

FERC ANOPR

Interconnecting Large Load RTO Compliance and the Consumer Response

NASUCA Summer Meeting

Minneapolis, MN

July 21, 2026

Next Steps on FERC's Orders

Aggressive timeline for action ahead

- **June 18, 2026:** FERC Show Cause Orders issued to six major RTOs/ISOs.
- **Reports on resource adequacy due within 30 days (July 20)**
 - RTOs/ISOs must explain how they plan to ensure adequate generation is available to service existing and new large loads, and any stakeholder conversations underway
- **RTOs/ISOs must respond within 60 days (Aug. 17)**
 - They can seek an abeyance of up to 90 days to develop their own proactive filings, but must provide a detailed plan
 - **Abeyance requests due within 45 days (Aug. 3)**
- **Responses to RTO/ISO filings must be filed within 30 days of RTO/ISO responses (on or about Sept. 16, unless an abeyance is sought)**

FERC Docket #s

- PJM: FERC Docket # EL26-67-000
- SPP: FERC Docket # EL26-68-000
- NY ISO: FERC Docket # EL26-69-000
- MISO: FERC Docket # EL26-70-000
- CAL ISO: FERC Docket # EL26-71-000
- ISO NE: FERC Docket # EL26-72-000

FERC's Large Load Interconnection Orders

“Show cause” orders directed to the six FERC-regulated RTOs/ISOs to speed large load interconnection and address cost and reliability impact concerns

- **Five categories of required reforms to RTO/ISO rules:**
 - 1) Implement clear transmission service application study rules for large loads
 - Includes new requirements to study Advanced Transmission Technologies (ATTs)
 - 2) Adopt pro forma cost recovery agreements to guard against costs shifts and provide additional transparency regarding large load-driven local transmission costs
 - 3) Establish clear rules guiding co-location of large loads with new generation and use of behind-the-meter generation
 - 4) Develop new transmission services to allow large loads to be flexible, i.e., limit use of the system under certain circumstances
 - 5) Create pathways for large customers to bring their own generation by studying large loads and “electrically-proximate generation” together