

PJM/MISO IPSAC
Annual Issues Review – 3rd Party Issues and Feedback
February 11, 2026

The undersigned transmission advocates appreciate the opportunity to submit comments pursuant to the 2026 PJM-MISO IPSAC Annual Issues Review (AIR) process. These build on comments that several of our organizations have submitted in 2024 and 2025.

We are heartened by the development of the Interregional Transfer Capability Study (ITCS) by PJM and MISO. This landmark initiative is very promising for identifying necessary upgrades along the PJM-MISO seam to accelerate transmission investment and lower costs for ratepayers through enhanced interregional transactions. Rising electricity costs underscore the need for more efficient market transactions and trades across the PJM-MISO seam. And, the increasing occurrence of extreme weather events that threaten reliability highlight the need for more robust interregional connections to allow neighboring regions to assist during tight capacity conditions.

To that end, **we encourage PJM and MISO to continue to endeavor to make necessary tariff revisions** to ensure that ITCS projects have a clear path forward to construction, including development of a new interregional project type that brings multiple benefits and engaging states on a viable cost allocation mechanism. We strongly support the adoption of the seven benefit metrics required under Order 1920's regional transmission planning provisions, and we remain ready to support the RTOs in this and believe that PJM's Order 1920 cost allocation compliance filing and MISO's Order 1920 compliance filing, both due June 12, 2026, provide a key opportunity for aligning interregional planning policies to lead to timely project construction. **We urge the RTOs to move swiftly, as any delay means that the ITCS results could quickly become outdated and irrelevant.**

At the March PJM-MISO IPSAC, we would appreciate it if the RTOs could respond to the following questions that relate to the current ITCS and to continued reforms we would like to see implemented:

1. **Can any ITCS projects be advanced through the existing JOA between PJM and MISO?** Are tariff revisions necessary to build any projects from the ITCS? Please share as soon as possible any timeline and process details you have for development of any new tariff language, including which stakeholder forums will be focused on discussing these developments.
2. **When do PJM and MISO plan to calculate and communicate their preliminary benefits assessment associated with ITCS projects?**
 - a. In our experience, sharing the benefits of transmission projects can help to justify their expense and align diverse stakeholders, such as in MISO's Long Range Transmission Planning ([LRTP](#)) process.
 - b. Please provide more details regarding how you will be assessing potential transmission solutions in the current ITCS study, as well as how you plan to

develop a joint set of benefit metrics for a new multi-driver interregional project type, such as are being considered in this study.

3. **To what extent do PJM and MISO anticipate making improvements in the coming years to their Coordinated Transaction Scheduling (CTS) system to minimize trading inefficiencies and friction, including investigating the potential for intertie optimization?**
 - a. SPP [announced](#) last year that they will begin studying inter-market (intertie) optimization on their seams, including with MISO, and has demonstrated the practical savings it can provide – \$20 million per year on the MISO seam alone. We would not want to see PJM and MISO “fall behind” other RTOs in implementing this cost saving strategy.
 - b. A 2024 [study](#) from the National Laboratory of the Rockies found that in 2022, PJM and MISO experienced uneconomic flows in 48% of hours due to delays in the CTS system.
 - c. A [Brattle Group analysis](#) from 2023 found that implementing intertie optimization between PJM and MISO can provide up to \$63 million in value annually for consumers by reducing time delays in trading.
4. **Is PJM looking at any changes to its capacity market to allow for external capacity resource imports to help reduce prices for ratepayers, such as increasing the Capacity Benefit Margin (CBM) or revisiting the technical requirements for External Capacity Resources?**
 - a. It is our understanding that PJM capacity market regulations currently make it extremely difficult for external resources to participate, exacerbating the capacity market price increases. By making it easier for external resources to participate, PJM can lower prices for ratepayers and maximize utilization of interregional transmission to MISO.
5. **How are you considering resource adequacy and other reliability benefits in benefit/cost analysis?**
 - a. Will this analysis consider extreme winter weather such as Elliott and Fern and extreme summer events?

Thank you, and we look forward to hearing from you at the next IPSAC meeting.

Respectfully submitted,

Advanced Energy United
Clean Grid Alliance
Clean Wisconsin
Earthjustice
Environmental Law & Policy Center
Fresh Energy

Natural Resources Defense Council
RMI
Sierra Club
Southern Environmental Law Center
Sustainable FERC Project
Union of Concerned Scientists