



Non-Firm Large Load (LLWG-2026-5)

Large Load Working Group

August 12, 2026

Purpose & Key Takeaway

Purpose

Review the initial proposal for a framework for Non-Firm Transmission Service for Large Loads titled Flexible Large-load Interconnection and Transmission Service (FLITS)

Key Takeaways

- Only Large Loads are eligible for FLITS
- The FLITS framework allows either interim or permanent Non-Firm Transmission Service and can be combined with Firm NITS
- MISO welcomes further feedback as it continues evaluating Resource Adequacy treatment for large loads taking FLITS
- All Interconnection Reliability Requirements for large loads apply to large loads taking FLITS
- The portion of a large load taking FLITS will not be eligible to register as a Demand Response Resource

In their abeyance request to the FERC show cause order, MISO and the Transmission Owners committed to a filing no later than November 16

Where we've been, where we're going

July 12, 2026:

The Large Load Working Group voted to accept a new issue for Non-Firm Large Load (LLWG-2026-5)

MISO presented some considerations for the issue and requested stakeholder feedback on those, as well as feedback on any additional considerations

Alliant Energy presented a proposal for consideration as a potential approach to the issue, Bridge Interim Transmission Service (BITS)

Today (August 12, 2026):

Discuss a proposal framework for Non-Firm Large Load: Flexible Large-load Interconnection and Transmission Service (FLITS)

Future:

Further refinement of proposal incorporating stakeholder feedback and development of draft Tariff language in partnership with Transmission Owners

Details on Next Steps slide

MISO continues to focus on three objectives to enable members to integrate large loads quickly and reliably while delivering lasting value for the region

Objectives	1	Connect Quickly	2	Transition and Scale with Flexibility & Transparency	3	Ensure Long-Term Reliability
		Get MISO approval within 120 days with all studies completed and GIAs signed		Transition and scale with flexible options consistent with timing of network upgrade buildouts and without cost shifting		Sustain reliable operations with ability to withdraw or inject energy based on conditions and signals
	Needs	Certainty on transmission needs and associated costs: Generation only, load only, generation-load combination		Curtailment capability, resource adequacy coordination, efficient use of existing transmission capacity		Real-time telemetry and coordination, curtailment capability, ride-through, stability control, resilience, security
Solutions		<ul style="list-style-type: none">Co-located resources (ZGIA)Expedited generation (ERAS)Fast load studies (EPR)Aligned load and generation studies (LARS)		<ul style="list-style-type: none">Co-located resources (ZGIA)Non-firm service option (FLITS)Firm service step-up optionCost shifting and transparency		<ul style="list-style-type: none">Clear requirementsOperations system enhancementsMarket pricing signalsDemand response and new reserve market products

FERC's show cause order outlines Transmission Service obligations

MISO interprets “willing and able to limit their use of the transmission system under certain conditions” without regard to the energy or capacity cost of such service

"Eligible Customers taking transmission service on behalf of flexible large load also may be willing and able to limit their use of the transmission system under certain conditions. As recognized in the ANOPR record, load flexibility can avoid inefficient and costly transmission system build-out. In addition, transmission services that reflect that flexible large loads are willing and able to limit their withdrawals from the transmission system under certain conditions could help timely interconnect flexible large loads..."

MISO should explain whether the Tariff remains just and reasonable without (1) an interim non-firm network transmission service while Network Upgrades are being constructed (i.e., interim NITS) and (2) permanent firm and non-firm contract demand transmission services (transmission service up to a specified MW quantity, i.e., the contract level, on a firm or non-firm basis)."¹

¹Midcontinent Independent System Operator, Inc., 195 FERC ¶ 61,212 at PP 104–105 (2026)

Proposed framework for Flexible Large-load Interconnection and Transmission Service

FLITS Proposal Considerations

1

Interim Transmission Service

FLITS provides non-firm NITS until upgrades needed for firm NITS are completed

2

Permanent Transmission Service

FLITS also provides non-firm NITS on a permanent basis or until a Large Load desires to move towards obtaining NITS service

3

Resource Adequacy

MISO is still evaluating Resource Adequacy options for Large Loads taking FLITS

4

Markets & Reliable Operations

All Large Load taking FLITS service will be treated the same in the ARR/FTR markets, Energy and Ancillary Service Markets, and have identical curtailment obligations

Although the elements of the framework are written in a decisive style, this is a proposal built from FERC direction, stakeholder feedback, known stakeholder priorities, MISO's reliability responsibilities, and MISO/stakeholder guiding principles

1.

INTERIM TRANSMISSION SERVICE

FLITS can provide non-firm NITS until upgrades needed for firm NITS are completed

- a) FLITS is only available to Large Loads that also have a Firm Service Step Up request submitted and can be combined with firm NITS
- b) Transmission Planning studies will identify base system conditions when loads taking FLITS must curtail
- c) MISO is evaluating the interaction between ZGIA resources and large load taking FLITS
- d) MISO and the Transmission Owners are working on appropriate rate schedule(s)

2. PERMANENT TRANSMISSION SERVICE

FLITS also provides non-firm NITS on a permanent basis or until a Large Load desires to move towards obtaining NITS service

- a) Permanent FLITS is an option for Large Load not meeting the criteria for interim FLITS and can be combined with firm NITS
- b) Transmission Planning studies will identify base system conditions when loads taking FLITS must curtail and may identify upgrades needed to support a requested amount of FLITS
- c) MISO is evaluating the interaction between ZGIA resources and large load taking Permanent FLITS
- d) MISO and the Transmission Owners are working on appropriate rate schedule(s)

3.

RESOURCE ADEQUACY PARTICIPATION

MISO is still evaluating Resource Adequacy options for Large Loads taking FLITS

- a) The BITS proposal contemplates Large Load taking FLITS service is always represented in the Planning Resource Auction

Questions for stakeholders:

1. Should Large Load taking FLITS be included in an LSE's load forecast for the Planning Resource Auction (PRA)?
2. Are these Loads eligible to register as LMRs if participating in the PRA?
3. Should MISO recognize Loads that bring Generation differently from Loads that do not?
4. Can these answers differ between RERRAs?

4.

MARKETS AND RELIABLE OPERATIONS

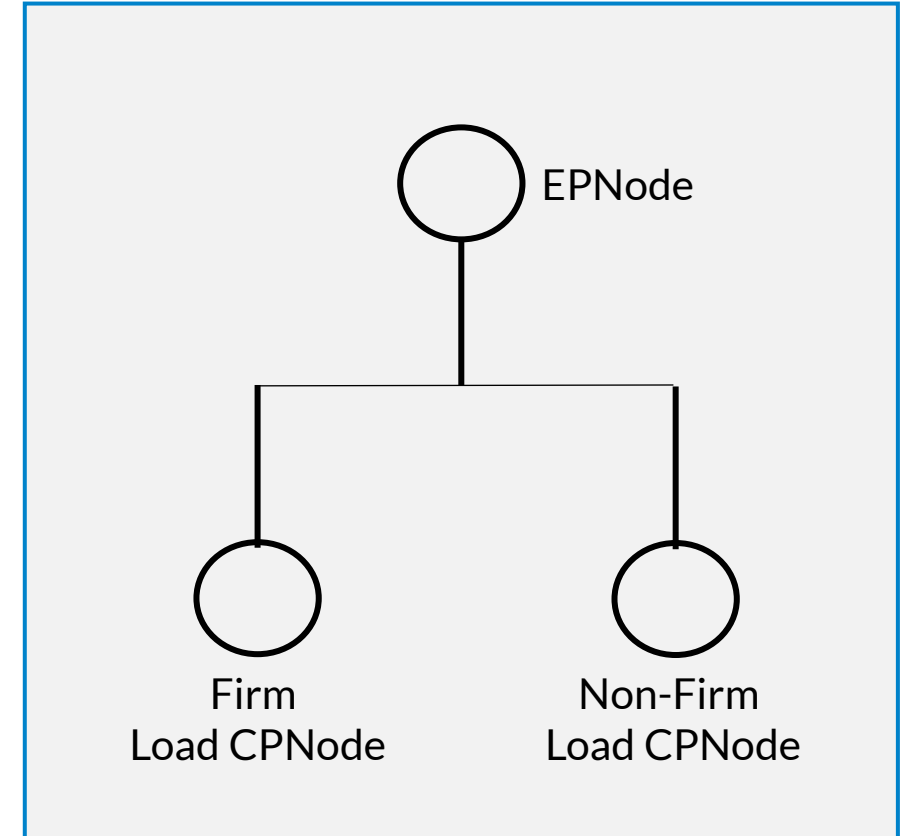
All Large Load taking FLITS service will be treated the same in the ARR/FTR markets, Energy and Ancillary Service Markets, and have identical curtailment obligations

- a) The portion of a Large Load served with FLITS must meet all Large Load Interconnection Requirements for visibility, ramp, and ride-through.
- b) FLITS will not be curtailed for economic reasons. Periodic studies will update base system conditions when loads taking FLITS must curtail to maintain reliability. FLITS loads are always curtailable in emergency operations.
- c) Large load taking FLITS is not eligible for ARR entitlements.
- d) Large loads taking FLITS may not participate as a Demand Response Resource (DRR) nor Emergency Demand Resource.

4a. Markets and Reliable Operations

The portion of a Large Load served with FLITS must meet all Large Load Interconnection Requirements for visibility, ramp, and ride-through.

- Modeling guidelines for the portion of Large Load being served under FLITS will be modeled with a separate Load CPNode from the portion being served under NITS service.
- A single EPNode may be used for both Load CPNodes, with each Load CPNode reflecting the amount of service of the appropriate type being obtained
 - This improves the visibility and curtailment instructions from MISO ensuring MISO does not send instructions to the firm portion of a Large Load
 - Also helps identify settlement impacts and ensures ARR Entitlements for the firm portion of a Large Load
- As the Large Load engages in the Firm Service Step Up process, the firm Load CPNode amount will increase while the Non-Firm Load CPNode amount will decrease

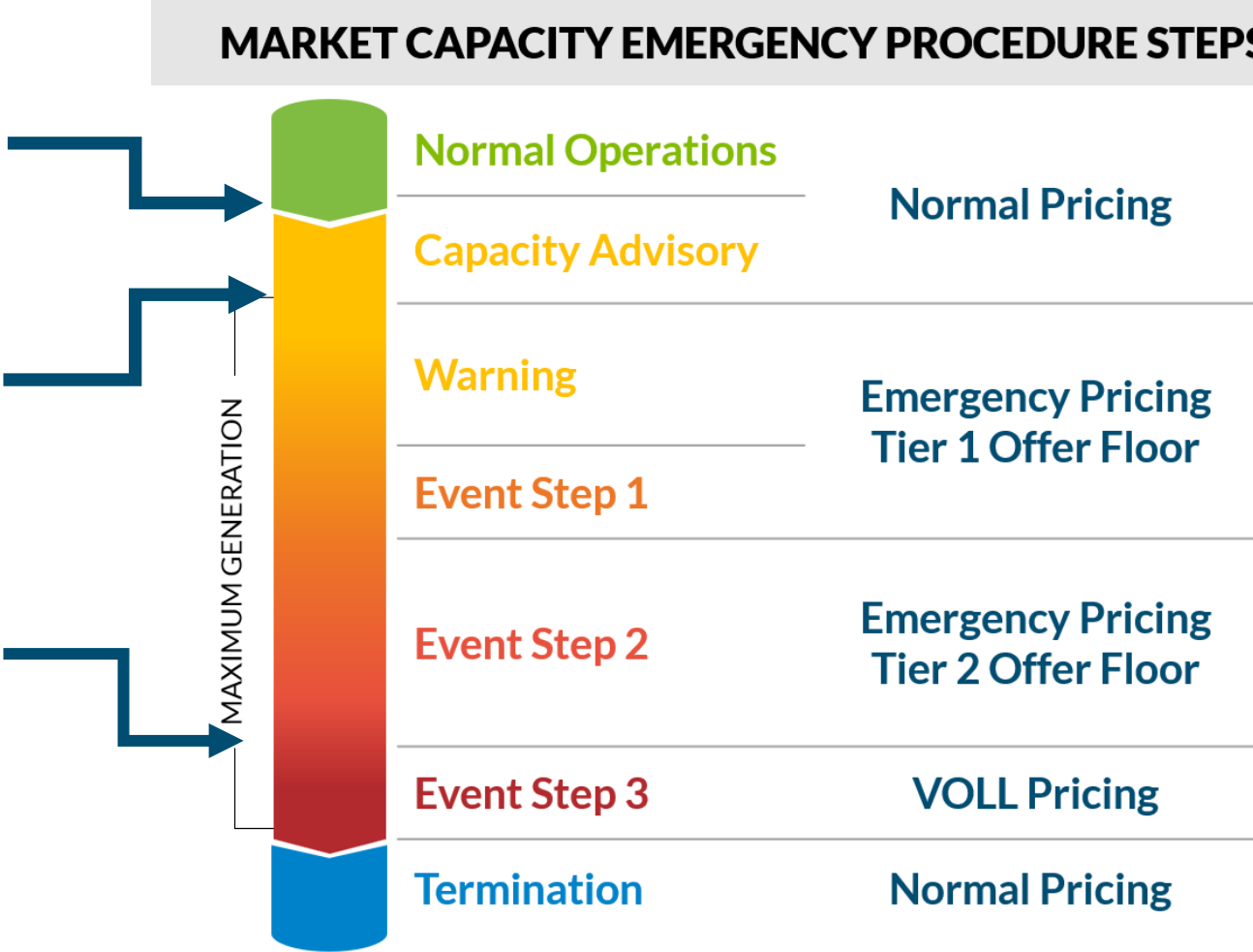


FLITS Curtailment in Normal & Emergency System Operations

- FLITS loads will not be curtailed to mitigate economic congestion
- Periodic Intermediate Planning and Forward Reliability studies will update base system conditions when FLITS loads must curtail to maintain reliability
- FLITS load may be curtailed in Transmission Emergencies (EOP – 004) or Capacity Emergencies (EOP – 002)
- Curtailment instructions will be issued as far in advance as possible
 - FLITS load must reduce to 0MW by the time instructed without violating the 30MW/minute ramp requirement
 - If an instruction is issued for immediate curtailment the FLITS load must reduce to 0 within 30 minutes or the minimum time achievable without violating the 30MW/minute ramp requirement for FLITS loads larger than 900MW
- Curtailment instructions may not be met by moving Load to another location within MISO without explicit MISO approval
- MISO is evaluating appropriate consequences for failure(s) to curtail including forced remote disconnect, financial penalties, or suspension/revocation of service

This proposal is contemplating three possible participation options for Large Load taking FLITS service in the Planning Resource Auction

- 1. Large Loads taking FLITS that do not have a Planning Resource Auction (PRA) obligation
 - These Loads would need to deploy prior to a Capacity Advisory
- 2. Large Loads taking FLITS have a PRA obligation and are required to participate as a Load Modifying Resource if not backed by Generation
 - The portion of Large Load with FLITS participating as an LMR would need to curtail prior to declaring a Max Gen Emergency
- 3. Large Load taking FLITS that are backed by Generation have a PRA obligation
 - The portion of Large Load with FLITS that are backed by Generation would curtail after LMRs and just prior to declaring an EEA 3



Large load taking FLITS is not eligible for ARR entitlements.

- Congestion costs to other customers can be mitigated through the ARR/FTR mechanism
- LSEs will not be permitted to include the interim or permanent FLITS portion of their Load in the ARR process
- An ARR Entitlement may be obtained for the Firm portion of a Load
 - Example 100 MW of Firm, 50 MW of FLITS, an LSE may nominate up to 100 MW of ARR nominations
- The Tariff currently only permits ARR Entitlements to Load with firm Transmission Service and MISO is not proposing to change this language
 - This is one mechanism to encourage Large Load taking FLITS serve to become Firm
- FLITS Load will be excluded from receiving Excessive Congestion Funds after the FTR Annual Distribution

Large loads taking FLITS may not participate as a Demand Response Resource nor Emergency Demand Resource

- In Order 745, FERC excludes compensation for “demand response under programs that RTOs and ISOs administer for reliability or emergency conditions”
- Precluding Loads from participating as a DRR is done for many reasons:
 - FLITS loads participate on an as-available basis and have mandatory curtailment directives under pre-defined conditions which obligates them to curtail for reliability reasons and distinguishes them from other loads
 - The curtailment obligation presents gaming opportunities
 - FLITS load could be compensated for curtailment it would otherwise be required to do for reliability reasons
 - Market Participants may sell back their Day-Ahead position in real-time if their Demand bids in the Day-Ahead are greater than their real-time Demand
 - Allowing participation as a DRR would also result in uplift paid for by Load taking firm Transmission Service
- FLITS loads have incentive to move to Firm Transmission Service and become fully eligible to participate in the Energy markets

Stakeholder Feedback Request

- MISO requests feedback on **Non-Firm Transmission Service (FLITS) (LLWG-2026-5)** by Wednesday August 19, 2026.
 - Please provide specific feedback on the questions on Resource Adequacy on slide 10
 - Please provide any other feedback on the proposal
- Feedback requests and responses are managed through the Feedback Tool on the MISO website: <https://www.misoenergy.org/engage/stakeholder-feedback/>

Next Steps

- Gather and review feedback on today's presentation
- Update FLITS proposal incorporating feedback
- Additional coordination with TOs on rates outside of LLWG
- Present an updated FLITS proposal at the LLWG in September

Contact

Large Load Program

largeloadprogram@misoenergy.org
