Organization of MISO States (OMS)
Resources and Seams Work Groups
Response to RASC Feedback Request
Submitted on June 12, 2026

In the May 20th meeting of the Resource Adequacy Subcommittee (RASC), MISO reviewed stakeholder feedback and introduced topics being evaluated for External Resource Accreditation. Stakeholder feedback was requested on the following:

- What other sources of information could be used for non-pseudo-tied External Resources to establish real-time availability and outage information?
- Given limited real-time availability data, what hours should be considered when accrediting External Resources?

https://www.misoenergy.org/engage/stakeholder-feedback/2026/rasc-external-resource-accreditation-rasc-2019-2-and-rasc-2024-5-20260520/

The OMS Resources and Seams Work Groups (OMS Work Groups) provide this feedback to MISO on External Resource Accreditation (RASC-2019-2 and 2024-5). **This feedback is from OMS work groups and does not represent a position of the OMS Board of Directors.**

The OMS Work Groups urge MISO to commit to developing a roadmap and timeline for interregional HVDC accreditation. Developing an accreditation method soon allows states along with LSEs to evaluate a suite of options to cost-effectively serve load with diverse resources and independent load. This suite of options must include interregional transmission as an option. MISO needs to help its members and states in evaluating how such lines fit within the resource adequacy framework in the near term.

This Issue "Capacity Accreditation for External Resources facilitated by HVDC Transmission RASC-2024-5" was introduced by stakeholders in 2024 to integrate planned and future facilities into MISO's Resource Adequacy construct. Since its introduction, MISO has repurposed the Issue to focus exclusively on external resource accreditation without recognition of the resource adequacy characteristics offered by HVDC facilities. We believe this is an improper appropriation of a stakeholder-submitted issue without a clear channel for resolving a critical aspect of the Issue's original scope.

MISO can partner with stakeholders with knowledge of HVDC technologies and support their efforts in the development of the accreditation of interregional HVDC ties. Interregional HVDC lines could provide significant value to MISO, but they will be difficult to finance and construct if MISO does not offer a pathway to participation and closes the door to the near-term design of such accreditation. Solution development should move forward in earnest so the footprint can tap into the substantial value that independent load and geographic diversity across external systems can provide.

Interregional HVDC presents an opportunity to access large quantities of generation from other footprints with the HVDC owner assuming all risks for delivery to the MISO footprint. A MW-based approach at the point of delivery in the MISO footprint would be a reasonable starting point to accredit HVDC connections. Although further discussion is needed regarding the complicated methods of accrediting interregional HVDC facilities, the resource accreditation does not need to be tied to specific resources since the lines have more value from a diverse resource pool than what a re-assignment of generation resources would provide between regions.

States with a range of policy objectives and LSEs agree HVDC accreditation should be a priority and MISO should provide proactive support in the effort to evaluate how such lines fit into resource plans and transmission models. Both LSEs and states have resoundingly supported efforts to unlock the value these lines can create, and MISO itself has acknowledged the same value in its Impact Assessment. Accrediting these lines in the near term is necessary so that the most cost-effective transmission portfolio can be selected. Such practices may obviate the need of or modify lines coming out of future transmission planning studies that MISO intends to perform with its neighbors and members. Furthermore, states are making resource adequacy decisions about these lines today and in the future and need this clarity when considering their options.

The OMS Work Groups call on MISO to develop a solution for interregional HVDC accreditation that can be filed by the end of the year. We reiterate prior feedback that MISO need not incorporate such accreditation in the DLOL modeling in the same timeframe and that MISO should develop the appropriate workstreams today as such HVDC lines are currently being planned and need their value quantified in order for them to be considered in resource adequacy workstreams under state authority.