Organization of MISO States (OMS)
Transmission Planning Work Group
PAC: Order No. 1920 Tariff Redlines
Submitted on March 27, 2026

In the February 25, 2026 Planning Advisory Committee (PAC), MISO provided draft Tariff redlines regarding its Order No. 1920 compliance filing for stakeholder review and feedback. Following MISO's June compliance filing, MISO and stakeholders will have two years to develop detailed processes and technical discussions, which will be documented in the Business Practices Manuals (BPMs).

- Order No. 1920 Tariff Redlines
- MISO Order No. 1920 Gap Analysis

The OMS Transmission Planning (TPWG) provides this feedback to MISO on its proposed Order No. 1920 Tariff redlines. **This feedback is from an OMS work group and does not represent a position of the OMS Board of Directors.**

Order No. 1920 contemplates several specific roles and opportunities for states (*i.e.*, Relevant State Entities) to engage on the development of Long-Term Regional Transmission facilities, including:

- Identification and description of benefits
- Consultation on project selection criteria
- Identification of cost-effective alternatives
- State agreement process (for purposes of cost allocation)
- Local and regional transmission project coordination
- Right-sizing provisions

OMS, through its Cost Allocation Principles Committee, the TPWG, and the MISO PAC, has reviewed Order No. 1920's directives for MISO as well as its opportunities for states and discussed how best to align MISO's compliance framework with OMS member needs, interests, and priorities. The TPWG appreciates MISO's evaluation of current relevant Tariff provisions and its comparison to Order No. 1920's requirements. We encourage MISO to incorporate the following recommendations into its Order No. 1920 compliance filing and to continue working with stakeholders to develop clear and substantive additions to MISO's Business Practice Manuals.

Benefits Explanation

For the benefits descriptions in the Tariff, MISO should include more detail about its intended measurement methodology. Order No. 1920 provides that there should be a description of how the benefits are measured, but the Tariff redlines appear to read more like definitions.

Project Evaluation and Selection Process

In the project evaluation and selection process description, please include more content specifying the type of content stakeholders will receive. Order No. 1920 notes that "evaluation of transmission facilities must culminate in a determination that is sufficiently detailed for stakeholders to understand why a particular Long-Term Regional Transmission Facility (or portfolio of such Facilities) was selected or not selected."

The TPWG recommends the following examples for information that stakeholders should receive:

- How costs and benefits were used to select projects;

- The methods for analyzing scenarios and sensitivities;
- The costs and benefits for the facilities considered; and
- The rationale for non-selection of facilities.

While MISO's proposed Tariff redlines currently include a sentence stating that MISO will provide a summary of projects not selected, it does not explicitly indicate whether stakeholders would have enough information to understand why certain projects were not included in a portfolio. The TPWG recommends coordinating with stakeholders regarding the specific disclosure requirements so that MISO's evaluation can be adequately understood.

Right-Sizing Provisions

With respect to right-sizing, the proposed Tariff redlines state that Transmission Owners will identify a minimum kV threshold for evaluation (see below). The TPWG recommends that MISO provide more detail on a shared standard that triggers evaluation. Ensuring transmission facilities are right-sized allows for cost effective delivery of energy services on the transmission system. A clearly defined understanding of right-sizing included in the MISO Tariff and coordination processes between MISO on RERRAs on identifying and upgrading facilities for right-sizing would afford greater transparency in understanding the costs incurred to build a reliable and cost-effective transmission system.

For reference, MISO's proposed Tariff language states:

> Right-sizing replacement facilities. Facilities that are anticipated to be replaced in-kind within 10-years, and are operated above a minimum kV threshold established by the Transmission Owner will be evaluated for upgrades that allow a "Right-Sized" replacement facility to more efficiently or cost-effectively meet long -term transmission needs.

Consultation with Relevant State Entities on Project Selection and Evaluation

The TPWG highlights the following provisions from Order No. 1920 where consultation with Relevant State Entities on the development of MISO's compliance framework is contemplated.

- "Subject to the requirements described further below, we adopt the NOPR proposal to require transmission providers in each transmission planning region to propose, after consultation with Relevant State Entities and other stakeholders, evaluation processes, including selection criteria, that they believe will ensure that more efficient or cost-effective Long-Term Regional Transmission Facilities are selected to address the transmission planning region's Long-Term Transmission Needs."

- "Specifically, we require transmission providers to demonstrate on compliance that they made good faith efforts to consult with and seek support from Relevant State Entities in their transmission planning region's footprint when developing the evaluation process and selection criteria that they propose to include in their OATTs."

The TPWG recommends that MISO explain how it has satisfied these directives at the next PAC meeting or in a written response by identifying the specific proposed Tariff language.