UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Interconnection of Large Loads to the Interstate Transmission System	Docket No. RM26-4-000

COMMENTS OF THE AMERICAN COUNCIL ON RENEWABLE ENERGY

The American Council on Renewable Energy ("ACORE") submits these comments in response to the Federal Energy Regulatory Commission's ("FERC" or "Commission") October 27 *Notice Inviting Comments* and November 7 *Notice Granting Extension of Time* in the above-captioned docket.

I. INTRODUCTION

ACORE is a national nonprofit organization that unites finance, policy and technology to accelerate the transition to a clean energy economy. Our membership includes investors, developers, manufacturers, utilities, corporate buyers, and professional services firms. The issuance of the Advanced Notice of Proposed Rulemaking ("ANOPR") is an important step, and ACORE supports the initiation of a new Commission rulemaking on the interconnection of large loads. As the Commission approaches the challenges of interconnecting large loads to the grid, we urge the Commission to avoid focusing solely on interconnection and instead take steps to expand and modernize the transmission system to achieve the greatest cost savings and reliability benefits.

Given the complexity and importance of these issues, ACORE recommends that if the Commission were to establish such a rulemaking, it does so with a reasonable timeline that allows for a sufficient evidentiary record and the development of informed and comprehensive

proposed and final rules, rather than seeking to issue a final rule by April 30, 2026 as requested in the ANOPR.

II. Large Loads will Require a Modernized and Expanded Grid

Regardless of the co-location of adjacent or behind-the-meter resources, a significant amount of the demand from these large loads will need to be served by the bulk power system.[1] Through rulemakings, guidance, and technical conferences, the Commission should therefore address needed improvements to the full ecosystem of the grid, especially the expansion of interregional higher-voltage transmission and greater deployment of advanced transmission technologies.

An expansion of transmission, especially long-range and high-voltage lines, is well demonstrated to achieve cost savings. For example, the Southwest Power Pool's Board of Directors has just approved a transmission plan for high-voltage lines that has benefits ranging from $12 to $18 for every dollar spent.[2]

This ANOPR was released two days after the Commission's annual Reliability Technical Conference, where the challenge of load growth was paramount in the discussion. Interregional transmission itself provides much needed capacity value to serve this increasing demand. For example, Invenergy Transmission LLC's testimony reported that the Grain Belt Express

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[1] See for example, Eric G. Gimon, *Dodging the Firm Fixation for Data Centers and The Grid*, Energy Innovation (Nov. 2025), stating at 19 that "a grid connection remains both a sink for surplus and an important backup option; most on-site power is not fully independent and large loads will still want interconnection to the bulk power system." Available at: https://energyinnovation.org/report/dodging-the-firm-fixation-for-data-centers-and-the-grid/

[2] *SPP board advances regional transmission plan to keep pace with accelerating growth and ensure grid reliability* (Nov. 4, 2025), available at: https://spp.org/news-list/spp-board-advances-regional-transmission-plan-to-keep-pace-with-accelerating-growth-and-ensure-grid-reliability/

"provides about 1 GW of RA value to MISO and about 500 MW of RA value to SPP. This value comes from connecting areas with non-coincident peak loads, which reduces the planning reserve margin needed to maintain RA as regions can share resources without needing to build their own capacity."[3]

Moreover, the testimony of American Electric Power Service Corporation ("AEP") at the technical conference on the role of Extra High Voltage ("EHV") transmission explained that: "The accelerating demands of AI and electrification require significantly more generation and transmission capacity than current planning frameworks anticipate. Importantly, generation is only part of the story….EHV transmission, such as 765 kV, can play a critical role in mitigating generation shortages by enabling access to remote generating resources and enhancing power delivery."[4]

One important step, among others, would be for the Commission to work with DOE and the National Laboratories to establish best practices and common methodologies for the forecasting of large loads and their power needs that can be incorporated into the long-term transmission planning process. ACORE also urges the Commission to move forward on a proceeding on the planning for interregional transmission.

Essential to cost-effectively meeting the large load needs is an accelerated deployment of Grid Enhancing Technologies and High-Performance Conductors. The White House AI Action Plan correctly highlighted the need for "advanced grid management technologies and upgrades to

[3] Statement of Matt Holz, Invenergy Transmission LLC at 5, Docket No. AD25-8-000 (Oct. 2025).

[4] Statement of Carlos Casablanca, American Electric Power Service Corporation at 7-8 Docket No. AD25-8-000 (Oct. 2025).

power lines that can increase the amount of electricity transmitted along existing routes."[5] As an analysis by the Brattle Group demonstrated, these technologies provide all of the seven transmission benefits that the Commission identified in Order No. 1920, along with the additional benefits of lower costs, faster installation, complementarity, portability, and reversibility.[6] As the transmission providers move forward with Order No. 1920 compliance and in particular, the development of a process for selecting transmission to meet the identified needs, a full inclusion of these advanced transmission technologies and their benefits will be essential.

III. The Interconnection Needs of Both Large Loads and Generation Should be Integrated with Transmission Planning

An essential component of improving the interconnection of large loads will be to fully integrate interconnection-driven needs into longer-term transmission planning. At the Reliability Technical Conference, AEP also noted that: "Integrated planning frameworks that account for the long-term interaction between transmission needs, generation availability, and load behaviors could produce more effective system solutions."[7] A key lesson from the history of the generator interconnection process is that "most transmission providers do not actively integrate interconnection studies with long-term, proactive transmission planning, instead relying on an

[5] *America's AI Action Plan*, The White House Office of Science & Technology Policy (July 2025) at 15, available at: https://www.whitehouse.gov/wp-content/uploads/2025/07/Americas-AI-Action-Plan.pdf

[6] T. Bruce Tsuchida, Linquan Bai, S. Ziyi Tang, and Jay Caspary, *Incorporating GETs and HPCs into Transmission Planning Under FERC Order 1920*, The Brattle Group and Grid Strategies, LLC, prepared for the American Council on Renewable Energy (April 2025), available at: https://acore.org/resources/incorporating-gets-and-hpcs-into-transmission-planning-under-ferc-order-1920/

[7] Casablanca, at 7-8.

inefficient, piecemeal approach to expanding the grid."[8] The benefits of an integrated approach and the resulting consumer savings were discussed extensively in Panel 1 on the first day of the Commission's September 2024 "Innovations and Efficiencies in Generator Interconnection Workshop."[9] Therefore, as part of this and related proceedings, the Commission should work with the transmission planning regions on improved coordination of transmission planning with the transmission needs created by the interconnection of both generation large loads.

IV. The Commission Can Establish Beneficial Rules for Large Load Interconnection

A recent whitepaper from the Nicholas Institute for Energy, Environment & Sustainability pointed out that "load interconnection processes generally do not currently follow a formal interconnection queue process written into tariffs," and that "the FERC rulemaking would likely first need to create rules around the queuing of load interconnections and then provide for flexible loads to be expedited within that process."[10] The Commission therefore has an opportunity at this time to establish beneficial rules for the interconnection of large loads, while avoiding an overly burdensome or standardized large load interconnection processes. With

[8] Rob Gramlich, John D. Wilson, Richard Seide, Yorgos Raskovic, J. Michael Hagerty, Joe DeLosa III, Johannes Pfeifenberger, *Unlocking America's Energy - How to Efficiently Connect New Generation to the Grid* (August 2024), Grid Strategies LLC & The Brattle Group, available at: https://gridstrategiesllc.com/wp-content/uploads/Exec-Sum-and-Report-Unlocking-Americas-Energy-How-to-Efficiently-Connect-New-Generation-to-the-Grid.pdf.

[9] See for example, Pre-Workshop Comments of John Hagerty, The Brattle Group, at 22, Pre-Workshop Comments of the R Street Institute at 2; Comments of David Mindham, EDP Renewables North America LLC at 2; Comments of Arash Ghodsian, Invenergy Transmission LLC at 2, Docket No. AD24-9-000 (Sep. 2024).

[10] Walsh, S., M. Farmer, A. Zevin, K. Smaczniak, G. Daly, N. Lobel, A. Clements, Y. Guo, and T. Profeta. 2025. *How DOE's Proposed Large Load Interconnection Process Could Unlock the Benefits of Load Flexibility*. NI PB 25-03. Durham, NC: Nicholas Institute for Energy, Environment & Sustainability, Duke University, available at: https://nicholasinstitute.duke.edu/publications/how-does-proposed-large-load-interconnection-process-could-unlock-benefits.

this in mind, ACORE provides the following recommendations to inform a rulemaking on the interconnection of large loads:

- ACORE agrees with the ANOPR recommendations to study load and hybrid facilities together with generating facilities as a means to improve the process efficiency and lower network upgrade costs; and to subject load and hybrid facilities to standardized study deposits, readiness requirements, and withdrawal penalties to provide greater certainty on the likelihood that such interconnection requests will materialize.

- Regarding the ANOPR recommendation to expedite the interconnection of large loads that agree to be curtailable and hybrid facilities that agree to be curtailable and dispatchable, ACORE is concerned that queue prioritization methods can disrupt the processing of needed generation waiting in lengthy interconnection queues. With limited transmission provider resources, expediting these load interconnections could detract from efforts to bring other resources on-line to provide the power needed to meet growing demand. It would be beneficial for the Commission and transmission providers to focus more on holistic transmission planning that integrates the needs of the load and generation in the interconnection queues, than on the prioritization of certain projects.

- The Commission should avoid a serial interconnection process for large load interconnection. As the Commission found in Order No. 2023, such a process introduces significant inefficiencies and contributes to interconnection queue backlogs.

- One gap in the ANOPR principles that should be incorporated into a rulemaking on the interconnection of large loads is to mirror Order No. 2023's requirements for "transmission providers to evaluate the following enumerated list of alternative

transmission technologies: static synchronous compensators, static VAR compensators, advanced power flow control devices, transmission switching, synchronous condensers, voltage source converters, advanced conductors, and tower lifting.[11] We also urge the Commission to include dynamic line ratings in the list of enumerated technologies. Such a requirement could lead to further deployment of these advanced technologies and improve the overall efficiency and capability of the grid.

V. CONCLUSION

ACORE recommends that the Commission's response to the ANOPR advance important reforms for the interconnection of large loads, while also fully defining the problem at hand and taking more holistic steps to address the needed expansion and modernization of the grid.

Respectfully submitted,

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[11] Order No. 2023 at P 1578.