



MISO Response to Feedback

Large Load Interconnection Reliability Requirements (July 16 LLWG)

Large Load Addition Resource Study (LARS)

August 20th, 2026

Purpose & Key Takeaway

Purpose

Share summarized stakeholder feedback requested at the July 16 Large Load Working Group regarding Large Load Addition Resource Study (LARS)

Key Takeaways

- 21 of the 31 respondents expressed a favorable position toward the concept of LARS and had multiple clarifying questions.
- Feedback fell into categories of General feedback, Load and Generation specifics, Application Process, Operational Considerations, and Modeling Assumptions.
- MISO will continue to engage with stakeholders as final details surrounding the LARS process are developed.

General Comment

Feedback Theme	MISO Response
Several commentors requested clarification on how the LRZ would be utilized to meet the FERC 206 order “electrically proximate” language	The LARS process will not meet all of the requirements of the FERC 206 Show Cause order but MISO believes this is part of the overall solution. Zero-Injection GIA (ZGIA) will be utilized to meet the co-located portion of the order. The LARS offers more flexibility in siting the load/generation pair to maximize the effectiveness of any developed transmission solutions.
Focus on correcting issues with DPP so that answers can be developed there in a more expedited manner to ensure open access to the system and reduce discrimination in parallel processes.	MISO continues work on Generator Interconnection Queue Improvements (PAC-2023-1) through the MISO Interconnection Process Working Group (IPWG) and Planning Advisory Committee (PAC) stakeholder forums. https://www.misoenergy.org/engage/committees/interconnection-process-working-group/ https://www.misoenergy.org/engage/committees/planning-advisory-committee/
Overall support for strong readiness requirements. Differs on what they should be and what level would need to be achieved.	MISO appreciates the support of establishing strict requirements for entry into the LARS process. This is not intended as a replacement or fast queue for generators to serve general load in an LRZ. It is related to very specific pairings with contracts in place and shovel ready conditions to begin implementation as soon as practical.
Several commentors requested a specifically designated project type for reliability and generator interconnection processes to ensure proper identification going forward.	The project type for LARS Associate Load transmission related projects through MTEP is being discussed as part of the Cost Shifting Risk Among Transmission Customers (LLWG-2026-8) issue presented at the August 27, 2026, LLWG. Generator Interconnection Projects (GIP) category will be maintained for the LARS Resource.

Load and Generation

Feedback Theme	MISO Response
Why 250+ MW? What led us to this number?	Recent EPR results show that large loads of 250 MW and above begin to create meaningful grid impacts, with upgrades becoming likely around 300–500 MW and consistently necessary at 1,200 MW and above with multi-element upgrades. Respondents to the threshold question provided an even split between agreement at 250 MW, a request to lower the threshold, and no opinions on the merits of the threshold.
How did MISO determine the 150% of load nameplate value? Does this limit the construction of generation and generation types to equal 150% of nameplate load or does it limit the injection of multiple different types of resources at the Point of Interconnection?	MISO clarifies that the 150% of load nameplate value limitation applies to the Interconnection Service request of the Interconnection Customer and not the nameplate value of the generating resources. Interconnection studies are based on the amount and type of interconnection service requested and they do not assess a generator’s potential accreditation, which can change annually based on operating conditions. MISO seeks to establish a closer connection between what is needed and what is being proposed by the LARS Interconnection Customer. The limitation of 150% of identified MW need will strike the proper balance between having a sufficient amount of Interconnection Service advancing through the study process to support the identified Large Loads.
Can generation be combined to serve one load?	The Large Load Addition Resource Study (LARS) will study 250+ MW loads and associated generation in parallel rather than consecutively to accelerate approval and optimize network upgrades. The Large Load must be located behind one POW. Multiple generators could be assigned to serve the single Large Load provided they interconnect to the same POI.
Can loads be combined to reach 250 MW?	
Can many loads be combined with many generators to meet the LARS requirements?	
Why is the LRZ being determined as the limiting factor for serving the load?	LRZ boundaries are already established areas where load and generation are required to balance. Transmission lines, including HVDC, cannot be utilized to bring generation from one LRZ into another.

Load and Generation continued...

Feedback Theme	MISO Response
Will DER be available to provide generation as part of the LARS process?	MISO's Distributed Energy Resources Affected System Study (DER AFS) study process does not involve dispatchability studies, but instead investigates substation aggregate DER generation for ERIS, or reliability impacts. Comparatively, LARS will grant NRIS. Therefore, due to the level of service that LARS will provide and MISO's desire to respect the jurisdictional nature of DER, MISO suggests that DER generation will not be part of the LARS process.
MISO should clarify whether a generator needs to serve all or part of the application load.	The generator associated with the LARS application need not meet all of the needs of the LARS load.

Application Process

Feedback Theme	MISO Response
Why is the submittal limited to Load Serving Entities? This is potentially discriminatory to IPPs.	While the LARS application process will be initiated by the LARS Associated Transmission Customer, the Interconnection Customer, Transmission Owner, and LARS Associated Transmission Customer must all complete the required information as part of the application before it will be reviewed by MISO. IPPs are not prohibited from participating as the Interconnection Customer as part of the process.
What happens to the fees collected should the load and/or generator exit the process.	If an application is withdrawn all non-refundable fees will be forfeited similar to MISO's other generator interconnection study processes. Any difference between study deposit and actual cost of the applicable study will be refunded as applicable.
How will MISO accept applications? First In? Will there be readiness requirements that must be met?	The LARS process will be open upon FERC determination of applicable Tariff filings. Applications will be processed on a 'first in' (timestamp) basis, similar to ERAS, determined by the timestamp on the LARS submittal form. Only ten (10) projects will be selected each cycle. Should more than ten (10) projects be submitted, the next ten (10) would automatically move to the next available cycle, and so on. Once applications are assigned for a cycle, should any withdraw, no new application will be inserted for the cycle. Only completed LARS applications will be considered. Readiness requirements must be completed for a valid application.
Can an existing generator in the DPP queue participate in LARS? What are the requirements? Is it similar to ERAS?	LARS design will utilize the same concepts introduced in the ERAS process. A generator which has not yet reached Decision Point 2 in the DPP process can withdraw, with penalties, and enter into the LARS process. The generator must meet all requirements pertaining to the LARS process and have agreement with TO/LSE/Load Customer to proceed. The generator will forfeit their position in the DPP process. Should conflicts arise and the application cannot proceed, the generator would need to withdraw from LARS and re-apply to the DPP process.

Modeling and Studies

Feedback Theme	MISO Response
What are the modeling assumptions for each part of the process? How will they align? How will they differ?	MISO LARS will incorporate two study perspectives into the gen/load/transmission combination. The reliability perspective will draw upon the fundamentals of the EPR process and the generator interconnection perspective will draw upon the fundamentals of the ERAS process for study. The entire gen/load/transmission combination will be fully represented in both studies with MTEP and GIA approvals utilized as the base.
Will the LARS process study the gen/load pair in a cluster or serial manner?	The transmission reliability studies will employ a cluster format including all other submitted EPRs and LARS projects to ensure the cumulative impacts of the load and transmission are observed. The generator interconnection perspective will study using a serial process with individual load and associated generation pairs.
Represent all under-study generator interconnection requests that have passed Decision Point 2 (DP2) in the existing DPP process into the LARS models.	Analysis of historical DPP project withdrawal rates after DP2 does not support this request. MISO DPP-2019, DPP-2020 and DPP-2021 cycles have an average withdrawal rate of approximately 5% in Phase 3. This shows that there are generator interconnection project withdrawals late in the DPP process, so including projects that are still under study would put the LARS model assumptions at risk. MISO will include higher queued projects in the LARS models that have signaled to MISO their commercial commitment with a signed GIA.
What are the model assumptions for the generation analysis and the transmission/load analysis? How do they align and how do they diverge?	MISO LARS will incorporate two study perspectives into the gen/load/transmission combination. Both processes will begin using the latest MTEP model. The reliability perspective will draw upon the fundamentals of the load process and the generator interconnection perspective will draw upon the fundamentals of the ERAS process for study. The entire gen/load/transmission combination will be fully represented in both studies with MTEP and GIA approvals utilized as the base.

Operations Horizon

Feedback Theme	MISO Response
Operationally, does dispatch of the generator need to meet load? Does the load need to be on if the gen is on? Can the load get service from the system if generator is off or is it off as well?	Both the load and the generator are receiving full-service. The ZGIA co-located option forces the load and generator to match, while the LARS process allows the generator to contract with a specific load and then fulfill the needs of the LRZ which the load is a part of. The Large Load and generator must become commercial together.
If the load does not materialize, create a process for the generator to enter into the DPP queue seamlessly	If either portion of the LARS withdraws prior to commercial operation, the LARS approvals are voided. The LARS load will need to submit to the MTEP or EPR process for approval; the LARS Resource must reapply to the DPP process for Interconnection Service.



Send questions or comments to:
LargeLoadProgram@misoenergy.org
