Organization of MISO States
Resources Work Group
Response to RASC Feedback Request
Submitted on June 11, 2026

In the May 20, 2026, meeting of the Resource Adequacy Subcommittee (RASC), MISO proposed adjusting the PY27-28 solar Non-GADS Template hours to better align with risk hours that are being observed in real-time. Stakeholders were asked to provide feedback on the following:

- Any inputs that should be considered that are not currently considered
- Any changes to the proposal being considered - please provide what changes and evidence demonstrating the appropriateness of the change
- Any changes that should be considered for accrediting new solar resources

https://www.misoenergy.org/engage/stakeholder-feedback/2026/rasc-solar-accreditation-for-py27-28-rasc-2019-2-20260520/

The OMS Resources Work Groups (OMS RWG) provide this feedback to MISO regarding its solar accreditation proposal for PY27-28. **This feedback is from an OMS work group and does not represent a position of the OMS Board of Directors.**

The RWG notes that LSEs and other market participants are already preparing for accreditation changes related to Direct Loss of Load (DLOL). Rather than introducing another moving part, the better way to help participants transition to DLOL is to provide more information. Participants are waiting on updated outyear DLOL class level results and analyses related to PRMR allocation.

The RWG also notes that MISO's proposed change to solar accreditation for PY27-28 appears out of step with the proposed transition period for DLOL, as described in MISO's FERC filing: *A successful tariff filing will provide certainty of direction for LSEs and regulators that engage in resource planning for their respective jurisdictions, and the transition period will provide an opportunity for everyone to adjust to the new methodology prior to implementation.*

Although the RWG understands that the change impacts language in the BPM, the RWG believe more discussion is needed regarding whether this change would actually meet the threshold for a Tariff-level change (i.e., the Rule of Reason) since it has the potential to significantly impact rates.

MISO staff stated that this interim change may have the ability to help avoid suppressing capacity prices. However, participants likely do not have time to act on changes related to this interim year. It might be considered imprudent for participants to make any investments or longer-term changes for PY27-28 anyway when changes related to PRMR allocation are pending.

- Participants do not have information needed to fully understand the impact of this interim change or price impacts as no data was shared and no new hours were specified.
- Changes to Net CONE may already result in higher ACPs for PY27-28, such as using the updated physical factor figures from more recent EIA data

Finally, the RWG recommends that if MISO intends to move forward with these changes, it should conduct a forward-looking assessment on the potential impacts to complement its evaluation of two years of backward-looking RA hours. Such an assessment could help indicate whether load pattern changes and the increasing number and geographic range of solar installations would widen and flatten the curve of RA hours that appears to already exist in the two-year backward-looking view.