Organization of MISO States
Resources Work Group
Supplemental Response to RASC Feedback Request
Submitted on May 1, 2026

On April 29, 2026, the OMS Resources Work Group (RWG) submitted feedback in response to MISO's PRMR Allocation proposal presented at the April 15, 2026 Resource Adequacy Subcommittee Meeting. After further discussion, the RWG provides the following supplemental feedback to MISO:

The RWG reiterates its strong preference that MISO incorporate three years of data rather than the proposed one year to align D-LOL accreditation and PRMR allocation look-back periods.

That said, some RWG members are concerned that allowing the simultaneous reduction in resource accreditation and increase of PRMR allocation is unreasonable because it may penalize a resource-owning LSE often for reasons outside its control. A bad weather event that causes a generator to be unavailable during an RA hour could devalue a resource's capacity and increase an LSE's RA responsibilities (e.g., amount of capacity it must construct or procure).

Resource investment decisions are for the long-term timelines and impose significant costs on retail customers; it should not be driven by incidental or infrequent causes. Furthermore, it should not lead to over-correction by counting doubling the effect (i.e., reducing a resource's value and increasing the capacity obligation).

The RWG looks forward to further discussions with MISO and stakeholders on this consequential framework.