoming a key driver of increases in interconnection requests and electricity demand growth, this is an important time to establish appropriate reliability requirements for these resources.

The IRR Filing is intended to respond to the Commission's Show Cause Order and appears to establish important requirements for Large Loads to address system reliability during a period of dramatic growth in interconnection requests and electricity demand driven primarily by these

[3] 18 C.F.R. § 385.214(a)(2) (2026).

loads. The size of these loads, their speed to power requirements, and the new operational risks introduced by computational loads warrant a regulatory response to ensure the stability of the BES. To this end, OMS generally supports MISO's focus on Visibility, Phasor Measurement Unit ("PMU"), Ramp, and Ride-Through Requirements, recognizing the potential for improvements as knowledge is gained on these types of loads. While NERC's process to develop industry-wide guidelines is underway, it is appropriate to implement requirements now to safeguard reliability and complement NERC's eventual requirements.

OMS recommends that the Commission evaluate the various proposals for Large Load requirements before it holistically, recognizing that Large Loads may interconnect across multiple transmission providers and that consistent, appropriately coordinated requirements will be important to maintaining BES reliability. Once the various proposals are filed, the Commission should consider whether additional coordination or standardization is necessary to ensure that reliability requirements appropriately address the risks presented by Large Loads across the broader interconnected system. Further, reliability requirements must consider the relative costs and benefits of any proposals, as well as how those costs will be allocated. OMS is concerned that MISO's application fails to address these important issues.

In the sections below, OMS highlights the importance of each of the proposed requirements and their importance to the MISO region.

A. OMS Generally Supports the New Large Load and Computational Load Definitions and Applicability of the Interconnection Reliability Requirements.

MISO's definition of "Large Load"[4] in the IRR Filing is generally consistent with an emerging industry approach that uses a 50 megawatt ("MW") threshold to identify loads subject

[4] *IRR Filing*, Tab A (IRR Tariff Redlines) at Definitions – L ("Proposed IRR Tariff"); *IRR Filing*, Tab C (Prepared Direct Testimony of BeiBei Li, Senior Manager of Strategic Assessment) at 12.

to enhanced reliability requirements.[5] While a 50 MW threshold is relatively low compared to the gigawatt-scale load additions being proposed across the country, it is important to note that MISO has also included a separate definition of Computational Load. MISO's separate definition of Computational Load appropriately recognizes that certain loads present operational characteristics and reliability risks that warrant additional requirements beyond those applicable to Large Loads generally. Computational Loads can experience dramatic and coordinated changes in demand, potentially across multiple facilities, that may create significant impacts to system voltage, frequency, and stability. Establishing additional requirements for these loads is therefore appropriate.

MISO's IRR Filing establishes requirements applicable to Large Loads and Computational Loads, identifies the circumstances under which exceptions may apply, and defines the requirements for those exceptions. OMS supports subjecting all Large Loads to visibility requirements, with Computational Loads being subject to additional PMU, Ride-Through, and Ramp requirements to account for their potentially increased operational risks.

B. OMS Generally Supports the Transition Provisions.

OMS generally supports MISO's proposed transition provisions, which apply the full set of Interconnection Reliability Requirements to incoming Large Loads while limiting application of the IRR to Large Loads that are in an advanced stage of development as of December 4, 2026. These provisions appear to balance the need to avoid disrupting existing commercial arrangements with the need to ensure that the substantial majority of new Large Loads are subject to meaningful visibility and reliability requirements.

[5] PJM, SPP, CAISO, ISO-NE, etc.

OMS recognizes the practical and legal considerations associated with applying new requirements to projects that are already significantly advanced in their development. At the same time, reliability risks associated with Large Loads do not necessarily depend on when a load becomes operational. Accordingly, OMS encourages the Commission and MISO to continue to consider whether the transition provisions appropriately balance these considerations and, in particular, whether loads that present material reliability risks should be subject to appropriate reliability requirements regardless of their development status.

OMS is concerned with MISO's decision to exempt qualifying Large Loads from Ramp and Ride-Through requirements for Large Load additions through MTEP 2026. As of the September 2026 System Planning Committee, MISO has planned for 46.5 GW of Large Load additions in their Expedited Project Review ("EPR") process since 2020.[6] MISO's reasoning for grandfathering this magnitude of Large Loads is unclear to OMS and may constitute a significant reliability risk to the grid despite the applicability of other visibility requirements to all Large Loads. The fact that some Large Loads are further along in the development process does not justify exempting them from these important requirements governing Ramp and Ride-Through capabilities and procedures that will eventually apply to all future Large Loads.

C. OMS Generally Supports MISO's Proposed Operational Requirements.

MISO's proposed Visibility, PMU, Ramp, and Ride-Through Requirements appear to align with the Commission's direction in the Show Cause Order and appropriately distinguish between the reliability risks presented by Large Loads and the risks presented by Computational Loads. Taken together, MISO intends these requirements to respond to the Commission's direction to

[6] *Preliminary MTEP26 Review*, MISO System Planning Committee of the Board (Sept. 15, 2026), available at: https://cdn.misoenergy.org/20260915%20System%20Planning%20Committee%20of%20the%20BOD%20Item%2005%20Preliminary%20MTEP26%20Review780457.pdf.

establish a framework for obtaining information and operational capabilities to maintain reliability as these loads increasingly connect to the BES.

The Visibility requirements are foundational to this framework and are designed to provide necessary information about the Large Loads coming onto the system that planners and operators can use to support assessments and reliability risks based on real data. OMS strongly supports applying these Visibility requirements to all Large Loads, as MISO has proposed. While MISO has proposed high-level requirements in its Tariff, OMS recognizes that significant implementation details will need to be developed in the Business Practice Manuals ("BPMs"). OMS expects to engage in this process to help ensure that the requirements provide MISO and impacted entities with the information necessary to plan and operate the system while remaining practical for Load Serving Entities and Large Load Customers.

OMS also recognizes that forecasting requirements for Large Loads present unique challenges. The rapid development of these facilities, uncertainty regarding project timelines and ultimate load levels, and the potential for substantial deviations between forecasted and actual demand may make accurate forecasting difficult. OMS encourages the Commission, MISO, and its stakeholder community to carefully consider the appropriate level of forecasting obligations, including how responsibility for inaccurate forecasts should be allocated and whether penalties or other consequences are appropriate when forecasts prove inaccurate despite reasonable efforts to comply with the requirements.

It is also appropriate to apply Ramp requirements to Computational Large Loads. Since these individual loads are often coordinated by a single owner across multiple sites, there is a significant risk of near-instantaneous, multi-gigawatt ramping needs. Such changes could exceed the ability of the BES to respond within a given timeframe. Establishing an initial 30 MW/minute

ramping limit for Large Loads, while providing MISO the ability to authorize deviations based on the operational capabilities of the BES, appropriately balances reliability considerations with the operational needs of these loads. This approach will reduce the risk of reliability impacts while allowing Computational Loads to ramp more rapidly when system conditions permit. The BPM should include language that decisions to authorize deviations shall be shared among the LSEs that own the generation, applicable Transmission Owners, and MISO.

Finally, Ride-Through requirements are necessary for similar reasons. Recent grid events have demonstrated that the sudden tripping of clusters of Large Loads can create cascading impacts and place significant strain on the BES. Applying Ride-Through requirements to Computational Loads is therefore appropriate to mitigate their unique risks, support system stability during disturbances, and assist with system recovery during stability events. However, MISO Ride-Through requirements must be market tested; if the inverter market can meet these requirements, they are appropriate.

III. CONCLUSION

OMS submits these Comments because a majority of OMS members support this filing. 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:

Illinois Commerce Commission
Iowa Utilities Commission
Indiana Utility Regulatory Commission
Kentucky Public Service Commission
Louisiana Public Service Commission
Michigan Public Service Commission
Minnesota Public Utilities 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 Arkansas Public Service Commission and the Mississippi 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 on this filing.

Respectfully submitted,

/s/ Brad J. Pope
Brad Pope
Director of Legal and Regulatory Affairs
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 Ave, Suite 400
Madison, WI 53703
tricia@misostates.org

Dated: September 18, 2026

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: September 18, 2026