Organization of MISO States
Transmission Planning and Resources Work Groups
Response to RASC Feedback Request
Submitted on October 14, 2026

In the September 30, 2026 meeting of the Resource Adequacy Subcommittee (RASC), stakeholders were invited to submit feedback on MISO's Unified Generation and Load Collection for Forward Assessments proposal (RASC-2026-4), including:

- Are there any challenges or concerns with specific components of the load data collection proposal? Please explain.
- Historical Data, Existing & Planned Large Loads & Data Centers, Peak Demand Forecast & Coincident Peak Factors, Electric Vehicles (EVs), Distributed Energy Resources (DERs)
- For new unified data collection tool, who beyond Market Participants need to submit data?

https://www.misoenergy.org/engage/stakeholder-feedback/2026/rasc-unified-generation-and-load-collection-for-forward-assessments-rasc-2026-4-20260930/

The OMS Resources and Transmission Planning Work Groups (OMS Work Groups) provide this feedback to MISO on its proposed Unified Data Collection initiative. **This feedback is from OMS work groups and does not represent a position of the OMS Board of Directors**

Issues of Scope: Use of LTLF Data in the NERC LTRA

According to the Problem Statement, MISO's Unified Generation and Load Data Collection for Forward Assessments initiative is focused on improving the efficiency and consistency of existing data collection processes. The OMS Work Groups understand that MISO previously indicated that LTLF data is not currently used in the NERC Long-Term Reliability Assessment (LTRA). However, MISO's recent slides indicate that it intends to begin using LTLF data for the LTRA.

The OMS Work Groups believe that introducing LTLF data for this new purpose should be addressed separately from the effort to unify existing data collection processes. Using LTLF data for the LTRA is a new application of the data, not simply a consolidation of existing processes. This distinction is important because states do not currently approve or oversee the data submitted to NERC for the LTLF. Using LTLF data in the NERC LTRA could result in information being reported that states have not reviewed or may disagree with.

As such, the OMS Work Groups recommend that MISO address the proposed use of LTLF data in the NERC LTRA through a separate stakeholder discussion that clarifies the intended use, degree of state oversight and review, and how disagreements regarding the data would be addressed. The current initiative should remain focused on unifying existing data collection processes.

The OMS Work Groups also request that MISO clarify whether the generation data collection discussions planned for Q1 of 2027 will introduce new uses for generation data or request new data elements, such as out-year generation forecasts. If so, those additions should be evaluated separately to determine whether they fall within the scope of this initiative.

Opportunity to Align Data Collection with LOLE Model Needs

Recent discussions in the LOLE Working Group identified a timing mismatch between the availability of large-load data needed to accurately determine CIL/CEL values and current forecast submission deadlines. As MISO considers enhancements to its data collection processes, the OMS Work Groups encourage MISO to involve staff responsible for the LOLE model. Aligning data collection timing with model requirements could address this additional issue while improving the usefulness of submitted data.

Clarify Data Sources, Uses, and Forecast Relationships

The OMS Work Groups recommend that MISO provide greater transparency into how collected data will be used and how existing forecasts and planning processes relate to one another. This includes identifying the sources used to develop and validate MISO's independent load forecast and explain how those sources are incorporated or weighted relative to LSE submissions. For each requested data element, MISO should identify its intended use and explain whether it will affect load forecasting, resource adequacy, transmission planning, operations, or simply be used for informational purposes.

The OMS Work Groups also recommend that MISO provide a matrix identifying which forecast or data set supports each process, including the PRA/LOLE model, NERC LTRA, Futures/LRTP, and the OMS-MISO Survey. MISO should clarify how these forecasts relate to one another and reinforce that unified data collection does not necessarily mean a single unified forecast.

Finally, the OMS Work Groups request that MISO explain how annual LTLF updates will align with Futures and LRTP cycles, including whether material load changes between planning cycles will be evaluated and incorporated and when transmission planning assumptions may need to be refreshed.

DER Data Collection

The OMS Work Groups recommend that MISO clarify the purpose, scope, and appropriate level of detail for DER data collection before finalizing submission requirements. In particular, it is important that MISO clarify its role in DER data collection, including whether collection is limited to MISO-registered DERs or also includes non-registered DERs, and the intended use of each category of data.

If MISO intends to collect information on both registered and non-registered DERs, it should make that distinction clear in its reports. Relatedly, MISO should also identify the operational capabilities it assumes for each category, such as accredited capacity, dispatchability, ancillary services, or reductions in observed load.

The OMS Work Groups would like to better understand why individual DER-level data is necessary rather than aggregated information at the LSE, EP Node, CP Node, or other appropriate level. Data requirements should reflect demonstrated planning needs and avoid unnecessary reporting burdens where aggregated information is sufficient.

Large-Load Forecasting and Co-Located Generation

The OMS Work Groups recommend that MISO clarify how large-load forecasts will account for project uncertainty and on-site or co-located generation (e.g., ZGIAs). MISO should distinguish generation dedicated to serving a co-located load from generation capable of providing broader system or resource adequacy value. The OMS Work Groups would also like to understand how known or expected co-located generation will be netted against large-load forecasts and how gross and net load will be used in planning and resource adequacy analyses.

The OMS Work Groups also recommend that MISO explore how to develop confidence rates to help explain how project status (e.g., preliminary, under review, approved) translates into the MW ultimately included in the forecast. MISO could achieve this objective by evaluating whether realization rates vary by project stage, type, or location and by requiring periodic reporting and project status

Balance Planning Value Against Reporting Burden

Before finalizing the LTLF survey, the OMS Work Groups recommend that MISO demonstrate that each requested data element is reasonably obtainable by LSEs and provides planning value commensurate with the reporting burden. Particular attention should be given to the feasibility and usefulness of the 20-year monthly forecast and detailed DER information. Reflecting points made above, MISO should explain how these data will be used, at what level of detail they are needed, and whether the intended benefits justify the collection effort.