Organization of MISO States
Transmission Planning Work Group
Response to MTEP26 Draft Report
Submitted on October 13, 2026

On September 28, 2026, MISO released its MTEP26 Draft Report for stakeholder feedback. The Draft Report and submitted feedback are available here:

https://www.misoenergy.org/engage/stakeholder-feedback/2026/draft-mtep26-report-appendices-feedback/

The OMS Transmission Planning Work Group (OMS TPWG) provides this feedback to MISO regarding the MTEP26 Draft Report. **This feedback is from an OMS work group and does not represent a position of the OMS Board of Directors.**

The TPWG is concerned by the significant use of MISO's Expedited Project Review (EPR) process, which has resulted in more than $8 billion in project costs across 89 of the 532 total MTEP26 projects – or 54% of total MTEP26 projected costs. In particular, the TPWG questions whether MISO's current cost allocation methods for these project types (e.g., Other – Load Growth; Other – Local Reliability; and Baseline Reliability) remain just and reasonable in light of the cost-shifting concerns identified by FERC in its Show Cause Order and recognized by several OMS members and other stakeholders in the Large Load Working Group.

The EPR process was not originally designed to accommodate the interconnection of large loads. Rather, it was intended to address smaller new loads, relocations necessitated by highway expansions, and upgrades needed to address newly discovered critical reliability issues. Applying this process to projects driven by large load growth raises significant concerns about whether existing customers are required to subsidize infrastructure costs attributable to new large loads.

The TPWG is encouraged by MISO's efforts to develop a dedicated Large Load Project Review process and by the expectation that the EPR process will return to its original scope. However, these prospective changes do not address the potential for substantial cost subsidization of new Large Loads by existing customers through projects already identified or approved under the current framework. The TPWG encourages MISO and the MISO Board to consider whether the existing cost allocation methods remain just and reasonable and to ensure that costs are allocated in a manner that appropriately reflects cost causation and protects existing customers from undue cost shifting.

The TPWG is also concerned about the volume of project changes throughout the MTEP cycles, specifically Age and Condition projects. From SPM-1 to the current Draft Report, spending on Age and Condition projects increased from $1.53B to $2.49B, almost $1B. With MTEP26 Age and Condition project submittals due from Transmission Owners in September of 2025, an explanation of why almost $1B of Age and Condition projects were added late in the process would greatly improve transparency into MISO's review of the local planning process.