Organization of MISO States
Resources and Seams Work Groups
Response to RASC Feedback Request
Submitted on April 30, 2026

In the April 15, 2026 meeting of the Resource Adequacy Subcommittee (RASC), MISO presented a draft problem statement and scope of work for External Resource accreditation reform. MISO requested feedback on the draft problem statement by April 30.

https://www.misoenergy.org/engage/stakeholder-feedback/2026/rasc-external-resource-accreditation-draft-problem-statement-rasc-2019-2-and-2024-5-20260415/

The OMS Resources and Seams Work Groups (OMS Work Groups) provide this feedback to MISO regarding its External Resource Accreditation Draft Problem Statement. **This feedback is from OMS work groups and does not represent a position of the OMS Board of Directors.**

Firm interregional HVDC provides access to a new and diverse external system with separate load and resource patterns, delivering significant capacity value to MISO.

This capacity is real and measurable – the resource adequacy value of imports is included in planning frameworks in ISOs across the country, including in MISO. While eventually these types of resources should be incorporated into the DLOL framework, we understand that is a longer-term effort. However, we believe there is a path to realize the value that interregional HVDC brings to MISO over the short term to address urgent resource adequacy needs.

To that end, the OMS Work Groups envision two possible paths forward:

- We urge MISO to expand the proposed problem statement and workstream to include a simplified solution to interregional HVDC transmission that can be finalized by the end of this year and to begin to address MISO's resource adequacy needs over the short term.
    - Rationale: Prior to accrediting such lines, we believe MISO need not introduce transmission into the LOLE model and seek complete harmony with neighboring regions – they do not need to solve all the problems at once. By not solving all problems at once, MISO can open the door to ideas from stakeholders with experience with such lines and capture the value that few lines offer and do so sooner. This would allow MISO the opportunity to better assess its own transmission buildout with their neighbors, lay the groundwork for shared benefits to be identified, and jump-start such a process. We believe MISO should prioritize such an effort so as not to go down a path like the one they are currently on through order by FERC in addressing how merchant HVDC is to be incorporated into models.

- If MISO chooses not to revise this workstream, then we are supportive of exploring a new workstream to build a framework to assess the resource adequacy value of interregional HVDC.

Regardless of which path MISO decides to follow, we urge MISO to complete this important and time-sensitive work by the end of this year.