



MISO Expedited Resource Addition Study Request for Stakeholder Feedback

July 1, 2026

In July 2025, FERC approved MISO's Expedited Resource Addition Study (ERAS) which is a temporary targeted process to address near term resource adequacy and reliability needs. ERAS is designed to accelerate the study and approval for generation resources that meet specific criteria.

In summary projects wishing to submit into ERAS must have 100% site control, be commercially operational within 3 years of ERAS submission, have an off-take agreement, be within the same Local Resource Zone as the identified need, and receive written verification from the Relevant Electric Retail Regulatory Authority (RERRA) confirming the need. Further submission requirements can be found within the [Tariff](#) accepted by FERC.

ERAS projects serving retail choice load are subject to further requirements as detailed in the [MISO's ERAS guide](#).

Given the various submission requirements defined by MISO, the Illinois Power Agency ("IPA" or "Agency") in coordination with the Illinois Commerce Commission ("ICC") are issuing a Request for Information from stakeholders to better understand what requirements may hinder developers from submitting projects into this process and why.

The IPA is seeking stakeholder feedback on barriers that may limit participation in the ERAS process and to explore potential changes which could facilitate greater participation in the initiative.

Comments are welcome from all stakeholders. **Responses are due on August 3, 2026, and should be sent to: IPA.ContactUs@Illinois.gov.**

Responses will generally be made public and will be published on the Agency's website. However, should a commenter seek to designate any portion of its response as confidential, that commenter should provide both public and redacted versions and the Agency will only post the redacted version. Independent of that designation, if the IPA determines that a response contains confidential information that should not be disclosed in connection with a competitive procurement event, it reserves the right to provide its own redactions.

Commenters need not respond to every question (some may not be applicable) and should not feel limited by these questions in providing feedback. The Agencies are seeking to better understand barriers and potential opportunities for remedy – stakeholders are encouraged to provide additional pertinent information.



Questions

1. As referenced in the preceding section, requirements must be met by a generation project before it can be accepted and studied within MISO ERAS. What, if any, requirements pose a barrier to developers seeking to access the MISO ERAS process for generation projects being developed in Illinois? Please consider requirements in Illinois law, from agencies, from utilities, or from MISO or corresponding MISO tariffs. Particularly, the Agencies are seeking feedback on the 100% site control, issues around transparency or data asymmetries, and off-take agreement requirements to obtain feedback if these are hindering submission into ERAS.

MISO's 100% site control requirement—particularly when coupled with the requirement to submit a Transmission Owner (TO)-approved Point of Interconnection (POI) as part of the ERAS application—creates a substantial and uneven barrier for Independent Power Producers (IPPs) and other non-utility developers seeking to advance ERAS projects in Illinois and across MISO. Unlike MISO's traditional Definitive Planning Process (DPP), where full site control and a finalized POI are not required until later in development, ERAS requires developers to resolve complex engineering, routing, permitting, and TO-coordination issues at the front end of the process. That is especially problematic because the appropriate interconnection route and POI often cannot be confirmed until after meaningful technical review and coordination with the TO. As a result, the requirement does not simply screen for viable projects; it can prevent otherwise viable resources from entering the process at all. The requirement also disproportionately favors vertically integrated utilities, which have greater visibility into, and operational control over, their transmission and distribution systems within their service territories. IPPs, in contrast, must depend on TO engagement and negotiated access to information and approvals before they can satisfy the ERAS threshold requirements, creating timing and information challenges that can materially restrict participation.

MISO has stated that the 100% site control requirement is intended to reduce speculative interconnection requests and ensure that only "shovel-ready" projects enter ERAS. While this is understandable, the current requirement excludes projects that are commercially and technically viable but cannot secure a final TO-approved POI before the ERAS application deadline. At the same time, recent experience with MISO-approved ERAS projects sponsored by vertically integrated utilities, including projects with delayed in-service dates or unexecuted Generator Interconnection Agreements—demonstrates that satisfying the existing site control requirements does not, by itself, ensure timely commercial operation. A more effective and competitively neutral approach would be to evaluate readiness through objective milestones that better reflect actual project maturity, such as evidence of major equipment procurement, executed or pending permit applications, demonstrated financing progress,

interconnection study progress, or binding development schedules. These criteria would more directly filter out speculative projects while avoiding favoring incumbent utilities and limiting the ability of IPPs and other developers to help meet Illinois' near-term reliability and resource adequacy needs.

2. Do other barriers, beyond that reference in Question 1, exist which may limit participation in MISO ERAS for projects being developed in Illinois?
3. What changes could be made to the MISO ERAS process to reduce or eliminate the current barriers identified in Questions 1 and 2, improving participation for projects being developed in Illinois?

MISO should revise ERAS submission eligibility by eliminating the 100% site control requirement and instead apply the existing DPP site control framework at the initial submission stage. This change would preserve MISO's ability to screen out speculative projects while allowing qualified market participants, including IPPs and other developers, to initiate ERAS submissions. To ensure projects are viable, MISO could require applicants to demonstrate project maturity through the objective readiness criteria described in the response to Question 1. This approach would better align eligibility with actual project viability and expand the pool of resources capable of meeting Illinois' near-term reliability and resource adequacy needs.

4. Are there additions, changes, refinements, or clarifications that could be made to the IPA's plans – Long-Term Renewable Resources Procurement Plan, recommendations for the forthcoming Energy Storage Procurement Plan, and/or renewable resources or energy storage system implementation processes and procedures – that could alleviate project barriers seeking to participate in the MISO ERAS processes? Please explain in detail.