UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Midcontinent Independent System Operator, Inc.	)	Docket No. ER27-25-000

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 October 2, 2026, MISO filed proposed revisions to its Open Access Transmission, Energy, and Operating Reserves Markets Tariff ("Tariff") to establish a Large Load Addition Resource Study ("LARS") process including associated application and operational requirements to enable loads greater than or equal to 200 MW and associated generation to be studied together. MISO states the LARS Filing is intended to address the Commission's preliminary finding in its June 18, 2026 Show Cause Order that MISO's Tariff may be unjust and unreasonable because it does not provide generator interconnection study procedures that account for the operational dynamics of serving electrically proximate Large Loads.[2]

OMS cannot support LARS in its current form but recognizes the potential benefits of a narrowly tailored process for coordinated studies of Large Loads and associated generation. OMS has significant concerns with the proposed framework, particularly the absence of comprehensive and enforceable protections against transmission cost shifting to existing customers, as well as

[1] *Midcontinent Indep. System Operator, Inc.*, Large Load Addition Resource Study Process, Docket No. ER27-25-000 (October 2, 2026) ("LARS Filing").

[2] *Midcontinent Independent System Operator, Inc.*, Order Instituting Proceeding Under Section 206 of the Federal Power Act, 195 FERC ¶ 61,212 at P 113 (2026) ("Show Cause Order").

deficiencies in study transparency, project eligibility and readiness, coordination with existing planning and interconnection processes, and potential impacts on competition and MISO's generator interconnection queue.

Notably, OMS could support a LARS framework that facilitates reliable and efficient Large Load integration while protecting existing customers and preserving nondiscriminatory access to transmission, as discussed below.

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. 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, resource adequacy, 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:

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[3] 18 C.F.R. § 385.214(a)(2) (2026).

II. COMMENTS

OMS recognizes the potential benefits of coordinating studies of significant new electricity loads and associated generation, including more efficient transmission solutions, improved coordination, and greater certainty for customers seeking interconnection. OMS also emphasizes the importance of integrating Large Loads reliably and efficiently while protecting existing customers from unjust and unreasonable costs. However, the proposed LARS process raises significant concerns regarding transmission cost allocation, ratepayer protection, study transparency, project readiness, coordination with existing planning and interconnection processes, and potential impacts on competition and MISO's generator interconnection queue. In recognition of these issues, OMS cannot support LARS in its current form but could support a filing that addresses these concerns.

Before implementation, MISO and the Transmission Owners must establish a just and reasonable, enforceable framework that assigns transmission costs caused by the interconnection and operation of Large Loads and associated generation to the responsible customers, consistent with the Commission's cost-causation principles. This framework must address not only directly attributable Network Upgrades, but also subsequent transmission investments identified through other planning processes, including associated reliability projects and Baseline Reliability Projects, as well as potential cost shifts arising from congestion, energy prices, and ancillary service requirements.

Furthermore, LARS must not divert resources from MISO's obligation to achieve its 373-day generator interconnection queue processing commitment under its Tariff and Order No. 2023. Given the evolving nature of Large Load integration and ongoing interconnection reforms, OMS also recommends a five-year sunset and formal review to ensure that a separate expedited study

pathway remains necessary and appropriate. OMS respectfully requests that the Commission require these modifications and safeguards before permitting LARS to proceed.

A. OMS Supports the Concept of Coordinated Large Load and Generation Studies, but Not LARS as Proposed.

OMS supports continued consideration of a narrowly tailored process for sufficiently mature, high-impact projects where coordinated studies provide clear benefits. Coordinated studies of Large Loads and associated generation may identify more efficient transmission solutions, reduce duplicative work, and improve visibility into the infrastructure needed to reliably serve new demand. These benefits depend on credible project assumptions, coordination with other planning processes, and appropriate cost allocation.

That said, LARS cannot become another departure from MISO's established generator interconnection procedures and could create preferential treatment for certain projects relative to those participating in the standard GIQ. OMS recognizes that the unprecedented scale and pace of Large Load development, along with recent federal directives, may warrant consideration of a specialized study process. Nevertheless, any such departure must be narrowly tailored, supported by demonstrated need, and subject to appropriate safeguards to preserve nondiscriminatory access to transmission capacity and prevent adverse impacts on existing queue participants. Consistent with OMS's prior conditional support for the Expedited Resource Addition Study (ERAS) process as a limited, one-time measure, OMS believes that exceptions to established interconnection procedures should not become permanent alternatives to the standard GIQ without a demonstrated and continuing need.

Accordingly, LARS cannot become a general alternative to the existing GIQ or provide preferential access to transmission capacity without adequate safeguards for existing queue participants and transmission customers. Expedited studies are not necessarily beneficial if

unreliable assumptions, repeated restudies, cost shifting, or delays to other customers result. OMS's willingness to consider LARS is therefore contingent upon meaningful limitations on its scope and duration, including the five-year sunset and formal review recommended in Section G. The Commission should evaluate LARS within MISO's broader Large-Load integration framework and require reliable, transparent, and cost-responsible outcomes.

B. Transmission Cost Allocation Must Be Resolved Before Implementation.

i. Large Loads must bear the costs they cause.

During the development of the LARS framework, OMS Work Groups provided feedback that MISO's proposal does not adequately address transmission cost allocation. The Work Groups recommended that MISO consider Market Participant Funded Projects ("MPFPs") for upgrades driven by Large Loads and use MISO's work on Transmission Cost Shifting Risk to inform the treatment of LARS-related costs. These concerns remain fundamental. Large Loads may require substantial transmission investments to address thermal and voltage constraints, maintain reliability, and accommodate requested demand. Such costs should not be shifted to existing retail customers, load-serving entities, or other transmission customers merely because upgrades are classified as regional or reliability projects.

OMS requests that MISO and the Transmission Owners establish a framework assigning all costs caused by Large-Load integration to the responsible loads. This framework must address direct and indirect network impacts, including upgrades identified through LARS subsequent planning processes and costs arising from changes in project size, timing, configuration, or operating characteristics. Consistent with the Commission's cost-causation principles, costs should reflect the burdens imposed by the customers or activities causing them. LARS should not be implemented before this framework is resolved.

ii. Establish enforceable cost responsibility

OMS recommends that MISO and the Transmission Owners evaluate a tariff framework designating attributable upgrades as Market Participant Funded Upgrades ("MPFUs"), or using another appropriate tariff-defined category that directly assigns all relevant costs to responsible Large Loads. The framework should identify the legally obligated payer, when obligations become enforceable, how shared upgrades are allocated, and what happens if a load or associated generator withdraws, materially changes, or fails to enter service. Facilities service agreements or other enforceable instruments should establish these obligations. MISO should explain how the framework interacts with existing GIQ cost allocation and prevents Large-Load-driven costs from being shifted to existing customers simply because upgrades are identified through regional planning.

iii. Require financial assurance and protect against withdrawals

During the development of LARS, OMS Work Groups recommended stronger financial commitments, potentially higher upfront application fees, and financial assurance sufficient to cover required upgrades, including consideration of obligations that survive a project's withdrawal. LARS should include meaningful protections against speculative applications and late withdrawals that leave other customers responsible for costs incurred in reliance on proposed projects. MISO should require appropriate escrow, bonds, letters of credit, or other enforceable financial instruments before other customers face financial risk. The Tariff should specify withdrawal consequences at each stage of the process, including after study completion, agreement execution, and construction commencement. The responsible parties should bear attributable costs under applicable tariffs and agreements. Cost responsibility between the load and generator should also be expressly addressed.

iv. Prevent cost shifting across planning processes

Network Upgrades identified through LARS may also arise in MISO Transmission Expansion Plan ("MTEP") studies, Expedited Project Reviews ("EPRs"), GIQ studies, or other Large-Load studies. MISO must establish transparent rules and study processes for identifying the projects and system needs responsible for those upgrades. An initially customer-driven upgrade should not lose its cost attribution merely because it becomes part of a regional project or is refined through another study. MISO should track upgrades and their underlying drivers across processes and preserve the ability to assign and recover costs attributable to Large Loads and do so in a manner sufficient to allow state regulators to be certain of proper cost assignment. The Commission should require these rules to be established in the tariff and related agreements before LARS implementation.

C. LARS Must Remain Limited to High-Impact Loads.

As MISO's filing recognizes, LARS must be restricted to high-impact loads because expedited coordinated studies could affect competition among generators and create disparate treatment from MISO's standard GIQ. OMS continues to support meaningful eligibility thresholds that prevent LARS from becoming an alternative queue for a broad range of projects. MISO should explain the basis for its proposed threshold, its relationship to other Large-Load processes and applicable state definitions, and how eligibility will be limited to the process's intended purpose.

MISO should also clarify the eligibility of associated generation, including applicable interconnection-service limits and their relationship to requested load and identified transmission impacts. Eligibility and readiness requirements should be objective and consistently applied. OMS does not support broadening access or lowering thresholds without demonstrating the need and evaluating effects on study resources, queue participants, and reliability.

D. MISO Must Validate the Electrical Relationship Between Load and Generation.

Concurrent studies may be beneficial when generation and load are genuinely associated. However, locating both within the same Local Resource Zone ("LRZ") does not necessarily establish that generation will offset the load's transmission impacts or produce the most efficient network solution. OMS Work Groups previously questioned MISO's proposed geographic scope for LARS, its definition of electrical proximity, and the study conditions applied when the full load is present but generation is unavailable, or when the load is offline but generation remains online. For example, under MISO's proposal, a generator in Montana could be paired with a large load in Wisconsin as long as they are both located in LRZ 1, raising the likelihood of cost shifting from increased congestion and additional networks upgrades.

MISO should identify the assumptions supporting any credit given to associated generation, including load size and operating characteristics, in-service dates, generation capability and interconnection service, contractual arrangements, and transmission requirements when either resource operates independently. Studies should evaluate credible operating conditions, including generator outages and load-generation mismatches. MISO should also establish revalidation or restudy triggers for material changes, delays, withdrawals, or termination of the load-generation arrangement. Finally, MISO should explain how its LRZ-based approach satisfies applicable Commission directives concerning electrically proximate loads and generation.[4]

E. Transparency and Consideration of Alternative Transmission Technologies Are Essential.

MISO should make final LARS study reports publicly available with sufficient information to evaluate study results, alternatives, costs, and cost allocation. Each report should include:

[4] The Minnesota Public Utilities Commission recommends limiting LARS to within two substations for "electrically proximate" paired generation and load to mitigate cost shifting from increased congestion costs and additional network upgrades, consistent with the Show Cause Order at P112.

1. The proposed load and generation's size, location, timing, and material operating assumptions.
2. Study models, model vintages, assumptions, and applicable planning criteria.
3. Identified upgrades and the reliability constraints or needs they address.
4. Alternatives considered, including non-transmission alternatives and alternative transmission technologies.
5. Comparative costs, reliability impacts, implementation timelines, and material trade-offs.
6. The rationale for the selected solution and supporting cost estimates.
7. Each upgrade's classification and cost-allocation methodology, including relevant transmission pricing zones and state locations.
8. Interactions with other MISO planning and interconnection processes.

OMS also recommends aligning the evaluation and documentation of Grid-Enhancing Technologies ("GETs") and other alternative transmission technologies with MISO's Large Load Application and Study Process and applicable Commission directives. Reports should explain why alternatives are infeasible, fail to satisfy planning criteria, do not resolve identified violations, or are less cost-effective or timely than the selected solution. These disclosures are essential to evaluating whether upgrades are necessary, alternatives were fairly considered, and costs are appropriately allocated. Core transparency requirements should be established in the tariff rather than left solely to business practices manuals or discretionary reporting.

F. LARS Must Address Restudies, Withdrawals, and Coordination Across Planning Processes.

OMS Work Groups previously recommended that MISO establish a defined process for restudies when a load, generator, or paired project withdraws after entering a study cycle. MISO should specify restudy triggers, responsible parties, costs, timelines, and notification requirements. These rules should address how withdrawals or material changes affect transmission solutions, reliability assumptions, and costs assigned to other projects.

MISO should also explain how LARS will coordinate with the Definitive Planning Process ("DPP"), EPR, MTEP, and other Large-Load processes. Coordination should identify overlapping constraints and upgrades, address differences in study models, and evaluate cumulative project impacts. A separate study pathway must not allow incompatible projects to rely on the same transmission capability or defer material system impacts until projects have advanced too far for efficient resolution. MISO should demonstrate how these interactions will be managed before initiating LARS study cycles.

G. LARS Should Have a Five-Year Sunset and Formal Review.

OMS Work Groups previously recommended limiting LARS to five years, followed by an evaluation and a new Commission filing if MISO seeks to continue the process. Because LARS is a new framework responding to evolving integration needs, its benefits and risks should be evaluated using actual experience. A five-year sunset would allow MISO and the Commission to assess whether LARS improves study efficiency, whether the existing interconnection queue is being utilized as intended, and whether LARS produces reliable, cost-effective solutions without adversely affecting other interconnection customers or shifting costs to existing ratepayers.

The public review should address study completion times, project completion and withdrawal rates, restudy frequency and causes, network upgrade costs, consideration of alternative technologies, cost allocation and recovery, impacts on the standard queue, and changes in underlying project assumptions. MISO should publish its findings and provide an opportunity for stakeholder input before seeking an extension or proposing a successor process.

H. LARS Must Not Interfere with Order No. 2023 Compliance.

OMS emphasizes that developing and implementing LARS must not distract from or delay MISO's obligation to improve the standard GIQ process. MISO's Order No. 2023 compliance filings establish a 373-day interconnection-queue processing commitment. That obligation

remains a priority, and the need to accommodate Large Loads does not diminish the need for timely, transparent, and nondiscriminatory generator interconnection.

MISO should demonstrate that LARS can be administered without diverting resources from achieving and maintaining the 373-day commitment. The Commission should require reporting on staffing, study schedules, modeling requirements, and implementation activities, as well as metrics measuring LARS's effects on standard-queue delays, restudies, and resource availability. OMS does not support expedited treatment for certain projects at the expense of other interconnection customers. MISO must pursue efficient Large-Load integration and timely generator interconnection together and demonstrate continued progress toward the 373-day commitment independently of any claimed LARS benefits.

III. REQUEST FOR COMMISSION ACTION

For the foregoing reasons, OMS respectfully requests that the Commission:

1. Recognize that OMS supports coordinated Large Load and generation studies in principle but cannot support LARS as currently proposed.

2. Require MISO and the Transmission Owners to establish a Tariff-based cost-allocation framework assigning all transmission costs caused by Large Loads to the responsible loads, consistent with cost-causation principles.

3. Require enforceable cost-responsibility agreements, appropriate financial assurance, and clear rules for withdrawals, restudies, and changes in load-generation arrangements.

4. Require transparent study reports documenting assumptions, alternatives, GETs and other alternative technologies, costs, project classifications, and cost-allocation rationales.

5. Require objective eligibility and readiness criteria, clarification of electrical proximity, and coordination with other planning and interconnection processes.

6. Require MISO to propose a five-year sunset, subject to public evaluation, and a new Commission filing if MISO seeks to continue LARS.

7. Require MISO to demonstrate that LARS will not impede progress toward its 373-day GIQ processing commitment under its Tariff and Order No. 2023.

OMS appreciates the Commission's consideration and encourages safeguards that ensure expedited Large-Load interconnection delivers measurable benefits while preserving reliability, protecting existing customers, and maintaining fair and timely transmission access.

IV. 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
Michigan Public Service Commission
Minnesota Public Utilities Commission
Missouri Public Service Commission
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, the Louisiana Public Service Commission, and the Mississippi Public Service Commission voted against these comments. The New Orleans City Council 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,

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Dated: October 23, 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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