UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Midcontinent Independent System Operator, Inc.	)	Docket No. ER27-8-000

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 1, 2026, MISO filed proposed revisions to its Open Access Transmission, Energy, and Operating Reserves Markets Tariff ("Tariff") to modify the treatment of resource lead times under the accreditation methodology set forth in Schedule 53A of the Tariff. MISO requested approval to revise its 24-hour lead-time assumption to better align resource accreditation with availability during high-risk periods. MISO requested Commission approval by December 1, 2026, to inform market participants' winter 2026 offers and allow system updates and testing before a September 1, 2027 effective date for the 2028-2029 Planning Year.

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

[1] *Midcontinent Indep. System Operator, Inc.*, 24-Hour Lead Time in Accreditation, Docket No. ER27-25-000 (October 1, 2026) ("Lead Time Filing").

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, resource adequacy processes overseen by state and local processes, and eventual cost assignment . 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.[2]

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

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II. COMMENTS

OMS recognizes MISO's legitimate interests in ensuring that resource lead times accurately reflect operational capabilities and in preventing resources from using lead time submissions to avoid performance obligations during critical reliability hours. Resources that are unavailable when needed should generally face appropriate accreditation consequences. However, OMS is concerned that MISO's proposed revisions address only one side of a broader reliability challenge: the disconnect between natural gas procurement timelines and MISO's commitment processes, particularly during extreme winter weather events.

Natural gas must often be procured days in advance to ensure availability, yet MISO may not commit the associated generation until after critical gas trading windows have closed. This creates a difficult choice for generators: whether to procure gas in advance without a commitment

[2] 18 C.F.R. § 385.214(a)(2) (2026).

and risk significant financial losses if the resource is not dispatched, or wait for MISO commitment and risk being unable to obtain fuel when called upon, potentially resulting in both reliability consequences and reduced resource accreditation.

At its core, this issue reflects a disconnect between MISO's generator commitment processes and the timelines necessary to secure natural gas during critical operating conditions. Generators may need to procure fuel days in advance to ensure availability, often before receiving a commitment from MISO. This creates significant financial uncertainty since procuring gas without a commitment exposes utilities and their customers to potentially unrecoverable costs, while waiting for a commitment may leave generators unable to obtain fuel when needed.

OMS recognizes that resource accreditation should appropriately reflect actual availability and performance. However, accreditation changes alone do not address the underlying operational constraints and financial risks that may contribute to resource unavailability. Moreover, restricting changes to resource lead times may incentivize generators to submit longer lead times in advance, potentially increasing rather than reducing uncertainty regarding resource availability.

A more comprehensive solution should align MISO's commitment decisions with actual fuel procurement requirements and establish appropriate cost recovery protections for reasonable fuel procurement undertaken to support system reliability. Potential approaches include improved use of multi-day commitments during extreme weather, greater coordination between gas procurement and generator commitment timelines, and mechanisms to address financial exposure when fuel is procured in anticipation of MISO dispatch. OMS encourages the Commission to consider whether MISO's proposed accreditation revisions adequately address these underlying challenges or whether complementary reforms are necessary to ensure that generators can reliably secure fuel without creating undue financial risks for utilities and their customers.

III. CONCLUSION

OMS submits this Notice of Intervention and 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. The Iowa Office of Consumer Advocate, as an associate member of OMS, also supports this filing.

Respectfully submitted,

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Dated: October 22, 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

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Dated: October 22, 2026