

## 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](mailto:StakeholderRelations@misoenergy.org)

**Timeline:** submit feedback by Tuesday, July 7th

**Links:**

- [June 29 LLWG Meeting Materials](#)
  - LL Interconnection Reliability Requirements Presentation
  - Technical Compendium

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**Company:** Microsoft

**Sector:** Large Load

**Do you wish for this feedback to be posted on the MISO public website? Yes/No**

| 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:

Microsoft appreciates MISO's continued revisions to the Large Load-related definitions, including consistency with the recent FERC show cause order. Microsoft agrees, for purposes of identifying a Large Load, that a new commercial or industrial Load with forecast Demand of 50 MW or more may be treated as a Large Load as of the proposed October 1, 2026, effective date. However, Microsoft strongly recommends that MISO reconsiders how "forecast Demand" and "increase of Demand" are measured in the definition, particularly where the definition also captures any modification or series of modifications that results in a cumulative increase of Demand by 25 MW or more, provided the total aggregate Load is 50 MW or more.

For purposes of applying the 25 MW modification trigger, Microsoft strongly recommends that MISO measure the cumulative incremental increase above contracted demand already evaluated in applicable interconnection studies or set forth in applicable interconnection agreement(s). The trigger should not apply to a facility which grows, after October 1, 2026, into capacity that has already been contracted for, studied, planned for, or otherwise approved through the utility's interconnection process. This would undermine the transition provision by requiring already operational sites that would otherwise qualify for exemption or transition treatment, to comply with new requirements solely because metered demand increased after October 1, 2026.

This clarification is important because:

1. Data center demand naturally fluctuates day-to-day, but within previously studied and approved service levels, so the October 1, 2026, metered load measurement should not become the baseline for determining whether a later 25 MW "increase" has occurred because it is arbitrary.
2. If a facility is operational on October 1, 2026, the interconnection was already studied and designed for the contracted demand level, therefore later growth into that approved capacity is not an incremental system impact that has not already been accounted for by the utility.
3. Compliance may require physical, electrical, controls, equipment, outage, vendor, and utility-coordination changes that may not be feasible for an operating facility.

4. Customers may be forced to leave already studied and planned for interconnection capacity unused to avoid expensive retrofits or being in non-compliance if retrofits are not possible. That result risks stranding transmission and interconnection investments that were planned and built to serve the contracted demand.

If MISO identifies a demonstrated, facility-specific reliability concern at a legacy site, that issue should be addressed through targeted mitigation or operating protocols rather than an automatic trigger based on metered demand growth that falls within already-contracted for service levels.

Microsoft strongly recommends revising clause (ii) as follows: “any modification or series of modifications that results in a cumulative increase of **25 MW or more above the Large Load’s contracted Demand in the applicable interconnection study or interconnection agreement**, provided the total aggregate Load is 50 MW or more.”

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

Response:

Microsoft appreciates that MISO has added a transition provision intended to avoid unnecessary retroactive application of the new requirements. The transition provision should be aligned with the modifications proposed in response to Question 1 regarding the relevance of a 25 MW modification or upgrade.

Microsoft also reiterates its prior feedback that clear exemption, extension, and/or alternative protection processes remain necessary where compliance cannot reasonably be achieved despite commercially reasonable efforts, particularly for existing facilities and facilities in advanced design or construction. These protections should not assume eventual full compliance in all cases. Where retrofit is not reasonably feasible due to physical, electrical, controls, equipment, outage, vendor, or utility-coordination constraints, MISO should allow exemptions or alternative operating protocols tied to demonstrated facility-specific reliability concerns rather than requiring automatic future compliance with all new requirements.

Microsoft strongly recommends revising clause (c) as follows: A Large Load with metered Demand equal to or greater than 50 MW after November 1, 2027, shall be subject to all requirements set forth in Section 37A except to the extent that the Large Load Customer demonstrates to the satisfaction of Transmission Provider that additional time, **an exemption, or alternative compliance treatment** is necessary to meet any such requirement(s) after the Service Commencement Date. In such case, the Large Load Customer must establish operating protocols with the Transmission Provider and the

applicable Transmission Owner and/or Local Balancing Authority necessary to mitigate any reliability impacts to the Transmission System or Bulk Electric System. ~~to be in effect until compliance with the applicable requirement(s) is achieved.~~ Such operating protocols shall address the specific actions, operational limitations, or equipment to be used to address any reliability impacts to the Transmission System or Bulk Electric System and shall provide a mechanism for the Transmission Provider and the applicable Transmission Owner and/or Local Balancing Authority to monitor and inspect the performance of the Large Load in order to verify compliance. Any operating protocols established pursuant to this Section shall remain in effect until the Large Load is capable of compliance with the applicable requirement(s), until alternative mitigation is implemented, or for so long as an exemption or alternative compliance arrangement remains appropriate based on facility-specific reliability conditions.

**3. Other general feedback:**

Response:

None

## LARGE LOAD TELEMETRY REQUIREMENTS (slide 18)

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

Response:

None

## LARGE LOAD RIDE-THROUGH REQUIREMENTS (slide 23)

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

Response:

None

## LARGE LOAD RAMP REQUIREMENTS (slide 14)

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

Response:

None