Organization of MISO States (OMS)
Transmission Planning Work Group
Response to LLWG Feedback Request
Submitted on September 10, 2026

During the August 27, 2026 Large Load Working Group (LLWG), MISO reviewed the action it is considering in response to the Show Cause Order to document the large load application and study process. Stakeholders were invited to submit feedback on the proposed Large Load Project Review requirements and scope.

https://www.misoenergy.org/engage/stakeholder-feedback/2026/llwg-large-load-application-and-study-process-llwg-2026-7-20260827/

The OMS Transmission Planning Work Group (OMS TPWG) provides this feedback in response to MISO's large load application and study process proposal. **This feedback is from an OMS work group and does not represent a position of the OMS Board of Directors.**

The OMS Transmission Planning Working Group (TPWG) appreciates MISO's attention to this important directive in FERC's Show Cause Order regarding large load interconnection. Establishing a clear and inclusive large load application and study process is a critical component of achieving a successful outcome from MISO's concurrent efforts to enhance cost transparency and mitigate the risks of cost shifting associated with large load development.

The OMS TPWG encourages MISO to consider the following recommendations as it develops the Large Load Application and Study Process (LLASP) framework:

Ensure comprehensive and standardized study reporting

The resulting study report should clearly identify:

- All reliability violations and proposed mitigations identified through the study.
- All transmission projects required to accommodate the large load, including projects identified through Corrective Action Plans (CAPs).
- MISO's and the applicable TO's evaluation of GETs, with strong and standardized reporting of the evaluation consistent with the LLASP requirements.

Standardized reporting of these results will provide greater transparency into the basis for proposed transmission solutions and allow stakeholders to better evaluate whether alternative solutions were appropriately considered.

Establish clear GET evaluation requirements in the Tariff and BPMs

MISO should specify in the Tariff what GETs evaluation must be included as part of LLASP, with further specificity provided in the applicable BPMs regarding the criteria, modeling tools, and evaluation techniques to be used. This should reflect the requirements identified in FERC's Show Cause Order, including:

- Use of models capable of evaluating the transmission system while accurately accounting for advanced transmission technologies.

- A demonstration of why alternative transmission technologies are not feasible. For example, because they would not resolve identified reliability violations or meet the applicable local planning criteria.
- A demonstration that alternative transmission technologies would not result in lower costs or a faster timeline for accommodating the transmission service request.

MISO should also establish a clear backstop for GETs evaluation if a TO does not have the capability to model GETs at the level of detail required. If a TO does not have the appropriate modeling capability or technical expertise, MISO should conduct, or ensure the completion of, the GETs evaluation at the required level. A lack of TO capability should not prevent a GET from being appropriately evaluated.

Allow GETs to address portions of reliability violations

MISO should clarify that GETs can be evaluated and applied to portions of a load interconnection capacity requirement or individual reliability violations. In other words, a GET should not be required to solve an entire violation in order to be considered a valid mitigation. GETs should be allowed to address a portion of a violation, with other transmission upgrades or mitigation measures addressing the remaining reliability need, where technically appropriate. This would allow MISO and TOs to consider GETs as part of a broader portfolio of solutions rather than requiring a GET to independently resolve an entire violation before it can be considered.

Establish clear and prescriptive EMT study requirements

MISO should establish strong, clearly defined, and prescriptive requirements for what must be included and studied as part of EMT studies for large load interconnections. This is consistent with the Show Cause Order's acknowledgement that interconnection studies should reflect the unique operating characteristics of large loads.

MISO should consider whether the large load or LSE should be required to submit detailed EMT models. MISO should also explore aligning its large load EMT study requirements with both:

- MISO's existing EMT study requirements for generation interconnection; and
- ERCOT's EMT study requirements for large loads (given their relative stringency).

Incorporate cost-shifting requirements into the LLASP framework

MISO should ensure that any cost allocation changes resulting from the Transmission Cost Shifting issue and proposal are incorporated into the LLASP framework. This would be consistent with MISO's explicit acknowledgement of this intent in its updated LARS proposal. MISO could also reference compliance with the applicable cost-shifting requirements directly in the relevant BPMs.

Strengthen the Electric Service Agreement requirement

The application requirement for an Electric Service Agreement between the LSE and TO should be as formal and enforceable a contractual commitment as practicable. A stronger contractual requirement would help disincentivize speculative projects from entering the LLASP without a meaningful commitment to proceed.

Clarify the future role of the EPR process

The OMS TPWG does not have a strong opinion at this time regarding what the future EPR process should look like. However, the prior EPR models were less aligned with the traditional MTEP process while still requiring the results to be shared with stakeholders through the PAC. MISO should consider retaining its recent EPR study process improvements while bringing back a formal PAC review requirement. The EPR process is likely to be used less frequently under the revised framework, but it is still a necessary process for smaller, time-sensitive load requests.