



MISO Response to Feedback

Large Load Working Group (LLWG)

Cost Shifting Risk Among Transmission Customers (LLWG-2026-8) – August 27, 2026

October 7, 2026

Stakeholder Feedback Themes and MISO Response

Theme	Stakeholder Feedback	MISO Response
Provision of data related to transmission costs resulting from the provision of transmission service to Eligible Customers on behalf of large loads to include on MISO's website	Broad support for a centralized database of information related to network upgrades to enable large loads and their associated costs	MISO appreciates the support for a centralized database of information related to network upgrades to enable large loads and will implement the requirements set forth in the FERC show cause order on the MISO Public Website. See Sept 6 th , 2026, draft dashboard here .
	<p>Stakeholder suggestions for additional information generally fell into the following categories:</p> <ul style="list-style-type: none">- Project Attributes: Stakeholders suggest adding additional data on project classification that further increases transparency into these projects.- Costs & Revenue Requirements: Stakeholders suggest increasing data points on cost estimates, changes, allocations and required financial protections.- Timeline, Milestones & Project Status: Stakeholders ask to increase transparency around key dates, progress markets and project development status.- Customer Commitments, Assumptions & Revalidation: Stakeholders ask to provide further evidence supporting load maturity and how assumptions evolve.- System, Market & Operational Impacts: Stakeholders ask to increase information around how large loads influence broader system conditions.	<p>MISO appreciates the over 40 stakeholder suggestions for additional information. MISO is committed to compliance with the requirements in the FERC show cause order in the initial filing but acknowledges that additional information may provide better transparency into Network Upgrades associated with Large Loads.</p> <p>MISO will revise its tariff to comply with the FERC show cause order by the November deadline. MISO will also continue to work with its TOs and OMS to ensure this transparency is provided through a combination of the transparency dashboard, the formulation in a <i>pro forma</i> cost recovery agreement, and workpapers in annual informational filings.</p>

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The cost recovery agreement minimum contribution being based on the level of jurisdictional transmission service (in MW) as preliminarily suggested by FERC	General support for a minimum contribution to help ensure that Eligible Customers taking transmission service on behalf of large loads are ultimately responsible for the costs incurred to provide transmission service, including the costs of network upgrades.	MISO appreciates the feedback and agrees that a minimum contribution from Eligible Customers on behalf of the large load will be part of a <i>pro forma</i> cost recovery agreement that mitigates the show cause cost shifting concerns
	Some stakeholder voiced support for a jurisdictional transmission service (in MW) approach to the minimum contribution, but only as a starting point for certain stakeholders.	MISO appreciates the varied views among stakeholders on the appropriate minimum contribution calculation. MISO continues to work with its TOs and OMS to determine the minimum contribution formulation that will be part of a <i>pro forma</i> cost recovery agreement that mitigates the show cause cost shifting concerns
	Many stakeholders do not recommend relying only on jurisdictional transmission service (in MW) as the approach to a minimum contribution. Instead, stakeholders suggest including other considerations, such as timing, the cost of network upgrades, and the actual annual transmission revenue requirements from the network upgrades.	

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Minimum credit support or financial security that is sufficient to secure the obligations of the Eligible Customer taking transmission service on behalf of large load	General stakeholder support for financial security requirements that are scaled for unrecovered transmission exposure, including considerations for potential stranded costs, service levels, project risk, change in risk over time, milestone changes, and unpaid obligations	MISO appreciates the stakeholder feedback and continues to work with its TOs and OMS to ensure that a <i>pro forma</i> cost recovery agreement contains credit support or sufficient financial security to secure the minimum contribution obligation of the Eligible Customer on behalf of the large load
	Stakeholders suggest ensuring security obligation is coordinated with the retail level security to ensure the obligation is not duplicative. Other stakeholders suggest ensuring security posted under a retail agreement is only counted if it is legally available for the wholesale obligation.	
	Stakeholder support for sufficient security to secure the obligations of the Eligible Customer taking transmission service on behalf of large load, with potential security instruments such as cash, letters of credit, creditworthy parent guarantees, surety bonds, or comparable securities that can be drawn upon following default, and consistency with the transmission owner's financial security standards.	

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Impact on existing customer agreements	Clarification on whether requirements adopted as part of this initiative apply to existing customer agreements	FERC emphasized in the show cause that "the proceeding is not intended to disrupt existing commercial arrangements, but rather to establish prospective reforms." MISO's compliance with the order will apply prospectively.
Consistency with other large load processes	MISO should apply comparable transparency, cost-recovery, and financial-security protections across LLPR, LARS, FLITS, BITS, ZGIA-related arrangements, phased projects, and future integrated generation-load processes.	Transparency and the <i>pro forma</i> cost recovery agreement will focus on network upgrades identified at the completion of studies associated with the Large Load Project Review, ensuring consistency across processes. This includes Large Load Project Reviews associated with the LARS process.
	The LARS proposal shows the cost allocation path for common and load-driven upgrades as undetermined, pending the outcome of this issue. That issue does not file until November, while MISO intends to finalize the LARS tariff language in September. If that language is finalized with the allocation path unresolved, the existing treatment applies by default, which is transmission pricing zone allocation. The result would be a socialization and cost shifting outcome reached through sequencing rather than through a deliberate decision.	The LARS tariff will use the project types of Baseline Reliability and Other as exists today for load studies. It does not require the finalization of the <i>pro forma</i> agreement or a transparency dashboard, as its focus is defining a combined load and generation study process with opportunity to incorporate these items as they mature.
	The LARS proposal identifies network upgrades on the basis of a load and generator studied together. If the pairing terminates after agreements are executed, the load may remain and still require service while the generation that supported the smaller upgrade set is gone. The resulting reliability need would surface in a subsequent MTEP cycle as a local reliability project allocated to the transmission pricing zone, after the customer that caused it has exited the process.	<p>The process if a generator is withdrawn is addressed in the LARS study process. The Interconnection Customer will remain responsible for Network Upgrades assigned as GIP. In the draft Tariff language for LARS "To the extent the generator fails to commence operation or retires the load must go through MTEP and during that transition may be subject to similar limitations if the Load-In-Service Date is prior to the LARS Resource below." In addition, the proposed Tariff language states that the LARS Associated Transmission Customer remains responsible for the identified BRPs and Other assigned projects, or replacements of such. The load would be required to enter the Large Load Project Review process, and the <i>pro forma</i> cost recovery agreement would apply.</p> <p>LARS also addresses the process if the load withdraws and will be supplemented by the <i>pro forma</i>. In that case, the generator would be required to enter the Generation Interconnection queue and the LARS Associated Transmission Customer submitting service on behalf of load will remain responsible for the associated projects assigned as BRP or Other. This is required in the LARS Tariff ("In the event that the LARS Associated Load is withdrawn from LARS, then the LARS Associated Transmission Customer shall remain responsible for the identified BRPs and Other assigned projects or replacement of such") and will be supplemented by the <i>pro forma</i>.</p>

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Cost shifting among wholesale transmission customers	Concern that high cost network upgrades could create a situation where costs are shifted to other wholesale transmission customers in a TPZ	Consistent with the show cause order, MISO is committed to addressing cost shifting concerns via a <i>pro forma</i> cost recovery agreement. Part of that agreement will include a minimum contribution by the Transmission Customer requesting transmission service on behalf of the Large Load to the relevant TOs annual transmission revenue requirement, including consideration of network upgrades and load served. MISO continues to work with its TOs and OMS to fill in specific details on the <i>pro forma</i> cost recovery agreement.
	To effectively prevent cost shifting, large loads would need to pay for both the incremental upgrades, which would be identified and recovered via the cost sharing agreement and their use of the existing transmission system, which would be recovered through existing zonal rates. Facilities recovered from cost sharing agreements would be excluded from zonal rate base.	
	Concerns for situations that can arise where the large load causes network upgrades on a neighboring transmission owner's system	MISO acknowledges that multiple agreements may be needed to cover upgrades on all affected MISO TO's systems.

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