



Flexible Large Load Integration Transmission Service

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

Large Load Working Group

September 9, 2026

Purpose & Key Takeaway

Purpose

The focus of today's presentation is limited to the Flexible Large Load Interim Transmission Service (FLITS) which is intended to address the Interim NITS findings from the show cause order

Key Takeaways

- Changes to the FLITS proposal from the last presentation include:
 - ARR Entitlements will not be granted to the non-firm portion of the Large Load
 - MISO is not proposing special rules for Large Loads in the Resource Adequacy construct
- MISO continues to develop a permanent non-firm Transmission Service option and will present an update to this Transmission Service at the Oct 8th LLWG
- MISO will post first draft Tariff language in the next week

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• Expedited generation• Fast load studies• Aligned load / generation studies		<ul style="list-style-type: none">• Transparent alignment of costs with large load drivers• Co-located resources• Non-firm service option• Firm service step-up option		<ul style="list-style-type: none">• Clear requirements• Operations system enhancements• Market pricing signals• Demand response and new reserve market products

Interim NITS and the gap in today's process

FERC show cause order

Therefore, we are concerned that MISO's Tariff does not include transmission services that reflect the use of the transmission system by Eligible Customers on behalf of flexible large load, on both an interim and permanent basis. ... Specifically, 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) ...

Today's NITS process

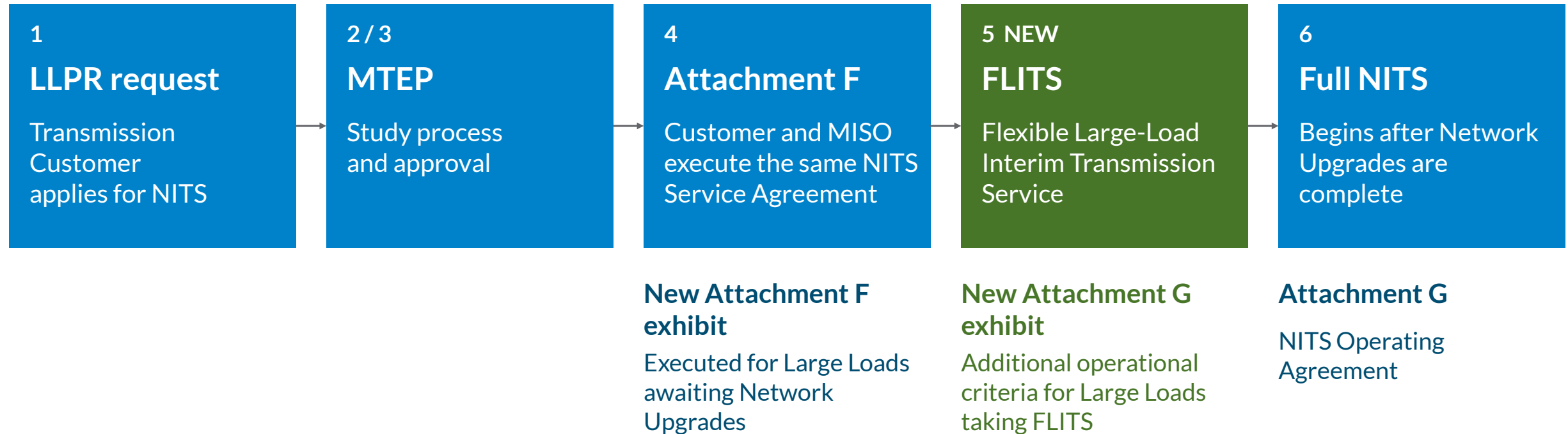


Why the current process cannot provide interim NITS

Section 29.3: NITS cannot commence until installation of all equipment specified in the Network Operating Agreement is complete.

FLITS adds interim service before full NITS

Flexible Large-Load Interim Transmission Service provides time-limited, non-firm Interim NITS while Network Upgrades are built.



Large Load growth of 25 MW or more

Cumulative growth since obtaining Attachment F requires an MTEP/EPR/LLPR study

FLITS

Flexible Large-load Interim Transmission Service

FLITS is an extension to NITS which may be available to Large Loads already studied in the MTEP, EPR, or the proposed Large Load Project Review process

- Transmission customers will be notified in advance of the maximum non-firm service available for a large load, and receive notice as early as possible if that service level can no longer be maintained
- MISO is developing studies to determine when Curtailment for Large Load taking FLITS will occur
- To facilitate the combination of firm and non-firm Transmission Service, separate individual EPNodes and CPNodes are required
- MISO is not proposing special rules for Large Loads in the Resource Adequacy construct
- ARR Entitlements will continue to be restricted to firm Load only
- FLITS can be utilized with Firm Service Step up
- MISO is recommending FLITS charges are determined through Schedule 9 and FLITS be considered Network Load in almost all cases

Transmission customers will be notified in advance of the maximum non-firm service available for a large load, and receive notice as early as possible if that service level can no longer be maintained

1. MTEP Study
Upgrades identified

- Upgrades identified to reach requested level service level*
- Transmission Customers requesting NITS on behalf of Large Loads are studied through the MTEP/EPR/LLPR
 - These studies are discussed further in the Large Load Application and Study Process (LLWG-2026-7)

2. System Impact Study
Attachment G executed

- Look at system intact and determine maximum non-firm service a large load can get (between 0 and requested service level) and non-firm service curtailment levels and triggers*
- Transmission Customers requesting to commence non-firm operations prior to completion of Network Upgrades
 - Execute Attachment G – Form of Network Operating Agreement for Network Service
- FLITS may be requested in addition to a Firm Service Step Up (FSSU) but is not required

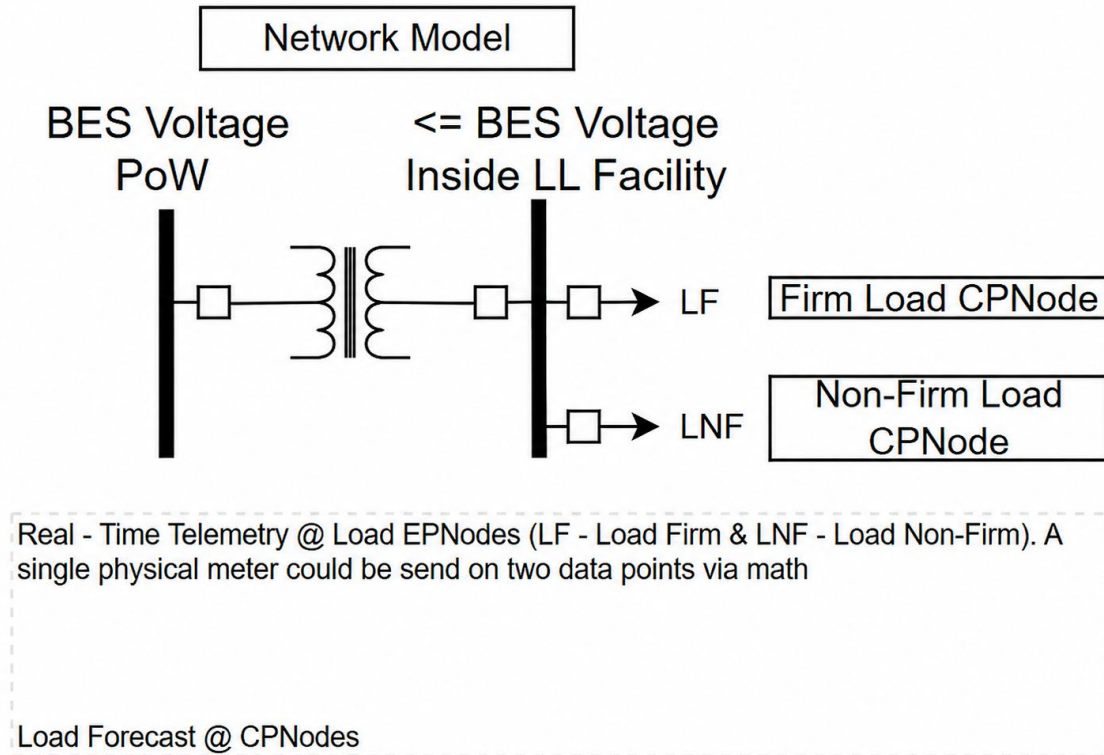
3. Operations Study
Load notified of service curtailment

- As system state changes, MISO validates if large load needs to operate below the established non-firm service levels, providing as much notice as possible*
- Validate non-firm service curtailment levels and triggers established through System Impact Studies under near real-time system conditions, if warranted.
 - Coordinate with and communicate the operating plan to the TO/LSE, including any proposed reductions to the agreed-upon non-firm service levels and the system conditions under which those levels would apply.
 - Provide awareness and visibility of the operating plan to MISO real-time operations.

Curtailment for Large Load taking FLITS

- A Large Load taking FLITS will...
 - **not** be curtailed to mitigate economic congestion
 - be curtailed with as much advance notice as possible in specific non-emergency conditions identified in the new Attachment G Exhibit and by studies triggered by changing system conditions
 - be curtailed in Transmission Emergencies (EOP – 004)
 - be curtailed at the same priority as all other firm load in capacity emergencies (EOP – 002)
 - be curtailed after non-firm Point-to-Point and the proposed permanent non-firm Transmission Service but prior to NITS, Firm Point-to-Point, and the proposed permanent firm Transmission Service
- Curtailed Large Load may not be moved to another location within MISO without explicit MISO approval
- If a Large Load taking FLITS fails to curtail MISO operators will implement remote disconnect procedures
- Large Load participating as an LMR that fails to curtail in a capacity emergency is subject to standard LMR penalties
- Large Load that fails to curtail in all other situations is subject to unreserved use penalties, additional financial penalties for repeated failure, and may have its transmission service terminated

To facilitate the combination of firm and non-firm Transmission Service, separate individual EPNodes and CPNodes are required



- All Large Loads will be required to have their own CPNode(s) comprised of underlying EPNodes associated with the Large Load
 - Large Loads must be their own Load Zone
- A Transmission Owner must provide a CPNode for the firm portion and CPNode for the non-firm portion of the Large Load
 - This requires separate Load Zones for the firm and the non-firm portion of the Load
- All Load is assigned to the firm portion of the Large Load first until all firm service has been used – all excess MWs will be assigned to the non-firm EPNode(s)

MISO is not proposing special rules for Large Loads in the Resource Adequacy construct

- All Large Loads, regardless of Transmission Service type are required to be included in the Coincident Peak Demand forecast
- Large Load may be registered as a Load Modifying Resource
- Large Load taking non-firm Transmission Service must be included in the Coincident Peak Demand forecast to the amount submitted in the Attachment F Exhibit
- MISO will discuss the broader issues related to any new Load coming on mid-Planning Year at the November RASC

ARR Entitlements and Supply Side Participation

ARR Entitlements

- Only the NITS portion of a Large Load (i.e. firm) will be eligible to receive an ARR Entitlements
 - The FLITS portion of the Large Load (i.e. non-firm) will not be permitted to receive ARR Entitlements
- Financial Transmission Rights (FTRs) may still be obtained through the FTR Auction for the Large Load
- Large Loads receiving non-firm Transmission Service under NITS/FLITS are excluded from the Peak Usage calculation and ARR Entitlements
 - The portion of the Large Load receiving firm Transmission Service under NITS/FLITS will be included in the Peak Usage calculation and is eligible to receive ARR Entitlements

Participation as a DRR or EDR will be prohibited for all non-firm portions of Large Loads

- All Large Load with FLITS will be prohibited from participation as a supply-side resource (excepting Load Modifying Resources) due to their classification as a reliability-based program
- Large Load with firm Transmission Service are eligible to participate as a DRR or EDR provided the Load CPNode associated with the non-firm portion of the Load has 0 MW of Load
- Large Load taking FLITS may be registered as a Load Modifying Resource

Stakeholder Feedback Request

- MISO requests feedback on **FLITS Transmission Service** by October 2, 2026:
 - Please provide feedback on any design elements that appear to be missing as it pertains to the Interim NITS option only
- MISO will also request feedback on the **Tariff Redlines on FLITS Transmission Service** two weeks after posting of the Tariff Redlines:
 - Please provide feedback on the Tariff redlines and what, if any, additional Sections/Attachments/Schedules other than those related to rate design (Schedule 9 and Attachment O) are missing
- Feedback requests and responses are managed through the Feedback Tool on the MISO website: <https://www.misoenergy.org/engage/stakeholder-feedback/>

Contact

Large Load Program

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