Organization of MISO States (OMS)
Transmission Planning and Resources Work Groups
PSC: Storage Charging Limits in GIAs
Submitted on February 13, 2026

During the January 28 Planning Subcommittee (PSC) meeting, MISO reviewed how storage resources are studied in transmission expansion planning, generator interconnection, and related studies. Stakeholders were invited to provide feedback on the following:

- Additional thoughts or insights regarding the data presented, and whether additional data is needed to inform potential process/policy change
- How storage resources should be studied in MISO planning processes, if not status quo
- General comments on MISO's current methodology for studying charging storage resources

https://www.misoenergy.org/engage/stakeholder-feedback/2026/psc-removing-storage-charging-limitations-in-gias-pac-2024-3-20260128/

The OMS Transmission Planning and Resources Work Groups (OMS Work Groups) provide this feedback to MISO on its proposal to remove storage charging limitations in GIAs. **This feedback is from OMS work groups and does not represent a position of the OMS Board of Directors.**

The OMS Work Groups appreciate MISO's work to explore how storage behaves on the system. We agree that an understanding of realistic storage behavior on the system is necessary to avoid unnecessary transmission charges for storage facilities. Without proper assessments, storage resources may be required to pay for transmission upgrade costs that limit their economic viability and do not correlate with their potential benefits of reducing congestion on the grid.

The data presented by MISO suggests that storage is not charging during peak times, but instead charges during periods when there is sufficient headroom available. Storage resources' flexibility and price-responsive nature should be considered when MISO models storage, though pricing should still reflect cost-causer principles, and storage resources should pay for any necessary upgrades. At a minimum, storage should be assessed the appropriate charges for the transmission needed and used during periods of charging. During those periods, storage is a load similar to other loads. Those costs should be borne by the cost-causers and not allocated to other loads and ratepayers.

The OMS Work Groups do not believe more data is needed to move forward on this issue. However, more information could be provided on how storage charging and discharging correlates with locational marginal pricing. Where relevant, insight on how other RTOs handle storage modeling and transmission cost responsibilities could also prove valuable.

The OMS Work Groups recommend that MISO:

1. Incorporate realistic storage charging and discharging behavior into modeling assumptions.
2. Review capacity market obligations to identify opportunities for storage resources to operate more flexibly.
3. Provide additional transparency on how storage operational patterns correlate with locational marginal pricing.

These reforms would better align MISO's market framework with the operational characteristics of storage, reduce unnecessary cost burdens, and unlock the full congestion-reducing and reliability benefits that storage can provide to the MISO system.