Organization of MISO States
Transmission Planning Work Group
Response to LLWG Feedback Request
Submitted on October 7, 2026

During the September 23, 2026 meeting of the Large Load Working Group (LLWG), MISO reviewed its proposed Large Load Project Review (LLPR) process and noted posted Tariff language. Stakeholders were invited to submit feedback on the following:

- Questions and clarification regarding the process
- Tariff language

http://misoenergy.org/engage/stakeholder-feedback/2026/llwg-application-and-study-process-tariff-and-process-design-llwg-2026-7-20260923/

The OMS Transmission Planning Work Group (OMS TPWG) provides this feedback to MISO regarding the Large Load Application and Study Process (i.e., LLPR) framework. **This feedback is from an OMS work group and does not represent a position of the OMS Board of Directors.**

Large Load Attribution in the Tariff

The OMS TPWG requests that MISO include in its Tariff redlines an explicit description of how the Large Load Study Process will attribute needed transmission facilities and their costs to specific loads, and requests that attribution be made publicly available. State regulators, who are responsible for retail-level cost allocation, need these two pieces of information (along with others) to fulfill their duties to prevent cost shifting. First, a clear description of how the study process attributes transmission upgrades to loads would provide regulators with evidence that the process identifies all appropriate costs, as required by laws in some states. Second, publishing the attribution of specific transmission upgrades and their costs to specific large loads gives regulators the information they need to allocate those costs at the retail level.

But-For Attribution Standard & Right-Sizing Exception

The OMS TPWG proposes that MISO explore a "but-for" attribution standard, under which all network upgrades that would not be built *but for* a particular Large Load would be attributed to that Large Load, even if the upgrades also provide benefits to other customers or the broader system.

Our comments to the cost shifting issue (LLWG-2026-8) proposed a possible exception to strict but-for attribution to allow for right-sizing of transmission upgrades. In those cases, the process for identifying and allocating costs should be clearly described in the Tariff, and the burden of proof for deviating from the but-for attribution standard should be on the proponent of the deviation to demonstrate that a different standard is just and reasonable under the circumstances.

The allocation should be based on a neutral, standardized, and transparent process. MISO, or another neutral party, should determine the portion of the upgrade attributable to previously identified transmission needs, such as projects or needs documented in MTEP Appendix B, and the portion attributable to serving the Large Load. This apportionment should be clear and publicly available. The Large Load should remain responsible for the portion of the upgrade that would not otherwise have been needed to address those pre-existing needs.

Separate Cost Recovery Schedule for Large Load Upgrades

This request for publicly attributing specific transmission facilities and their costs to specific Large Loads complements the OMS TPWG's feedback on cost shifting (LLWG-2026-8) submitted on October 1. That feedback was focused on pricing to allocate network upgrade costs at the wholesale level. This feedback on the study process is focused on determining which costs are attributable to a specific Large Load.

Additionally, the TPWG recommends that MISO seriously consider the creation of a new project type and cost recovery Schedule, separate from Schedule 9, for all attributable costs. A separate Schedule would greatly aid state and local commissions' ability to transparently track large load network upgrade costs. These costs would appear in regulated utilities' rate cases as a separately incurred expense line item instead of being included with all other transmission expenses in the Schedule 9 incurred expense line item. It is difficult for regualtory commissions to track the cost of a particular network upgrade once it goes into the proverbial blender of the Schedule 9 line item.

Disentangling that cost requires careful understanding of the Schedule 9 rate formula, references to a Transmission Owner's Attachment O filing and Form 1 to determine what percent of the TO's network load is attributable to the LSE, and a host of other substantive calculations all aimed at providing transparency into how large loads are paying for their network upgrades. This requirement for specialized knowledge, expertise, and time-intensive review imposes a burden on already resource-pressed regulatory commissions that could be simply addressed at the wholesale level with the creation of a new project type and corresponding recovery Schedule.

Near-Term Transparency Measures and Dashboard Improvements

On September 3, the OMS TPWG provided feedback in response to MISO's cost transparency and cost-shifting presentation on August 27. The OMS TPWG provides the following supplemental feedback on near-term measures to support state and local regulators' transparency needs. The OMS TPWG requests that MISO add filterable columns "spot load," "load value," "Project Type," and "Other Type" to its existing TO Dashboard, EPR Dashboard, MTEP Projects Dashboard, and any new LLPR Dashboards, similar to the "Approved Projects Supporting Spot Loads" Dashboard.

In addition, the OMS TPWG requests creation of a single dashboard that includes a map, a filterable column for study type (e.g., EPR, LLPR, standard MTEP, LARS, DPP (cycle), ZGIA, JTIQ (cycle), etc.), and all of the following filterable columns, which are available in some dashboards but not others:

- URL
- MTEP Project ID
- TO Project ID
- Project Name
- Submitting TO
- MTEP Cycle
- Planning Region
- State(s)
- Target Appendix
- Current Appendix
- Board Approved Date
- Project Description
- System Need
- Project Type
- Other Type
- Spot Load
- Load Value
- Expected ISD
- Current Cost
- Cost Share Status
- Planning Status – including withdrawn projects
- Created On