Organization of MISO States (OMS)
Transmission Planning Work Group
Response to PSC Feedback Request
Submitted on August 7, 2026

During the July 22, 2026 meeting of the Planning Subcommittee (PSC), MISO reviewed its proposal to expand the exemption of Transmission Service Requirements (TSR) for Electric Storage Resources (ESR) charging from the grid. Stakeholders were invited to provide feedback on the following:

- General feedback on the proposal
- Support for or against the proposal with reasons why
- Thoughts on inclusion of self-scheduled ESR charging from the grid being included in exemption from TSR

https://www.misoenergy.org/engage/stakeholder-feedback/2026/psc-tsrs-for-charging-esrs-from-the-grid-pac-2023-2-20260722/

The OMS Transmission Planning Work Group (OMS TPWG) provides this feedback to MISO on its proposal to expand the exemption of TSRs for ESRs charging from the grid. **This feedback is from an OMS work group and does not represent a position of the OMS Board of Directors.**

The OMS TPWG supports eliminating the requirement for an ESR to obtain Transmission Service that is offered into the MISO market under economic dispatch by MISO. In other words, the ESR offer must have the "Economic Dispatch" flag checked.

The OMS TPWG supports MISO's recommendation that all ESR's outside those ESRs under economic dispatch by MISO shall obtain Transmission Service when charging. MISO seemed to indicate that an ESR that charges outside MISO's economic dispatch (i.e., self-schedule) may have the requirement for Transmission Service waived if charging outside MISO's economic dispatch was a rare occurrence. The OMS TPWG rejects this potential waiver.

ESRs who have not acquired Transmission Service due to participation in MISO's economic dispatch shall have full deliverability to load as determined by appropriate studies (NRIS or equivalent). An ESR with service such as ERIS or other shall obtain the necessary Transmission Service to participate in the MISO market including when participating under MISO's economic dispatch.

Requests for Information

The OMS TPWG requests that MISO provide a short summary of the necessary studies for the various types of ESRs that determine the requirements for an ESR to achieve deliverability to MISO load.

MISO notes ESR charging occurs in part "...when the future need outweighs the current system conditions." The OMS TPWG requests that MISO advise on the process that will be utilized under MISO's economic dispatch to determine when such a situation occurs.

The OMS TPWG respectfully requests MISO to provide information on how MISO will optimize ESR State of Charge under MISO's economic dispatch. The OMS TPWG recognizes this request is somewhat unrelated to the TSR requirement and is for informational purposes.

The OMS TPWG requests information on the operational requirements that MISO's economic dispatch will use to avoid unanticipated congestion that could require manual curtailments by the Transmission Operator should this congestion not be captured in the DA and/or RT markets. The OMS TPWG recognizes this request is somewhat unrelated to the TSR requirement and is for informational purposes.

Does MISO plan to require ESRs that charge "behind-the-meter" and increase net load when charging to obtain Transmission Service?

Does MISO anticipate any changes for ESRs that charge from co-located resources since these ESRs do not require Transmission Service per Order No. 841?