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July 20, 2026

VIA ELECTRONIC FILING

The Honorable Debbie-Anne Reese
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

**Re: Midcontinent Independent System Operator, Inc.
Informational Report
Docket No. EL26-70-000**

Dear Secretary Reese:

The Midcontinent Independent System Operator, Inc. ("MISO"), through this filing, submits this informational report in compliance with the Federal Energy Regulatory Commission's (the "Commission") Order Instituting Proceeding Under Section 206 of the Federal Power Act issued in this proceeding on June 18, 2026 (the "Show Cause Order").¹ MISO respectfully requests that the Commission accept this filing in compliance with the Show Cause Order's requirements.

I. Executive Summary

MISO appreciates the support of the Commission to ensure efficient, cost-effective and reliable integration of large loads. MISO continues to work diligently with the states both individually and through the Organization of MISO States ("OMS"), as well as its member utilities, to support resource adequacy for planned load growth in a manner that maintains customer affordability, efficiency and regional reliability. MISO's current framework is well-suited to meet the needs of traditional load growth, and MISO's existing processes have enabled us to maintain resource adequacy. The unique nature of certain new large loads and the need to help ensure speed to power, however, brings new challenges that require MISO to continue to work with its states and broader stakeholder community to develop new tools and processes to ensure resource adequacy is maintained going forward. Conventional load forecasting was designed around gradual and geographically-dispersed growth. The new large loads, which include data center developments, reflect a new type of load growth. A single project may require more load than an entire city at one location and desire service within a short period. This concentrated and discontinuous load growth requires new processes to most effectively meet this new demand and maintain resource adequacy. Many of these new large loads are difficult to forecast with a high

¹ *Midcontinent Indep. Sys. Operator, Inc.*, 195 FERC ¶ 61,212 (2026) (the "Show Cause Order").

degree certainty using traditional forecasting methods, and the flexibility in locational siting does not align well with traditional utility planning. It is not prudent for load serving entities to build local transmission, or generation, for speculative loads. Yet the pace of large load additions and early need-by dates nonetheless require acceleration of transmission planning and generator interconnection processes, even in the face of this uncertainty.

While MISO's existing processes have been sufficient to ensure resource adequacy in the short term, the unique operational characteristics of new large loads have prompted MISO to consider new processes within the current regulatory framework and Resource Adequacy construct. As discussed below, MISO, the states, and our members have taken a number of steps to address resource adequacy in the near term and to plan for resource adequacy needs in the future given the shifting resource mix and risk profile in the MISO region.

In order to meet the unique speed to power needs of these new large loads and provide additional tools that support resource adequacy, MISO is developing two new processes to speed the delivery of energy to large loads. First, MISO will file its Zero Injection Generator Interconnection Agreement ("ZGIA") by early August. MISO began working with stakeholders in 2025 to develop a new Interconnection service study type—ZG Interconnection Service, an associated study process, and revisions to its *pro forma* Generator Interconnection Agreement and modifications to its *pro forma* GIA designed to facilitate faster interconnection of generation resources that serve only Load connected to the same substation and will not inject energy further onto the Transmission System. As discussed in more detail below, the ZGIA is not restricted to use only for large loads. However, the process is particularly responsive to the challenges faced by large loads. The ZGIA will facilitate the accelerated interconnection of generation needed to serve a specific nearby load source where broader injection onto the broader Transmission System is not needed and system impacts—and corresponding Network Upgrades—can be limited to roughly the substation level. This provides a valuable option for generation to be co-located with large loads without having enter the Definitive Planning Phase of MISO's generation interconnection queue or obtain a form of Interconnection Service that is broader and potentially more costly than what is needed.

In addition, at the July 16, 2026 Large Load Working Group MISO initiated stakeholder discussions to develop a new set of processes for concurrently studying large loads and associated generation.² This new framework (provisionally named the "Large Load Parallel Study Process") aligns the study processes used to assess the transmission infrastructure needed to meet new large loads and new generation in an efficient framework that can be executed on a shorter timeline using shared modelling inputs. The Large Load Parallel Study Process recognizes the unique commercial realities of these new large loads. This framework is expected to position MISO's members to meet the challenges presented by new large loads on a more immediate timeline. The Large Load Parallel Study Process will support resource adequacy and further supplement the opportunities available for members to effectively facilitate new large spot loads, with speed, and supports resource adequacy while protecting customers from unnecessary investments relating to

² See <https://cdn.misoenergy.org/20260716%20LLWG%20Item%2006b%20Generation%20and%20Load%20Alignment%20Presentation768740.pdf>

the uncertainty of spot large load siting. MISO will work with stakeholders to further develop the Large Load Parallel Study Process and intends to submit a Section 205 filing to the Commission codifying the Large Load Parallel Study Process in the Tariff as part of the suite of solutions responsive to the Commission's Show Cause Order.

II. BACKGROUND

On June 18, 2026, the Commission issued the Show Cause Order. The Show Cause Order directed the following compliance requirements:

122. Accordingly, we direct MISO to submit in Docket No. EL26-70-000, within 30 days of the date of issuance of this order, a detailed informational report on any proposals under consideration in its stakeholder process to address the issue of resource adequacy to serve new large loads. We also strongly encourage new proposals to the extent necessary to address these concerns. The informational report must include a detailed schedule of key milestones, such as stakeholder or MISO Board votes, that includes the estimated date on which MISO expects to file any such proposals with the Commission. Additionally, as part of this informational report, we direct MISO to identify any ongoing stakeholder processes that aim to increase the pace of adding generating capacity in the MISO region. The informational report must include a detailed schedule of such initiatives, including timing of the stakeholder process and dates of any anticipated filings with the Commission.³

III. INFORMATIONAL FILING

To respond to the Show Cause Order's requirements, MISO has divided its informational report into three sections. Sections A and B discuss MISO's role in promoting Resource Adequacy in the MISO Region and the ability of the Transmission System to meet projected large load demands under current Tariff processes and expected generation additions. Section C discusses new initiatives that MISO is developing with its stakeholders to further buttress resource adequacy and accelerate the pace of adding generation to meet the emerging needs of large loads.

A. The MISO Region Is Resource Adequate.

1. The role of the States in ensuring resource adequacy.

Within the MISO region, States are primarily responsible for resource adequacy, which involves overseeing Load Serving Entities ("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 responsibility of the States and LSEs to ensure sufficient capacity is available

³ *Id.* at P 122.

to meet Load and reserve requirements. MISO's Resource Adequacy construct complements the jurisdiction that State commissions and Relevant Electric Retail Rate Authorities ("RERRA") have in determining the necessary level of Resource Adequacy and works in concert with LSEs, as LSEs are the entities responsible for providing demand forecasts that help drive the development of local and regional requirements by MISO. Additionally, MISO partners with the Organization of MISO States, Inc. ("OMS") to conduct a survey ("OMS-MISO Survey") of resource owners within MISO footprint on an annual basis to assess anticipated generating capacity over a five-year planning horizon. The OMS-MISO Survey results, along with MISO's Planning Resource Auction ("PRA") and other forward-looking analyses (e.g., Futures), provide a comprehensive view of system risks and resource needs, supporting states in their resource adequacy responsibilities and members in their resource planning.

2. The MISO region is expected to experience capacity surpluses in the near term.

a. OMS-MISO Survey

The OMS-MISO Survey provides transparency in expectations of future resource adequacy plans, among other vehicles.⁴ Overall, the OMS-MISO Survey provides a five-year view of resource adequacy, indicating if expected capacity based on member plans will meet planning reserve margins and yield a surplus or deficit.

The 2026 OMS-MISO Survey results, published on June 4, 2026, show an adaptive response to increasing demand through generation additions that sustain near-term resource adequacy.⁵ As provided in the 2026 OMS-MISO Survey results, the MISO region is projected to maintain sufficient capacity to meet demand across the next five years, based upon current load forecasts and anticipated load growth.⁶ MISO examines the survey results in tandem with forecast data submitted by LSEs. The forecast data indicates that Load growth as submitted by LSEs continues to accelerate, with a Compound Annual Growth Rate ("CAGR") projected between 3.1% and 5.1% over five years.⁷ The study results also indicates that, to support rising demand, the MISO Region needs to maintain the increased pace of capacity additions, noting that timely generation builds, generator interconnection queue improvements, as well as the Expedited Resource Adequacy Study ("ERAS"), will help meet this need.⁸ The study results further confirm that seasonal reliability risk is changing in a way that contributes to shifting hours of reliability

⁴ "OMS" refers to the Organization of MISO States, which encompasses state utility regulators in the MISO footprint.

⁵ 2026 OMS-MISO Survey Results available at: <https://cdn.misoenergy.org/20260604%20OMS-MISO%20Survey%20Results%20Workshop%20Presentation761711.pdf>

⁶ *Id.* at 2.

⁷ *Id.*

⁸ *Id.*

risk and the seasonal distribution of risk. For example, MISO is seeing a shift in risk away from summer and towards winter as the resource mix evolves.⁹

b. MISO's Regional Resource Assessment

MISO is confident that the MISO Region will continue to be resource adequate in both the near and longer term. In addition to the OMS-MISO Survey, MISO had also developed Regional Resource Assessment ("RRA") to assess the state of resource adequacy in its footprint in the past. The RRA¹⁰ was one of the periodic studies MISO used to forecast how the mix of electricity-generating resources in the MISO Region could evolve going forward.

While the RRA and the OMS-MISO Survey are similar in some ways, there are some key differences. The RRA is a 20-year outlook based on publicly announced resource plans and state and policy goals, whereas the OMS-MISO Survey is a more near-term (5-year outlook) resource adequacy assessment based on member plans and resource addition trends. Separately but related, MISO also develops MISO Futures which typically entails two or more scenarios, with 20-year outlook, and is used for transmission planning purposes.

B. MISO's Efforts to Support Resource Adequacy

MISO works diligently to develop, implement, and refine programs to give states and our members the support needed to ensure resource adequacy in the MISO Region. MISO's ongoing resource adequacy efforts involve a holistic, stakeholder-driven approach that has culminated in numerous Tariff enhancements, some of which are under development and some of which have recently taken effect. This filing discusses the subset of those initiatives that specifically address the market reforms to send transparent price signals that provide all parties with the information necessary to make informed decisions in their resource planning efforts. These initiatives are discussed in greater detail in the remainder of this section. MISO anticipates that it will provide more detail on additional initiatives addressing other aspects of the large load integration challenge in a forthcoming abeyance request.

1. Seasonal Construct and Reliability Based Demand Curve

MISO's recent shift to a seasonal capacity market with seasonal accredited capacity better reflects extreme weather conditions that have become more prevalent. These weather conditions affect both the seasonal peak demand and the available seasonal supply. In addition, the seasonal construct better reflects the seasonal planned & forced outage patterns of supply. The recent implementation of the Reliability Based Demand Curve ("RBDC") reflects the contributions to reliability incremental MWs can add to the system. The RBDC helps with price signals by indicating if the MISO Region has sufficient capacity for the prompt Planning Year. On the supply

⁹ *Id.*

¹⁰ More information on MISO's 2024 Regional Resource Assessment can be found here: https://cdn.misoenergy.org/2024%20RRA%20Report_Final676241.pdf.

side, resources are being accredited based on availability during all times of need, across all seasons (Schedule 53, seasonal accredited capacity resources).

Data from the 2025-2026 PRA confirm the reliability benefits of the RBDC construct. At a system level, MISO cleared more capacity beyond the seasonal PRM. The auction cleared above seasonal final reliability target, representing additional reliability value at cost competitive prices. For all seasons, Subregional RBDCs set the requirement for both subregions. The efficiency of the RBDC enabled MISO to secure more capacity at a significantly lower price.

2. Transition to the Direct Loss-of-Load Accreditation Methodology

MISO is currently transitioning to a two-step accreditation approach (the “Direct Loss-of-Load” or “DLOL”-based methodology) that accredits capacity based on marginal contribution to reliability during periods of highest system risk (“marginal effective load carrying capability” or “marginal ELCC”) on a Resource Class basis. MISO’s DLOL-based methodology combines both probabilistic and deterministic elements into a single resource accreditation process. Simply described, the DLOL-based methodology takes two steps by first determining the size of the pie, and second, divvying up the pie. The DLOL-based accreditation methodology will provide both MISO members and regulators engaged in integrated resource planning the right investment and retirement signals to help ensure the availability of resources with the attributes necessary to maintain reliability into the future.

3. Expedited Resource Addition Study

In June of 2025, consistent with the Commission’s direction, MISO filed its revised Expedited Resource Addition Study (“ERAS”) proposal (“Revised ERAS Proposal”). As noted in its filing, the ERAS proposal was driven by the fact that MISO was facing urgent near-term resource adequacy and reliability concerns due to load growth, generation retirement, and delays in the interconnection process¹¹ and that it would experience a 4.7 gigawatt (GW) shortfall by 2028 if currently planned generation facility retirements were to occur.¹²

In support of the ERAS proposal MISO asserted that, while it has undertaken reforms to improve queue processing, the current processing presents a barrier to developing generation that can address these near-term needs. As such, MISO proposed revisions to its Generator Interconnection Procedures (“GIP”) and *pro forma* Generator Interconnection Agreement (“GIA”) to establish a ERAS process, which provides for accelerated study of interconnection requests that will address urgent resource adequacy and reliability needs in the near term (*i.e.*, within the next five years).¹³ Specifically, under the Revised ERAS Proposal, MISO proposed to create a quarterly

¹¹ Ltr. to the Hon. Debbie Ann Reese, Secretary, Docket No. ER25-1674-000, at p. 5 (Mar. 17, 2025).

¹² *Id.* at 6 (citing NERC’s 2024 Long-Term Reliability Assessment (published December 2024), https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_Long%20Term%20Reliability%20Assessment_2024.pdf).

¹³ *Id.* at 1. See MISO, Proposed Tariff, Attach. X (GIP) (175.0.0), §§ 1 (Definitions), 2.1 (Application of Generator Interconnection Procedures), 3.3.1 (Initiating an Interconnection Request), 3.4 (OASIS Posting), 3.9 (Expedited

“first-come, first-served” serial study process to facilitate the rapid study of interconnection requests for generating resources that are committed to addressing specific, identified resource adequacy and/or reliability needs with RERRA verification,¹⁴ resulting in an ERAS Generator Interconnection Agreement (“EGIA”) within approximately 90 days of study kickoff.

The Commission accepted MISO’s ERAS proposal on July 21, 2025, finding that MISO’s proposed Tariff revisions accomplish the purposes of the Commission’s final rules on generator interconnection, including Order Nos. 2003 and 2023, by helping to ensure that interconnection customers are able to interconnect to the transmission system in a reliable, efficient, transparent, and timely manner.¹⁵

ERAS was filed as short term, limited-use, ‘bridge’ process to enable generators needed to respond to specifically identified and urgent resource adequacy and reliability needs, thus giving MISO’s broader queue reforms time to take effect. ERAS has succeeded in its goals. To date, 40 projects and 19 GWs of generation have completed the accelerated ERAS process and received final or near-final generator interconnection agreements allowing them to meet these urgent needs. MISO has filled the 50 Load-Serving Entity (“LSE”) slots and 10 Independent Power Producer (“IPP”) slots and expects to fill the remaining 8 retail choice spots allowed under the ERAS caps prior to the ERAS sunset date. However, while ERAS has been extremely useful and necessary in the short term, MISO acknowledges that it is not permanent and that other new processes or enhancements to existing processes must address longer-term needs.

4. Improving Queue Speed

MISO has also made reforms that, taken collectively, enable it to become an industry leader in facing the challenges of a swelling interconnection queue while addressing both the current and projected needs of Interconnection Customers and load for a more reliable and efficient transmission system and Tariff processes tailored to meet emerging needs.

In January 2017, MISO comprehensively restructured the GIP and instituted a three-phase Definitive Planning Phase (“DPP”) process¹⁶ to facilitate a structured study and restudy of proposed generation projects (“2017 Queue Reform”).¹⁷ The key elements of the novel GIP

Resource Addition Study), 5.13 (Transition to ERAS Process), 7.2.1 (Requirements for Demonstrating Site Control for Generating Facility), 7.3.1.4 (Interconnection Decision Point I), 7.3.2.3.1 (Additional Analysis Applicable to Interconnection Requests in a JTIQ Screening Group), 11.1 (Tender), 11.2 (Negotiation), 11.2.1 (Optional negotiation period adjustment for Interconnection Facilities Study), and 11.3 (Execution and Filing); *id.* app. 1 (Interconnection Request for a Generating Facility) (56.0.0); *id.* app. 6 (GIA) (106.0.0), art. 1 (Definitions), 2.3.3, and 2.4 (Termination Costs).

¹⁴ Transmittal at 4; Filing, Tab C (Testimony of Andrew Witmeier) at 51-52 (Witmeier Testimony).

¹⁵ *Midcontinent Independent System Operator, Inc.*, 192 FERC ¶ 61,064 (2025) at P 31 (“ERAS Order”).

¹⁶ The DPP is the principal part of the GIP where the interconnection study process takes place, as described in section 7 of the GIP. See Tariff, Attach. X, GIP § 7.

¹⁷ See *Midcontinent Indep. Sys. Operator, Inc.*, 158 FERC ¶ 61,003 (“2017 Queue Reform Order”), order on reh’g, 161 FERC ¶ 61,137 (2017).

process adopted in 2017 included: sequential System Impact Studies (“SIS”) and Facilities Studies, a separate financial milestone at the beginning of each DPP phase,¹⁸ and two Interconnection Customer Decision Points (“Decision Points”) serving as off-ramps to allow Interconnection Customers with projects that are no longer viable to exit the queue with minimal impacts on other projects. This multi-phase model proved to be a significant improvement over the prior one-phase process, and it has been adopted in some other large RTOs.¹⁹

After the implementation of the 2017 Queue Reform, MISO and its stakeholders continued to evaluate the effectiveness of the new three-phase DPP process, responding to emerging issues and refining the initial design with various improvements, both internally and through FERC filings. The following additional main improvements to the three-phase DPP process were implemented: (1) reforms to strengthen certain milestone and site control requirements (2019);²⁰ (2) reforms to the Option to Build, harm test calculation, and provisional GIA requirements (2021);²¹ (3) reforms to classify fuel type change requests made in the DPP process as a Material Modification and allow Interconnection Customers to request Surplus Interconnection Service earlier in the interconnection study process (2021);²² (4) and an innovative proposal to reduce the GIP timeline by offering enhanced flexibility and an optional path for Interconnection Customers to execute GIAs in under one year, thereby improving coordination and alignment with MISO’s transmission expansion planning process, and to implement various other enhancements to the interconnection process (2022).²³

In 2023, during the pendency of the Order No. 2023 process, MISO embarked on yet another reform to strengthen its withdrawal penalty regime, including through the adoption of an Automatic Withdrawal Penalty, and further refine its site control requirements. As MISO explained in its filing, the reforms were critical to address the ballooning size of MISO’s generator interconnection queue and winnow out the speculative interconnection requests that so frequently distort price signals and delay cost certainty to the developers of generation. The Commission found these reforms just and reasonable and accepted them effective January 22, 2024,²⁴ to apply starting from MISO’s DPP-2024 queue cycle.

In addition, MISO worked with its RTO neighbors, PJM Interconnection, LLC (“PJM”) and Southwest Power Pool, Inc. (“SPP”), to improve affected system studies procedures and requirements that are contained in MISO’s Joint Operating Agreements (“JOAs”) with these

¹⁸ There are currently three financial milestones in the GIP: M2, M3, and M4. M2 marks the beginning of DPP Phase I, M3 marks the beginning of DPP Phase II, and M4 marks the beginning of DPP Phase III.

¹⁹ See *PJM Interconnection, L.L.C.*, 181 FERC ¶ 61,162 (2022) (adopting a three-phase interconnection process); *Southwest Power Pool, Inc.*, 167 FERC ¶ 61,275 (2019) (adopting a three-stage interconnection study process).

²⁰ See *Midcontinent Indep. Sys. Operator, Inc.*, 169 FERC ¶ 61,173 (2019).

²¹ See *Midcontinent Indep. Sys. Operator, Inc.*, letter order, Docket No. ER21-2173-000 (Aug. 10, 2021); *Midcontinent Indep. Sys. Operator, Inc.*, 176 FERC ¶ 61,122 (2021).

²² See *Midcontinent Indep. Sys. Operator, Inc.*, 177 FERC ¶ 61,234 (2021).

²³ See *Midcontinent Indep. Sys. Operator, Inc.*, 178 FERC ¶ 61,141 (2022).

²⁴ *Midcontinent Indep. Sys. Operator, Inc.*, 186 FERC ¶ 61,054, *reh’g denied*, 187 FERC ¶ 61,031 (2024).

entities.²⁵ These reforms have significantly enhanced MISO's affected system procedures resulting in more expeditious processing of Interconnection Requests involving affected system studies with these neighboring RTOs while also allowing Interconnection Customers to move forward even where an affected system study is delayed.

MISO continues to work with its state commissions, stakeholders, and neighbors to improve the efficiency, accuracy, and speed of its interconnection queue through developing innovative solutions. For example, MISO integrated modeling software Suite of Unified Grid Analyses with Renewables ("SUGAR"), for Phase 1 DPP studies with plans to integrate in Phase 2 and 3. SUGAR is designed to perform power flow analyses, identify Network Upgrades, allocate costs using MISO's Transmission Cost Estimation Guide and Transmission Owner upgrade inputs, and validate constraint mitigation. The SUGAR software leverages powerful circuit simulation methods developed to study billion-transistor electronic systems; this innovation underlies the ability to expedite some of the more time-consuming aspects of running interconnection studies. In addition to providing data within MISO's acceptable tolerances, as benchmarked against current software, SUGAR reduced DPP phase 1 cycle time significantly from the status quo as evidenced in the DPP 2022, 2023 and 2025 cycles. The implementation of SUGAR advances MISO's Reliability Imperative by continuing to improve processes for new generator interconnections.

5. Joint Targeted Interconnection Queue Study

The MISO-SPP Joint Targeted Interconnection Queue Study ("JTIQ") has sped the queue up considerably by providing an alternative to the backlogged ordinary affected systems study process with SPP while providing both more efficient solutions to the needs of multiple cycles of Interconnection Customers as well as greater up-front cost certainty regarding potentially significant affected systems costs to generators entering the Definitive Planning Phase or MISO's ERAS processes. This increased efficiency and cost certainty allows generators to reach GIA faster and develop their projects from a starting point of increased cost certainty.

The JTIQ portfolio directly enables new generation to serve emerging load by proactively constructing the transmission backbone needed for interconnection, rather than waiting for incremental upgrades triggered by one project at a time. By identifying and mitigating cross-seam constraints in advance, JTIQ provides large, regionally optimized transmission solutions that unlock more than 28 GW of new interconnection capability along the MISO-SPP seam. Because these upgrades are included upfront in MISO and SPP's planning and interconnection models inclusive of ERAS studies, DPP cycles, and Expedited Project Reviews; projects can interconnect faster and with far greater cost certainty.

C. MISO's Future Efforts to Bring Resources Online Faster

1. Zero Injection Generator Interconnection Agreement – Expected Filing Date – July 31, 2026

²⁵ See *Midcontinent Indep. Sys. Operator, Inc.*, 171 FERC ¶ 61,275 (2020).

MISO began working with stakeholders in 2025 to develop a more robust zero injection generator interconnection agreement (“ZGIA”) to facilitate faster interconnection of generation resources that will be co-located with load and will not inject energy further onto the Transmission System. The ZGIA provides a limited, structured option to support large load integration through:

- A limited service framework supported by associated generation,
- Defined interconnection study processes tailored to zero-injection configurations, and,
- Clear allocation of operational and planning responsibilities.

This construct enables a pathway for certain large load configurations to achieve speed to reliable power while maintaining system reliability. A table of MISO’s stakeholder meetings and links to respective materials regarding MISO’s ZGIA proposal is provided in Attachment A hereto. MISO expects to submit the ZGIA proposal to the Commission in a Federal Power Act Section 205 filing on, or about July 31, 2026.

2. Large Load Parallel Study Process

Current load and generation study processes are dependent on each other, requiring one to be complete before the next can begin. Some large load customers are seeking a more integrated, predictable experience that reflects the real-world pairing of large loads with the generation needed to serve it, without requiring co-location. MISO is working to address these concerns through the proposed Large Load Parallel Study Process. The Large Load Parallel Study Process will be used for studying load greater than or equal to 250MW and will allow MISO to integrate studies for planned load and generation to increase speed to approval and optimize network upgrades.

Through the proposed Large Load Parallel Study Process, an LSE will submit a proposed generation and load combination. The generation and load have separate eligibility requirements (e.g., load ≥ 250 MW, generation nameplate max 150% of identified load need). The proposed Large Load Parallel Study Process will analyze generation and transmission using the same study assumptions applied in Generator Interconnection and MTEP. Both studies will be run concurrently and in parallel, with the load/transmission model incorporating the planned generation and planned load and finish at approximately the same time—within 120 days. The proposed process is intended to ensure faster and more transparent interconnection arrangements for large loads, while offering customers speed-to-power, optimized transmission solutions, and greater certainty to support siting, financing, and state coordination. This solution aligns with the spirit of the Commission’s Show Cause Order for interconnection process arrangements to address the speed of adding generation to serve large load. The outcome of the processes is MTEP approval of transmission required to reliably facilitate the withdrawal of the load and injection rights for the generation.

MISO initiated the stakeholder process with a presentation of the Large Load Parallel Study Process at the July 16, 2026, Large Load Working Group and has requested stakeholder feedback on the proposed process. MISO will continue stakeholder discussions on the Large Load Parallel

Study Process at the August 27, 2026 LLWG. Ultimately, MISO expects to file the Large Load Parallel Study Process on or about the end of September.

IV. COMMUNICATIONS

MISO respectfully requests waiver of Rule 203(b)(3) of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.203(b)(3) (2026), to the extent necessary to permit the designation of more than two persons for service on behalf of MISO in this proceeding and requests all communications related to this filing be directed to:

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V. NOTICE AND SERVICE

MISO has served a copy of this filing electronically upon all parties listed on the Commission's eService list, and upon all Tariff customers, MISO Members, Member representatives of Transmission Owners and non-Transmission Owners, as well as all state commissions within the MISO Region and the Organization of MISO States. The filing has been posted electronically on MISO's website at <https://www.misoenergy.org/legal/ferc-filings/> for other interested parties in this matter.

VI. CONCLUSION

For all of the foregoing reasons, MISO respectfully requests that the Commission accept this filing in compliance with the requirements of the Show Cause Order and grant waiver of any Commission regulations the Commission deems applicable to this filing in order for the Commission to accept it as proposed. The MISO region currently is resource adequate and MISO's work with recent reforms and partnership with OMS, the states and members has provided a firm foundation. However, with new urgent challenges created by the introduction of new large spot loads, additional tools are needed to support this growth and maintain Resource Adequacy going forward. MISO looks forward to bringing new Resource Adequacy tools to LSEs to meet the unique challenges associated with the new spot load growth occurring across the footprint. These tools will help support affordability for customers while enabling speed to power in a reliable cost effective manner that can meet the new emerging demand.

Respectfully submitted,

/s/ Christopher D. Supino

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Attachment

ATTACHMENT A

Planning Advisory Committee (PAC) and Large Load Working Group (LLWG)

MEETING DATE	MATERIALS
December 3, 2025 Planning Subcommittee (PSC)	Consideration of Zero-Injection GIA
January 21, 2026 PAC	Consideration of Zero-Injection GIA
January 30, 2026 Large Load Workshop	Large Load Additions Workshop
February 25, 2026 PAC	Market Participation and Registration of Co-Located Load and Generation (PAC-2024-4): Consideration of Zero-Injection GIA Large Load Interconnection Reliability Requirements (PAC-2024-1)
April 20, 2026 LLWG	Large Load Overview Consideration of Zero-Injection GIA Resource: Adequacy Participation and Markets and Reliable Operations New Large Load Issue Submissions Large Load Interconnection Reliability Requirements (LLWG)
April 22, 2026 PAC	Consideration of Zero-Injection GIA (Interconnection and Planning Draft Tariff Updates): Market Participation and Registration of Co-Located Load and Generation (PAC-2024-4A) PAC April 2026: PAC: Large Load Definition (PAC-2024-1)
May 14, 2026 LLWG	Consideration of Zero-Injection GIA (Resource Adequacy, Markets & Reliable Operations Draft Tariff): Market Participation and Registration of Co-Located Load and Generation (PAC-2024-4B) Large Load Interconnection Reliability Requirements (LLWG)

	ZGIA Q&A
May 27, 2026 PAC	Consideration of Zero-Injection GIA (Interconnection and Planning Draft Tariff Updates): Market Participation and Registration of Co-Located Load and Generation (PAC-2024-4A) Large Load Definition Update (PAC-2024-1) Attachment X Appendix 19 ZGIA Interconnection Agreement_Redlines.docx
June 10, 2026 LLWG	Consideration of Zero-Injection GIA: Market Participation and Registration of Co-Located Load and Generation (PAC-2024-4B) Large Load Interconnection Reliability Requirements (LLWG) Reliability Requirements Technical Compendium
June 29, 2026 LLWG	Market Participation and Registration of Co-Located Load and Generation Marc Keyser 11:30 Consideration of Zero-Injection GIA (PAC-2024-4B) Large Load Operational Reliability Requirements Large Load Reserve Product Enhancements (LWLG-2026-2)
July 16, 2026 LLWG	Posted meeting materials
Upcoming Meetings: July 27, 2026 LLWG August 12, 2026 LLWG August 27, 2026 LLWG September 23, 2026 LLWG October 8, 2026 LLWG October 29, 2026 LLWG November 16, 2026 LLWG	Meetings primarily will address the non-resource adequacy aspects of large load integration and compliance with the Show Cause Order