194 FERC ¶ 61,093
FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, DC 20426

February 3, 2026

In Reply Refer To:
Midcontinent Independent System
Operator, Inc.
Docket No. ER26-677-000

Midcontinent Independent System Operator, Inc.
720 City Center Drive
Carmel, IN 46032

Attention: Sarah Nieman

Dear Ms. Nieman:

1. On December 5, 2025, Midcontinent Independent System Operator, Inc. (MISO) filed, pursuant to section 205 of the Federal Power Act (FPA)[1] and Part 35 of the Commission's regulations,[2] proposed revisions to MISO's Generator Interconnection Procedures (GIP) and *pro forma* Generator Interconnection Agreement (GIA), contained in Attachment X of MISO's Open Access Transmission, Energy and Operating Reserve Markets Tariff (Tariff), to: (1) implement a lower insurance requirement for small generating facilities;[3] (2) clarify that an interconnection customer may not connect its generating facility to the transmission system of any transmission provider other than MISO; (3) clarify how MISO determines queue position for valid interconnection requests and interconnection requests requiring a material modification; and (4) correct ministerial errors in both the MISO *pro forma* GIA and the MISO-Southwest Power Pool, Inc.

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[1] 16 U.S.C. § 824d.

[2] 18 C.F.R. pt. 35 (2025).

[3] MISO's GIP defines small generating facility to "mean a Generating Facility that has an aggregate net Generating Facility Capacity of no more than five MW and meets the requirements of Section 14 [FAST TRACK PROCESS.] and Appendix 3 [CERTIFICATION CODES AND STANDARDS AND CERTIFICATION OF SMALL GENERATOR EQUIPMENT PACKAGES]." MISO, Tariff, attach. X (GIP) (182.0.0) § 1 (Definitions).

Joint Targeted Interconnection Queue (JTIQ) Commitment Agreement (JTIQ Commitment Agreement).[4] As discussed below, we accept MISO's proposed Tariff revisions,[5] effective February 4, 2026, as requested.

2. First, MISO states that article 18.4.4 of MISO's *pro forma* GIA currently requires interconnection customers to carry a minimum amount of public liability insurance of $20 million per occurrence and $20 million aggregate regardless of the size of the generating facility. MISO states that a stakeholder proposed updating MISO's *pro forma* GIA insurance requirements for small generating facilities to align with the lower insurance requirements applicable to smaller generating facilities under the Commission's *pro forma* Small GIA (SGIA). MISO states that, while it does not use a separate GIA for small generating facilities, it processes such interconnection requests through an expedited fast track procedure described in GIP section 14. MISO states that it can permit a reduced insurance requirement for small generating facilities within its *pro forma* GIA without creating inefficiencies or unreasonable risks to the transmission system. MISO proposes to add language to *pro forma* GIA article 18.4.4 to set a new minimum insurance requirement of a combined single limit of $5 million per occurrence and $5 million in aggregate for small generating facilities. MISO argues that the proposed revision is just and reasonable because it mirrors the Commission's language in *pro forma* SGIA article 8 and allows generating facilities that will be no larger than 5 MW to carry public liability insurance in an amount less than larger generating facilities. MISO also argues that, based upon accumulated experience with small generating facilities, adopting this lower insurance requirement will still provide sufficient protection for the transmission system, especially given the lower voltages at which such small generating facilities tend to interconnect. MISO notes that small generating facilities remain rare in the MISO region, and its proposal would not disrupt the GIA framework.[6]

3. Second, MISO states that increasingly, potential interconnection customers have expressed interest in having the ability to develop generating facilities that have dual, physical interconnections with the transmission systems of both MISO and another regional transmission organization/independent system operator (RTO/ISO). MISO states that it, other transmission providers, and the North American Electric Reliability Corporation (NERC) have long understood that generating facilities can only be connected to one transmission provider's system and thus under the control of one transmission provider (with the exception of pseudo-ties and legacy agreements that

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[4] *See Midcontinent Indep. Sys. Operator, Inc.,* 189 FERC ¶ 61,108 (2024).

[5] See Appendix for tariff records accepted in this order.

[6] Transmittal at 2-3, 9-10.

predate RTOs/ISOs and NERC Reliability Standards). MISO states that NERC's Rules of Procedure dictate that "all loads and generators are under the responsibility and control of one and only one Balancing Authority,"[7] and MISO states that the proposed clarifications to its interconnection request criteria bring MISO into alignment with NERC Reliability Standards FAC-001-3 (Facility Interconnection Requirements) and BAL-005-01 (Balancing Authority Control). Specifically, MISO proposes to add clarifying language to section 3.3.1 and Appendix 1 of its GIP, as well as article 5.19.4 of the *pro forma* GIA, to provide that a valid MISO interconnection request may not connect or propose to connect to the transmission facilities of any transmission provider other than MISO. MISO argues that these changes are necessary to fully implement historical practice and NERC requirements into the MISO Tariff.[8]

4. Third, MISO states that it has recently discovered language in the Tariff that was not updated when MISO moved from a four-phase generator interconnection process to three phases. MISO states that the adoption of the Definitive Planning Phase queue cap[9] and the Expedited Resource Addition Study (ERAS)[10] process makes it advisable to clarify GIP section 4.1 and remove any conflicts between this provision and the more recently adopted Tariff language. In particular, MISO states that its revisions clarify that, to avoid opportunities for conflict, an interconnection customer's queue position is not based on when it cures an application but rather on the date and time MISO receives a valid interconnection request. MISO proposes language in GIP sections 4.1 and 4.4 that aligns MISO's GIP with the "queued on initial submission approach adopted" in the Commission's *pro forma* Large GIP (LGIP) while retaining the requirement to timely cure deficiencies.[11] MISO also proposes to clarify that when a material modification triggers a new Definitive Planning Phase queue position, the new queue position is assigned based on the date and time of submission of the modification. MISO also proposes to revise the language prohibiting changes to the point of interconnection or point of connection "during the Definitive Planning Phase" to instead refer to changes "after the kick off of Definitive Planning Phase I."[12] MISO argues that the proposed

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[7] *Id.* at 4 (citing NERC, *Rules of Procedure*, § 501.1.4.4 (Nov. 28, 2023), https://www.nerc.com/globalassets/who-we-are/rules-of-procedure/nerc-rop-effective-20231128_with-appendicies.pdf).

[8] *Id.* at 3-5.

[9] *See Midcontinent Indep. Sys. Operator, Inc.*, 190 FERC ¶ 61,057 (2025).

[10] *See Midcontinent Indep. Sys. Operator, Inc.,* 192 FERC ¶ 61,064 (2025).

[11] Transmittal at 12.

[12] *Id.* at 13.

revisions are just and reasonable because they reflect the practical application of queue priority rules since at least MISO's 2016 and 2017 queue reforms and thus are consistent with stakeholder expectations. Additionally, MISO asserts that the proposed revisions are consistent with the approach expressly adopted in MISO's ERAS and queue cap filings and will conform with current practice.[13]

5. Finally, MISO states that it proposes revisions to the *pro forma* GIA and the *pro forma* JTIQ Commitment Agreement to correct several clerical errors and incorrect references that were inadvertently included in the JTIQ filing. MISO proposes to correct language in the GIA to accurately describe where the JTIQ Commitment Agreement can be found (in Attachment X, Appendix 18). Additionally, MISO proposes several non-substantive, clean-up revisions throughout the JTIQ Commitment Agreement. MISO states that these proposed edits correct grammatical errors and references to other provisions and ensure consistent language.[14]

6. Notice of the filing was published in the *Federal Register*, 90 Fed. Reg. 57194 (Dec. 10, 2025), with interventions and protests due on or before December 26, 2025.[15] Louisiana Public Service Commission filed a notice of intervention. Timely motions to intervene were filed by: Ameren Services Company, on behalf of its affiliates Ameren Illinois Company, Ameren Transmission Company of Illinois, and Union Electric Company; American Electric Power Service Corporation, on behalf of its affiliates AEP Indiana Michigan Transmission Company, Inc., AEP Energy Partners, Inc., and AEP Retail Energy Partners LLC; and Cooperative Energy.

7. Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214 (2025), the notice of intervention and the timely, unopposed motions to intervene serve to make the entities that filed them parties to this proceeding.

8. We accept the proposed Tariff revisions, effective February 4, 2026, as requested. We find that the proposed Tariff revisions are just and reasonable and not unduly discriminatory or preferential. We also find that MISO's proposed Tariff revisions accomplish the purposes of the Commission's final rules on generator interconnection, including Order Nos. 2003 and 2023, because they will ensure that interconnection

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[13] *Id.* at 3-7, 13.

[14] *Id.* at 8.

[15] On December 22, 2025, the Office of the Secretary issued a notice stating that the Commission would be closed on December 26, 2025 and that pursuant to 18 C.F.R. § 385.2007 (2025), "all filings and documents due to be filed on . . . Friday, December 26, 2025, will be accepted as timely on the next official business day." Notice of Commission Closing and Filing Deadlines (Dec. 22, 2025).

customers are able to interconnect to the transmission system in a reliable, efficient, transparent, and timely manner.[16] This will contribute to increasing overall efficiency of MISO's generator interconnection process. Therefore, we find that MISO's proposed revisions to its *pro forma* GIA, *pro forma* GIP and the *pro forma* JTIQ Commitment Agreement meet the independent entity variation standard.

9. In particular, we find that MISO's proposal to set a new minimum insurance requirement for small generating facilities is just and reasonable, as it mirrors language in the Commission's *pro forma* SGIA. Additionally, we find MISO's proposed Tariff revisions to clarify that an interconnection customer can only propose to connect its generating facility to MISO's transmission system to be just and reasonable.[17] We also find MISO's proposed revisions to clarify queue position, both for valid interconnection requests and interconnection requests requiring a material modification, to be just and reasonable, as these revisions are consistent with current practice and the approach adopted in the Commission's *pro forma* LGIP. Finally, we find MISO's proposed Tariff revisions to make ministerial corrections to be just and reasonable, as they are non-substantive in nature and maintain consistency in the Tariff.

By direction of the Commission.

Debbie-Anne A. Reese,
Secretary.

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[16] *Standardization of Generator Interconnection Agreements & Procs.*, Order No. 2003, 104 FERC ¶ 61,103, at PP 11-12 (2003), *order on reh'g*, Order No. 2003-A, 106 FERC ¶ 61,220, *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); *Improvements to Generator Interconnection Procs. & Agreements*, Order No. 2023, 184 FERC ¶ 61,054, at P 1 (2023), *order on reh'g*, Order No. 2023-A, 186 FERC ¶ 61,199, *errata notice*, 188 FERC ¶ 61,134 (2024).

[17] *See Sw. Power Pool, Inc.*, 132 FERC ¶ 61,137, at P 40 (2010) (finding that "the Commission's *pro forma* LGIP does not contemplate large generator interconnection requests as a means for connecting two discrete, non-affiliated transmission systems").

Appendix – Tariff Records

Midcontinent Independent System Operator, Inc.
FERC Electric Tariff

- ATTACHMENT X, Generator Interconnection Procedures (GIP) (184.0.0)
- Attachment X: Appendix 1, Interconnection Request for a Generating Facility (59.0.0)
- Attachment X: Appendix 6, Generator Interconnection Agreement (GIA) (110.0.0)
- Attachment X: Appendix 18, JTIQ Commitment Agreement (32.0.0)

Document Content(s)