UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Midcontinent Independent System Operator, Inc. Docket No. **ER26-3552-000**

PROTEST OF COMMUNITY ORGANIZATIONS AND CLEAN ENERGY ADVOCATES

I. INTRODUCTION

Community Organizations[1] and Clean Energy Advocates[2] and their respective members reside throughout the Midcontinent Independent System Operator Inc.'s ("MISO") footprint. They rely on MISO to provide affordable and reliable wholesale service to power many aspects of their lives, including their residences, businesses, hospitals, places of worship, and schools. Their members also rely on MISO's adherence to non-discriminatory practices that enable a diverse set of energy generation technologies, namely distributed energy resources, to provide low-cost energy options that will help lower their energy bills without increasing pollution in their communities. Additionally, one of Clean Energy Advocates is an organization including energy project developers that regularly use MISO's interconnection services.

[1] Community Organizations are Community Collaboration on Climate Change and Michigan Environmental Justice Coalition, which are nonprofit organizations chartered under the laws of Michigan; and Midwest Tribal Energy Resources Association, a nonstock corporation chartered under the laws of Wisconsin.

[2] Clean Energy Advocates consist of Sierra Club and Natural Resources Defense Council, which are nonprofit environmental organizations with members throughout MISO territory; and Clean Grid Alliance, a nonprofit corporation chartered under the laws of Minnesota.

On June 18, 2026, the Commission issued an order to show cause ("OSC" or "Show Cause Order") to MISO and its transmission owners ("TOs") directing them to either provide more options to fast track the grid interconnection of large load customers, which at the moment are primarily data centers, or explain why MISO's tariff is sufficient. MISO submitted its Zero Injection Generator Interconnection Agreement ("ZGIA") proposal (the "Proposal") to respond to the co-location requirements in the Commission's OSC.[3] Our organizations do not oppose the intended design of MISO's ZGIA Proposal—a co-location arrangement that results in no injections or withdrawals of electrons to MISO's transmission system and, therefore, does not require network upgrades nor cause negative impacts to the Definitive Planning Phase ("DPP") process. Rather, we oppose the lack of processes and tariff provisions to make those design elements a *reality*.

Without proper tariff provisions, this process could have the opposite of MISO's intended effect by instead operationalizing ongoing cost shifts that will be difficult, if not impossible, for states to untangle, triggering otherwise preventable reliability shortalls, and allowing generators with ZGIA service ("ZG Resource") to perpetually gain an unfair advantage over projects in DPP, frustrating the implementation of Order 2023's queue reforms to the detriment of market participants and consumers, like our members. As discussed below, we urge the Commission to direct MISO to address these tariff and procedural defects through either a deficiency letter or direct further compliance via the show cause proceeding.

[3] Midcontinent Indep. Sys. Op., Inc.'s Transmittal Letter for Zero Injection Generator Interconnection Agreement Filing, Docket No. ER26-3552-000 (Aug. 18, 2026), Accession No. 20260818-5152 ("MISO Transmittal" or "Transmittal Letter").

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II. ARGUMENT

A. The Proposal Fails to Actually Ensure Zero Injection by ZG Generators.

1. *ZG Generating Facilities that Make Unauthorized Injections Should Be Penalized.*

Zero injection is an extremely clear program design element in this Proposal,[4] but MISO fails to ensure that zero means zero. The Transmittal Letter, testimony, and proposed tariff language are silent about what happens when a ZG Generator exports power to the grid outside the Point of

[4] Transmittal Letter at 8 (MISO stating that the "new generator with ZGIA Interconnection Service cannot inject past the interconnecting substation…"); *id* at 13 (MISO stating that the "ZG Interconnection Service is limited to requesting and being awarded Interconnection Service at a level that does not exceed the peak demand of the ZG Associated Load."

Interconnection ("POI") and the Transient Tolerance Window. Yet the Commission clearly stated in the Show Cause Order that it is concerned with the lack of tariff provisions that "specify requirements for necessary control technologies and protections systems" needed to limit withdrawals consistent with study arrangements and related agreements.[5] The Commission should require MISO to modify its ZGIA proposal to include robust operational penalties for ZGIA Generating Facilities that make unauthorized injections into the MISO transmission system notwithstanding the use of control technologies and/or protection systems.[6] MISO cannot be silent on its enforcement procedures in light of the serious reliability risks to the grid that may arise if a ZGIA Generating Facility fails to limit its injections as promised. The Commission should require MISO to impose strict operational penalties to give ZG Generating Facilities adequate incentives to limit their injections as expected or risk termination of their transmission service if they fail to perform.

i. Unauthorized injections are likely to increase reliability risks in MISO.

Unauthorized injections on the transmission system can lead to increased reliability risks, making it imperative that generators are properly incentivized to follow zero-injection requirements. MISO has acknowledged the reliability risks associated with large loads, including the risk associated with frequency and voltage instability, system balancing, and Area Control Error volatility.[7] MISO's Board previously made a commitment to address the operational risks associated with large loads, particularly with respect to ramping, adequacy, and stability.[8] Yet, in

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[5] *Midcontinent Independent System Operator, Inc.*, Order Instituting Proceeding Under Section 206 of the Federal Power Act, 195 FERC ¶ 61,212, P 64 (2026).

[6] *See generally, PJM Interconnection LLC*, 193 FERC ¶ 61,217 at P 212 (2025) ("PJM Co-location Order").

[7] *Interconnection of Large Loads to the Interstate Transmission System*, Comments of the Midcontinent Independent System Operator, Inc., Docket No. RM26-4-000, Accession No. 20251121-5472 at 30 (Nov. 21, 2025).

[8] *Id.* at 29, n.29.

this filing, MISO fails to adequately address the severity of potential reliability issues that could be caused by unauthorized injections on the system.

Recent grid fluctuation events illustrate the serious reliability risks that could result from unplanned injections on the system. In July 2026, over three GW of data centers on the PJM grid suddenly disconnected, causing voltage and frequency fluctuations that could be detected from Virginia to Illinois.[9] While operators can typically correct grid disturbances within milliseconds, this event took almost 10 minutes to stabilize.[10] A similar event occurred two years prior, also in PJM, where 1.5 GW of data center load suddenly dropped in Northern Virginia, forcing operators to make emergency adjustments to prevent cascading outages.[11] There is growing concern from the North American Electric Reliability Corporation ("NERC") about the increased amount of customer initiated load reduction events as large, extended fluctuations can lead to cascading fluctuations and system blackouts.[12]

The Commission should require MISO to impose strict operational penalties to prevent similar grid fluctuation events from occurring in MISO's territory. MISO anticipates that ZG Associated Loads may, at some point, suddenly decrease their load.[13] The ZGIA proposal establishes a Transient Tolerance Window during which the ZGIA Generating Facility will ramp down to match

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[9] Lee Shaver, *Data Centers are Already Stressing the Grid. Regulators are Playing Catch-up*, Union of Concerned Scientists (Aug. 6, 2026), https://blog.ucs.org/lee-shaver/data-centers-are-already-stressing-the-grid-regulators-are-playing-catch-up.

[10] Tim McLaughlin, *Massive Disconnect of Power Roils Largest US Electric Grid*, Reuters (Jul. 22, 2026), https://www.reuters.com/business/energy/massive-disconnect-power-roiled-largest-us-electric-grid-2026-07-22.

[11] Rachel Mural, et. al, *AI, Data Centers, and the U.S. Electric Grid: A Watershed Moment*, Belfer Center for Science and International Affairs (Feb. 10, 2026), https://www.belfercenter.org/research-analysis/ai-data-centers-us-electric-grid.

[12] NERC, *Characteristics and Risks of Emerging Large Loads: Large Loads Task Force White Paper* (July 2025), https://www.nerc.com/globalassets/who-we-are/standing-committees/rstc/whitepaper-characteristics-and-risks-of-emerging-large-loads.pdf, at 21-36; NERC, Level 3 Alert: *Computational Load Modeling, Studies, Instrumentation, Commissioning, Operations, Protection, and Control* (May 4, 2026), https://www.nerc.com/globalassets/programs/bpsa/alerts/level-3-computational-load-alert.pdf, at 8.

[13] Transmittal Letter at 21.

the reduced load level.[14] MISO's filing acknowledges that ZG Generating Facilities cannot instantaneously ramp down to meet the associated load loss, which presents increased risks of grid fluctuations as ZGIA arrangements attempt to stabilize. If multiple ZG Generating Facilities fail to ramp down as expected, either by choice or by misoperation of control technology, the MISO grid could experience cascading fluctuations across its system. As demonstrated in PJM, as more GWs of load drop from the system, fluctuations are harder to manage. If MISO anticipates that large loads will use the ZGIA service to connect to the grid, it must ensure that ZG Generating Facilities will limit their injections when necessary. The control equipment and management measures contemplated in the Proposal, even if optimally chosen,[15] are not sufficient.

ii. Strong Operational Penalties Are Needed to Ensure That ZG Resources Will Not Make Unauthorized Injections That Could Lead to Greater Reliability Risks.

The Commission must require MISO to implement strong penalties to prevent ZG Resources from making unauthorized injections into MISO's transmission system above their authorized level of service (namely, zero), consistent with the Commission's prior finding that transmission customers should be subject to penalties for unreserved use of the transmission system.[16] Absent such penalties, the Proposal cannot be found just and reasonable.

MISO's ZGIA proposal fails to discuss any penalties to be levied on ZGIA Generating Facilities that violate the rule against unauthorized injections outside the Transient Tolerance Window.[17] Similarly, MISO's proposal states that the ZG Interconnection Service Study must

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[14] *Id.*

[15] As discussed *infra* in section II.A.2, MISO has not optimally or adequately structured its requirements for control equipment and measures.

[16] PJM Co-location Order at P 212 (2025) (directing PJM to brief appropriate penalty charges for transmission customers' unreserved use of the PJM transmission system).

[17] Transmittal Letter at 43.

confirm that a generator's proposed equipment can sufficiently limit injections, but is silent as to any consequences if the equipment malfunctions and allows the generator to inject into the transmission system outside the Transient Tolerance Window.[18]

The Proposal contains no specific penalty schedule or mandatory reporting of injection events and control failures. There seems to be no consequence for an unauthorized injection—no charge, curtailment, suspension, mandatory retesting, or graduated penalty. This lackadaisical approach to enforcement is inconsistent with the serious reliability risks that would occur if ZG Generating Facilities made unauthorized injections into the system. When faced with potential consequences as serious as widespread outages, MISO must implement operational penalties that are just as serious.

The Commission has already found that operational and financial penalties are just and reasonable to ensure that customers follow curtailment directives, especially where there are significant reliability risks if customers fail to curtail.[19] In its recent proceeding on co-location arrangements in PJM, the Commission directed PJM to establish an appropriate penalty charge and "any other remedial action" that PJM should take to address a customer's unreserved use of the transmission system or excess energy withdrawals.[20] PJM established three separate penalties that escalated in severity based on the potential harm to the transmission system—a pause in service, disqualification, and financial penalties—where customers rely on control technologies that fail more than once, fail to follow Load Shedding and Curtailment directives, or make

[18] Transmittal Letter at 13, 14.

[19] *PJM Interconnection, L.L.C.*, Order on Rehearing, Clarification, Compliance Filing, and Paper Hearing, 195 FERC ¶ 61,209, at P 515 (2026) ("PJM Co-Location Rehearing Order").

[20] PJM Co-location Order at P 212.

unreserved use of the transmission system.[21] The Commission found that it was just and reasonable to establish these operational penalties because (1) PJM's new services for co-location arrangements were designed for Eligible Customers that are willing and able to limit their withdrawals from the transmission system; and (2) there are significant reliability risks if Eligible Customers fail to curtail.[22]

Similarly, MISO's ZGIA proposal is designed on the assumption that ZGIA Generation Facilities can and will limit their injections on the system and that (like in PJM), there are serious reliability risks if ZGIA Generating Facilities fail to limit their injections when directed to. MISO's proposal states that "[t]he premise of ZG Interconnection Service is that injections beyond the interconnecting substation can be limited."[23] ZG Generating Facilities, and their ZG Associated Loads, would be allowed to interconnect quickly on the assumption that they will adhere to strict limitations on injections.[24] Under the proposed ZG Interconnection Agreement, a Generating Facility taking ZG Interconnection Service agrees to the requirements to install equipment to reduce its injections at times when the ZG Associated Load reduces its demand and to cease all injections onto the transmission system when necessary.[25] Allowing ZGIA Generating Facilities to connect quickly through ZGIA on the basis that they will limit their injections, but not enforcing any penalties against them when they fail to limit those injections would, as PJM said with respect to its co-location penalties filing, "implicitly bless such dangerous behavior."[26]

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[21] Initial Brief of PJM Interconnection, L.L.C., Docket No. EL25-49-000, at 50 (Feb. 23, 2026), Accession No. 20260223-5189 ("PJM Initial Brief").

[22] PJM Co-Location Rehearing Order at P 515.

[23] Transmittal Letter at 42.

[24] Transmittal Letter at 7.

[25] Proposed Att. X, App'x 19, § 9.7.4.7.

[26] PJM Initial Brief at 42.

MISO should terminate or pause a ZG Generating Facility's ability to use the transmission system if the generator fails to stay true to its promise to limit its injections. Otherwise, ZGIA Generating Facilities would receive the benefits of connecting to the grid quickly without providing a commensurate benefit to the grid, and at worst, would risk endangering the stability of the transmission system. The failure of a ZG Generating Facility to limit its injections could cause reliability risks similar to those contemplated in PJM's Co-Location docket, including a higher risk of widespread outages across the bulk power system.[27] In order to ensure that the severe risks of failing to limit injections are weighed equally to the benefits that ZGIA Generation Facilities receive from the ZG Interconnection Service, the Commission should require MISO to impose operational penalties on Generating Facilities that fail to limit their injections as directed.

2. *ZGIA's Requirement for System Protection Facilities is Poorly Defined.*

Next, MISO falls short in its unnecessarily weak standard for System Protection Facilities that will ensure zero injection. The applicant ZG Generating Facility is required to identify "any proposed system protection facilities"[28] in its Interconnection Request. Although not capitalized in that passage, System Protection Facilities is an existing defined term meaning, as relevant, "equipment [] required to protect [] the Transmission System or other delivery systems or other generating systems from faults or other electrical disturbances occurring at the Generating Facility."[29] It is apparent from the filing that "System Protection Facilities" (or system protection facilities) in this context is intended to "control injection onto the rest of the Transmission

[27] NERC, *Characteristics and Risks of Emerging Large Loads: Large Loads Task Force White Paper*, *supra* note 12, at 20.

[28] Proposed Att. X § 3.11(ii); Att. X, App'x 1 § 10 and Att. A-5.

[29] Att. X § 1 (definition of System Protection Facilities).

System,"[30] although that is not codified in the proposed tariff. Following the Interconnection Request, the proposed ZG Facilities Study is to identify "any required system protection facilities and equipment,"[31] with such facilities memorialized in the ZG Interconnection Agreement.[32]

MISO's proposal falls short of what is needed to ensure that zero means zero by missing any minimum configuration of System Protection Facilities necessary to block unauthorized power injections to the grid beyond the POI. Outside the proposed tariff, MISO narrates its intentions:

> "MISO anticipates reviewing a variety of configurations, physical equipment, and operational requirements that may independently, or in sum, prevent injections on the Transmission System beyond the substation where the Point of Interconnection is located. For example, the injection limitation may be implemented through equipment controls such as export-limiting controls, directional relays, interlocks, and fail-safe trip logic. Operational requirements may include generation limits, curtailment obligations, outage coordination, and restrictions on operation. These operational requirements are in addition to any monitoring, testing, or maintenance requirements."[33]

The lack of clarity with this choose-your-own-adventure configuration approach is precisely why the Commission directed transmission providers to submit tariff proposals or explain why they are not needed.[34] No export-limiting control device (nor control over such device) is required anywhere in the proposed tariff. MISO proposes to give itself discretion to judge whether the "proposed control equipment ***and/or*** operating procedures […] are sufficient to prevent injections"[35] (emphasis added), suggesting that a protocol for manual intervention alone

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[30] Transmittal Letter at 28; see also proposed Att. X, App'x 19 § 9.7.4.7 (requiring the ZG Generating Facility to "install equipment" required to comply with the zero-injection requirement outside the Transient Tolerance Window.

[31] Proposed Att. X. § 3.2.5.2.2.

[32] Proposed Att. X, App'x 19, App'x A §§ 2, 5.

[33] Keyser Test. at 33; see also proposed Att. X § 3.2.5.2.1

[34] *See generally,* Show Cause Order at P 21 (cautioning against stand-alone study agreements); *id* at P 49 (requiring a degree of clarity and specificity in the tariff regarding studies for customers to avoid a variety of issues including disputes regarding how studies are conducted).

[35] Proposed Att. X § 3.2.5.2.1.

by the ZG Generating Facility's operator might be acceptable to MISO. The Commission in the Show Cause Order called for MISO to develop generator interconnection service that reflects "a generating facility with necessary control technologies and/or protection systems, which may include a special protection scheme, that ensure that the injection does not exceed the limit in the […] interconnection agreement."[36] "Special protection scheme" was defined there as in the PJM Co-Location Rehearing Order,[37] which in turn referenced the PJM Co-Location Order: "a plan designed to detect abnormal system conditions and to ***automatically*** take appropriate corrective action, to maintain system stability, acceptable system voltages, and acceptable facility loading"[38] (emphasis added). But, defying the Commission's directives, MISO here proposes no requirement for *automatic* corrective action.

Additionally, the Proposal fails to be just and reasonable in missing any specific requirements for testing the protective measures. The ZG Interconnection Agreement gives MISO a "right to inspect" the ZG Generating Facility's "System Protection Facilities and other protective equipment," including looking at tests, inspections, settings, and maintenance records, but sets no requirement for MISO to do so at any particular interval.[39] Similarly, the agreement requires the ZG Generating Facility to test its System Protection Facilities "[a]t intervals suggested by Good Utility Practice" but does not set any interval or require MISO to verify the testing.[40] This stands in contrast to, for example, the clear requirement for a ZG Generating Facility's metering equipment to be testified at least biennially.[41]

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[36] Show Cause Order at P 113.

[37] PJM Co-Location Rehearing Order at P 480.

[38] PJM Co-Location Order at P 204.

[39] Proposed Att. X, App'x 19 § 6.4.

[40] *Id.* §§ 9.7.4.5, 9.7.4.6.

[41] Proposed Att. X, App'x 19 § 7.4.

3. *Length of the Transient Tolerance Window Should be Set According to Clear Standards.*

A third infirmity in ensuring that zero means zero is how MISO proposes to set the "Transient Tolerance Window," which is "the period of time after a reduction or loss of load by the ZG Associated Load by the end of which window the [ZG] Generating Facility must have" ceased injections to the grid.[42] In other words, this time span, defined as no more than 20 seconds,[43] is the time for a ZG Generating Facility to ramp down production as needed when its co-located load drops. This time window is a fundamental engineering parameter of ZGIA service, but MISO has not justified why a maximum period of 20 seconds is either operationally *attainable* by a generator (or if a greater or lesser time window would be more appropriate), or operationally *acceptable* for the transmission grid to remain stably within reliability criteria while receiving unexpected injections over that time interval.

MISO states that it "determined that a 20-second limit provides the best system-wide balance between what is technically feasible and commercially practical on the one hand, and minimizing even transient injections on the other hand";[44] and MISO's witness Keyser opines that 20 seconds was chosen "in order to align with the MTEP modeling interval of 20 seconds for transient stability analysis."[45] The physical or even customary basis of 20 seconds remains obscure, as this figure is mentioned neither in the existing Attachment FF (Transmission Expansion Planning Protocol) nor in Business Practices Manual 20 (Transmission Planning). MISO should better justify the specific time interval chosen with reference to NERC standards, local planning criteria, or some other grounding in electrical engineering realities.

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[42] Proposed Att. X § 1; proposed Att. X, App'x 19, Art. 1 (proposed definition of Transient Tolerance Window).

[43] *Id.*

[44] Transmittal Letter at 21-22.

[45] Keyser Test. at 25:20-22

An additional deficiency with MISO's definition of Transient Tolerance Window is its allowance that 20 seconds would be the maximum period allowed, while the time period could be "further described by the Business Practices Manual for Large Load."[46] MISO gives more color its intentions in its filing letter, offering that "there may be circumstances where a narrower window is necessary and practical given electrical topography on certain parts of the MISO System, or Applicable Local Planning Criteria. It would be impractical to identify all such circumstances in the Tariff. Therefore, the definition allows for the creation of Business Practices Manual ("BPM") rules that narrow the window based on specific circumstances[.]"[47] A tariff that remained silent about all the standards and intentions in the prior quotation while reserving authority for MISO to make discretionary changes outside the Commission's oversight would violate the Rule of Reason, which requires that provisions that (1) significantly affect rates, terms, and conditions of service, (2) are realistically susceptible of specification, and are (3) not generally understood in a contractual agreement must be included in the tariff.[48] While the D.C. Circuit has recently recognized that "even specifiable practices that significantly affect rates need not be included if they are clearly implied by the tariff's express terms,"[49] the proposed tariff's passing reference to the BPM hardly implies anything as to how MISO will consider varying the 20-second rule.

As a policy matter, users of ZGIA service, not to mention regulators and stakeholders, will want to develop reasonable expectations about how the 20-second interval for unauthorized injections might evolve; but the placement of untariffed policies in the Business Practices Manual

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[46] Proposed Att. X § 1.

[47] Transmittal Letter at 21.

[48] *City of Cleveland v. FERC*, 773 F.2d 1368, 1376 (D.C. Cir. 1985).

[49] *Hecate Energy Greene Cnty. 3 LLC v. FERC*, 72 F.4th 1307, 1314 (D.C. Cir. 2023)

will complicate that. A Transient Tolerance Window that MISO can adjust by standardless fiat hardly supports orderly market development.

B. The Proposal Lacks Required Transparency.

The Commission found in the Show Cause Order that MISO must provide "cost transparency measures […] to provide stakeholders with sufficient information and visibility regarding the Network Upgrades, and their associated costs, needed to provide transmission service to Eligible Customers on behalf of large loads."[50] The Commission further found that MISO's tariff is not just and reasonable to the extent "it does not require the provision of data on MISO's website in a single location, and in an easily accessible format that is searchable and allows users to filter the data, that identifies the Network Upgrades that are needed to accommodate requests for transmission service by Eligible Customers on behalf of large loads, and the costs of those Network Upgrades."[51] Despite this clear command from the Commission for transparency of large load[52]-induced costs, and MISO's stated attempt to respond to the Show Cause Order, MISO has fallen well short of the Order's clear requirements on transparency. It is simply not correct that the "ZGIA proposal is well aligned with the Commission's goals and objectives of transparency," as MISO avers.[53]

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[50] Show Cause Order at P 71.

[51] *Id.* P 77.

[52] Although the ZGIA proposal is not restricted to serving only *large* loads, it is reasonable to expect that large loads will be a significant share of the end-use customers benefiting from the program. "MISO notes that this description [generally outlining ZGIA] explains how ZGIA will serve large loads"; "The ZGIA proposal represents another critical tool to help support the timely, reliable, cost-effective integration of new large loads into the MISO system"; "the ZGIA is particularly responsive to the needs of a large load[.]" Transmittal Letter at 8 n.33, 9, 11.

[53] Transmittal Letter at 5.

MISO is aware of how to design an interconnection program with deliberate transparency, as the Commission found last year.[54] Yet, no provision within the ZGIA proposal requires MISO to post ZGIA study reports, required Network Upgrades identified or deferred, or affected-system results. No provision requires the publication of costs of such upgrades, once known. Without the underlying studies and upgrade information, stakeholders and regulators may be unable to quantify incremental costs attributable to an expedited project or evaluate whether later MTEP upgrades result from assumptions made in the ZGIA process. The existing generator interconnection tariff includes various precedents[55] for required publication of data, and there is no reason why MISO could not post vital information on Network Upgrades.

MISO may rest on its requirement that a ZG Generating Facility can qualify for ZG Interconnection Service only if the ZG Impact Assessment and ZG Facilities Study find that the proposed interconnection "[w]ill not require the construction or modification of any Network Upgrades to address impacts to the Transmission System with the exception of Network Upgrades located at the same substation as the POI, except for System Protection Facilities at adjacent substations."[56] However, to the extent the ZG Generating Facility is owned by a vertically integrated, state-regulated utility, the costs of Network Upgrades, even if borne by the generator's utility owner, may be allocated in indeterminate ways at the retail level. The ZG studies may also identify foregone Network Upgrades that *would have been* required to interconnect the generator absent the ZG Associated Load, or Network Upgrades that *would have been required* to accommodate the new load absent the ZG Generating Facility. It will be important to track these

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[54] *Midcontinent Independent System Operator, Inc.*, 192 FERC ¶ 61,064, at P 197 (noting "MISO's commitment to publicly post detailed information about each ERAS interconnection request and its corresponding type of load served").

[55] Att. X §§ 3.3.4, 3.4.2.1 – 3.4.2.6.

[56] Proposed Att. X § 3.2.5.1(2); also see §§ 3.2.5.2.1, 3.2.5.2.2, 3.11(iii).

foregone upgrades should either the ZG Associated Load or ZG Generating Facility depart the co-located arrangement in the future, putting upgrade costs back on the table. Overall, the Proposal falls well short of the necessary transparency urged by the Commission.

C. The ZGIA Program's Scope Should Have a Defined Limitation.

The Commission's two orders last year on the ERAS fast-track interconnection program emphasized the Commission's longstanding policy on open access to the transmission system and requirement to limit the scope of departures therefrom. The first ERAS order denied MISO's initial proposal as not just and reasonable, in part because it lacked a program size cap (in either project counts or project megawatts).[57] The Commission also found that the proposed program end date of December 2028, allowing for three and a half years' worth of project selections, would "exacerbate[] the potential for a volume of ERAS interconnection requests untethered to reliability or resource adequacy needs" and would "make[] it difficult to determine […] whether the solution is narrowly tailored to fix the problem."[58] MISO altered the time limit on its ERAS proposal when it re-filed, setting August 2027 (two years after program commencement) as the sunset date, and capping the size of the program at 68 total projects. The Commission credited these limitations in ultimately approving the second ERAS proposal, finding that "the limited, one-time design of the [proposed ERAS] process weighed significantly on our decision here."[59]

Despite this precedent, MISO now comes to the Commission with a new fast-track interconnection pathway that is similar to the one it rejected. The program has a structure of 10 applications processed per quarter,[60] but otherwise no limit on the long-term availability of the

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[57] *Midcontinent Independent System Operator*, *Inc.*, 191 FERC ¶ 61,131, at PP 199-201.

[58] *Id.* at P 199.

[59] *Midcontinent Independent System Operator, Inc.*, 192 FERC ¶ 61,064, at PP 84, 195, 203, 265.

[60] Proposed Att. X § 3.11.2.

program for new applicants, the total project number,[61] or the total megawatts of capacity. MISO calls it "fundamentally a limited product"[62] but offers no limitations on the scope of the program. Witness Keyser explains in testimony why ZGIA service is proposed as a "permanent product" for a given participating generating plant but ignores why MISO is not capping the number or size of participating projects, or the overall lifespan of the program. This mirrors MISO's approach to stakeholder feedback earlier this year. While acknowledging stakeholders' "[r]equests to ensure ZGIA is a transitional construct and does not replace the standard GIA process," MISO wholly ignored the point in its response to related comments:

What MISO Heard	MISO's Response
✓ Requests to ensure ZGIA is a transitional construct and does not replace the standard GIA process ✓ Interest in a time-bound ZGIA construct with a clear transition to full interconnection service ✓ Need for a clear pathway for ZGIA resources to obtain ERIS or NRIS when long-term injection rights are desired	• ZGIA resources may pursue full interconnection service at any time through the DPP process, but MISO does not propose to require any time constraints on a ZGIA. • ZGIA Interconnection Service does not include the right to inject, and a ZGIA resource must go through the DPP process to secure ERIS or NRIS to inject.

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To achieve the narrow tailoring required by the Commission's open access precedents, a program that bypasses the traditional interconnection queue must have some limitation on how large it could get. Such limitation would be consistent with, for example, the Commission's approval earlier this year of Southwest Power Pool's HILLGA ("High-Impact Large Load Generation Assessment") interconnection program, which limits the HILLGA service for any

[61] MISO expressly acknowledged this point at a stakeholder meeting earlier this year: "there is no limitation on the number of ZGIA requests[.]" Minutes of April 22, 2026 Planning Advisory Committee meeting, https://cdn.misoenergy.org/20260527%20PAC%20Item%2001c%20Minutes%2020260422754915.pdf, at 6.

[62] Transmittal Letter at 12.

[63] MISO, Consideration of Zero-Injection GIA (Interconnection and Planning Draft Tariff Updates), Presentation to Planning Advisory Committee (April 22, 2026), https://cdn.misoenergy.org/20260422%20PAC%20Item%2006%20Consideration%20of%20Zero-Injection%20GIA%20%20(PAC-2024-4)752672.pdf, at 23.

given generator to five years.[64] For MISO ZGIA, a pilot program, for example, with a defined time limit of availability for new applicants or a defined time limit for each given interconnection agreement, followed by Commission review for renewal, could allow the Commission to consider whether continued derogation from open access should continue. Absent those guardrails, ZGIA is not just and reasonable.

D. The Proposal Fails to Adequately Mitigate the Risk that Network Upgrades Will Be Paid by Other than the Cost Causers.

MISO's ZGIA proposal includes two primary mechanisms that together are designed to prevent cost-shifting from ZGIA projects to other interconnection customers or load. These mechanisms involve: 1) a requirement that, in order to qualify for ZG Interconnection Service to begin with, the ZG Generating Facility will not require additional large-scale network upgrades, and 2) that MISO can credit the ZG Generating Facility as a "Non-Transmission Alternative" as a result of signing five-year commitments with ZGIA load. However, as further described below, those protective measures do not sufficiently insulate Network Upgrade costs from instances when some or all the ZG Associated Load is not placed in service.

Specifically, as discussed in section II.D.2 below, there are at least three principal flaws with the Proposal that can result in cost-shifting: 1) the five-year commitment is insufficiently concrete to provide the requisite certainty that the load integration study and its assumptions regarding needed upgrades are accurate; 2) the structure of the Proposal creates a fast-track ZGIA to GIA process whereby ZG Generating Facility could later convert to ERIS or NRIS service and thereby

[64] The HILLGA program requires an applicant generator to be within two substations of the large load it serves, such that the generator will be "injecting within the local area of the [large load]" similar to the MISO ZGIA Proposal. *Southwest Power Pool, Inc.*, 194 FERC ¶ 61,031 (Jan. 14, 2026) at PP 25, 28, 33.

skip ahead of the normal interconnection queue while also potentially avoiding network upgrades; and 3) the mismatch in the timing of the various study cycles can result in further cost-shifts.

1. *Overview of MISO's Cost-Shifting Safeguards*

The first mechanism in the Proposal is a condition of obtaining ZG Interconnection Service which states that a ZG Generating Facility is eligible for the service only if it does not require construction or modification of large-scale Network Upgrades, except for same-substation upgrades and certain System Protection Facilities.[65] The analysis for this determination is performed through the ZG Impact Assessment, which is a screening process used to examine whether the project is eligible for ZG Interconnection Service.[66] Pursuant to this assessment, the proposed tariff states that a project must "not require the construction or modification of any Network Upgrades to address impacts to the Transmission System with the exception of Network Upgrades located at the same substation as the POI, except for System Protection Facilities at adjacent substations."[67]

In other words, the ZG Impact Assessment must find that no broader transmission upgrades are needed, reliability can be maintained without Network Upgrades beyond the interconnection substation, and only same-substation upgrades or protection facility upgrades may be required.[68] If broader transmission upgrades are needed for the proposed project, it will not qualify for the ZG

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[65] *See* Transmittal Letter at 13.

[66] *Id.* at 28.

[67] *See* Proposed Att. X, Generator Interconnection Procedures, Section 3.2.5.1(2); *see also id.* at 3.2.5.2.1 ("For ZG Interconnection Service to be granted, these analyses must determine that no Network Upgrades are needed to maintain system reliability other than Network Upgrades at the same substation as the Point of Interconnection or System Protection Facilities."

[68] *See* Transmittal Letter at 28.

Interconnection Service.[69] If it does qualify, the interconnection customer then generally bears those costs of those limited upgrades, if any.

The second mechanism involves the way in which MISO can credit a ZG Generating Facility as a "Non-Transmission Alternative" under the proposal and defer upgrades that would otherwise be needed to serve the ZG Associated Load.[70] Attachment FF describes the "process of studying the Network Upgrades needs to integrate new loads onto the Transmission System," which includes an the "capability of [ZG Resources] to offset the need for Network Upgrades.[71] The proposal also requires "(1) an executed [five-year] agreement[72] between the entity with the ZG Associated Load and the [ZGIA] Generating Facility […] and (2) that the Generating Facility associated with the ZG Associated Load has achieved Commercial Operation by the time that the transmission solution would otherwise need to be in service."[73] "In the event that the Generating Facility associated with the ZG Associated Load fails to achieve Commercial Operation by the date that the transmission solution would otherwise need to be in service or the contract between the ZG Associated Load and the associated Generating Facility terminates, then the Transmission

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[69] *Id*.

[70] *See* Keyser Test. at 19.

[71] *Id*.

[72] Transmittal Letter at 32-33 ("MISO proposes to require the Interconnection Customer to submit an executed agreement between itself and the entity with the ZG Associated Load specifying that the full output of the Generating Facility is intended to be used by the ZG Associated Load, with an expected term of at least five years. […] The language of the agreement requirement is based on, and largely identical to, the requirements applicable to ERAS Interconnection Requests with several differences[:] […] First, ZG Interconnection Service imposes a requirement that the ZG Associated Load at least intend to use the output of the Generating Facility for at least 5 years […] [but] MISO [] only requires that the agreement specify an *intent* [emphasis in original] to use the full output of the Generating Facility for at least five years rather than a firm commitment"); *see also* proposed Att. X § 3.11(vii).

[73] Att. FF § I.D.1.b (as proposed for amendment).

Provider may require the applicable Load Serving Entity to delay the in-service date of ZG Associated Load until such time as an alternative solution can be placed in service."[74]

2. *MISO's Safeguards are Inadequate to Prevent Cost-Shifting of Network Upgrades to Interconnection Customers and Load.*

The safeguards described above were, in several different ways, inadequately designed to prevent cost shifts of Network Upgrades being socialized to non-ZGIA load. MISO's proposal is unjust and unreasonable until such time that it closes the gaping holes in its proposal that are particularly vulnerable to gaming and undue cost shifting.

i. The proposed five-year commitment requirement does not provide certainty that the load integration study and its assumptions regarding needed upgrades are accurate

First, for new ZG Associated Load, the Proposal does not require adequate financial security, cost-recovery agreements, or true-ups for the cost of deferred transmission upgrades if the ZG Generating Facility fails to materialize, retires early, or becomes permanently unavailable. For example, if the ZG Generating Facility or its contractual arrangement terminates, and a deferred upgrade is identified and becomes necessary through a later MTEP cycle, MISO's proposal would not specifically have those costs assigned to either the ZG Generating Facility or to the associated LSE. Therefore, the upgrade[s] would likely be allocated under ordinary MTEP rules and spread to other transmission customers. MISO itself acknowledges that such reconciliation occurs after-the-fact: "Any transmission issues identified by reconciling the cases will thus be addressed through the existing MTEP process."[75] The ZGIA's contingent facilities are fixed at execution, and

[74] *Id.*

[75] Transmittal Letter at 15.

the filed ZGIA provides no apparent mechanism for adding cost responsibility later to the appropriate ZGIA project.[76]

Relatedly, the five-year commitment requirement is insufficient to protect against this cost-shift pathway. Here, MISO made a deliberate choice. as described in its submission, to accommodate "commercial considerations" at the expense of ensuring just and reasonable rates, by "only requir[ing] that the agreement specify an *intent* to use the full output of the Generating Facility for at least five years rather than a firm commitment."[77] Specifically, MISO justifies this choice by speculating about the "difficult[y]" of "Interconnection Customers and ZG Associated Loads to agree to a firm minimum term of at least five years."[78] Beyond this bald statement, MISO provides no evidentiary basis for choosing this inadequate formulation and therefore is arbitrary.

Where MISO allows MTEP to rely on a ZG Generating Facility as a Non-Transmission Alternative, but later identifies a needed reliability upgrade under a ZG Resource outage contingency, the Proposal does not clearly specify whether that upgrade is treated as a load-driven cost of the ZG arrangement or as a generally socialized reliability project. MISO has stated that "Generator outages are accounted for in the MTEP process as P11 or P31 planning events used in the MTEP Reliability Analysis. ZGIA generator outages will be accounted for in this manner."[79] Therefore, to the extent a later MTEP review identifies that a ZGIA generator outage necessitates Network Upgrades, there is nothing in the proposal to expressly prevent those upgrades being assigned through the normal MTEP process.

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[76] See proposed Att. X, App'x 19 at *passim.*

[77] Transmittal Letter at 33 (emphasis original).

[78] *Id*.

[79] *See* MISO Response to Feedback, ZGIA Proposal Framework (PAC-2024-4) (April 15, 2026): available at https://cdn.misoenergy.org/PAC%20ZGIA%20Proposal%20Framework%20(PAC-2024-4)%20Feedback%20Response%20(20260225)751481.pdf, slide 3.

Moreover, MISO's compromised position belies an irreconcilable tension in its filing. MISO states that "[i]n order to ensure that the load integration study is an accurate representation of future conditions, *there must be certainty that the Non-Transmission Alternative becomes operational and remains operational*."[80] However, here there is no such certainty, as the contracts merely require a statement regarding contractual expectations and intent. This weak construct has the effect of undermining the accuracy and reliability of the assumptions and outputs of the ZG load integration study. MISO should instead study each arrangement both with and without the ZG Generating Facility, identify every upgrade deferred in reliance on that resource, and require financial security or a cost-responsibility agreement covering nonperformance. The proposed five-year "intended" commercial arrangement is not a reasonable basis for deferring transmission facilities with much longer planning lives.

ii. The structure of the proposal distorts the normal interconnection queue process by providing a fast-track to ZGIA Generating Facilities that later convert to ERIS or NRIS service

Next, the structure of the proposal also provides a fast-track pathway for ZGIA resources to connect to the gird while also allowing them to avoid needed network upgrades if they later convert to ERIS or NRIS service. In other words, not only can the ZGIA resource energize faster as compared to resources in the traditional DPP queue, the ZGIA resource can also avoid the network upgrades they would otherwise be responsible for. This structure presents serious gaming opportunities for ZG Resources seeking to energize quickly.

As described in the filing: "[a]n Interconnection Customer with ZG Interconnection Service is free to submit an Interconnection Request into MISO's queue for ERIS and/or NRIS. Once the Interconnection Customer completes studies and obtains ERIS or NRIS for its ZG Resource, this

[80] Keyser Test. at 19 (emphasis added).

automatically would supersede any ZG Interconnection Service that such ZG Resource has and the parties would replace or amend the ZGIA with a GIA reflecting the new service levels."[81] Witness Keyser further states, "[i]f [a] project meets the eligibility requirements to enter the ZGIA interconnection process, DPP projects in active DPP cycles at or before Decision Point 2 may transfer to the ZGIA process."[82] Therefore, if the ZG Associated Load disappears, which is a material possibility based on the weak contractual requirements,[83] the ZG Generating Facility will have skipped interconnection queue line as it can then apply for NRIS/ERIS, while also possibly avoiding the Network Upgrades that it may have otherwise been assigned had it completed the DPP interconnection process in the first instance. This structure creates a fast-track ZGIA to GIA process where ZG Resources could use the ZG Interconnection Service to get ahead of DPP resources. MISO's proposal includes no safeguards applicable to the ZG Generating Facilities in the form of weighted escrow, securities, or other mechanism to protect against this opportunity for gaming and cost-shifting.

iii. MISO's proposal will result in further cost shifts as a result of mismatched study cycle timing

Lastly, a study timing mismatch yields yet another opportunity for undue cost-shifting, as some deferred upgrades, like missed cumulative fault-duty and other reliability effects,[84] that show up in MTEP but not the ZGIA study cycle may be charged to load more generally. An energized generator contributes fault current even when it is not exporting real power, which is why the Tariff permits, among other things, System Protection Facilities at adjacent substations as the sole extra-

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[81] *Id.* at 15-16.

[82] *Id.* at 29.

[83] As describe above, the ZG Associated Load is required to have only an agreement evincing an "intent" to take the ZG Generating Facility's power for five years.

[84] Such as protection coordination, voltage performance, and dynamic stability.

substation upgrade. However, the system impacts of these effects may be lost because of the timing of ZGIA and DPP studies.

MISO plans to include all interconnection requests with an approved GIA in the base case for each ZGIA cycle, but not to the base case for DPP cycles if the DPP studies are ongoing.[85] Once the DPP cycle is finished, the output from the cycle and the completed ZGIA and the MTEP's Expedited Review Projects will be included in the new MTEP base case.[86] MISO plans to reconcile any differences caused by the different study assumptions in the ZGIA and the DPP through the MTEP process. The next DPP cycle will then use the latest MTEP base case.[87]

However, waiting until the MTEP process to reconcile differences between the ZGIA and DPP study assumptions means that the Network Upgrades potentially caused by ZG Resources, but not identified until the MTEP process, will be spread to load in MISO through either its regional or subregional cost allocation processes. Unlike in the generator interconnection process, where generators pay for Network Upgrades, in the MTEP, Network Upgrade costs are generally allocated across load.[88] As a result, any transmission upgrades that are not identified in the ZGIA and DPP process will be identified in the MTEP process and will be paid for by load.

In other words, successive ZGIAs do "see" one another because MISO adds each GIA approved since the last base case to the following ZGIA cycle. The gap therefore runs between ZG Resources and pending DPP requests in both directions: the DPP base case is likewise frozen at kickoff and not updated for ZGIAs approved mid-cycle. Projects in each track may therefore be studied against models that omit the other. MISO has not adequately explained how their

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[85] Transmittal Letter at 15.

[86] *Id*.

[87] *Id*.

[88] Att. FF § III.A.2.

cumulative short-circuit, protection, voltage, and stability effects will be reconciled before approvals become final. That gap could cause upgrades to be identified later through MTEP, without a corresponding ZGIA cost true-up. The Tariff should identify the required base case; require cumulative modeling of prior ZGIAs and relevant pending projects such as projects in DPP Phase 2; establish minimum short-circuit, protection, steady-state, and stability analyses; and provide clear restudy and cost-allocation rules. The current provision making thermal and voltage analysis discretionary "if necessary" is too open-ended. Ultimately, this means that residential ratepayers and small industrial customers may end up paying for upgrades caused by these resources and their associated loads.

E. The Proposal Requires Greater Clarity on the Treatment of Hybrid Resources.

The Proposal allows for Hybrid Resources to apply for ZG Interconnection Service.[89] However, there are two distinct problems in the Proposal that may hinder Hybrid Resources from fully participating on a level playing field with other types of resources. First, the Proposal sets the capacity accreditation of a ZG Generating Facility that is a Hybrid Resource based in part on a cap at "the level of firm interconnection service."[90] As ZG Interconnection Service may be interpreted as not "firm," Hybrid Resources in the ZGIA program could receive capacity accreditation of zero without clarification.

Second, the Proposal is silent as to important dimensions of how the battery storage component of a Hybrid Resource will be treated within the ZGIA construct. MISO has stated elsewhere that

[89] Under the Proposal, "[a] ZG Resource may participate as a Generation Resource, Dispatchable Intermittent Resource, Electric Storage Resource, or Behind the Meter Generation resource"; while Hybrid Resources are already defined as a type of Generation Resource. Proposed Module A § 1 (proposed definition of Zero Injection Generation (ZG) Resource); Module A § 1 (definition of Hybrid Resource).

[90] Proposed Module E-1 § 69A.4.1(i); Module E-1 § 69A.4.1(f).

a storage unit's charging activity will be considered in the DPP interconnection study,[91] but MISO's Proposal leaves unclear how, for a Hybrid Resource within ZGIA, the constituent storage unit's charging behavior would be considered in the study. Relatedly, in the required ZG Impact Assessment, "the stability and steady state analyses [will] test[] the impact of injections if the ZG Associated Load trips offline for the duration of the Transient Tolerance window,"[92] but the Proposal leaves unclear whether any such tripping potential by the constituent storage unit would be considered in the study. Additionally, a ZG Generating Facility shall be metered "separate from any metering used for the ZG Associated Load,"[93] but the Proposal should clarify whether a constituent storage unit within a ZGIA Hybrid Resource must be separately metered from the constituent generator and whether its charging behavior should be netted from the ZG Generating Facility's "injections" to the extent they must not exceed[94] the Load or Demand of the ZG Associated Load.

F. Drafting Errors

While Community Organizations and Clean Energy Advocates continue to believe the Proposal is not just and reasonable as filed, we write here to highlight what may be unintended errors in the Proposal as submitted.

1. *Limitation on Injections*

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[91] MISO, *Removing Storage Charging Limitations in GIAs* (PAC-2024-3) (Jun. 10, 2026), https://cdn.misoenergy.org/20260610%20PSC%20Item%2005%20Removing%20Storage%20Limitations%20in%20GIAs%20(PAC-2024-3)762998.pdf, at *passim;* MISO, *Removing Storage Charging Limitations in GIAs* (PAC-2024-3) (Aug. 26, 2026), https://cdn.misoenergy.org/20260826%20PAC%20Item%2007a%20Removing%20Storage%20Limitations%20in%20GIAs%20 (PAC-2024-3)776961.pdf, at *passim*.

[92] Transmittal Letter at 15, 28 (discussing proposed Att. X § 3.2.5.2.1); Keyser Test. at 11:2-4, 31:6-7.

[93] Proposed Att. X, App'x 19 § 7.1.

[94] See, *e.g.,* proposed Att. X § 1 (definition of Transient Tolerance Window); proposed Att. X § 3.11(v) (limiting the ZG Interconnection Service amount to the ZG Associated Load's Demand); proposed Att. X, App'x 19 § 9.7.4.7 (requiring a ZG Generating Facility to reduce injections to match the ZG Associated Load's Demand).

To support a ZG Generating Facility's requirement to avoid grid injections and produce only the power its ZG Associated Load demands, MISO proposes to require that, after a reduction or loss of load by the ZG Associated Load, the ZG generator shall "reduce its injections to a level that does not exceed the Demand of the ZG Associated Load within the Transient Tolerance Window [after a load reduction]"[95] or "reduce[] its injections to an amount not greater than the Load of the ZG Associated Load."[96]

A probable error is in the phrase "reduce its ***injections***" (emphasis added). As the name of the interconnection program suggests, grid injections are supposed to be zero, after the Transient Tolerance Window elapses. The intent of the referenced phrase may be better captured by MISO's statement: "it is important to correspondingly reduce the output of the ZG Resource to prevent power from flowing out onto the Transmission System"[97] or statements in the Show Cause Order contemplating that under this type of arrangement, "a generating facility's output is matched to the demand of the electrically proximate large load or large co-located load."[98] The Commission should, at minimum, clarify whether MISO intended to write "output" rather than "injections" in the referenced quotations. If MISO intended the phrasing as written, further clarification may be needed to avoid creating a data center-sized loophole: "injections" in the quoted tariff language in Attachment X, Section 1 and in Attachment X, Appendix 19, Section 9.7.4.7 can mean only injections within the circuit up to the POI, with zero injections beyond that.

It is also unclear whether the reference to Demand in Section 9.7.4.7 of the ZGIA Interconnection Agreement was intended to say Load, as Demand is defined in Module A as a

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[95] Proposed Att. X, App'x 19 § 9.7.4.7(b).

[96] Proposed Att. X § 1 (definition of "Transient Tolerance Window").

[97] Transmittal Letter at 42.

[98] Show Cause Order at P 113.

maximum amount of Load over a specified period. If "Demand" was intended, then (i) the inconsistency with the use of "Load" in the definition of Transient Tolerance Window is unexplained; (ii) it is not clear how the Demand of the ZG Associated Load is to be calculated for this purpose; and (iii) it is unclear why the ZG Generating Facility would be allowed to indefinitely inject power at the level of some *maximum* level of Load.

2. *Reference to Interconnection Study*

In proposed new Attachment X, Section 3.2.5.1, the tariff language provides that "This [ZGIA] service is available only if the study required by Section ***3.2.3.2*** of these GIP determines that the proposed interconnection…" (emphasis added). This appears to be an error; the reference should have been to (proposed new) Section 3.2.5.2 on the next page of Attachment X. The same reference error is also found at proposed new Attachment X, Appendix 19, Section 4.1.4.1.

III. CONCLUSION

To effectuate MISO's zero injection concept without raising the risk of adverse reliability events and cost shifts, Community Organizations and Clean Energy Advocates respectfully ask the Commission to use its authority to help MISO course correct. Given the demonstrated reliability concerns interconnecting and serving large load customers, no countervailing reasons justify failing to establish operational penalties and transparent baseline requirements for system protection mechanisms. Similarly, as the Commission noted in the OSC, cost transparency is paramount given the scale and pace of forecasted load growth. Without publishing study information and reducing instances for mismatching cost responsibility between the multiple generator interconnection queue processes, MISO's ZGIA process could unduly shift cost burdens to other ratepayers without giving states and other advocates visibility to identify or resolve the issues.

Since MISO has the structure for a reasonable co-location program, we urge the Commission to direct MISO to cure the deficiencies with filing before accepting it.

DATED: September 8, 2026

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been served in accordance with 18 C.F.R. § 385.2010 upon each party designated on the official service list in this proceeding by email.

DATED: September 8, 2026

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