Organization of MISO States (OMS)
Transmission Planning and Resources Work Groups
LLWG: ZGIA Proposal Draft Tariff Language
Submitted on June 1, 2026

In the May 14, 2026 meeting of the Large Load Working Group (LLWG), MISO requested feedback on the ZGIA Proposal Draft Tariff Language.

https://www.misoenergy.org/engage/stakeholder-feedback/2026/llwg-zgia-proposal-draft-tariff-language-20260514/

The OMS Transmission Planning and Resources Work Groups (OMS Work Groups) appreciate MISO's proactive efforts to evolve its interconnection and planning processes to accommodate rapidly accelerating demand from large loads. The development of a formal Zero-Injection Generator Interconnection Agreement (ZGIA) framework represents a potential pragmatic near-term tool to facilitate the interconnection of large loads (such as data centers) with on-site generation while minimizing unnecessary network upgrades.

However, given the complexity of the recent design shifts and the substantial market implications introduced during recent workshops, the OMS Work Groups respectfully request that MISO delay its planned ZGIA FERC filing by at least four weeks (i.e., no earlier than July 31, 2026).

Rushing a Section 205 filing without fully vetting unresolved Resource Adequacy impacts, commercial participation models, and long-term reliability considerations creates a high risk of deficiency letters or protests at FERC. A brief four-week extension should provide the necessary runway for stakeholders and MISO to collaboratively refine the Tariff language to ensure a just, reasonable, and durable framework.

Core Areas Requiring Further Stakeholder Engagement

The OMS Work Groups believe that a four-week delay is necessary to address three primary outstanding issues:

1. Resolution of Outstanding Resource Adequacy (RA) Aspects

While a ZGIA resource is characterized by its inability to inject energy into the broader MISO transmission system, its physical presence heavily impacts regional reliability and load-serving calculations. Several critical RA elements remain under-developed:

- **Commercial Model and Capacity Auction:** Stakeholders require further clarity on how these ZGIA resources and associated loads will be accounted for in the commercial model and capacity auction. For ZGIA resources that are accredited capacity value and designated as a Capacity Resource, it is still unclear how their must-offer obligation would work and potential impacts on MISO's energy markets. MISO has stated that at least three zero-injection resources are currently operating in MISO's markets. We request that MISO explain how they have handled these resources in its capacity and energy markets, including how load was accounted for and whether and how the no injection resource bids into energy markets and whether the practices and operations of

those resources is how ZGIAs will be operated/used. Similarly, for existing zero-injection resources and their associated load, explain the nature of their participation in MISO's ancillary services market, if any, and whether those practices are proposed to continue.

- **Behind-the-Meter-Generation (BTMG) Treatment and Capacity Credit:** Clear rules must be established regarding whether or how ZGIA resources can participate in or offset Resource Adequacy requirements, particularly if the associated load drops offline or if the generator is called upon to perform during localized instances of grid stress.
- **Outage Coordination:** If a ZGIA generator trips offline, the immediate reliance of the large load on the broader MISO system alters local transmission contingencies. The interplay between the generator's outage tracking and the load's delivery rights must be explicitly detailed.

2. Evaluation of Time Limitations

The OMS Work Groups understand that the ZGIA framework is being fast-tracked largely as an interim, stopgap mechanism to solve immediate large-load integration challenges while broader queue reforms play out. As such, the OMS Work Groups recommend that the final design include guardrails against unintended long-term consequences:

- **Time Limitations / Temporary Status:** The OMS Work Groups strongly recommend that MISO and stakeholders discuss the inclusion of a "time limitation" or "sunset clause" for individual ZGIA resources (e.g., a three- to five-year term limit) as well as the ZGIA framework in general. This would help ensure that ZGIA resources eventually become full-fledged network resources, thereby alleviating potential cross-subsidization concerns. MISO and stakeholders would need to discuss the exact parameters of such timing requirements and whether to grandfather in or otherwise carve out the extant generation resources operating under zero-injection commitments.
- **Transition Pathways:** Clear rules are needed detailing how a ZGIA resource can later transition into a standard GIA with full injection rights through the traditional Definitive Planning Phase (DPP) queue. The OMS Work Groups recommend that certain restrictions or requirements be implemented to prevent ZGIA resources from somehow jumping other resources already in the queue or gaining some other advantage.

3. Operational Control and Contractual Linkages

Recent stakeholder feedback highlights the need for strict operational guardrails to maintain system reliability. MISO and stakeholders need additional time to refine the following:

- **Contractual Linkage Enforceability:** Solidifying the legal and financial mechanisms that bind the generation to the associated load. MISO's Tariff must clearly outline cost-sharing responsibilities and penalties if either the associated load or the ZGIA resource fails to materialize or drops offline prematurely.
- **Modeling and Metering Separability:** Ensuring that distinct metering and modeling requirements for both the associated load and the ZGIA resource are clearly articulated in MISO's Business Practice Manual to allow MISO operators adequate visibility under NERC TPL planning events.

Proposed Path Forward

The OMS Work Groups do not intend to stall progress on this important initiative. Instead, we propose utilizing the requested four-week extension to hold targeted workshops or special sessions of the Planning Advisory Committee / Large Load Working Group. These sessions should focus exclusively on resolving:

1. The capacity and commercial market registration rules for ZGIA resources.
2. The specific legal parameters of a ZGIA time-limitation mechanism.
3. Review of the draft Tariff redlines to ensure stakeholder consensus before submission to FERC.

Taking the time to resolve these structural questions now will result in a more complete FERC filing that is better understood and, potentially, supported by stakeholders thereby reducing regulatory delays. We look forward to discussing these issues and questions further with MISO at the OMS Board meeting on June 11.