Organization of MISO States (OMS)
Transmission Planning Work Group
Response to LLWG Feedback Request
Submitted on October 2, 2026

During the September 23, 2026 Large Load Working Group (LLWG) meeting, MISO presented changes to its Non-Firm Transmission Service proposal (i.e., Flexible Large Load Interconnections and Transmission Service (FLITS). Stakeholders were invited to provide feedback on any design elements that appear to be missing as they pertain to the Interim Network Integration Transmission Service (NITS) option only.

https://www.misoenergy.org/engage/stakeholder-feedback/2026/llwg-flexible-large-load-interconnections-and-transmission-service-flits-interim-nits-option-llwg-2026-5-20260923/

The OMS Transmission Planning Work Group (OMS TPWG) provides this feedback to MISO regarding the FLITS proposal. **This feedback is from an OMS work group and does not represent a position of the OMS Board of Directors.**

Load Notified of Service Curtailment
Given the increasing layers of operational complexity with large loads on the transmission system, any notifications and/or signals for curtailment should seek to minimize the amount of manual burden on the control room at MISO to avoid preventable mistakes. The OMS TPWG supports using triggers to notify transmission customers serving large loads of curtailment as needed under real-time system conditions and encourages MISO to further these efforts to ensure reliable and streamlined operation of the transmission system as large loads emerge.

Curtailment for Large Load taking FLITS
When applying penalties to large loads who fail to curtail, MISO should ensure these financial penalties are aligned with the large loads' willingness to pay for transmission service to induce the desired behavior. The OMS TPWG is concerned that the budgets of large loads may allow for large loads to simply absorb penalties if workloads remain profitable despite them. For example, although the 200% multiplier on unreserved use penalties and usage of the daily firm Point-to-Point rate may have been sufficient for historic transmission customers to avoid unreserved use, large loads may be willing to pay the penalties if the benefit of increased transmission service outweighs those unreserved use penalties. Similar assessments should be done for other penalties related to taking FLITS. The OMS TPWG supports combining appropriately high penalties with remote disconnect procedures and possible termination of transmission service to mitigate the risk of capital-rich entities seeing penalties as the cost of doing business.

Rate Design
As MISO develops the rate design for FLITS, the OMS TPWG supports including the flexible portion of FLITS load in determining Schedule 9 rates and that it should be used in the Coincident Peak Forecast (CPF) input. A key benefit of interim NITS service is that the large load may come online faster and begin paying for its share of embedded system costs faster than its full load date to the benefit of non-large load customers. Realizing this benefit requires that FLITS load be included in the CPF used in the denominator of the Schedule 9 calculation. The inclusion of FLITS

in Schedule 9 should be aligned as needed once issues raised in Cost Shifting Risk Among Transmission Customers (LLWG-2026-8) have been resolved.

ARR Entitlements

The OMS TPWG supports excluding FLITS load from receiving ARR entitlements and correspondingly excluding FLITS load from the Peak Usage calculation to determine the ARR entitlement MW cap. The OMS TPWG believes a distinction in the treatment of FLITS load in different processes is appropriate – including it in the Resource Adequacy construct and transmission rate calculations, excluding it in the ARR nomination process.

Further, the OMS TPWG is concerned with the current ARR/FTR construct's ability to flexibly adapt to the congestion impacts that the operation of large loads on the system may cause. MISO's Independent Market Monitor has identified this risk in the 2025 State of Market Report as well.[1] With the vast majority of congestion hedges being transacted in the annual FTR auction, a large load materializing on the system part way through the Planning Year may unpredictably shift congestion patterns, causing what was once a prevailing flow path to become counterflow, and vice versa. Although there are opportunities to adjust hedges in the Multi-Period Monthly Auctions (MPMAs), the limited capacity available in these auctions may not be adequate to address the magnitude of change in congestion patterns.

As a result, hedges that Market Participants have prudently acquired could switch to substantial expenses as flows dynamically shift. The OMS TPWG reiterates support for moving the ARR and FTR processes and shifting more transmission capacity to auctions closer to the relevant delivery period for Market Participants to rebalance their portfolios with improved information on system conditions. Given the substantial impact that large loads are likely to have on congestion patterns in MISO, the OMS TPWG maintains that changes to MISO's ARR/FTR construct are *more salient* with the emergence of large loads and raise the need for proposed enhancements to be implemented sooner rather than later.

[1] 2025 STATE OF THE MARKET REPORT - Executive Summary, page xi