UNITED STATES OF AMERICA

BEFORE THE

FEDERAL ENERGY REGULATORY COMMISSION

Interconnection of Large Loads to the Interstate Transmission System	**)** **)** **)**	**Docket No. RM26-4-000**

COMMENTS OF

THE MIDCONTINENT INDEPENDENT SYSTEM OPERATOR, INC.

The Midcontinent Independent System Operator, Inc. (MISO) respectfully submits the following comments in response to the above-captioned Notice Inviting Comments issued by the Federal Energy Regulatory Commission (Commission) on October 27, 2025.[1] The Notice regards a proposed advance notice of proposed rulemaking (the "proposed ANOPR") issued by the Department of Energy (DOE) for consideration and final action by the Commission. In the proposed ANOPR, the DOE requests the Commission implement potential reforms to standardize interconnection procedures and agreements for large loads, including large loads that seek to share a point of interconnection with new or existing generation facilities,[2] to ensure the timely and orderly interconnection of large loads to the transmission system. The proposed ANOPR sets forth 14 principles intended to ensure efficient, timely, and non-discriminatory load interconnections and DOE requested comments. Given the relatively short time frame provided by the Notice for

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[1] *Interconnection of Large Loads to the Interstate Transmission System, Notice Inviting Comments*, October 27, 2025. MISO submitted a doc-less intervention in this proceeding on November 19, 2025.

[2] The proposed ANOPR defines large loads sharing a point of interconnection with new or existing generation facilities as "hybrid facilities."

comments, MISO's comments provide high-level input to help inform the Commission and recommend guidance in the event the Commission decides to pursue a formal rulemaking.[3]

MISO appreciates: (1) the goal of the DOE's proposed ANOPR to help facilitate large load interconnections and deliver "speed to power", and (2) the Commission's interest and work to support the timely and efficient interconnection of load resources onto the transmission system.[4] MISO supports the use of all available tools to meet the ongoing challenges to support the reliable operation of the transmission grid while also accommodating large load's rapid growth in electricity demand. To that end, and as discussed further in these comments, MISO already has existing processes that effectively facilitate the interconnection of large loads, and MISO also consistently works with stakeholders to ensure such processes continue to meet the needs of large loads and resource planners. MISO's existing processes effectively reflect unique facts and circumstances of MISO's system, its states, and members. Importantly, states and load serving entities are primarily vertically integrated and responsible for resource adequacy within the MISO footprint. As a result, many states and utilities within MISO have processes which enable them to review and pare through speculative load requests to determine projects with more certainty, allowing MISO processes to enable speed to power for more certain large load interconnections, including determining the associated transmission required to facilitate the required generation interconnections. Additionally, states will be key in ensuring the costs from related upgrades are accurately assigned to the large loads causing them, through rate design that better reflects local needs as opposed to cost-assignment through a MISO-driven process.

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[3] MISO interprets DOE's proposed ANOPR as proposing large load interconnection procedures to be followed by all RTOs, ISOs, and Transmission Providers.

[4] *See e.g.,* Letter dated September 19, 2025, to John Bear from Chairman Rosner regarding load forecasting and the impacts of new large load growth, as well as John Bear's response letter dated October 8, 2025 (Docket No. EL25-109), and the Commission's October 21, 2025, Reliability Technical Conference, Panel 2.

Moreover, MISO, as well as other RTOs and ISOs,[5] is currently engaged in several efforts to efficiently effectuate the integration of these large loads—including improvements to short-term and long-term load forecasting; revising North American Electric Reliability Corporation (NERC) standards; and improving operational visibility, monitoring, and coordination of such large loads. Consequently, the Commission should be mindful of regional differences that might limit the success of a "one size fits all" mandate. Shifting to standardized large load interconnection procedures could nullify currently effective processes and/or delay significant work that has been undertaken and currently ongoing.

Moreover, shifting to a one-size-fits all approach could introduce *delays* to interconnecting large loads, which would be contrary to the very progress desired by the DOE and the Commission. The reasons for delays include: (1) utilizing a generator interconnection process as a template that historically has experienced delays and is unlikely to provide the speed to power needed by large load customers; (2) requiring additional work and requirements that are not currently required under MISO's existing processes, and which may be unnecessary; and (3) meaningful differences between generation and load that will prevent a seamless utilization of the generator interconnection process for large load interconnection purposes and will present challenges. Fundamentally, MISO questions whether standardized large load interconnection procedures will result in the "speed to power" that is necessary to allow the United States to effectively compete in the global competition for economic development, such as in artificial intelligence and creating manufacturing and industrial jobs. Later in these comments MISO addresses its concerns regarding delays in greater detail.

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[5] MISO is actively engaged with other RTOs to compare experiences and leverage lessons learned to help develop best practices to efficiently integrate new large loads.

Furthermore, MISO is concerned of the impact the proposed ANOPR could have on MISO members' and states' resource plans and efforts for economic development. MISO's existing processes include working partnerships with stakeholders – including state regulatory commissions, utilities, and transmission owners – to ensure that they and MISO have an accurate understanding of evolving electric system needs and timelines.[6] Utilities in the MISO region, which operate under their respective state's jurisdictional authority, are on the front lines, working directly with new large loads to bring them online. The partnership between MISO, its members, and states, supports their plans and interests while ensuring continued reliability and preparing for the system of the future. The partnership also provides a solid foundation to move forward on timely, cost-effective solutions that provide flexibility to help meet the challenges ahead, as well as drives needed generation and transmission infrastructure investments, allowing the most efficient use of infrastructure of all types. The partnership has successfully resulted in significant large load additions. MISO is concerned that the proposed ANOPR would negatively impact this partnership, potentially hinder member and state's interest, and result in less efficient large load interconnections.

In addition to delays and the need to support MISO's members and states' interests, MISO understands that large loads (e.g., data centers) have different business and service models. Such business and service models may differ depending on facts and circumstances presented in different regions[7] and even based on different facts in the same region. For example, a large load that seeks to connect to the transmission system may be accompanied by co-located generation to

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[6] As the RTO, MISO leverages technology and ongoing process improvements, and conducts long-term planning, to support the states' resource adequacy role and the obligation of load serving entities to serve their end-use customers.

[7] For example, states' economic development priorities may differ from region to region, as well as state regulatory jurisdictional authority over utilities (e.g., retail access).

serve that load or it may depend on resources existing or to be developed elsewhere on the Transmission System. The appropriate study process may look very different for each of these scenarios. Also, the costs of interconnecting load to the transmission system may not be viewed by some large load customers as a significant component of the overall costs of bringing data centers online whereas for others this may prove an impediment. Unique considerations and priorities such as these may not be met through a "one size fits all" mandate.

MISO also respectfully cautions the Commission against diverting industry attention to developing a one-size-fits all approach that will likely lead to a less efficient process.[8] In lieu of requiring standard large load interconnection procedures, and in light of the concerns expressed above, the Commission should allow MISO, as well as other industry participants, to continue focusing attention on efficiently interconnecting large loads pursuant to processes that reflect the unique circumstances of their members, states, stakeholders, and transmission systems. Alternatively, the Commission could refine the principles started by DOE and issue a policy statement to guide the industry processes to be used for large load interconnections. This would enable Transmission Providers to craft unique solutions suited for their regions guided by Commission principles.

To the extent the Commission believes it must pursue standard large load interconnection procedures or another rule mandate through a formal rulemaking process, it should extend the "Independent Entity Variation" principle to any final rule. Providing this flexibility would be consistent with prior acknowledgements of the Commission regarding the unique status of ISOs and RTOs as independent, stakeholder-driven organizations that are best positioned to address

[8] To the extent that individual regions of the country are facing challenges in effectively integrating large loads the Commission could target significant reforms for those individual regions. This will support the development of best practices across the nation, while ensuring progress within individual regions that are struggling to keep pace.

specific interconnection issues that may arise in their regions.[9]

I. MISO Comments

A. MISO's existing processes effectively facilitate interconnection of large loads, so there is no benefit at this time for standard large load interconnection procedures.

Transmission and generation are critical enablers to facilitate the interconnections of large loads. MISO has updated and enhanced its processes across the transmission and resource planning horizons to efficiently support large load additions and improve the integration of large loads. The efficient integration of new large loads depends on MISO being allowed to continue using its existing processes, as well as working with stakeholder on potential prospective enhancements. Below MISO provides a summary of its existing processes.

i. MISO has enhanced its generator interconnection processes to help bring new generation online more quickly.

One of the challenges of large load additions is that typically large loads desire to be served quickly, so any delays in generation interconnection analysis or the construction of necessary transmission upgrades can create challenges. Therefore, MISO has undertaken several enhancements to its generator interconnection process to allow generation to come online more quickly and better align with the time frames for large load additions. Those efforts include:

- The Expedited Resource Addition Study (ERAS) process, which is a temporary, targeted process that allows certain generation projects to utilize ERAS instead of the standard, often backlogged, interconnection queue[10] to obtain a Generator Interconnection Agreement faster and connect to the grid in significantly less time. MISO has 52 active ERAS applications across 12 states for approximately 26 gigawatts (GW) of proposed new generation capacity. The studies for the first 10 applications have been

[9] Encouraged by the Commission, MISO and other RTOs adopted numerous region-specific variations to the pro forma LGIP and LGIA, engaging together with their respective stakeholders, in continuous review, and when necessary, reforms, of their generator interconnection practices and procedures. The Commission has reviewed these proposals under its more lenient "independent entity standard," which allows significant deviations from the *pro forma* rules and accommodates considerable regional variations among RTOs and ISO. At a minimum, the Commission should extend the same flexible principles to large load interconnections under this rulemaking.

[10] For MISO, the standard interconnection queue is the Definitive Planning Phase (DPP) interconnection queue.

completed and are now in the generator interconnection agreement phase. Figure 1 provides a map of the ERAS applications.

- The MISO-Southwest Power Pool (SPP) Joint Targeted Interconnection Queue (JTIQ) Study, which is an innovative study process that facilitates more timely interconnection study processes and identifies larger, more comprehensive transmission projects to allow future interconnection requests to occur at lower costs than what would be achieved through the ordinary process of studying individual groups of Interconnection Requests for the smaller upgrades that those projects typically require. The JTIQ portfolio of upgrades[11] are scoped to enable multiple clusters of generation and are included in going forward models for transmission planning and generation interconnection, including the models for the DPP 2023 cycle[12] and ERAS studies. JTIQ will enable generation to come online faster and provide greater upfront cost certainty for the resources needed to enable large load additions.

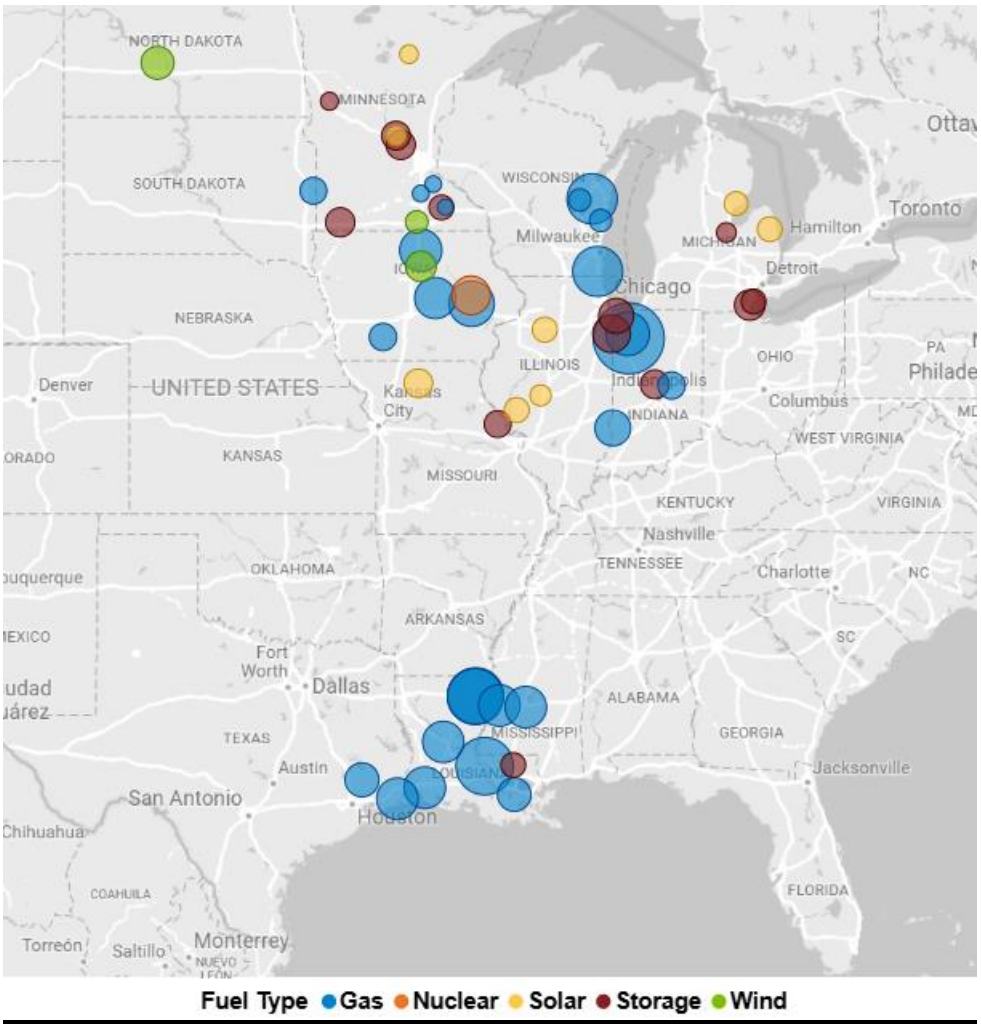
- Revisions to MISO's standard interconnection process, including: (i) increased milestone payments; (ii) automatic withdrawal penalties; (iii) increased withdrawal penalty provisions; and (iv) expanded site control requirements for interconnection facilities. These enhancements significantly improve queue speed by deterring speculative projects and streamlines the process for those projects that are viable and needed. Additionally, starting with the 2025 DPP cycle, MISO will begin limiting the amount of interconnection requests that will be studied in any given DPP cycle. Reducing the amount of new generation studied at a time will result in more realistic study results and cost estimates, less constraints that require new network upgrades, and faster study results.

- Utilization of the Suite of Unified Grid Analyses with Renewables or "SUGAR" platform from Pearl Street Technologies to process and speed up the large backlog of generator interconnection studies. SUGAR automates the creation and operation of power flow models, and identifies transmission constraints and potential mitigation solutions, significantly reducing the time needed for the initial phases of the interconnection study. This technological integration helps MISO better manage the high volume of interconnection requests and will assist in meeting the goal of achieving a one-year study timeline for new generation projects.

Figure 1 – Map of Active ERAS Applications

[11] As discussed further below, this portfolio is referred to as JTIQ Portfolio #1.

[12] DPP 2023 began on September 30, 2025.



ii. <u>MISO's existing transmission planning processes help facilitate large load additions in a timely manner</u>.

While discussion of generation needs associated with large loads has gotten significant attention, it is critical not to overlook the role a robust transmission system plays in ensuring a resilient and cost-effective foundation to meet this new load growth. The transmission system allows these new loads to leverage the efficiencies associated with demand and supply side diversity across a wide footprint resulting in lower energy costs, lower required resource planning reserve margins and increased reliability of supply. On the transmission planning side, MISO currently has three avenues to determine the necessary and most cost-effective transmission system improvements for large load interconnections:

1. The annual MISO Transmission Expansion Plan (MTEP), where MISO reviews both NERC driven and Transmission Owner projects to ensure reliability is maintained.

2. The Expedited Project Review (EPR) process, which allows an expedited review for Transmission Owners who must start construction on the transmission projects to support large load additions more quickly than would be enabled under normal MTEP timelines; and

3. MISO's Long Range Transmission Planning (LRTP), which takes a long-range (roughly 20- to 40-year) view of the system to address future issues and provides flexibility to the electrical grid by enabling the integration of diverse energy sources and creating a robust, resilient system capable of adapting to future changes, including the implementation of large load additions.

These processes work in conjunction with, and build upon, each other. For example, the results of one MTEP cycle, build on the next. Additionally, large loads may site where backbone transmission developed through the LRTP process will be built; these loads would then be able to rely on the LRTP transmission as they build their site-specific upgrades through the MTEP or EPR processes.

These processes form a solid foundation, and one which MISO continues to enhance in coordination with our stakeholders. For example, in 2024 and 2025, MISO collaborated with stakeholders to implement enhancements to the existing EPR process due to the consistent increase in EPR applications (as depicted in Table 1), which reflects the increased proliferation of data centers and other large loads.

Table 1 – Approved EPRs

Cycle	Projects	Load (MW)	Investment ($M)
2021	17	229	233
2022	16	570	215
2023	36	1231	570
2024	23	3391	947
2025	49	9704	5035

The EPR enhancements:

1. Provide consistent reliability analysis while recognizing the overall impacts of multiple large loads to our system through appropriate clustering;

2. Enable MISO to create sequential and well-defined study cases for EPRs on an every-other-month basis, including prior-approved EPRs, generators with interconnection agreements, and new EPRs requesting approvals; and

3. Enable MISO to quickly approve new requests, with opportunities for EPRs to potentially be recommended for approval monthly, depending on the complexity of the study and the solutions identified to support the new load.

Under the processes discussed above, since the 2022 MTEP cycle, MISO has approved approximately 17 GW of large load additions.[13] For comparison purposes, the net summer peak load for the state of Arkansas in 2025 was 15.9 GW.[14]

iii. MISO's updated long-term load forecasting and outreach efforts help efficiently facilitate large load interconnections.

Between 2009 and 2024, MISO's peak load remained essentially flat, with an average CAGR of 0.5%. Load forecasting during this period relied heavily on methods that assumed that

[13] This figure was determined by starting with the 2022 MTEP Cycle and looking at projects of 50 MW or greater. As of the date of this filing, 52 such projects, for 17 GW of load, have been approved.

[14] https://www.eia.gov/electricity/state/

historical trends and relationships between economic variables and electricity demand would persist into the future. However, as discussed earlier, data centers, industrial, and transportation drivers are materially increasing the outlook for load growth over the coming years. Projected load growth within MISO's footprint is expected to be approximately three times higher than previously forecasted.

In late 2024, MISO updated its load forecast approach to incorporate new methods, metrics and models to improve the accuracy of long-term forecasts. These updates enable MISO to align emerging trends with actual historical outputs to better keep pace with rapid industry shifts. Central to these updates is a shift toward end-use modeling and refined industry segmentation, allowing for a deeper assessment of critical load growth drivers. MISO's updated load forecast accounts for load growth across five key drivers.[15] The updated load forecast approach generates three distinct outlooks to account for uncertainty, each reflecting a range of potential drivers such as industrial activity, data centers and building electrification. The forecasts are also benchmarked against member-provided load data to ensure alignment and accuracy. As discussed further below, MISO is working to update its forecast again in early 2026. Indications are showing that large load growth continues to accelerate from previous forecasts, which continues to highlight the importance of developing processes to find the best way to reliably and efficiently integrate new large loads.

B. MISO's efforts to enhance Large Load Interconnections.

As evidenced above, MISO's existing processes are effectively interconnecting large loads in a timely fashion, with approximately 17 GW of large load additions since the 2022 MTEP cycle.

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[15] The five key drivers are: (1) Artificial Intelligence Revolution and Data Centers; (2) Building Electrification; (3) Electric Vehicles; (4) New Industry Development and Reshoring; (5) hydrogen; and (6) distributed energy resources.*See*https://cdn.misoenergy.org/MISO%20Long-Term%20Load%20Forecast%20Whitepaper_December%202024667166.pdf.

Nonetheless, MISO is also actively engaged in multiple efforts to help improve such interconnections in a reliable manner, enhance MISO's ability to forecast for such load additions, and to enhance MISO's ability to operationally address such large load additions.

For example, MISO continues to actively develop and refine its forecasting. MISO recently launched a pilot load survey, which represents an important step toward obtaining more granular information for large loads, as well as anticipated future buildouts.[16] The data to be collected through the survey includes: (1) existing large loads and data centers; (2) planned large loads and data centers; (3) peak demand forecasts; (4) energy forecasts; (5) electric vehicles; (6) distributed generation and storage; and (7) demand side management and energy efficiency.

MISO also consistently communicates with its members to help facilitate the addition of new large loads. Such efforts include:

- Periodic communications with members to discuss large load additions, including potential developmental efforts, timing, location(s), and size(s).
- Responding to questions associated with existing processes to help facilitate new large load additions, for example as a part of the ERAS, MTEP or EPR processes.
- Working with regional or national organizations focused on understanding and managing load growth.

These types of outreach efforts assist MISO in efficiently planning for and efficiently adding new large load additions.

MISO is also focused on identifying a minimal set of reliability requirements needed for large loads to reliably materialize within the MISO footprint. To do this, MISO developed an internal large load program and advisory committee and created an enterprise risk framework that

[16] As of November 19, 2025, MISO received 51 submissions from 44 entities responsible for approximately 75% of MISO's total energy.

ties all requirements directly to both existing and emerging risks posed by large loads.[17] The framework defines risk dimensions, develops scenarios, identifies gaps in current practices, and translates these into reliability requirements and planning parameters that make risks measurable and manageable. In building this enterprise risk framework, MISO brought together as much material on this topic as possible and is determining the additional necessary steps to mitigate the operational risks of large load additions in MISO's footprint.

Finally, while currently generation and transmission studies to support large load additions are done separately, MISO is considering approaches to study transmission and generation simultaneously for large load additions. MISO is also developing a "zero-injection generator interconnection agreement" proposal for generation co-located with load. The zero-injection generator interconnection agreement would allow a generator to serve load directly but grants no interconnection service and would prevent the generator from injecting onto the transmission system. This proposal would allow processing of the generator request outside the standard queue process, since the transmission system would not be utilized by the generator. MISO plans to address this proposal with stakeholders in the near future. Any final proposal that requires tariff changes would be filed with the Commission for acceptance.

C. Requiring standard large load interconnection procedures will likely delay large load interconnections.

As noted above, shifting to standard large load interconnection procedures could introduce delays to interconnecting large loads, which would be contrary to the progress desired by the DOE and the Commission. The reasons for delays include: (1) utilizing a generator interconnection process as a template that historically has experienced delays and is unlikely to provide the speed to power needed by large load customers; (2) requiring additional work and requirements that are

[17] *See* MISO's Reliability Technical Conference, Panel 2, comments of Jennifer Curran at p. 9.

not currently required under MISO's existing processes, and which may be unnecessary; and (3) meaningful differences between generation and load that will prevent a seamless utilization of the generator interconnection process for large load interconnection purposes and will present challenges.

i. The delays experienced in the standard generator interconnection procedures indicate that such an approach for large loads is unlikely to provide speed to power.

As noted earlier, the proposed ANOPR appears to request that standard large load interconnection procedures, similar to the large generator interconnection procedures, be implemented. While large load interconnection procedures would need to vary in process from the large generator interconnection procedures, the generation interconnection queue process provides warnings of the ability to rapidly enact a "one size fits all" approach for large loads, which would thwart the speed to power needed by such large loads.

Historically the standard generator interconnection procedures resulting from Order No. 2003[18] experienced delays in processing studies and achieving executed generator interconnection agreements. The delays were in part due to: (1) utilizing an interconnection queue that required customers to wait on others to be studied (*e.g.* queued into a line), rather than studying on an as available basis; and (2) restudies necessitated by speculative requests that were withdrawn.[19] The delays led to numerous RTOs and Transmission Owners filing for interconnection queue reforms. 20 years later, the Commission issued revised universal interconnection procedure reforms in

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18 *Standardization of Generator Interconnection Agreements & Procs., Order No. 2003,* 104 FERC ¶ 61,103 (2003), *order on reh 'g*, Order No. 2003-A, 106 FERC ¶ 61,220 (2004), *order on reh 'g,* Order No. 2003-B, 109 FERC ¶ 61,287 (2004), *order on reh 'g, Order No. 2003-C,* 111 FERC ¶ 61,401 (2005), *aff'd sub nom. Nat'l Ass 'n of Regul. Util. Comm'rs v. FERC,* 475 F.3d 1277 (D.C. Cir. 2007).

19 Some of these delays are due to factors outside of the control of either the Commission or transmission providers, such as the large increase in the number of new interconnection requests and rapidly evolving industry needs and preferences that drive the need for new generation and can create uncertainty for stakeholders. Other delays relate to how generation must be studied to facilitate cost allocation of Network Upgrades.

Order No. 2023, such as cluster study process, increased study deposits, increased financial commitments and readiness requirements, and study delay penalties.[20]

While these reformed generator interconnection procedures now implement a standard cluster study approach, even that approach potentially would require large load customers to wait to be studied while prior-queued large load requests' studies are completed (e.g., there are cluster request windows by which generator interconnection customers must submit requests, otherwise they must wait until the next cycle).[21] This is in contrast to the processes MISO uses today, which allows such requests to be studied as they are ready based on preliminary work done by the large load customer and LSE. The utilization of a queue could inherently lead to delays.

In addition, even these reformed generator interconnection procedures are still susceptible to speculative generator interconnection requests, which can result in delays if/when the speculative requests withdraw. According to data from the Lawrence Berkeley National Laboratory, only about 13% of the total capacity entering interconnection queues nationwide ultimately achieves commercial operation.[22] Withdrawals of speculative interconnection requests frequently require restudies, particularly for later-stage withdrawals, which in turn could delay completion of studies and ultimately delay bringing viable generation proposals online. Creating standard large load interconnection procedures patterned off of the large generator interconnection procedures would carry the same type of potential for delays and unsuccessful requests. In contrast, MISO's existing processes: (1) mitigate against speculative large load requests due to the

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[20] *Improvements to Generator Interconnection Procs. & Agreements*, Order No. 2023, 184 FERC ¶ 61,054, *order on reh 'g*, 185 FERC ¶ 61,063 (2023), *order on reh 'g*, Order No. 2023-A, 186 FERC ¶ 61,199, *errata notice*, 188 FERC ¶ 61,134 (2024).

[21] MISO notes the proposed ANOPR does not clarify whether large load requests would be studied on a serial or cluster basis.

[22] https://emp.lbl.gov/sites/default/files/2024-04/Queued%20Up%202024%20Edition_1.pdf

meaningful work typically undertaken between the MISO member(s) and large load customer(s) prior to submitting requests to MISO; and (2) provide MISO approvals more quickly, with such approvals being provided monthly, depending on the complexity of the study and the solutions identified to support the new load.

ii. Requiring large load interconnection procedures will require new requirements and work that do not currently exist and could delay large load interconnections.

Requiring a shift to standard large load interconnection procedures will require new work to be undertaken by MISO that is not currently undertaken, as well as new requirements and business risks for large loads that are not currently required. Under the existing paradigm in MISO, typically prospective large loads initially interact directly with transmission owners and/or states to determine whether to locate their loads in a particular area. Part of that work entails the MISO members undertaking analyses to determine the extent of upgrades needed to implement the large load addition(s). Once that work is complete, the MISO member submits the request to MISO for implementation. The proposed ANOPR appears to eliminate the initial, critical work undertaken by the MISO member(s). Similar to what occurs today in the generator interconnection procedures, large load interconnection procedures will allow speculative requests to be submitted and studied as opposed to having a well formulated proposal that is supported by the large load customers, MISO members, and states before MISO becomes involved.

Additionally, generator interconnection procedures include requirements such as site control, financial commitments, and readiness requirements; MISO does not require such obligations to be under its existing practices. These requirements on large loads at a wholesale level are not only an increase in obligations for customers, but also an increase in administrative work and processing for MISO that do not exist today. These requirements create significant risks

that would thwart the speed to power needed for such interconnections, will be time consuming and likely onerous for new types of stakeholders that have never been subject to them before.

iii. There are significant differences between generation and load that will not allow a seamless use of the standard generator interconnection process for large loads.

Furthermore, to the extent the ANOPR purports to utilize the generator interconnection procedures as a template for large load interconnections, there are significant differences between generation and load that will not allow for a seamless utilization of the generator interconnection process for large load interconnection purposes and, consequently, could delay interconnections of large loads. MISO provides examples of differences between generation and load below.

First, generators and load have very different regulatory histories. Prior to the development of uniform Large Generator Interconnection Procedures (LGIP) and Large Generator Interconnection Agreement (LGIA) in order No. 2003, some generators were subject to entry barriers to the transmission system (i.e., entry on the same terms as generators owned by the entity that also owned the needed transmission facilities). The Commission extended the open access principles of Order No. 888 to generator interconnections to address these concerns. The principles that underlie the LGIP/LGIA reflect a long development history of both major and minor rulemakings informed by these considerations. While the study process for generating facilities may be costly and time consuming, it provides generators with valuable uniform "interconnection service," including Energy Resource Interconnection Service and Network Resource Interconnection Service that addresses specific needs of generators and provides defined services that align with how generation developers structured their commercial arrangements.

In contrast, there is no evidence of undue discrimination of loads, large or small, by load serving utilities. Unlike generators, individual load additions can site where they want and are not assigned costs for their impacts to the transmission system at a wholesale level. Load is not in

competition with vertically integrated utilities because load is a consumer of energy whose existence creates the need for the utility to serve. This is a very different paradigm than what generators faced prior to the development of the LGIP. Further, loads are retail customers and the FPA assigns the task of policing the relationship between retail customers and load serving entities to state public utility commissions. State regulators have tools to ensure that load interconnection procedures are just and reasonable and, in fact, such procedures exist in many states in the MISO footprint. Creating a parallel set of provisions at the federal level will likely result in confusion and may create opportunities for forum shopping.

Second, the core components of the LGIP/LGIA construct are geared specifically to generators and do not provide a reasonable template for load interconnection procedures. For example, the pro forma generator interconnection services, ERIS and NRIS, are generator-specific products that cannot be adapted to loads. The generator queuing process, the specific interconnection studies, the myriad of technical, penalty and timing mechanisms and requirements included in the LGIP likewise are all geared towards generators and cannot be easily adapted to the load interconnection process based on the same assumptions.

In addition, the generator interconnection procedures assume the process will culminate in an interconnection agreement that establishes the contractual relationship between the generator and the transmission provider and imposes rights on obligations on each for the life of the generating unit. Unlike generators, loads are not in the electricity industry business and many construction, facility operation and maintenance obligations that the pro forma LGIA imposes on generators are impractical with respect to loads. Consequently, there are numerous practical questions about which—if any—of the existing rights and obligations codified in the Commission's *pro forma* LGIA make sense to apply to load.

D. MISO comments regarding the 14 DOE principles.

MISO appreciates the DOE's efforts to further the discussion in the industry on this important topic. At this time, MISO has not yet formulated positions on all of the 14 principles set forth in DOE's proposed ANOPR, but has provided comments for consideration. Moreover, MISO does not yet have experience with the volume and types of dense large loads that are expected in the future and, therefore, MISO's comments and positions could change based on experience.

As described in detail below, while well-intentioned, many of the principles are either not practical or would require significant Tariff and business practice changes for MISO and, consequently, will not lead to the speed to power sought in the proposed ANOPR. Several of the principles lead to further questions, as opposed to providing guidance, and would require further collaboration among the necessary parties. The need for further collaboration supports the Commission granting flexibility for MISO to: (1) interconnect large loads pursuant to processes that reflect the unique circumstances of MISO's members, states, stakeholders, and transmission systems; and (2) seek Commission acceptance of enhancements developed through appropriate stakeholder processes.

1. Commission jurisdiction.

MISO works with its members and states through collaborative, stakeholder-driven processes in a variety of areas, including long-range transmission planning, market design, and training. This approach ensures input from various groups are considered to help shape the development of future scenarios, policies, and system operations. A key example is that, consistent with its Tariff, through MISO's MTEP and LRTP, MISO is obligated to include a resource expansion that aligns with the MISO member integrated resource plans. As such, transmission

planning works to help ensure the energy planned by members, and required due to their plans or load growth, can be delivered to where it is needed.

Today, MISO members and states actively engage with potential large load customers (such as data centers). While MISO actively engages in such efforts, as well, MISO does not have the first-hand knowledge of our members' or states' circumstances and priorities in developing such economic opportunities. Thus, while the Commission may have the jurisdiction to implement the large load interconnection procedures proposed in the DOE proposed ANOPR, to the extent such a process allows large loads to bypass working directly with MISO members and states, MISO respectfully urges the Commission to consider that such a bypass could lead to less efficient proposals for interconnection of large loads and, consequently, make such interconnections more costly, ineffective, and more time consuming.

From a jurisdictional perspective, it will also be important for the Commission to consider whether the interconnection of large loads constitutes a retail sale of electricity as the large loads could be viewed as end users. The U.S. Supreme Court has stated that, although "the wholesale and retail markets in electricity are inextricably linked,"[23] the Commission "may not regulate. . . retail sales of electricity."[24] The Court further stated that "no matter how direct, or dramatic" a proposal's impact on wholesale rates, the Commission still may not regulate retail electricity sales.[25] The Court also clarified that because the FPA limits the Commission's jurisdiction to wholesale sales, reserving regulatory authority over retail sales to the states alone, a regulation that

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[23] *FERC v. Elec. Power Supply Ass'n*, 577 U.S. 260, 279 (2016).

[24] *Id.* at 267 (citing *New York v. FERC*, 535 U.S. 1, 17, 23 (2002)). The Court emphasized that state utility commissions continue to oversee retail transactions. *Id.*

[25] *Id.* at 279-80. This statement presents a limit on the Court's finding that the Commission has authority under the FPA to ensure that practices directly affecting wholesale rates are just and reasonable. *Id.* at 277-78.

"specifies terms of sale at retail" would exceed the Commission's authority under the FPA.[26]

The integral nature of the critical roles MISO's members and states currently serve in facilitating the interconnection of large load additions further emphasizes the need for the Commission to be mindful of regional differences that might limit the success of "one size fits all" mandates. Instead, the Commission should authorize RTOs to interconnect large loads pursuant to processes that are effective, reflect region-specific needs and characteristics, and are informed by robust stakeholder-driven processes. As noted earlier, MISO currently has effective processes that facilitate large load additions in a timely manner and is continuing to explore potential enhancements; MISO respectfully recommends it be allowed to continue such processes in lieu of standard large load interconnection procedures.

2. The reforms should only apply to new loads greater than 20 MW and, for hybrid facilities, where the load is greater than 20 MW. We seek comment on alternative thresholds, including whether such a threshold is necessary at all.

MISO interprets this principle to define what constitutes a "large load" for interconnection purposes and whether any thresholds should be implemented for that purpose. As discussed below, defining what constitutes a "large load" can vary from region to region and further supports the Commission authorizing RTOs to interconnect large loads pursuant to processes that reflect region-specific needs and characteristics and not mandating a one-size fits all process.

MISO has been actively involved in many discussions related to potentially formulating a definition for large loads, as well as setting a minimum threshold for load to be considered "large." One of the challenges is that large loads have different impacts from one Balancing Authority to the next and, accordingly, are handled differently amongst Balancing Authorities.[27] Another

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26 *Id.* at 279-80.

27 The different impacts could include impacts due to size, electrical strength, and/or other types of equipment on the grid.

challenge is that a universal definition would need to account for pre-existing or in-process large load additions, which means *existing* large loads would fall in the scope and requirements, but existing facilities may not have the technology or means to comply.

Variables such as forecasting data availability, characteristics of the load, and the location and the density of the load and transmission infrastructure of the area should be considered in defining what loads should be considered ”large”. For example, density of load and transmission infrastructure in the surrounding area will impact contingency studies. A large load that is connected inside a transmission constrained area could also impact the day to day operations in ways that exceed the impacts of the same load in an area with more robust connections. ISO/RTOs will need the flexibility to determine which variables outweigh others in specific circumstances. There are already some existing Reliability Standards that provide ISO/RTOs this flexibility, such as MOD-032-1 Attachment 1, where the Transmission Planner/Planning Coordinator can define when additional information is needed.

Further consideration should be given to whether the Commission (or NERC) should either: (i) define large loads as an “Applicable Entity”, which could mean end-users would become a Functional or Registered Entity type; or (ii) write the standard requirements so that large loads would be defined by facility types or through explicit threshold language within the requirements. Additionally, the collective responses of NERC’s recently issued *NERC Alert Large Load Interconnection, Study, Commissioning, and Operations* should be considered in determining whether a universal approach to defining large load thresholds is appropriate or if a hybrid, varied approach would be more effective.

In light of the above, a universal definition of “large load” should not be based solely on size. Instead, MISO recommends a hybrid approach to determining what constitutes a “large

load." The hybrid approach could consist of: (i) NERC registration or NERC Reliability Standards development; and (ii) allowing ISO/RTOs to determine specific minimum thresholds to support market registration and application processes that fit the unique needs of their footprints.

3. To the extent practicable, load and hybrid facilities should be studied together with generating facilities.

MISO currently studies generation and load largely separately. As discussed in response to Principle #5, maintaining separate visibility of generation and load into the operating horizon is critical for reliability purposes. Further, separating transmission upgrades required for load and generation can assist in appropriately assigning the costs of necessary system enhancements.

That being said, MISO has implemented revisions, for example, to its Business Practice Manual (BPM) 15, under which it considers whether transmission projects identified under newly approved loads additions will alleviate constraints identified for a generator interconnection request(s). Under this process transmission projects from those newly approved loads can be tested to see if generator interconnection constraints would be alleviated after adding the transmission projects and the load. Conversely, MISO can consider new generation with signed agreements as mitigation in the connection of large loads, potentially reducing the amount of transmission that may be constructed while maintaining reasonable certainty that the mitigating action (in this case the construction of generation) will proceed.

4. Standardized study deposits, readiness requirements, and withdrawal penalties.

As discussed in detail above, MISO has concerns that standard large load interconnection procedures will delay interconnection of large loads, which would be contrary to the intent DOE's proposed ANOPR and hinder the competitiveness of the United States in the deployment of artificial intelligence technologies and to support needed economic development. This principle assumes such large load interconnection procedures are implemented, which as discussed above

would place new obligations and work on large load customers and MISO. Under those circumstances, MISO agrees that study deposits, readiness requirements and withdrawal penalties would be needed to help mitigate speculative requests.

5. Hybrid facilities should be studied based on the amount of injection and/or withdrawal rights requested. For example, a hybrid facility consisting of a 500 MW load and a 600 MW generating facility may seek no withdrawal rights and 100 MW of injection rights.

As noted in response to Principle #3, currently generation and transmission studies to support large load additions are done separately. However, as noted earlier in these comments, MISO is considering approaches to study transmission and generation simultaneously for large load additions. While it may be that in the future studies can be done simultaneously, it is critical for reliability purposes in the operational horizon that MISO views the output from the generator being placed on the system separately from the load being served. Each input will impact how the MISO system responds to maintain reliability.

From a market's perspective, load and generation are settled separately today by MISO. Depending on the design of the hybrid facility (i.e., if the hybrid facility has a different point of receipt and a different point of interconnection), the generation and load may have different locational marginal prices and, consequently, would need to be settled separately to accurately reflect their cost to serve. It may also be that a hybrid facility will want to rely on the system to serve its load depending on market pricing; in that case, it will also be necessary to separate load and generation for settlement purposes. As a practical matter, however, if the load and generation are both registered to the same market participant, then the settlement statement(s) would largely reflect a netting of the load and generation. If the Commission were to require a netting of generation and load for market settlement purposes, it may require significant Tariff and BPM revisions for MISO.

6. Any hybrid interconnection shall be required to install the system protection facilities necessary to prevent unauthorized injections or withdrawals that exceed the respective rights.

MISO agrees that hybrid interconnections should be required to install protective relays to prevent unauthorized injections or withdrawals. MISO notes that NERC is considering this topic. NERC issued a white paper *"Characteristics and Risks of Emerging Large Loads"* in July of this year, which discusses the need for protective facilities to prevent unauthorized injections or withdrawals from co-located generation or load, particularly in behind-the-meter configurations.

7. The interconnection study of large loads that agree to be curtailable and hybrid facilities that agree to be curtailable and dispatchable should be expedited.

MISO does not have a final position regarding this principle, but notes that: (1) large loads may not desire to be curtailable given their general high electricity needs; and (2) MISO's primary goal is to facilitate the interconnections of large loads in a manner that allows the system to continue to operate reliably. At the same time, MISO fully supports the efficient use of transmission system, which could involve expedited study processes for large loads that agree to be curtailable or hybrid facilities that agree to curtailable and dispatchable. An example of MISO's efforts to facilitate the efficient use of the system is the zero injection generator interconnection agreement approach that MISO is currently finalizing to propose to stakeholders in the near future. Overall, MISO has an interest to provide safe and reliable service that meets its customers, members, and states' resource plans and interests.

8. Load and hybrid facilities should be responsible for 100% of the network upgrades they are assigned through the interconnection studies.

This principle reflects a shift from what occurs today. As noted above, MISO's members and states currently undertake important work in facilitating the interconnection of large load additions prior to MISO's involvement. In addition to ensuring that non-speculative proposals are submitted for MISO's review, MISO understands the work generally involves agreements between

the load serving entity (LSE) and the large load customer for recovery of costs, such as network upgrades, required to allow the large load to come online and provide service.

This principle would call for MISO allocating such costs directly to the large load customer. MISO has concerns with this approach as it may reduce the options and flexibility that exist today between the LSE, large load customer, and possibly the retail jurisdiction, to develop creative approaches for cost recovery to more readily facilitate siting of new large load additions.

9. To the extent the interconnection customer is not the transmission owner, the interconnection customer shall be afforded the same (or equivalent) option to build as currently provided to generator interconnection customers.

As a practical matter, MISO notes that the option to build is rarely chosen by generator interconnection customers in MISO. However, when this option is chosen by interconnection customers, they are typically power companies that have utility branches and already have expertise in transmission. Loads are not in a similar position and do not have this expertise.

Moreover, bulk power system owners, operators, and users must register with NERC to ensure compliance with mandatory reliability standards. This includes generators. However, loads are not currently required to register with NERC. Therefore, there would currently be no responsibility or accountability for loads that build interconnection facilities or network upgrades. Consequently, MISO views this principle as impractical.

10. An existing generating facility that seeks to enter a partial suspension to serve a new load at the same location must go through a system support resource (SSR)/reliability must run (RMR) type study. We invite comments on whether and how resource adequacy should be considered in the SSR / RMR type study.

MISO interprets this principle as involving a generator that currently serves load on the MISO transmission system but would completely disconnect (referred to as a "suspension" in the principle) from the MISO transmission system to serve co-located load and how resource adequacy should be considered in such a scenario. In the MISO, states are primarily responsible for resource

adequacy, which involves overseeing LSEs and ensuring LSEs plan for and secure enough power to meet their customers' demand. MISO supports resource adequacy by determining Planning Reserve Margin, administering the Planning Resource Auction and providing data for planning, but it is the states' and LSEs' responsibility to ensure they meet their required capacity. Because the vast majority of MISO's states and LSEs are vertically integrated, it is unlikely that state commission(s) would authorize an existing generator(s) to discontinue serving existing load of an LSE to solely serve new co-located load. However, the states would need to determine whether such a change would be in the public interest based on a number of factors, including impacts to resource adequacy.

In MISO, there can be no suspension (partial or otherwise) of a generator if it is still synchronously connected to the transmission system. Under MISO's Tariff, a disconnected generator would be considered a generator retirement, which is reviewed pursuant to Attachment Y and includes MISO conducting a reliability study to determine if the proposed retirement will result in local reliability issues. If the study finds local reliability issues, MISO could require the generator to remain connected to the transmission system until necessary transmission upgrades are constructed and operational. MISO load would pay for the upgrades required to resolve the local reliability issues. However, if the disconnected generator later proposes to reconnect to the MISO transmission system, it would be assessed the costs of the upgrades.

11. Utilities serving large loads, including those at hybrid facilities, should be responsible for transmission service based on their withdrawal rights, as that value amount reflects the quantity of capacity and energy that is being transmitted across the transmission system to the load.

This principle represents a deviation from how MISO currently assesses transmission rates for network integration transmission service under Schedule 9 of its Tariff, which is based on peak load. The Schedule 9 charges are obtained by applying the effective annual Schedule 9 zonal rate

to the Network Load, which includes Grandfathered Load or load served by Behind-the-Meter Generation.[28] This principle appears to net the load and generation for purposes of establishing the transmission service requirements. No such netting occurs today in MISO.

12. Utilities serving large loads, including those at hybrid facilities, should be responsible for ancillary services based on peak demand, without consideration of any co-located generation. Any co-located generating facilities will similarly be fully compensated for the provision of ancillary services.

MISO agrees that large loads should be treated like any other loads for procuring required ancillary services. Moreover, to the extent co-located generation provides ancillary services, it should be compensated.

In the Day Ahead and Real Time Operating Reserve Markets, the costs for Ancillary Services products (e.g., spinning, supplemental, regulation and short-term reserves) are paid in MISO by the load on an hourly basis. The ancillary services needed for a Reserve Zone are procured from generation in that Reserve Zone and the costs are allocated to load based on their load ratio share in the Reserve Zone. In this way, load pays for the actual use of ancillary services. This applies to how large loads in MISO are assessed ancillary service charges today and this approach adheres to cost causation.

In contrast, the ANOPR proposes to assess ancillary service charges based on peak load. Unlike MISO's current approach, using peak load would mean that ancillary services are charged based upon the highest use in one hour. This is not consistent with the cost causation principle as it does not assess based on load's actual use of ancillary services. Moreover, the approach is inconsistent with how MISO procures ancillary services, which are procured based on Market-Wide and Co-Optimized Zonal Requirements. These requirements can adjust hourly. Changing

[28] *See* MISO BPM-012 Transmission Settlements Business Practices Manual at Section 3.1.8.2.

to peak load would require Tariff, business practice manual, and system changes to at least four of our existing charge types.

13. There must be a plan to implement these proposed reforms. We seek comment on appropriate transition plans, including the treatment of large load interconnections that are already being studied for interconnection.

Implementation of any proposed reforms will be time consuming and detract from current efforts to implement and enhance existing MISO processes that effectively integrate new large loads. Consequently, MISO respectfully urges the Commission to not require standard large load interconnection procedures but instead authorize RTOs and ISOs to develop or demonstrate the effectiveness of existing large load integration processes that meet the unique circumstances of their members, states, stakeholders, and transmission systems.

If the Commission does mandate a standard large load interconnection procedures, the steps required for implementation will include: (1) development of internal processes; (2) resource evaluation and potential expansion; and (3) development of additional technical capabilities – all of which should be finalized through stakeholder review. It may be that in undertaking the implementation steps, MISO: (1) may identify further refinements necessary for implementation and such refinements may reflect unique circumstances in MISO, or (2) will continue to learn about data center behavior, which may require an alternative compliance approach to ensure efficient interconnection. Therefore, it will be imperative for the Commission to provide sufficient time for implementation and to grant flexibility.[29]

14. Utilities serving large loads must meet all applicable NERC reliability standards and OATT provisions. Utilities and we must be prepared to revise large load interconnection procedures and agreements, as necessary. NERC should review its reliability standards to

[29] MISO notes that its Board of Directors has also made commitments to implementation of enhancements for large load interconnections. The commitments include: (1) strategic priorities of the Markets Committee to address operational risks from large load additions on ramp, adequacy, and stability; and (2) addressing Market Participation and Registration of Co-Located Load and Generation as a part of the Planning Subcommittee.

determine if new registration categories or new or modified reliability standards are required to ensure reliability of the BES.

NERC has taken a structured, multi-phase approach to address the reliability risks posed by emerging large loads such as data centers, AI training facilities, cryptocurrency mining, and hydrogen production through the work of the Large Loads Task Force (LLTF). Through these efforts, the NERC LLTF finalized a white paper on the *Characterizations of Emerging Large Loads*, which defines large loads and categorizes their types. The white paper identifies reliability risks across planning, operations, stability, power quality, security, and system restoration domains. The NERC LLTF is also in the process of finalizing a second white paper on *Assessment of Gaps in Existing Practices, Requirements, and Reliability Standards*, as well as drafting a Reliability Guideline for mitigating risks, including recommendations for data sharing, modeling, interconnection processes, and operational coordination. MISO is actively following and contributing to the efforts of the NERC LLTF.

The work of the NERC LLTF has highlighted the key reliability risks associated with large load fluctuations or sudden disconnection. These risks include frequency instability, voltage instability, balancing and reserves, Area Control Error (ACE) volatility, and system restoration challenges. Large loads, like all other grid assets, should be designed and behave in a manner that does not negatively impact grid reliability. Given their size and unique electrical characteristics, it is warranted for NERC and the industry to evaluate the impact of current designs and determine if they should be changed. New rules should be added to the extent that the impact of large load's performance during disturbances leads to negative outcomes.

The NERC LLTF also recently released a preliminary Reliability Guideline entitled "Risk Mitigation for Emerging Large Loads" to address reliability challenges from large, power-electronics-based facilities such as data centers, hydrogen production, and crypto operations. The

guideline provides practical recommendations for planners, operators, developers, and equipment manufacturers to improve interconnection practices, visibility, modeling, ride-through performance, protection coordination, and restoration planning. It is not a new compliance standard but a set of best practices aimed at ensuring large loads are visible, predictable, and coordinated within the bulk power system. The Request for Comment period runs from November 3 to December 19, 2025 and NERC is seeking feedback from industry stakeholders on the practicality, clarity, and applicability of the proposed recommendations to ensure the final guideline effectively supports reliability as large load growth accelerates across North America.

MISO encourages the industry to come together for this evaluation and determination. NERC Reliability Standards focusing on Protection and Control, as well as Facility Interconnection Requirements[30] and others may need to be updated to address the reliability risks that large load additions pose. A key challenge in addressing these reliability risks (through NERC Reliability Standards development) is the need to require large loads registrations or gain industry consensus on applying large load considerations within the NERC Reliability Standard requirements where there currently are varying definitions amongst regions. Another challenge could be addressing potential limitations that some end-users have regarding data collection, sharing, and monitoring.

In addition to the NERC LLTF efforts, MISO is also focused on identifying a minimal set of reliability requirements needed for large loads to reliably materialize within the MISO footprint. To do this, MISO developed an internal large load program and advisory committee and created an enterprise risk framework that ties all requirements directly to both existing and emerging risks posed by large loads. The framework defines risk dimensions, develops scenarios, identifies gaps

[30] For example, PRC-024, PRC-019/PRC-029, PRC-002/PRC-008, FAC-001/FAC-002.

in current practices, and translates these into reliability requirements and planning parameters that make risks measurable and manageable. In building this enterprise risk framework, MISO brought together as much material on this topic as possible and is determining the additional necessary steps to mitigate the operational risks of large load additions in MISO's footprint.

Consequently, MISO is not only drawing on NERC LLTF work, but also considering industry experiences across the U.S., Europe, and Canada, as well as evaluating documented risks from grid operators' perspectives. MISO also coordinates with industry peers such as the ISO/RTO Council (IRC), Energy Systems Integration Group (ESIG), Electric Power Research Institute (EPRI), Eastern Interconnection Planning Collaborative (EIPC), and other stakeholder groups to share ideas, lessons learned, and approaches to integrating large loads reliably.

MISO is supportive of NERC's efforts and will continue to engage with NERC. MISO will also continue to utilize the work products of the LLTF to support and inform MISO's risk framework and approach to integrating large loads in the MISO footprint regardless of the timing of formal NERC standards. MISO understands the NERC standards process can take some time, but in the same way MISO has adopted requirements ahead of NERC requirements relating to Inverter-based Resources, MISO will consider adoption of appropriate tools and requirements to ensure the reliable integration of large loads in partnership with our members.

In addition to the NERC efforts described above, large loads can also lead to increased congestion along seams between different operating entities, especially if sufficient generation and/or transmission is not in place or built to support the additional load. A rapid influx of vast amounts of new load, especially in certain areas, could make congestion more difficult to manage under the current systems that are in place, particularly if a portion of the load is curtailable while the remainder is firm. In addition, a significant increase in congestion on the MISO-SPP and

MISO-PJM seams could affect the ability of the Market-to-Market process[31] to function efficiently, resulting in higher overall payments between the RTOs. Therefore, if the Commission decides to move forward with standard large load interconnection procedures, it should also consider how to mitigate the potential increase in congestion along the seam(s) that could result from the interconnection of large loads.

II. Conclusion

MISO appreciates the: (1) opportunity to provide comments regarding the DOE proposed ANOPR, and (2) the intent of the proposed ANOPR to provide "speed to power" for large load interconnections. However, as illustrated in these comments, requiring standard large load interconnection procedures is unlikely to provide the speed sought by the ANOPR, but instead will lead to additional delays and complexities that do not currently exist in MISO. Moreover, diverting industry attention to developing a one-size-fits all approach will likely hinder the very progress desired by the Department of Energy and the Commission.

MISO's existing processes effectively interconnect large loads, with approximately 17 GW of large loads being approved since the 2022 MTEP cycle. MISO is actively working with stakeholders and the industry to continue to enhance its processes. In lieu of requiring a "one-size fits all" mandate, the Commission should the Commission should allow MISO, as well as other industry participants, to continue focusing attention on efficiently interconnecting large loads pursuant to processes that reflect the unique circumstances of their members, states, stakeholders, and transmission systems.

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[31] Market-to-Market is the process described in the MISO-PJM Interregional Coordination Process and the MISO-SPP Interregional Coordination Process, whereby MISO and PJM, and separately MISO and SPP, jointly manage flowgates near their respective borders through the security constrained economic dispatch of both markets.

Respectfully submitted,

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Dated: November 21, 2025

CERTIFICATE OF SERVICE

I hereby certify that I have caused to be served this day the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated this 21st day of November, 2025 in Carmel, Indiana.

/s/ Cortney Sanders

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