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Generator and Load Interconnection Process (GALIP)

MEETING THE MOMENT ON LOAD INTERCONNECTIONS

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Agenda

Topic 1 | Show-Cause Order

Topic 2 | GALIP Proposal

Purpose | Present an alternative approach
to analyzing transmission system
impacts from large loads

****This is an independent proposal**





Show-Cause Order

UNCLEAR OR UNJUST?

June 18, 2026 Order

- Topic Areas:
 - Transmission Service for Large Load:
 - MISO's tariff lacks provisions how MISO or the TOs will timely study (60-90 days) the provision of transmission service serving LL.
 - EPR combined with 90 day TO study timelines exceeds this limit
 - Cost Shifting Among Transmission Customers:
 - MISO's tariff lacks mechanisms to prevent cost shifting from LL to existing Tx customers.
 - Using "Other" type projects shift this responsibility to Transmission Owners and LSEs
 - Co-Location Arrangements and Load with BTMG:
 - MISO's tariff does not provide clear framework for co-location or co-located load/BTMG served load
 - No requirement for TO study to account for use of co-located generation and load
 - Extending New Transmission Service to Large Load:
 - MISO's tariff does not recognize large loads can limit or curtail their transmission usage during certain system conditions.
 - System Impact Study performed by TO not required to look at an 'as-available' basis for interconnection
 - Serving Electrically Proximate Large Load and Co-Located Load:
 - MISO's tariff does not adequately address generation developed specifically to serve nearby loads or co-located load.
 - Load is not included in GIP until after MTEP approval of large load interconnection plans
 - GI Requests are not included in MTEP until after GIA execution



Generator and Load Interconnection Process (GALIP)

INCREASED SPEED WHILE RETAINING CONTROL

Combined Interconnection Processing

- GALIP:
 - Inclusion of load interconnection requests classified as 'Large Load' in the Generator Interconnection Process
 - Service Types:
 - NRIS for firm network designation
 - ERIS for flexibility and as-available use
 - Load Types:
 - Stand-Alone: Load only request
 - Combined Generation and Load: Electrically proximate load-gen request not fully self-served
 - Inclusive of all combined generation and load request configurations
 - Caps on injection and withdrawal to be included in initial request
 - Zero Impact: No material impact to the transmission system, no injection rights
 - ZGIA after Material Modification Study
 - Inclusion of fast-track process
 - Higher entry milestones and true-up
 - Access directly into ongoing DPP Phases
- Benefits:
 - Development of more cost effective and efficient Network Upgrades
 - Solutions geared towards most likely future system demands
 - Cost Allocation in line with Cost Causation and Show-Cause Order
 - Protects against existing customers subsidizing large loads
 - Increases certainty
 - Higher entry requirements to limit cycle size
 - Incentives for early withdrawal
 - Dynamic queue cap
 - Leverages recent improvements in Storage and IBR modeling requirements to ensure accuracy and reliability

Proposed Changes

(Shown in Red)

- Request Types:
 - Combined Cycle
 - Combustion Turbine
 - Diesel Engines
 - Hydro
 - Nuclear
 - Storage
 - Coal
 - Oil
 - Waste Heat
 - Wind
 - Solar
 - ADD LARGE LOAD
 - Hybrid – any combination of the above
- Service Types:
 - Generation NRIS
 - Full deliverability as a capacity resource
 - Generation ERIS
 - As available service for participation in wholesale energy market
 - Load NRIS
 - Firm Transmission Service
 - Load ERIS
 - Non-firm Transmission Service

Proposed Changes

(Shown in Red)

- Study Requirements:

- Phase 1:
 - Steady-state thermal and voltage
 - Local Planning Criteria requirements
- Phase 2:
 - Steady-state thermal and voltage
 - Transient Stability
 - Short Circuit
 - Affected Systems Studies
 - Interconnection Facilities Study
 - Local Planning Criteria requirements
- Phase 3:
 - Steady-state thermal and voltage
 - Transient Stability
 - Short Circuit
 - Affected Systems Studies
 - Network Upgrade Facilities Study
 - Local Planning Criteria requirements

- Withdrawal Penalties

- Prior to DPP Start
 - Penalty free withdrawal
 - Full refund of Milestone 2
- DPP Start through end of Decision Point 1
 - ~~10% Withdrawal Penalty~~ Penalty free withdrawal
 - ~~50~~ 10% of Milestone 2 at risk
- Phase 2 start through end of Decision Point 2
 - ~~35~~ 50% Withdrawal Penalty
 - ~~65~~ 50% of M2 + M3 at risk
- Phase 3 start through GIA Negotiation Start
 - 75% Withdrawal Penalty
 - 25% of M2, 100% of M3 and M4 at risk

Proposed Changes

(Shown in Red)

- Milestones:
 - Milestone 1
 - Application fee
 - Study Deposit
 - Technical requirements
 - Milestone 2: ~~\$8,000~~ \$15,000 per MW
 - Milestone 3: The greater of ~~20%~~ 25% of Network Upgrades – M2, or \$1,000 per MW
 - Milestone 4: ~~30%~~ 50% of Network Upgrades – M3 – M2
- Queue Cap:
 - A cap is placed on total MW included in a cycle for each subregion
 - The cap is equal to 50% of peak demand for the subregion + 150% of load interconnection in subregion

Proposed Changes

(Shown in Red)

- Cost Allocation:
 - Interconnection Facilities
 - 100% paid by interconnection customer
 - Network Upgrades
 - 100% of upgrades under 300 kV paid by interconnection customer
 - 90% of upgrades above 300 kV paid by interconnection customer
 - Remaining 10% paid by MISO Load
 - Magnitude based on contribution
 - Costs allocated amongst requests exceeding the distribution factor threshold
 - Costs split based on share of contribution
- Expedited Review – Fast Track Process:
 - Allows a request to direct inclusion in the next DPP Phase II or III to start in the subregion the request is located within
 - Application Fee: \$250,000
 - Full Share of Network Upgrades based on DPP contribution factors
 - Demonstration of no harm to current cycle participants
 - If harm is identified, option to cover full cost responsibility for costs of network upgrades up to the point of no harm 100% Site Control demonstration
 - Proof of service
 - Complete Electric Service Agreement for Load
 - Executed and approved resource acquisition for Generators

How does this meet Show-Cause Order?

- **Transmission Service for Large Load:**
 - MISO's tariff lacks provisions how MISO or the TOs will timely study (60-90 days) the provision of transmission service serving LL.
 - GALIP: Inclusion of Fast-Track process directly being included in DPP Phase III analysis, estimated to be complete within 60 days with 30 days remaining for Transmission Service to be reviewed and granted
- **Cost Shifting Among Transmission Customers:**
 - MISO's tariff lacks mechanisms to prevent cost shifting from LL to existing Tx customers.
 - GALIP: Assigns costs based on allocation mechanisms developed to ensure the same protections against customers unreasonably incurring costs related to new generation interconnections
- **Co-Location Arrangements and Load with BTMG:**
 - MISO's tariff does not provide clear framework for co-location or co-located load/BTMG served load
 - GALIP: Combined Generation and Load requests, and Zero Impact requests allow for full or partial self-service
- **Extending New Transmission Service to Large Load:**
 - MISO's tariff does not recognize large loads can limit or curtail their transmission usage during certain system conditions.
 - GALIP: Includes an ERIS service type that allows for as-available service
- **Serving Electrically Proximate Large Load and Co-Located Load:**
 - MISO's tariff does not adequately address generation developed specifically to serve nearby loads or co-located load.
 - GALIP: Combined Generation and Load requests for electrically proximate pairings, additionally allows for single large load request to find best electrically proximate resources available via review of study requests in the same cycle

Additional Benefits

- **Direct coordination of new load and generation requests**
 - Coordinated impacts and upgrades evaluated
 - Immediate incorporation and analysis of withdrawal impacts
- **Reduced complexity via use of existing process**
 - Reduces strain on MISO resources by including load interconnections within existing process
 - Reduces regulatory lag by limiting changes to be filed and approved
- **More certainty on cost**
 - Modified penalties provide incentive for early withdrawal
 - Fast-track process ensures late entries don't result in surprise costs
- **Increased deliverability**
 - More load directly included in deliverability analyses ensures a larger pool of resources for which output can be delivered
 - Deliverability Upgrades are certain to match future system use

Timeline for Inclusion

- Full implementation
 - Full implementation of updates in the next DPP cycle to begin
 - DPP 2026 has not yet reached DPP Start
- Transitional Study
 - Fast-Track Process
 - Available for any DPP Phase II or III to begin after the effective date of the changes
 - Inclusion of Large Loads and ERAS Generation
 - Inclusion of completed EPR and ERAS requests in the first DPP Phase immediately following the effective date of the changes



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