Organization of MISO States (OMS)
Resources Work Group
Response to LLWG Feedback Request
Submitted on July 15, 2026

In the June 29, 2026 meeting of the Large Load Working Group (LLWG), MISO requested feedback on its proposed plan to file ZGIA as presented at the June 10 LLWG, with the exceptions and differences described in the June 29 presentation.

https://www.misoenergy.org/engage/stakeholder-feedback/2026/llwg-zgia-proposal-framework-pac-2024-4b/

The OMS Resources Work Group (OMS RWG) provides this feedback to MISO on its Zero-Injection GIA (ZGIA) proposal. **This feedback is from an OMS work group and does not represent a position of the OMS Board of Directors.**

The OMS RWG appreciates MISO's decision to delay its ZGIA filing at FERC by several weeks in order to further develop specific design elements of the proposal and ensure alignment with recent action from FERC on large load interconnection requirements.

With the extra time, the OMS RWG urges MISO to address the following unresolved resource adequacy issues. If not before its FERC filing, the OMS RWG requests that MISO commit to addressing these items at a future date.

- If ZGIA resources curtail specifically due to reductions in associated load, the reduced resource availability – once translated as an input to the LOLE model – could result in a reduced UCAP value for the associated resource class. Reduced performance specifically related to ZGIA rules may need to be modeled or accounted for otherwise to avoid creating noise and/or inaccurate results in the LOLE model.

- As ZGIA resources have SAC capped commensurate with the Coincident Peak Demand forecast of associated load outside of the LOLE model, this could potentially result in the LOLE model identifying a fleet of resources as able to satisfy the PRM, but once ZGIA resources are capped, that same fleet would not be able to satisfy the PRM.

- With DLOL implementation in Planning Year 2028/29 and potential changes to PRMR allocation forthcoming, language about capping a ZGIA resource's SAC specifically based on Coincident Peak Demand forecast may need to be updated.