Organization of MISO States
Resources Work Group
Response to RASC Feedback Request
Submitted on October 30, 2026

In the October 20, 2026 meeting of the Resource Adequacy Subcommittee, MISO invited stakeholder feedback on Planning Reserve Margin Requirement (PRMR) allocation draft Tariff language.

https://www.misoenergy.org/engage/stakeholder-feedback/2026/rasc-prmr-allocation-draft-tariff-redlines-rasc-2019-2-and-2020-4-20261020/

The OMS Resources Work Groups (OMS RWG) provides this feedback to MISO on its revised PRMR allocation proposal. **This feedback is from an OMS work group and does not represent a position of the OMS Board of Directors.**

Design Simplification

Applying the net-peak based PRM to a coincident net peak demand forecasts (CNPDF) is a simpler design, which is appreciated. The OMS RWG believes this may be potentially workable; however, several important issues still need to be addressed before the OMS RWG can confidently support this proposal.

The OMS RWG also reminds MISO that rather than making a tariff change, MISO could collect more data and monitor this situation. For example, monitoring the correlation between load-ratio share at coincident peak and net peak might help MISO determine if a change is needed in either the allocation process, the model, or both.

Reliability Requirement Changes

With this version of the proposal, the OMS RWG understands it is possible that for a given system CPDF, the LOLE study could produce a PRMR that would not match the obligation that the proposal would generate. As an example, if all LSEs kept their CPDFs identical at the time of the LOLE study as when RA obligations are determined but their CNPDF changed, the systemwide PRMR would change.

Hypothetical example:

	LOLE study	**RA obligations**
CPDF	100,000	100,000
Model net peak	95,000	NA
CNPDF	NA	90,000
LOLE model (DLOL) PRMR	**105,000**	NA
Net PRM	.105	.105
Peak PRM	.05	.05
CNPDF-based PRMR	NA	**99,473**

With the status quo, the PRM scales the PRMR consistently for the updated CPDF as the PRM preserves the modeled relationship between the CPDF and Critical Hour load that sets the PRMR. However, there is no relationship between CNPDF and the model. In lieu of updating the model to incorporate the CNPDF (as MISO has stated that is not an option), we suggest MISO at least commit to tracking and reporting the following for review each year:

- Historical peak and net peak by season
- The corresponding model peak, net peak, and critical hour load by season
- The corresponding aggregate seasonal CPDF that was used as the model input and the CNPDF that paralleled that CPDF (but was not used as an input)
- Updated aggregate CPDF and CNPDF at the time of setting RA obligations
- The net peak-based PRM and PRMR using CNPDF net peak, and for illustrative purposes, the peak-based PRM and PRMR using CPDF

This review could help track whether the new method is satisfactory and may highlight the potential need for improvement in forecasts, the LOLE model, or both.

Other Issues for Consideration:

1. Please provide a plan for what support and oversight will take place regarding CNPDF development, including when unexpected values trigger extra review.
2. Please provide a plan for instances of large discrepancies in model net peak and aggregate CNPDF that may impact the resulting systemwide PRMR.
3. The OMS RWG suggests that MISO collect CNPDF that corresponds to the November 2026 CPDF LSEs will submit. We know this submission would not be possible by the November 2026 deadline, but MISO could collect these values in early 2027. That way, MISO can examine how the aggregate CNPDF compares to the net peak in the model that is produced with load shapes from the CPDF from November 2026. If there are large discrepances, MISO will have more runway to address it.
4. LSE modeling: Can LSEs use net peak based PRMs in their own modeling? Please discuss this with LSEs to anticipate challenges.
5. PRA: This method can result in changes in the total PRMR for the Planning Areas and the total PRMR by LRZ compared to what the LOLE model would expect for any given CPDF. The LRZ and Planning Area PRMRs are used as parameters to solve the auction. Would the new PRMR values based on the CNPDF be used instead as parameters to solve the auction?