



Large Load Application and Study Process (LLWG-2026-7)

Large Load Working Group

September 23, 2026

Purpose & Key Takeaway

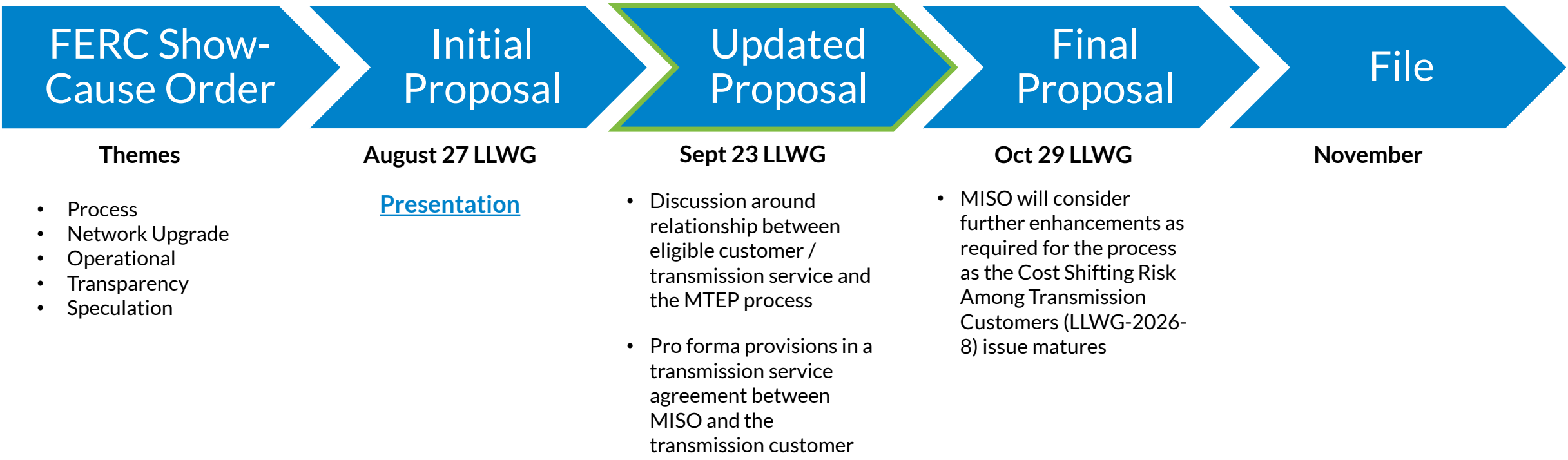
Purpose

Review MISO's Large Load Project Review (LLPR) process, which addresses the Large Load application and study process

Key Takeaways

- FERC's show-cause order asks MISO to address processes for efficient and fast infrastructure build for new large loads.
- A proposed large load study process harmonizes with the show-cause goals while offering large load customers increased speed and certainty for required network upgrades.
- To support an open and transparent dialogue, MISO is requesting further feedback on questions and clarifications as well as Tariff proposal; feedback is requested by October 7.
- MISO proposes the October EPR cycle be the last window for Large Load requests while we prepare to transition to the Large Load Project Review process, requests after that date considered in the new process.

Today’s discussion focuses on a refined proposal; stakeholders will see a final proposal again in October, before filing in November



Note: October will be the final submission window for Large Loads under the current process

Summary of stakeholder themes and feedback

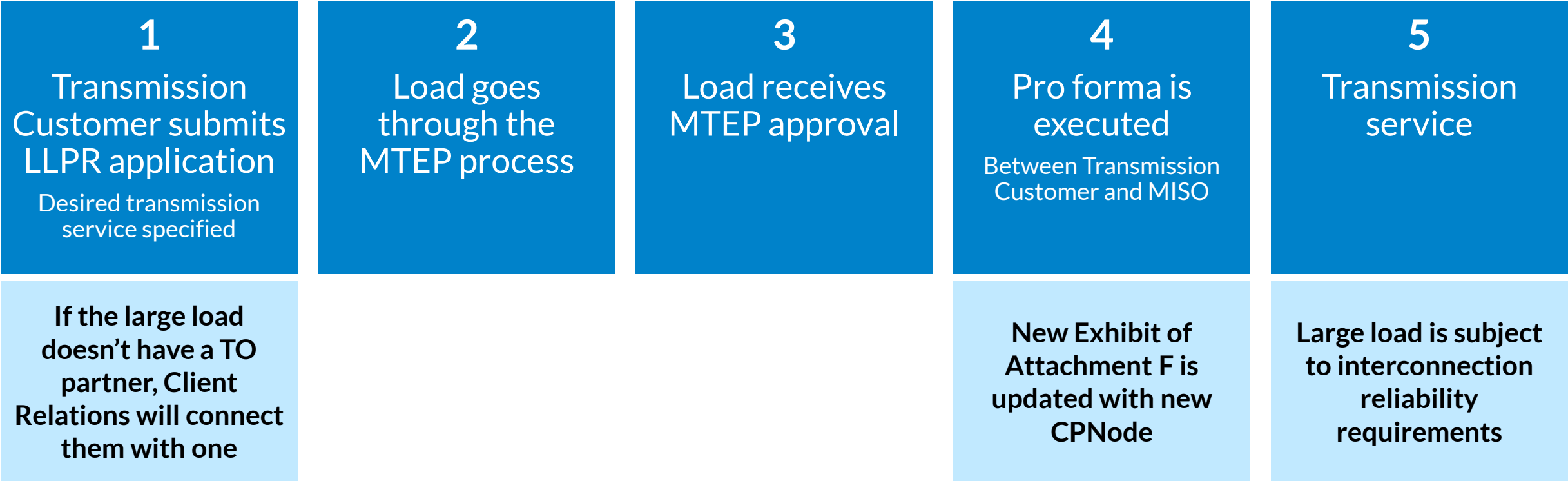
Theme	MISO Response
Readiness, anti-speculation, and financial commitments <ul style="list-style-type: none"> Broad support for meaningful entry requirements to deter speculative requests and focus scarce study resources on viable projects. Stakeholders ask for clarity on fee magnitude, refundability, and true-up. Debate over the Electric Service Agreement (ESA) at pre-study: several parties propose attestation-based readiness instead of a pre-executed ESA, citing commercial sensitivity and the need to see study results first. Suggested deposit sequencing: sizable study deposit at submission, followed by a milestone deposit after results, scaled to project cost, to reduce late withdrawals and restudies. 	<p>MISO supports meaningful entry requirements and has drafted initial requirements due at submission. To address confidentiality concerns, MISO has updated the ESA requirement to an attestation.</p> <p>MISO does not plan to pursue multiple milestone deposits in the quick process, as they introduce administrative burden and delay. Stakeholders are invited to provide additional feedback on readiness commitments and whether stronger measures should be required to further reduce speculative activity.</p>
Study assumptions must reflect flexible service options: Strong theme that assumptions should match requested service (flexible/non-firm, generation-load alignment) rather than defaulting to fully firm service; otherwise studies may overstate impacts and upgrades.	<p>MISO agrees and will align study assumptions with the requested service type.</p>
Transparency & standardized study reports: <ul style="list-style-type: none"> Consistent support for a formal, standardized report documenting assumptions, scope, violations, mitigations, upgrades, costs, timelines, operational requirements, and ATT/GETs evaluation Requests to clearly label spot load, submitting TO, LSE, and to post PAC comment windows and stakeholder input opportunities. 	<p>MISO will develop a standardized report including assumptions, scope, upgrade costs, timelines, and ATT/GETs considerations.</p> <p>PAC comment periods are shared on the Planning Superlist following each Technical Studies Task Force meeting.</p>
EMT / stability requirements: Support for clear, prescriptive EMT study criteria; questions on which loads require EMT, whether preliminary EMT models can be provided early, and whether an additional deposit can substitute for providing EMT study at application when designs are not final.	<p>MISO will provide additional information on EMT expectations as part of the large load BPM discussion. EMT analysis and coordination will need to occur prior to submission. MISO is evaluating options to provide services that support the required EMT analysis.</p> <p>Any updates to requirements or expectations will be reflected in the large load BPM.</p>

Summary of stakeholder themes and feedback

Theme	MISO Response
Quarterly cycle mechanics, restudy, and cluster-like handling: Stakeholders ask how a cumulative/quarterly approach will operate and state concerns regarding shared upgrades, withdrawals, restudy limits, study position retention, and cross-cycle treatment when later projects benefit from earlier customer-funded upgrades	MISO will complete a cumulative study. The results of that study, along with cost-shifting considerations, will inform whether additional adjustments to the process are needed. A separate process exists for project withdrawals, in which MISO conducts a no-harm evaluation to ensure reliability is maintained. This process is expected to apply only to committed load.
Relationship to existing EPR and other pathways: Many recommend preserving EPR (or an equivalent expedited path) for smaller/time-sensitive needs.	EPR will be preserved, with additional information to be provided in a later discussion.
Distributed Energy Resources (DERs) as network relief: Recommendation to evaluate utility-grade DERs (dispatchable, nodal, not baseline DR) as candidate solutions that can relieve transmission constraints faster than conventional upgrades; model at transmission nodes and attribute firm withdrawal/curtailment relief and capacity value to the sponsoring load that funds them.	Under the MISO Planning Modeling Manual, utility-grade DERs are currently represented as either negative load or as generators, and they are modeled nodally. They are considered inputs to the model and cannot be used as candidate solutions at this time.
Resource adequacy linkage: Suggestion to incorporate physical capacity requirements for LSEs adding large loads.	MISO provides multiple pathways for resource development to support load growth (including ZGIA, LARS, and existing PGIA avenues). MISO will not require a resource linkage for large load studies.
Process triggers & scope clarity: defining when a request enters LLPR (new load, incremental additions, specified MW thresholds, qualified changes) and when re-entry/restudy is required.	LLPR applies when load exceeds 50 MW or increases by 25 MW, in accordance with the Large Load definition. Changes to electrical characteristics will be further defined and are likely to be addressed through the normal MTEP process. Additional guidance on qualified changes and the implications for this process will be developed as part of BPM work.

In response to the 206 order, MISO proposes to establish the Large Load Project Review (LLPR) to codify the large load study process in the Tariff

Large Load Project Review (LLPR)



If generation is involved, this process may be combined with ZGIA or LARS processes

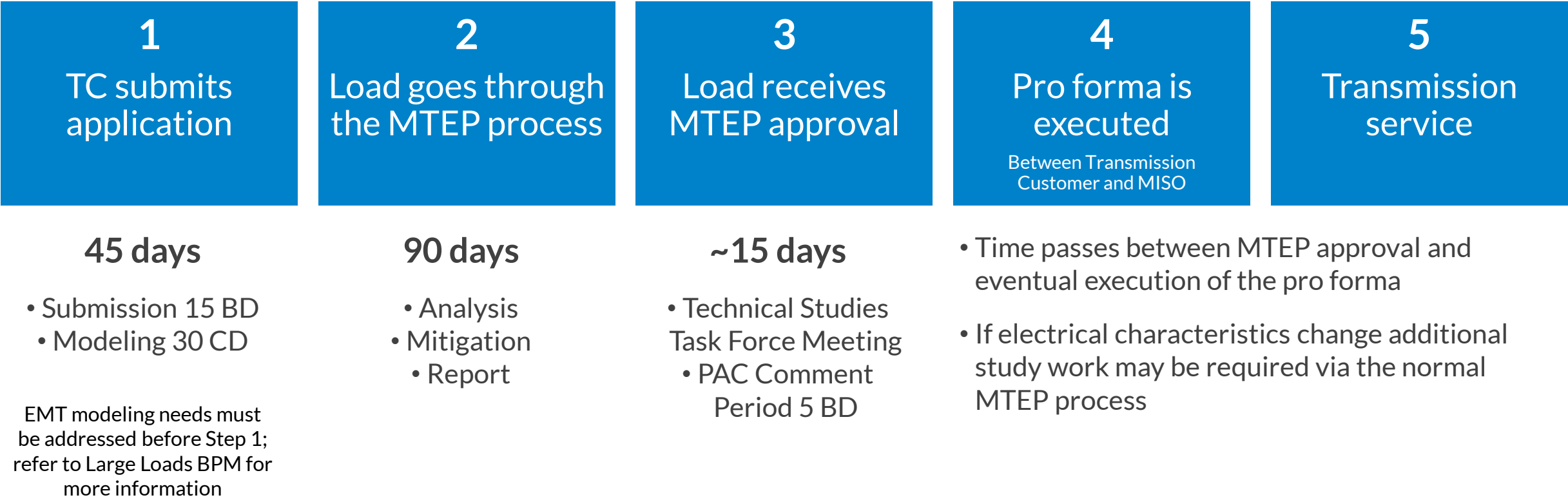
The Transmission Customer Large Load Application will also require a list of requirements that must be submitted for a complete application resulting in access to the next study cycle

Study Files
MTEP project ID
MOD project ID
Applicable planning models and supporting model documentation/verification information
TO interconnection planning study report (Steady state and dynamic)
ATT / GETS considered and outcome
Contingency /monitored element update
One-line diagram

Facility Information
Facility location (address, county, GPS), Point of Withdrawal
Firm/non-firm capacity
Facility load composition and major equipment characteristics
Operating and dynamic characteristics
Protection, ride-through, recovery/reconnection, and other material dynamic-performance characteristics, as applicable
Requested ISD, trial Operation date
Attestations
Attestation of Large Load Customer meeting all IRR at the time of trial/commercial operation
Attestation of Willingness to construction through ESA or something equivalent.

MISO is proposing to conduct the Large Load Project Review 3 times a year to align with LARS, resulting in continual alignment of loads and a plan for reliability

Large Load Project Review



Relationship of LLPR with other study processes, MISO will default to Transmission Customer request to inform study requirements

Service requested must be identified by the Transmission Customer in the application

Process	Relationship to LLPR	Additional considerations
LLPR	The core study for Large Loads that are 50 MW or increased by 25 MW	If generator is associated with Large Load that is less than 200 MW the generator must achieve a GIA prior to Transmission Customer application
Load Addition Resource Study (LARS)	The core study for Large Loads minimum of 200 MW that have associated Generation required	The same requirements, study process, and outcome for the LLPR apply for the Large Loads associated with the LARS process
Firm Service Step Up FSSU	Takes place after LLPR	LLPR is required to be completed prior to eligibility to participate with FSSU
Expedited Project Review (EPR)	No direct relationship to LLPR	Applies to non-load urgent changes to the transmission system and loads that are <50 MW or increases <25 MW

- Relationship of LLPR to Flexible Load Interim Transmission Service (FLITS), Firm Contract Demand, and Non-Firm Contract Demand to be determined based on final design
- The outcomes of LLPR, Load piece of LARS, and FSSU is a form of Network Integration Transmission Service

Summary of Tariff changes

Outline	Summary of content
Transmission Customer submitting application	Ties to Large Load definition (50 MW or increase 25 MW or more)
Overall process	Overview and expectations of coordination of process
Study timeline	<ul style="list-style-type: none"> • Studies three times a year • Application deadline posted defined days in advance • Requests accepted on a rolling basis
Requirements for LLPR Processing	<ul style="list-style-type: none"> • Three sections outline requirements (application form, study files, documentation of agreements, application fee) • Requirements align with today's EPR • Requirements enhanced to accommodate Interconnection Reliability Requirements (further details will be in BPM)
Application review period	<ul style="list-style-type: none"> • Transmission Provider 15 days, Transmission Customer 10 days to cure • Errors identified post study kickoff have 5 business days to cure
Model review period	Build model within 30 calendar days after conclusion of the Application cure process (which includes the model review)
Analysis and timeline for mitigation	<ul style="list-style-type: none"> • Two rounds of Transmission Owner and Transmission Provider mitigation • Missed mitigation review deadlines will result in project withdrawal with provisions to resubmit
Stakeholder forum completion	Consistent with process today
Execution of agreement	Placeholder for cost agreement Execution of Operations Agreement which is proposed a new exhibit to Attachment F the Network Integration Transmission Service agreement
Confidentiality provisions	Who information can be shared with and under what circumstances NDAs are required

Stakeholder Feedback Request

- MISO requests feedback on **Large Load Application and Study Process (LLWG-2026-7)** by October 7, 2026
 - Please provide feedback on the following:
 - Questions and clarification regarding the process
 - Tariff language
- Feedback requests and responses are managed through the Feedback Tool on the MISO website: <https://www.misoenergy.org/engage/stakeholder-feedback/>

Next Steps

- Clarification around EMT studies, some information shared in later agenda item
- Relationship and timing around EPR process
- MISO will consider further enhancements as required for the process as the Cost Shifting Risk Among Transmission Customers (LLWG-2026-8) issue matures
- File November

Contact

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