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November 10, 2026

To: MISO Large Load Program

Re: Comments of ON Energy Storage, Inc. on MISO's Power-Fluctuation Propagation Study Methodology (LLWG-2026-3, October 29, 2026)

ON Energy Storage, Inc. (ON.energy) submits these comments on the Power-Fluctuation Propagation Study (PFPS) framework that MISO presented at the October 29, 2026 meeting of the Large Load Working Group (LLWG).[1] ON.energy builds and operates power systems for AI data centers, including medium-voltage, dual-conversion uninterruptible power supply (UPS) systems with integrated battery energy storage (BESS).

ON.energy supports MISO's objective of technically supported, subregional power-fluctuation limits for the 2027 Large Load Project Review (LLPR) cycle and agrees that "a simple MW limit should be supported by system-specific analysis." These comments respond to MISO's request for feedback on limit development, compliance demonstrations, and acceptable mitigation alternatives.[2] ON.energy recommends that MISO:

1. Recognize dual-conversion UPS and BESS as eligible mitigation for power fluctuations, subject to technology-neutral performance requirements demonstrated through project-specific studies.

2. Measure fluctuations in aggregate net Demand at the Point(s) of Withdrawal (PoW), including computational, cooling, and mechanical load, with credit for demonstrated UPS/BESS buffering and other facility-side controls.

[1] MISO, Large Load Power-Fluctuation Propagation Study (PFPS): Technical Basis and Study Framework (LLWG-2026-3), LLWG Presentation (Oct. 29, 2026) [hereinafter PFPS Presentation].
[2] PFPS Presentation slides 5, 13-14.

3. Publish the subregional limits, applicable frequency ranges, measurement windows, and modeling assumptions, with their technical basis, before the 2027 LLPR cycle.

I. MISO SHOULD RECOGNIZE UPS AND BESS AS ELIGIBLE MITIGATION

MISO's framework lists the use of "storage, UPS, or fast energy buffers to absorb and supply active power and smooth net withdrawal variations" among the ways to mitigate fluctuations, but describes them as "[i]llustrative approaches only" and not a "commitment to specific mitigation requirements."[3] MISO should expressly recognize facility-side energy buffering, including dual-conversion UPS and BESS, as eligible mitigation where validated studies demonstrate acceptable net power fluctuations at the PoW, including relevant equipment and control interactions.[4]

The requirement should remain technology-neutral: MISO should specify the net performance required at the PoW and accept any equipment or controls that achieve it, as draft Section 9.2 does for ride-through.[5] Validated equipment-level models should be reusable across projects with materially equivalent equipment and controls, subject to project-specific verification of aggregate facility performance.[6]

II. FLUCTUATIONS SHOULD BE MEASURED AS NET WITHDRAWAL AT THE POINT(S) OF WITHDRAWAL

PFPS translates a "[c]andidate Large Load power variation" through the network, and MISO recognizes that mitigation effectiveness "depends on the resulting net power variation at the

[3] PFPS Presentation slide 6.
[4] See Comments of ON Energy Storage, Inc. on MISO's Large Load Application and Study Process (LLWG-2026-7), at 3 (Nov. 4, 2026) [hereinafter ON.energy November 4 Comments].
[5] Midcontinent Indep. Sys. Operator, Inc., Business Practices Manual for Large Loads § 9.2 (redline draft Oct. 8, 2026); Comments of ON Energy Storage, Inc. on MISO's Revised Large Load Ride-Through Requirements, Section 9 (LLWG-2026-3), at 6 (Oct. 20, 2026); Comments of ON Energy Storage, Inc. on Draft BPM-032, Section 11, Large Load Ride-Through Requirements (LLWG-2026-3), at 12-13 (Sept. 8, 2026) [hereinafter ON.energy September 8 Comments].
[6] ON.energy November 4 Comments at 10; ON.energy September 8 Comments at 15.

PoW."[7] The Business Practices Manual for Large Loads (BPM) should specify that the source variation subject to any limit is the aggregate net Demand of the Large Load at its PoW(s), including computational, cooling, and mechanical load, net of UPS/BESS buffering and facility controls. That is what the Transmission System experiences and the basis MISO proposes for ramp compliance.[8]

III. MISO SHOULD PUBLISH LIMITS, CRITERIA, AND ASSUMPTIONS BEFORE THE 2027 LLPR CYCLE

MISO plans to establish limits in December 2026 for the 2027 LLPR, but the endurance limit and load shape ratio are "proposed screening assumptions" that are "subject to further technical justification and validation."[9] The industry criteria MISO is benchmarking differ in form (time-domain or frequency-domain), evaluation signal, and frequency range, and mitigation must be sized to each.[10]

ON.energy asks MISO to publish, before the first 2027 LLPR application deadline, the subregional limits and supporting study results; the form of each limit, the frequency range the evaluation signal must preserve, and the measurement window; and the modeling assumptions and source-variation profile to be demonstrated against. Each application should be evaluated against the criteria posted at its deadline.[11]

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[7] PFPS Presentation slides 6, 12.
[8] MISO, Ramp Requirements (LLWG-2026-3), LLWG Presentation, slide 3 (Oct. 8, 2026); Comments of ON Energy Storage, Inc. on MISO's Material Adverse Effect Framework, Draft BPM-033 Section 2 (LLWG-2026-3), at 5 (Nov. 6, 2026).
[9] PFPS Presentation slides 10, 13.
[10] PFPS Presentation slide 9.
[11] See ON.energy November 4 Comments at 9.

IV. CONCLUSION

ON.energy supports performance-based, technology-neutral limits and appreciates the opportunity to provide these comments.

Respectfully submitted,

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