UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Midcontinent Independent System Operator, Inc.	)	Docket No. ER26-1915-000

MOTION FOR ACCEPTANCE OF LATE-FILED COMMENTS AND LATE-FILED COMMENTS OF THE ORGANIZATION OF MISO STATES, INC.

The Organization of MISO States, Inc. ("OMS") submits this Motion for Acceptance of Late-Filed Comments and Late-Filed Comments in support of proposed Tariff revisions filed by the Midcontinent Independent System Operator, Inc. ("MISO") with the Federal Energy Regulatory Commission ("Commission") in the above-captioned proceeding regarding the interconnection service limit for Co-located Resources.[1] OMS agrees that the proposed Tariff revisions will allow MISO to dispatch Co-located Resources more efficiently, improve resource visibility, and encourage continued development of Co-located Resources. As such, OMS respectfully requests that the Commission approve MISO's Filing with a June 30, 2026 effective date.

I. MOTION FOR ACCEPTANCE OF LATE-FILED COMMENTS

Pursuant to Rule 212 of the Commission's Rules of Practice and Procedure, OMS respectfully requests that the Commission accept these late-filed comments.[2] On April 15, 2026, OMS timely filed a doc-less Notice of Intervention in this proceeding.[3] Due to the need to

[1] *Midcontinent Indep. System Operator, Inc.*, Interconnection Service Limit for Co-located Resources, Docket No. ER26-1915-000 (March 25, 2026) ("MISO's Filing").

[2] 18 C.F.R. § 385.212.

[3] *Notice of Intervention of the Organization of MISO States, Inc.*, Docket No. ER 26-1915 (April 15, 2026).

coordinate the perspectives of several OMS members and allow for sufficient review, it was determined that additional time was necessary to conduct a vote on the comments.

OMS offers the following comments to aid the Commission in its decision-making process. The Commission may allow an untimely response when there is no showing of undue prejudice or delay. Through these brief comments, OMS does not seek to disrupt or delay the proceeding. OMS believes these comments will assist the Commission in its deliberations and improve overall understanding by offering the important perspectives of state regulators. Therefore, good cause exists to grant this Motion. OMS respectfully requests that the Commission grant this Motion and accept OMS's comments.

II. LATE-FILED COMMENTS

On March 25, 2026, MISO filed proposed Tariff revisions that would enable Co-located Resources to be more efficiently dispatched in the MISO Day-Ahead Energy and Operating Reserve Market and the MISO Real-Time Energy and Operating Reserve Market while ensuring overall system reliability. The MISO region is currently experiencing significant growth of multiple resource types interconnecting behind a shared point of interconnection and under a single Generator Interconnection Agreement.[4] The flexibility inherent to these arrangements helps resource owners reduce interconnection costs, accelerate development timelines, and maximize value by pairing intermittent generation with other resources (such as storage or gas) to capture energy that would otherwise be curtailed. As MISO has acknowledged, however, current market rules restrict the full participation of multiple resource configurations giving rise to this proposal.

[4] MISO Filing at 2.

As part of MISO's Filing, MISO proposed revisions to the definitions of both Co-located Resources as well as Hybrid Resources.[5] Additionally, MISO added definitions for the following terms: The Interconnection Service Limit and the Interconnection Service Limit Constraint.[6] Co-located Resources will be defined as two or more resources located behind the same point of interconnection and governed by a shared Generator Interconnection Agreement but which participate in MISO's markets as separate Resources.[7] These resources can operate separately, which allows them to participate as either Dispatchable Intermittent Resources or Electric Storage Resources thereby leveraging already existing market participation models. Co-located Resources submit separate bids, receive separate market dispatch instructions, submit separate outages, have separate metering arrangements, and coordinate and self-limit their offers and output. Thus, under current market rules in MISO, Co-located Resources must coordinate and limit their offers such that the resources' aggregate offer does not exceed the interconnection service limit. This requirement has the practical effect of restricting full market participation of Co-located Resources and results in inefficient offers, commitment, and dispatch.

MISO's introduction of the Interconnection Service Limit Constraint Tariff definition and accompanying software enhancements will simplify the participation of Co-located Resources in its Day-Ahead and Real-Time Energy Markets. If MISO's Filing is approved, MISO will install an automatic interconnection service limit constraint within its market software engines that will enforce an overall interconnection service limit and allow Co-located Resources to offer up to their full availability. MISO's proposed changes also clarify the difference between Co-located

[5] *Id*. at 4.

[6] *Id*. at 4-5.

[7] Conversely, Hybrid Resources are two resources behind the same point of interconnection that operate as one resource.

Resources and Hybrid Resources in a way that provides MISO visibility into Co-located Resource capability and allows MISO to dispatch their commitments more economically.

OMS supports MISO's Filing because it would enable Co-located Resources to participate in MISO's markets more effectively, lead to more efficient market outcomes, and benefit Market Participants and ratepayers. Furthermore, the increased visibility into Co-located Resource capabilities will provide MISO with additional data that will enhance operational reliability and facilitate appropriate monitoring of market participation. While MISO's Filing takes a significant step to unlocking the full potential of multiple resources located behind the same point of interconnection, OMS encourages MISO and its stakeholders to continue exploring ways to ensure Co-located Resources *and* Hybrid Resources are able to participate in all MISO markets to the fullest extent to which they are technically capable.

For the reasons stated above, OMS respectfully requests that the Commission approve MISO's Filing with an effective date of June 30, 2026.

III. CONCLUSION

OMS submits this Motion for Acceptance of Late-Filed Comments and Late-Filed 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

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 Arkansas 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,

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Dated: April 17, 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: April 17, 2026