Organization of MISO States (OMS)
Transmission Planning and Resources Work Groups
Response to LLWG Feedback Request
Submitted on July 30, 2026

During the July 16, 2026 meeting of the Large Load Working Group (LLWG), MISO proposed a new process for concurrently studying large loads and associated generation. Stakeholders were invited to submit feedback on the following:

- Is ≥ 250MW the right minimum? If not, what threshold better captures high-impact loads without diluting intent? Please explain any reliability or study-volume implications.
- What readiness or securitization rules best guard against speculative submissions while preserving genuine projects' speed?
- Are there any items in this process needing improvement? If so, please include your recommended solution or suggested approach.

https://www.misoenergy.org/engage/stakeholder-feedback/2026/llwg-generation-and-large-load-alignment-llwg-2026-6-20260716/

The OMS Transmission Planning and Resources Work Groups (OMS Work Groups) provide this feedback to MISO on its Generation and Large Load Alignment proposal. **This feedback is from OMS work groups and does not represent a position of the OMS Board of Directors.**

Is ≥ 250MW the right minimum? If not, what threshold better captures high-impact loads without diluting intent? Please explain any reliability or study-volume implications.

States are aware that generation projects for large loads will be proposed and have language in state tariffs and regulations that establish MW thresholds for large loads. The OMS Work Groups recommend that MISO and stakeholders carefully consider the compatibility between the definitions of large load in state rules and this load addition resource study process as well as the broader large load ramifications of this criterion.

The OMS Work Groups support a mechanism (e.g., minimum MW threshold) that limits the scope of the proposal to only high-impact large loads. We recognize this process steps away from optimizing network upgrades for multiple generators like the Generation Interconnection Queue and are still weighing the trade-off to optimize necessary network upgrades between a single generator and an associated load.

The OMS Work Groups are still discussing this issue but generally trend toward the MISO proposed 250 MW threshold. Concerns exist that this study framework needs to be narrowly tailored to large loads and that any lower threshold will simply create an additional interconnection queue. The OMS Work Groups will provide additional feedback on this issue in future discussions.

What readiness or securitization rules best guard against speculative submissions while preserving genuine projects' speed?

Consistent with the Show Cause Order, we expect that consideration of GETs will be required as part of a Transmission Owner's identified solutions and submitted in MTEP with sufficient supporting information to identify alternative costs, trade-offs, and rationale for selecting GETs or proposed solutions.

Please clarify if a prospective generator that does not meet the existing requirements in the generator interconnection process (e.g., generator site control) would be barred from the joint large load and generation study process.

Are there any items in this process needing improvement? If so, please include your recommended solution or suggested approach.

Currently, the joint large load and generation study process slides do not discuss what would be provided in a final study report. As directed in the Show Cause Order, the OMS Work Groups expect a final report to be posted publicly that details: size and timing of the spot load and generator additions; how network upgrades were studied and identified; all alternatives considered; how alternatives were evaluated; and how cost estimates were derived.

This report should also include evaluations of alternative technologies that include, as detailed in the Show Cause Order, "...a sufficiently clear demonstration of why alternative transmission technologies are not feasible (i.e., would not resolve reliability violations identified or meet the relevant planning criteria) or would not result in lower costs or a faster timeline for accommodating the transmission service request."

Consistent with the Show Cause Order's transparency requirements, this report should include detailed explanations of how the identified network upgrades will be cost allocated, including the: project category, justification of project category, applicable transmission pricing zone, and state location.

- Further discussion regarding sufficient transparency will be required. Since transparency is a FERC requirement from the Show Cause Order, we anticipate that new transparency requirements will be proposed in the tariff rather than in MISO BPMs.

Relatedly, we strongly recommend that if this study process results in new projects, then they should be classified as Market Participant Funded Projects (MPFPs) to avoid cost shifts to other LSEs in the same TPZ. Since this new study process would not optimize network upgrades between multiple interconnecting generators and instead optimize network upgrades between a distinct generator and a load, it is important, from a potential cost shifting perspective, to ensure that any network upgrades resulting from the new study process are transparently tied to the interconnecting load.

- We are concerned whether this process can address (or prevent) a situation where transmission facilities are later identified (e.g., in other studies) or moved from Appendix B to Appendix A during the EPR study, as reliability projects needed to fix any unaddressed or exacerbated reliability issues related to a large load interconnection that used the joint large load and generation study process. We recommend that this issue – namely the need for additional future reliability upgrades – be contemplated and addressed in the final study report.

In addition to the final report's substance, the OMS Work Groups are concerned that modifications to the cost allocation of transmission network upgrades identified as necessary to interconnect a large load are not being contemplated in this proposal. MISO has proposed that identified network upgrades will be categorized as BRP or Other projects, with no option for MPFPs.

- The OMS Work Groups believe that MPFPs should be utilized since they would directly allocate the cost of network upgrades identified as required to interconnect a large load customer. MISO's proposal is out of step with direction from the Show Cause Order and the Ratepayer Protection Pledge.
- The cost allocation design element should be discussed further with stakeholders. It is unclear which project types will be eligible for categorization in this process – this should be clearly stated in any Tariff, BPM, and Final Study Reports.

Further, the OMS Work Groups question if leaving the status quo cost allocation methodology in place for this proposal will promote speculative projects and project size. Since the current cost allocation methodology does not directly assign necessary interconnection network upgrades (unlike generators), large loads do not face responsibility for full cost consequences of requesting speculative (i.e., increased) interconnection capacity (i.e., building in optionality for down the road while other customers pay for super-sized upgrades). Similarly, for reliability upgrades driven by large load interconnection, MISO should use distribution factor analysis to determine cost allocation, as is currently the practice for generator interconnection upgrades.

While some work group members do not object to the use of the LRZ as a geographic limit, some still have questions regarding compliance with relevant Show Cause Order directives. Questions have been raised how the proposed process of studying generators and load in the same LRZ complies with the Show Cause Order's definition of generation and 'electrically proximate large load' to be "effectively the same as if they were located at the same substation (e.g. large load that is located no more than two substations away from the generating facility)." [1,2]

OMS requests that MISO provide additional detail on the study process to understand how it will analyze conditions when full load exists and the associated generation has a planned or forced outage. Also, how will the study process analyze the system with the load off-line and the generation online?

Finally, the OMS Work Groups are concerned that timing discrepancies may exists depending on 'who' is paying for transmission upgrades at what time. Timing and cost certainty should be shared objectives to ensure that captive customers are not subsidizing large load upgrades – even temporarily – without sufficient reimbursement.

[1] Show Cause Order at paragraph 112.
[2] Notably, SPP's initial HILLGA proposal would have allowed generation and load in the same deliverability area, but the wide geographic scope for HILLGA was removed from their proposal after stakeholders and the SPP Market Monitoring Unit expressed concerns about queue jumping.