Organization of MISO States (OMS)
Transmission Planning and Resources Work Groups
PAC: ZGIA Framework
Submitted on March 20, 2026

In the February 25, 2026 Planning Advisory Committee (PAC), stakeholders were invited to provide feedback on MISO's proposed Zero-Injection GIA (ZGIA) framework:

1. MISO requests detailed feedback on the elements of the ZGIA proposal relating to the interconnection process – both overall, and element by element as appropriate. (Proposal consideration item 1)
2. MISO requests detailed feedback on the elements of the ZGIA proposal relating to planning for the load – both overall, and element by element as appropriate. (Proposal consideration item 2)
3. MISO requests initial, directional feedback on the outline of elements of the ZGIA proposal relating to resource adequacy participation and relating to markets and reliable operations. (Proposal consideration items 3 and 4)

https://www.misoenergy.org/engage/stakeholder-feedback/2026/pac-zgia-proposal-framework-pac-2024-4-20260225/

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

Stakeholder Engagement and Evaluation

The OMS Work Groups continue evaluating the design elements of the proposed ZGIA framework, but significant questions and concerns remain. More detail and discussion are needed to sufficiently understand and develop informed opinions on the ZGIA's potential ramifications and system impacts from markets and reliability perspectives. OMS Work Groups will continue to discuss and synthesize member concerns and questions and may follow up with supplemental feedback to MISO.

On slide 18 of MISO's Feb 25 PAC presentation, it appears stakeholders will have limited opportunity to discuss the proposal with MISO and each other. We realize that a potential Large Load Working Group may serve as the stakeholder body to address ZGIA-related issues, but the charter, leadership, and management plan are currently unknown. Given the aggressive filing timeline and interdisciplinary nature of the proposal, the OMS Work Groups strongly recommend that MISO schedule more frequent meetings devoted to this topic, with a focus at the very least on the complex and critical resource adequacy implications.

Reliability and Operational Considerations

In the proposed study process, it appears MISO has only provided for a scenario when a co-located ZGIA generator trips offline. No contingency case appears to exists to ensure the safety and reliability of the transmission system if the co-located load were to trip offline. This may create unstable conditions on the transmission system and should be required during both the generator and load interconnection studies.

To properly safeguard reliability from a ZGIA resource injecting onto the transmission system, the OMS Work Groups believe that financial penalties assessed to the generator, for even momentarily injections onto the transmission system, are alone insufficient protection / disincentive since this is not evaluated

during the interconnection studies. A physical device preventing injection, a remedial action scheme, or other generator drawback control schemes are likely necessary measures that MISO should require of ZGIA generators and Transmission Owners to prevent generator injection.

Electrically Equivalent / Multiple Points of Interconnection

The OMS Work Groups appreciate MISO's consideration of the generator replacement provisions for applicability to utilizing multiple points of interconnection for ZGIA generator resources and associated load. However, we believe that the potential reliability, cost shifting, markets, and jurisdictional concerns outweigh the benefits of this additional flexibility. At this time, the OMS Work Groups recommend that MISO ground its June ZGIA FERC filing in the use of the same point of interconnection and continue the conversation about expanding to multiple POIs thereafter.

Transparency and Cost Allocation

Several transparency and cost-shifting issues are present in a proposal where a ZGIA generator withdraws or does not fully materialize after the load interconnection study is complete.

MISO has indicated its intent to add BPM/Tariff language that would require the relevant entity to notify MISO of the ZGIA generators withdrawal. This would prompt a restudy of the load's interconnection to identify any additional network upgrades required without the ZGIA generator present. This is a substantial protection against potential cost shifting and transparency concerns that the OMS Work Groups support and urge MISO to implement.

Several other related issues could use more clarity. For instance, MISO should consider and explain how network upgrades identified in a restudy would be tracked and attributed back to the original load interconnection decision, thereby ensuring traceability between avoided upgrades and subsequent reliability-driven upgrades (or cost socialization of later socialized reliability or deferred upgrades). Exclusion of these considerations will likely exacerbate affordability concerns.

Resource Adequacy Considerations

The OMS Work Groups note that key elements of the ZGIA proposal related to resource adequacy and market participation appear undeveloped. MISO and stakeholders should consider convening joint RASC-Large Load Working Group meetings to address the following questions and concerns:

- How ZGIA resources will be modeled with respect to their resource class in the LOLE model given their inability to / prohibition from injecting energy;
- The rationale for accrediting ZGIA resources similarly to other resources and whether their operational characteristics warrant different treatment (and additional information on how other non-transmission-assets are treated);
- How ZRCs will be treated in the PRA, including must-offer provisions and treatment;
- How ZRCs will be tied to market participants/LSEs;
- The ability to trade or differentiation of ZGIA-ZRCs and regular ZRCs; and
- How outages (either transmission or generation) will be treated and how load obligations are met when ZGIA resources are not available.

Interconnection Impacts / Industry Coordination

The OMS Workgroups would appreciate more information regarding existing N-1 planning standards and how the scale of new loads and generation may introduce new system risks. A presentation on NERC's and ESIG's continuing related work in this area would be beneficial.

Other Considerations

Finally, the OMS Work Groups are working through concerns and questions regarding the potential for preferential treatment of large loads utilizing the ZGIA pathway. These include: whether there are considerations that should be given to other customers, resources, or market participants; how the ZGIA framework would change the risk considerations at the state level when considering CPCNs, IRPs, or other competitive solicitations; and how to safeguard against unintended consequences including cost or reliability risks shifted to the broader system.

The OMS Work Groups look forward to reviewing the comments of other stakeholders and continuing discussions on this topic.