Organization of MISO States
Transmission Planning and Resources Work Groups
Response to RASC Feedback Request
Submitted on May 29, 2026

In the April 13, 2026 Long-Term Load Forecast Workshop, stakeholders were invited to submit feedback on the Long-Term Load Forecast with a focus on the following questions:

- What improvements would make the forecast outputs more actionable or transparent?
- Which areas of the load forecast should MISO prioritize for enhancement?
- Are there emerging trends or technologies in your footprint that MISO should explicitly incorporate?
- What additional collaboration opportunities could strengthen alignment between MISO and stakeholders?
- What aspects of MISO's uncertainty approach need greater transparency, including any areas where forecasts may consistently over- or under-estimate expected conditions?
- Are there any timing considerations we should be aware of as MISO establishes a predictable cadence for releasing load forecasts?

https://www.misoenergy.org/engage/stakeholder-feedback/2026/workshops-long-term-load-forecast-20260413/

The OMS Transmission Planning and Resources Work Groups (OMS Work Groups) provide this feedback to MISO regarding the Long-Term Load Forecast (LTLF) Workshop. **This feedback is from OMS work groups and does not represent a position of the OMS Board of Directors.**

What improvements would make the forecast outputs more actionable or transparent?

- The OMS Work Groups support greater transparency regarding the data sources, assumptions, and methodologies used in the LTLF. It would be helpful for workshop materials and resulting white paper to include an appendix documenting key methods, data sources, references to stakeholder surveys, and other inputs used in developing the forecast.
    - The white paper generally references broad source categories, but provides limited citations to specific publications, datasets, and vintages. The workshop slides appear to contain more detailed references (e.g., specific references to FERC Form 715 DER data). MISO should strive to include more specific source citations in the white paper where practical, particularly when data sources materially influence forecast outcomes.
- The OMS Work Groups encourage MISO to maintain consistency in data sources and forecasting methodologies over time. When changes are made, stakeholders should be informed of the changes, the rationale for the changes, and the expected impact on forecast results.
- MISO should provide clarity on the stakeholder submitted data (the black-dotted line):
    - Was this line updated with the final forecast submissions collected in 2026 in advance of the PRA? The workshop slides indicate it is "preliminary," and the white paper does not specify.

    - Why is the black-dotted line in 2026 smooth, whereas the corresponding line in the December 2024 Long-Term Load Forecast show more variation by year?
- Can MISO provide more detail about the Kevela analysis, and how their results changed the LTLF?
- The OMS Work Groups express caution when developing data center and BTMG assumptions. From the workshop, it sounded like MISO was contemplating the possibility that reported data center load could be over- or under-estimated due to apparent data center interest in BTMG.
    - If so, we observe that initial experiences with data centers indicate interest in BTMG varies widely. Unless forecasts are provided that explicitly state large loads would incorporate BTMG, we would not suggest making assumptions about BTMG interest.

Which areas of the load forecast should MISO prioritize for enhancement?

N/A

Are there emerging trends or technologies in your footprint that MISO should explicitly incorporate?

- The OMS Work Groups express interest in seeing a low-end estimate for large load that contemplates more substantial limiting factors to data center growth such as supply chain issues, workforce issues, and/or regulatory lag.
    - Another aspect to consider would be the maturation of the industry itself.
- If data center development does not follow the normal S-curve development as an industry and finds ways to be more efficient with input/outputs, we can expect the industry to mature like anything else and continued growth should not be overloaded. MISO seems to be factoring in this consideration, but if the initial growth is overstated, the forecasts may still be too high.

OMS Work Group members questioned whether data centers will continue growing at 17.9% to 18.2% through 2046. Figure 15 indicates growth assumptions of 91% CAGR for 2026–2030, 6% for 2030–2035, and 1.8% thereafter. Similar uncertainty applies to other rapidly evolving categories, such as EVs.

What additional collaboration opportunities could strengthen alignment between MISO and stakeholders?

OMS Work Group members continue to explore potential and intended uses of the LTLF, which may impact the need for accurate inputs or various sources of data (e.g., utility-only, third-party, disclosure requirements) may be needed depending on use output.

What aspects of MISO's uncertainty approach need greater transparency, including any areas where forecasts may consistently over- or under-estimate expected conditions?

The OMS Work Groups request further detail on why adjustments need to be made for particular factors or trends. This recommendation recognizes that the impact of some of these factors may already be appearing in historical data in which case adding further medications might be unnecessary.

- We request more information about the role of Landgate including the specific tasks they completed and how they were selected.
- Did MISO consider any potential conflict-of-interest issues with having a company that sites- and finds capacity for-large load involved in this work and report?

Are there any timing considerations we should be aware of as MISO establishes a predictable cadence for releasing load forecasts?

- Having predicable out-year forecasts for class-level accreditation values is critical. As those values become outputs of MISO's Futures study and the long-term load forecast is an input into the Futures study, we recognize a need for a predictable cadence to accomplish that objective.
    - While every LTLF does not necessarily inform each Futures initiative, we see a need for MISO to discuss needs and objectives with stakeholders about expectations around the release of out-year class-level accreditation values.

Finally, the OMS Work Groups note that it would increase clarity for stakeholders if naming conventions for these studies could be more consistent. For example, it appears the 2026 LTLF should be named the 2025 LTLF if following past patterns for how MISO names these studies.