UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Midcontinent Independent System Operator, Inc.	)	Docket No. ER26-3813-000

NOTICE OF INTERVENTION AND COMMENTS IN SUPPORT 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 September 21, 2026, MISO filed proposed revisions to Attachment X – Generator Interconnection Procedures ("GIP") of its Open Access Transmission, Energy, and Operating Reserves Markets Tariff ("Tariff") with two main objectives: 1.) to reform the Generator Interconnection Queue ("GIQ") restudy process for all Definitive Planning Phase ("DPP") cycles; and 2.) to reduce the size of its 2022-DPP Cycle ("GIQ Reform Filing"). With respect to the second objective, MISO proposes to allow all Interconnection Customers in the DPP-2022 Cycle a one-time, unconditional opportunity to withdraw from the queue penalty-free at Decision Point II. In exchange, the threshold for penalty-free withdrawal after Decision Point II would be increased.[2] These provisions, if approved, would encourage the timely exit for unviable projects and, thereby, accelerate the study process for later DPP cycles.

OMS recognizes that a functional interconnection queue is essential to reliability, resource adequacy, competition, and effective planning. Since the DPP-2022 Cycle predates MISO's recent

[1] *Midcontinent Indep. System Operator, Inc.*, Legacy Queue Acceleration and Restudy Limitation Proposal, Docket No. ER26-3650 (Sept. 21, 2026) ("GIQ Reform Filing").

[2] GIQ Reform Filing, Transmittal Letter at 2.

queue reforms and continues to experience delays and uncertainty, OMS supports targeted measures to address the legacy backlog. Specifically, OMS tentatively supports a one-time, penalty-free withdrawal opportunity for DPP-2022 projects, an increase in the penalty-free withdrawal threshold from 35% to 50%, and a defined post-Phase 3 withdrawal window for future DPP cycles followed by a final restudy when necessary to address identified reliability impacts. OMS views these measures as practical complements to MISO's broader queue reforms that can reduce unnecessary study work, provide greater certainty to interconnection customers, and help ensure that newer reforms can operate effectively.

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 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. 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:

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[3] 18 C.F.R. § 385.214(a)(2) (2026).

II. COMMENTS

OMS has consistently supported efforts to establish a more efficient, predictable, and manageable GIQ process. In its prior comments supporting MISO's GIQ Cap proposal, OMS recognized that the size of the interconnection queue had reached an unmanageable level and supported measures to bring the queue to a size at which MISO could conduct realistic studies and process interconnection requests more effectively.[4] OMS similarly supported MISO's GIQ "quality" reforms, including measures intended to ensure that projects entering the queue are sufficiently mature and viable to proceed through the interconnection process.[5] In these and other filings, OMS recognized that a functional interconnection queue is essential to resource adequacy, reliability, competition, and the ability of states and Load Serving Entities to plan for and procure needed generation.

While those reforms are important for establishing a more sustainable process going forward, they did not apply retroactively to the DPP-2022 Cycle – the subject of this filing. The current condition of MISO's DPP-2022 demonstrates that additional action is necessary. Years of cascading delays in older DPP cycles have contributed to MISO's inability to timely process subsequent queue cycles and have created substantial uncertainty for interconnection customers, Transmission Owners, Load Serving Entities, and state regulators.[6] MISO's creation of the Expedited Resource Addition Study process and its recent announcement that the application deadline for DPP-2026 has been moved to January 15, 2027, further demonstrate the continuing effects of the legacy backlog.

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[4] *Notice of Intervention and Comments of OMS*, Docket No. ER24-341-000 (filed Dec. 4, 2023).

[5] *Notice of Intervention and Comments of OMS*, Docket No. ER25-507-000 (filed Dec. 16, 2024).

[6] Significant uncertainty is also caused by the substantial volume of GIAs that are signed but have delayed in-service dates.

OMS therefore tentatively supports MISO's proposal to both allow a one-time, penalty-free withdrawal in DPP-2022 and limit post-Phase 3 restudies to circumstances in which a reliability impact is identified through an appropriate reliability screen. OMS believes this approach can materially accelerate the processing of legacy queue cycles while preserving MISO's responsibility to identify and address reliability concerns. OMS urges the Commission to approve MISO's proposal and supports MISO's continued efforts to develop complementary measures that can accelerate the resolution of the legacy backlog while protecting projects that remain in the queue from inappropriate or avoidable cost impacts.

A. DPP 2022 One-Time Withdrawal Opportunity

OMS tentatively supports MISO's proposal to provide, for the DPP-2022 Cycle, a one-time, penalty-free withdrawal opportunity for all Interconnection Customers at Decision Point II. OMS also supports increasing the threshold for penalty-free withdrawal and milestone-payment refunds from 35% to 50% of combined Network Upgrade and Affected System costs, measured from Phase II through the beginning of GIA negotiations.

The DPP-2022 Cycle presents an appropriate opportunity for targeted relief. A one-time opportunity to withdraw without penalty would allow projects that are no longer viable to exit the queue without perpetuating the cycle of late-stage withdrawals and restudies that has contributed to the legacy backlog. This targeted relief is consistent with OMS's longstanding position that the size and composition of the interconnection queue must be managed so that MISO can devote its resources to projects that are potentially viable to proceed. Should this withdrawal opportunity prove effective with DPP-2022, OMS would support applying this same principle to additional cycles in follow-up filings. MISO's more recent reforms will remain ineffectual until these legacy queue cycles are cleared.

B. A Defined Withdrawal Process for Future DPP Cycles

For future DPP cycles, OMS is not opposed to MISO's proposal to establish a single withdrawal window after Phase 3, followed by a final restudy upon its conclusion, if necessary. OMS agrees that post-Phase 3 restudies should be focused on circumstances in which additional study is necessary to address identified reliability impacts. Limiting restudies in this manner would allow MISO and the Transmission Owners to reduce unnecessary study work while preserving its ability to identify and address legitimate reliability concerns.

A defined final withdrawal opportunity would also provide greater certainty to both MISO and Interconnection Customers. Once the withdrawal window closes and any necessary final restudy is completed, the remaining projects can proceed without the continuing cycle of withdrawals and restudies that has contributed to delays in the legacy queue.

OMS is concerned, however, that the proposed withdrawal framework could have downstream cost-allocation consequences that are not yet sufficiently understood. MISO should explain how its screening and subsequent reliability studies will identify upgrades that remain necessary following withdrawals, and how those costs will be reassigned through later DPP cycles, affected system studies, and MTEP. Greater transparency through this process – along with the large load study process and assumptions – is necessary to ensure costs appropriately follow the projects that cause them and do not ultimately shift to transmission customers and retail rate payers.

C. The Legacy Queue Must Be Resolved for Recent Reforms to Succeed

OMS's prior support for the Queue Cap and Queue Quality reforms reflects a consistent principle: MISO needs a manageable and sufficiently mature interconnection queue to produce timely and meaningful study results. The current legacy queue presents a different but related challenge. Projects that entered the queue under prior rules continue to generate cascading delays

that consume resources and impede the processing of subsequent cycles. Until that backlog is substantially reduced, the benefits of MISO's recent queue reforms are expected to remain constrained.

MISO's proposal provides a targeted means of addressing this problem. The DPP-2022 penalty free withdrawal would provide an immediate opportunity to reduce the number of projects remaining in a legacy cycle, while the proposed single withdrawal window and final restudy process would help prevent the same cycle of repeated withdrawals and restudies from continuing in future DPP cycles. As such, OMS supports these measures as a practical complement to the Commission's and MISO's broader interconnection reforms.

III. CONCLUSION

OMS tentatively supports MISO's proposed measures to reduce the legacy interconnection queue and establish a more predictable process for future DPP cycles. For the DPP-2022 Cycle, OMS supports the proposed one-time, penalty-free withdrawal opportunity and the increase in the applicable cost threshold from 35% to 50%. For future DPP cycles, OMS is not opposed to a single post-Phase 3 withdrawal window followed by a final restudy focused on identified reliability impacts, provided MISO's study process ensures that necessary upgrades are identified and resulting costs remain with the appropriate cost-causer rather than shifting downstream to transmission customers. OMS's support for these measures builds on its prior support for MISO's Queue Cap and Queue Quality reforms. Those reforms established important mechanisms for managing the queue going forward, but targeted action is needed now to address the legacy backlog that predates them.

Finally, OMS recognizes the timing constraints associated with this filing but remains concerned that increasingly compressed stakeholder processes limit states and other stakeholders'

ability to meaningfully evaluate significant Tariff changes. OMS encourages MISO and the Commission to ensure sufficient time for meaningful stakeholder review wherever practical to ensure downstream ramifications do not hinder progress and speed to power.

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:

Arkansas Public Service Commission

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

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

Respectfully submitted,

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Dated: October 5, 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.

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Dated: October 5, 2026