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

During the August 27, 2026 Large Load Working Group (LLWG), MISO proposed a new Large Load Addition Resource Study (LARS) process for concurrently studying large loads and associated generation. Stakeholders were invited to submit feedback on the proposed process and draft Tariff Language.

https://www.misoenergy.org/engage/stakeholder-feedback/2026/llwg-large-load-addition-resource-study-llwg-2026-6-20260827/

The OMS Transmission Planning and Resources Work Groups (OMS Work Groups) provide the following feedback in response to MISO's Large Load Addition Resource Study (LARS) proposal. **This feedback is from OMS work groups and does not represent a position of the OMS Board of Directors.**

The OMS Work Groups reiterate their support for limiting the use of the LARS process to high-impact loads, as the process may reduce competition between interconnecting generators as a trade-off for the increased interconnection speed needed to support a large load. The OMS Work Groups recommend that the LARS framework be limited to five years, after which MISO should evaluate whether LARS is still needed and, if so, re-file with FERC for approval.

The OMS Work Groups support allowing the results of MISO's Transmission Cost Shifting Risk topic to inform how any load network upgrades identified during the LARS process will be cost allocated.

We also suggest that MISO align the evaluation and documentation of alternative transmission technologies (e.g., GETs) in the final load study report with the evaluation and documentation requirements established through the Large Load Application and Study Process.

The OMS Work Groups recommend that LARS include a process for how MISO will handle any restudies that may be necessary if a load, generator, or load/generator pair decides not to move forward with executing a GIA after being included in a study cycle.

Since LARS is intended to be used for loads and generators that have a higher degree of certainty, MISO may want to consider requiring more stringent site control requirements for both loads and generators using LARS to help ensure that the projects can ultimately be constructed. For example, requiring both the load and generator to have obtained conditional use permits from the local units of government, if necessary to construct the projects at the selected site, prior to entering a LARS study cycle would provide an indication that the local community is receptive to hosting the load or generator.

It is understood, however, that requiring permits prior to entering a LARS study cycle may be unworkable in some cases because the load or generator may need to determine whether it can

economically interconnect at the proposed site before obtaining the necessary permits. One alternative approach to ensure project constructability would be to:

1. Require higher upfront application fees that provide a greater financial commitment to the LARS process; and
2. Require the load and generator to pay for 100% of the required network upgrades, regardless of whether the load or generator is ultimately constructed.

As noted in our previous comments, upgrades identified in a LARS study could be classified as Market Participant Funded Upgrades (MPFUs). The obligation to pay for the MPFUs could be established at the time the GIA is executed for the generator. For the load, the Transmission Customer taking service on behalf of the load could be required to execute a facilities service agreement, at which point it would become obligated to pay 100% of the MPFU costs.

Further, to ensure that the load and generator can cover the costs of the required network upgrades, the load or generator should provide financial assurance (e.g., escrow, bond, or letter of credit) for the full cost of the required network upgrades at the time the applicable agreement is executed.