



MISO Response to Feedback

Large Load Working Group LLWG

Flexible Large-Load Interconnections and Transmission Service (FLITS) Proposal (LLWG-2026-5)

September 9, 2026

Purpose & Key Takeaway

Purpose

Stakeholder feedback was taken into consideration to improve the design for non-firm Transmission Service and MISO appreciates stakeholders quickly providing actionable feedback

Key Takeaways

- MISO received 23 pieces of feedback to its initial discussion on non-firm Transmission Service
- A variety of opinions were expressed, though most stakeholders provided feedback indicating a desire to see non-firm LL be included in the Coincident Peak Demand forecast
- Several stakeholders raised concerns or asked questions regarding congestion prices, cost shifting, curtailment priority and several other issues
- This feedback is written with the Sept 9th draft of the non-firm options and therefore excludes feedback on issues that are no longer being considered, please see the Sept 9th presentation for the latest design proposal
 - Not all questions have been answered to prevent confusion with the rapidly evolving design

Resource Adequacy and the BITS proposal

STAKEHOLDER COMMENTS	MISO RESPONSE
<p>Most stakeholders submitted feedback on Resource Adequacy and MISO appreciates the attention paid in the stakeholder community to Resource Adequacy.</p> <p>Overall, 12 stakeholders, including OMS, indicating support for Large Load to be included in the Coincident Peak Demand forecasts, 2 stakeholders indicated support for keeping the non-firm portion of these Loads out of the RA obligation, and 4 stakeholders desired additional conversation before selecting an option.</p>	<p>MISO will include all Load in the obligation for the Coincident Peak Demand forecast and treat all Loads equally. This means Transmission Service will not impact curtailment for Resource Adequacy purposes and Large Load taking non-firm Transmission Service will be eligible to participate as a Load Modifying Resource.</p>
<p>MISO also received several pieces of feedback requesting MISOs position on the BITS proposal or for MISO to proceed with the BITS proposal.</p>	<p>MISO has viewed the FLITS and the BITS proposal as very similar, with BITS being a subset of the FLITS proposal.</p> <p>Given stakeholder feedback and after reviewing the purpose of the Transmission Services, MISO will be splitting FLITS into an Interim NITS option titled FLITS and a Contract Demand Transmission Service. FLITS will now be an interim only option and is very similar to BITS though Resource Adequacy will be handled differently and MISO is considering providing all Load taking FLITS service ARR Entitlements.</p>

Stakeholders have concerns with congestion costs being shifted

STAKEHOLDER COMMENTS	MISO RESPONSE
<p>MISO has interpreted the FERC order narrowly and will not be curtailing Large Loads taking non-firm Transmission Service based on LMP. Stakeholders expressed concerns with this approach. MISO will continue to discuss whether and to what degree DA/RT prices can inform curtailment decisions to maximize reliability without requiring these Loads to curtail too frequently.</p>	<p>At this time, MISO does not plan to curtail based on prices; however, MISO will continue to discuss whether and to what degree DA/RT prices can inform curtailment decisions to maximize reliability without requiring these Loads to curtail too frequently.</p>
<p>Regarding the ARR/FTR solution, stakeholders expressed concern that the ARR/FTR market may not provide an adequate hedge against congestion. Stakeholders also stated that converting an ARR to an FTR may result in additional charges to the FTR holder if the congestion reverses because of a Large Load; thereby increasing costs to ratepayers even further than the congestion prices because of the FTR obligation.</p>	<p>MISO recognizes stakeholder concerns regarding the ARR/FTR market and is engaged in work at the Markets Subcommittee to help improve the ability of LSE's to obtain a hedge against congestion.</p> <p>Currently, MISO is considering whether to permit ARR Entitlements for all Large Load taking FLITS/NITS service (i.e. that combination of NITS with an interim non-firm option while Transmission Upgrades are being made) and exclude CPNodes associated with a Large Load taking Contract Demand Transmission Service from being used as a sink for an ARR Entitlement.</p> <p>MISO also recognizes the concerns of congestion reversing leading to additional charges and will continue to evaluate the functioning of the FTR markets and the ability for LSEs to hedge.</p>

Several Stakeholders also asked for more information about curtailment

STAKEHOLDER COMMENTS	MISO RESPONSE
Stakeholders asked questions about curtailment priority and whether or not FLITS (i.e. non-firm Interim NITS) would be curtailed with or after non-firm Large Load taking Contract Demand Transmission Service or Non-Firm Point-to-Point Transmission Service	MISO is still considering the curtailment priority ordering and whether it is appropriate to curtail FLITS before other non-firm Large Load.
Other stakeholders asked questions about curtailment priority within Large Loads; i.e. will Large Load coming on the system first be curtailed prior to Large Loads that come on at a later date.	MISO intends to curtail these Large Loads on a first-come, first-served basis in keeping with current curtailment rules for Non-Firm Transmission Service. This may change as MISO continues to consider operational details and to what extent this curtailment ordering is possible.
Several stakeholders raised concerns with the fixed 30 MW/min ramp rate proposed by MISO. They pointed out that Transmission Emergencies require faster response and that it may be necessary for these Loads to curtail very rapidly. Questions were also raised about the penalties for failing to curtail.	MISO agrees with stakeholders that limiting the ramp rate to 30 MW/min for curtailment is an overly prescriptive design and has adjusted the curtailment to be defined by the time the instruction is issued. MISO will continue to flesh out the curtailment requirements and any associated penalties for failing to curtail.
Another question concerned when curtailment instructions will be issued.	<p>MISO will endeavor to issue curtailment directives as far in advance as possible. More specific details will be shared as soon as possible; however, only a high-level requirement for curtailment will be defined in the Tariff and specific operational details will continue to be discussed after MISO has made its Tariff filing.</p> <p>Currently, curtailment will be for the following reasons:</p> <ol style="list-style-type: none">1. Pre-identified Transmission System conditions specific to each Large Load – these curtailments will be defined when the Large Load is initially studied with periodic updates providing additional curtailment requirements2. As the first step when a Transmission Emergency is imminent

Several Stakeholders asked about planning studies and rates of service

STAKEHOLDER COMMENTS	MISO RESPONSE
<p>Different rates should be assigned to Large Load taking interim or permanent non-firm service. In particular, permanent non-firm service that is curtailed at system peak may be contributing to a reduced rate of service.</p> <p>One option we have explored in other venues is a Peak Growth Contribution Modifier (PGCM) mechanism, assigned by large load customers. This approach credits back some portion of the transmission contribution for any peak growth not attributable to a particular customer, while retaining a cost assignment share for the system at the time of the large load's initial energization.</p>	<p>MISO is working directly with the Transmission Owners to establish just and reasonable Transmission Service rates and intends to bring these rates before stakeholders by the October 29th LLWG.</p>
<p>To allow stakeholders to assess MISO's FLITS proposal, MISO should specify the study methodology and criteria it would apply to determine the MW of FLITS it would grant in response to a request. In addition, MISO should limit the build for FLITS load to the facilities needed to interconnect the load.</p> <p>We recommend a standardized study framework defining assumptions, study frequency, treatment and priority of overlapping requests, re-study triggers, coordination with Transmission Owners, and the notice provided before a new curtailment condition becomes effective. MISO should demonstrate that this framework can be administered within the promised service timeline before FLITS is implemented. Similarly, MISO should capture input from transmission operator stakeholders regarding the timing, cost, and duration of implementing a FLITS service product prior to implementation of real time operator tool(s) to avoid the process becoming overly burdensome within the BES.</p>	<p>MISO appreciates this feedback and is working hard to develop appropriate planning studies and processes. MISO is committed to maintaining a safe, reliable, and efficient operation of the Transmission System. MISO is working with the MISO TO's to develop study processes and clearly assign responsibility for who will do the studies, provide approvals, identify necessary upgrades, and identify the conditions under which these Loads will be required to curtail.</p> <p>Stakeholders with an interest in planning are advised to follow the Large Load Application and Study Process that is ongoing at the Large Load Working Group.</p>

Other Stakeholder questions I

STAKEHOLDER COMMENTS	MISO RESPONSE
<p>We request further clarity and information on how MISO intends the CPNode treatment for Large Loads to work at all levels.</p>	<p>MISO has adjusted the presentation to reflect the correct modeling requirement and apologizes for the error at the August 12th presentation. The correct diagram is shown on the Sept 9th presentation.</p> <p>MISO will require all Large Load taking FLITS (i.e. the interim NITS Transmission Service) or Contract Demand to provide two (2) EPNodes, each associated with a separate Load CPNode. These CPNodes may not include the output of any behind the meter generator, whether registered in the MISO market or not. This ensures the Load is measured at its Gross consumption, a core requirement of the FERC show cause.</p> <p>These Large Load CPNodes will function in all ways like a normal Load CPNode; requiring separate CPNodes provides additional insights to both MISO and State regulators about the consumption and costs of Large Load and ensures just and reasonable Transmission Rate charges and improved Load forecasting, planning, and reliability.</p>
<p>A few stakeholders requested delaying the filing of the non-firm Transmission Service option to permit more time for stakeholder feedback.</p>	<p>MISO does not have the ability to delay the filing while meeting the requirements of the Show Cause order. Stakeholders can expect continued work to improve the Transmission Services after the filing as any gaps are identified and additional details are fleshed out.</p>

Other Stakeholder questions II

STAKEHOLDER COMMENTS	MISO RESPONSE
<p>Some stakeholders requested that all Load be permitted to take FLITS and Contract Demand Transmission Service.</p>	<p>MISO will only permit Large Load to take these Transmission Services. This helps to limit the scope and prevent any undesired impacts to occur; for example, the requirement to have two separate EPNodes/CPNodes assumes an ability for these Loads to be identifiable at the BES level from discrete connection points. Other types of Loads, such as municipalities or smaller Loads become much more difficult to clearly define and therefore are excluded.</p>
<p>At the 8/12/2026 LLWG, MISO presented again on non-firm load, but it had not yet responded to the feedback request “Non-Firm Large Load,” due 7/31. For the sake of efficiency and out of respect, before presenting again on an issue, MISO should respond to any applicable feedback requests.</p>	<p>MISO appreciates this feedback and apologizes for the delay in responding to feedback. MISO has incorporated the following stakeholder feedback into the design proposal even with the delay to the formal response being created:</p> <ol style="list-style-type: none">1. How Resource Adequacy will be treated.2. Splitting the Transmission Service into two separate paths to provide clarity and ease of understanding.3. Removing the 30 MW/min ramp rate restriction4. MISO is re-considering treatment for the ARR Entitlements

Other Stakeholder questions III

STAKEHOLDER COMMENTS	MISO RESPONSE
Will there be a maximum load size that can be considered?	MISO is not considering placing restrictions on the size of a Large Load taking non-firm Transmission Service.
Will MISO limit the number of Large Loads taking non-firm Transmission Service within a TPZ, LRZ, or other operationally relevant area?	MISO currently does not plan to put this type of limit in place. The first-come, first-served curtailment priority being considered is expected to naturally limit the number of Large Load taking non-firm Transmission Service within an operationally relevant area.
Will Large Load be required to take FLITS (i.e. Interim NITS) Transmission Service or Contract Demand Transmission Service?	<p>No. A Large Load may continue to take NITS Transmission Service and wait to come online until all upgrades are completed. MISO views FLITS to be an augmentation of the NITS Transmission Service, not a replacement.</p> <p>MISO is considering requiring Large Load to take either NITS/FLITS or Contract Demand Transmission Service and limiting the ability for Large Load to take Point-to-Point Transmission Service; however, no decision has been made yet.</p>
Some stakeholders expressed concern that the FERC show cause order does not require MISO to develop a permanent non-firm Transmission Service.	MISO respectfully disagrees and understands that FERC has explicitly directed a permanent non-firm Transmission Service be developed within each ISO/RTO. For example, see paragraph 117 of the June 18 th PJM Order. ¹

P117. We do not find Exelon and FirstEnergy’s argument availing. The mere fact that there may be preexisting mechanisms in the Tariff to accomplish something (even assuming that they are equivalent, which we do not) does not mean that adding an additional mechanism is not just and reasonable. Exelon and FirstEnergy offer no justification or citation to support the proposition that having multiple provisions targeted at similar objectives is not just and reasonable.

Other Stakeholder questions IV

STAKEHOLDER COMMENTS	MISO RESPONSE
<p>As MISO refines the tariff language for FLITS, we encourage MISO to clarify that large loads can satisfy the operational criteria for "flexible load" through hardware and software solutions, including onsite dispatchable generation operating behind-the-meter, to achieve the real-time operational flexibility required for non-firm service.</p>	<p>If a Large Load is co-located with a Generation Resource receiving capacity payments (i.e. a resource registered in the MISO market that is not a ZG Resource) and this Load is curtailed during an EEA 3 declaration; the curtailment must be by the directed amount and the Generation Resource is expected to push power onto the Transmission System.</p> <p>If the Large Load is co-located with a ZG Resource or a BTMG; the Load may continue to consume via the BTMG/ZG Resource only.</p> <p>MISO will continue to discuss if this treatment should be extended to all other curtailment directives or if the co-located Generation Resource may serve the Load directly excepting the above discussed EEA 3 declaration rules.</p>
<p>FLITS and Contract Demand Transmission Services should operate as part of coordinated service options that allows customers to switch between and/or combine the suite of large load rules and the optionality/flexibility they provide – i.e. firm transmission service, non-firm transmission service, firm step up service and generation-load arrangements.</p>	<p>MISO is building these Transmission Services as part of the broader rules and will require all non-firm Large Load to fully comply with the Interconnection Reliability Rules filed at FERC.</p> <p>Switching between Transmission Services will be limited to FLITS - > NITS; FLITS may be added to a Large Load with NITS service that wishes to expand; and Contract Demand Transmission Service may switch to NITS. NITS will NOT be permitted to switch to Contract Demand Transmission Service.</p>

Other Stakeholder questions V

STAKEHOLDER COMMENTS	MISO RESPONSE
<p>Based on MISO’s presentation at the 8/12/2026 LLWG and the discussion, MISO is concerned that a non-firm transmission service option may be too attractive. Because interim FLITS is temporary, it would not pose the same incentive concerns permanent FLITS would.</p>	<p>MISO aims to develop Transmission Services that provide a pathway for Large Load to connect to the Transmission System quickly while maintaining overall system reliability, assigning costs in a just and reasonable manner, and ensuring that Large Loads benefiting from the Transmission System pay for these services even if not drawing power directly from the Transmission System.</p> <p>To the extent a Large Load developer is considering which Transmission Service to take; MISO seeks to develop clear tradeoffs to help Large Load customers make efficient decisions.</p>
<p>During transmission emergencies, we believe it is important that MISO can remotely disconnect loads that do not adhere to MISO's curtailment instructions. Relying on penalties may be ineffective in ensuring that large loads curtail when needed to avoid overloading transmission facilities.</p> <p>Other stakeholders raised concerns about how RAS equipment would interact with the broader Transmission ecosystem and cautioned against leaning against this equipment.</p>	<p>MISO understands FERCs directive to obligate the installation of RAS equipment for Large Load taking Contract Demand Transmission Service. To the extent that this is an obligation, MISO is working with the Transmission Operators (recall unlike PJM, MISO is not the Transmission Operator in the MISO footprint) to determine appropriate requirements for RAS equipment.</p>

Stakeholder Concerns

STAKEHOLDER COMMENTS	MISO RESPONSE
<p>From a reliability perspective, in the short run, we do not see a distinction between interim and permanent FLITS load, given MISO would curtail each to maintain reliability. However, in the long run, while Interim FLITS load would fluctuate as MISO approves new interim FLITS load and existing interim FLITS load transitions to firm, permanent FLITS load could potentially grow, further increasing the complexity of operating the system reliably.</p>	<p>MISO appreciates this feedback and will continue to evaluate any additional limitations that need to be placed on Contract Demand Transmission Service as the system evolves.</p> <p>One concern MISO shares with the stakeholder is ensuring OASIS is prepared to handle this type of Transmission Service and that MISO operations is ready to manage these Loads in an efficient manner which may inform a later Effective Date.</p>
<p>The FERC Show Cause order discusses the ability of flexible large loads to respond to price signals as a justification for the need for non-firm transmission service. MISO's proposal does not require that type of responsiveness. Non-firm load curtailment may be best conditioned on price signal in the energy market in combination with administrative capacity emergency status, to balance both economic and operational risks as conditions tighten. If large loads taking service under FLITS cause or worsen congestion, requiring curtailment based on price signals could help ensure service is only available at times to limit the potential to negatively impact other customers.</p>	<p>MISO appreciates this feedback and will continue to evaluate the show cause to properly understand all requirements envisioned by FERC.</p>
<p>We think MISO's current Tariff remains reasonable without either interim or permanent FLITS and MISO should explain to stakeholders why that is not the case.</p>	<p>MISO will articulate at the Sept 9th presentation why the current Transmission Services are not sufficient to address the goals expressed in the FERC show cause order.</p>

Contact

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