

Stakeholder Feedback Template

Large Load Interconnection Reliability Requirements – June 29 LLWG

Purpose: provide feedback to MISO for Large Load Interconnection Reliability Requirements presented during the June 29 Large Load Working Group.

Instructions:

- Add feedback by topic to this workbook
- Email the completed workbook to StakeholderRelations@misoenergy.org

Timeline: submit feedback by Tuesday, July 7th

Links:

- [June 29 LLWG Meeting Materials](#)

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Sector:

Do you wish for this feedback to be posted on the MISO public website? Yes

Tariff Section	Description
Module A/B	NEW DEFINED TERMS, APPLICABILITY, TRANSITION PROVISION, and effective date
Module B	LARGE LOAD INFORMATION REQUIREMENTS: Basic Facility Data
Module B	LARGE LOAD TELEMETRY REQUIREMENTS
Module B	LARGE LOAD RIDE-THROUGH REQUIREMENTS
Module B	LARGE LOAD RAMP REQUIREMENTS

General Feedback for Large Load Interconnection

Reliability Requirements (Slides 8,12)

1. Do you have any specific feedback related to the Large Load related definitions in slide 8?

Response: No response.

2. Do you have any specific feedback related to the TRANSITION PROVISION in slide 12?

Response: The updated language around the Transition Provision is consistent with the updated definitions and as described during the June 29 LLWG. The effective date for some changes has also been shifted back one month for consistency with the timing for the FERC filing which has now been delayed a month. Despite these changes aiming to provide additional flexibility, new loads with contracts in place or under negotiation still may face negative impacts of these requirements retroactively being applied by being based on the in-service date rather than contract execution date, particularly where load is ramping up and overlapping the transition period between 10/01/2026 into full compliance after 11/01/2027. FERC's 6/18/2026 Show Cause Order directs MISO to “protect existing commercial arrangements including: (1) what would be a reasonable implementation period to ensure minimal disruption to such existing commercial arrangements, and (2) how to allow a reasonable amount of time to finalize ongoing agreements that are nearing completion as of the date such Tariff provisions are filed with the Commission.”¹ This indicates a desire by FERC to preserve, rather than disrupt, existing contracts and minimize the impact of changes upon contracts that are in process. The current transition period fails to protect these existing commercial arrangements if it does not permit reasonable

¹ Midcontinent Independent System Operator (MISO) Show Cause Order, EL26-70-000, 195 FERC ¶ 61,212 at P123.

time to finalize negotiations that are underway or nearly finished, yet did not consider these additional requirements. Although the proposed transition permits partial grandfathering where some facilities may be permitted exemptions or additional time for compliance, it is not enough lead time to avoid adverse impacts through retroactive disruption. There should be greater flexibility in grandfathering in existing agreements, both to support these developments and avoid derailing them but also to ensure compliance with FERC's latest directives. Revising the in-service date to the contract execution date will ensure that these contracts avoid disruption or staggered and variable compliance requirements.

3. Other general feedback:

Response: No response.

LARGE LOAD TELEMETRY REQUIREMENTS (slide 18)

4. Do you have any feedback regarding this requirement(s)?:

Response: No response.

LARGE LOAD RIDE-THROUGH REQUIREMENTS (slide 23)

5. Do you have any feedback regarding this requirement(s)?:

Response: Details on the ride-through requirements are also set for the BPM. However, MISO should provide additional clarity for how NERC PRC-006 overrides these proposed frequency ride through requirements and if those will be documented in the BPM.

LARGE LOAD RAMP REQUIREMENTS (slide 14)

6. Do you have any feedback regarding this requirement(s)?:

Response: The updated Tariff language is acceptable but broader concerns remain around the benefit of being able to review and consider the forthcoming BPM updates concurrently with the Tariff changes. Give that the ramp limits and other details are delegated to the BPM, stakeholders would benefit from both seeing these components as well as having a better understanding of any flexibility that may also be considered in the BPM.