

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

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

**COMMENTS OF ISO NEW ENGLAND INC.**

Pursuant to the Federal Energy Regulatory Commission’s (“FERC” or “Commission”) Notice Inviting Comments issued on October 27, 2025 in the above-referenced docket, ISO New England Inc. (“ISO-NE”) respectfully submits these comments in response to the Advanced Notice of Proposed Rulemaking (“ANOPR”) that the Secretary of Energy (“Secretary”) released on October 23, 2025 for consideration and final action by FERC.

In the ANOPR, the Secretary directs FERC to initiate rulemaking procedures and consider the ANOPR presenting potential reforms to ensure the timely and orderly interconnection of large loads<sup>1</sup> to the transmission system. The ANOPR includes a set of principles to inform the Commission’s rulemaking procedures. ISO-NE is providing comments for some of those principles for the Commission’s consideration in the development of proposed reforms. ISO-NE looks forward to working with the Commission and stakeholders in ensuring that large loads are timely and orderly interconnected to the New England transmission system.

**I. IDENTIFICATION OF ISO-NE; COMMUNICATIONS**

ISO-NE is a private, non-profit entity that serves as the regional transmission organization (“RTO”) for New England. ISO-NE operates the New England bulk power

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<sup>1</sup> For purposes of the ANOPR, large loads are defined as greater than 20 MW, consistent with how FERC has defined large generation resources.

system and administers New England’s organized wholesale electricity market pursuant to the ISO New England Transmission, Markets, and Services Tariff (“ISO-NE Tariff”) and the Transmission Operating Agreement.<sup>2</sup> In its capacity as an RTO, ISO-NE also has the objective to assure that the bulk power system within the New England Control Area conforms to the proper standards of reliability as established by the Northeast Power Coordinating Council (“NPCC”) and the North American Electric Reliability Corporation (“NERC”).

All correspondence and communications concerning these comments should be sent to the following person at the address shown:

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## **II. INTRODUCTION**

ISO-NE agrees that clear principles and rules are needed for the interconnection of large loads and hybrid facilities to the transmission system. The development of these principles and rules could be informed, in part, by the robust processes that already exist in New England, including those supporting administration of requests for Regional Network Service (“RNS”) and Interconnection Service. These processes were recently revised as part of the New England region’s efforts to comply with FERC Order Nos. 2023 and 2023-

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<sup>2</sup> Capitalized terms used but not defined in these Comments have the meaning ascribed to them in the ISO-NE Tariff.

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In New England, Eligible Customers seeking to interconnect their load to Pool Transmission Facilities (“PTF”) for wholesale service proceed under ISO-NE’s RNS process set forth in Section II.B of the ISO-NE Open Access Transmission Tariff (“OATT”).<sup>4</sup> State laws in each of the New England states may impact a large load’s eligibility to take wholesale service under the ISO-NE OATT.

RNS is the ISO-NE-administered regional integrated transmission service that allows Network Customers to use the PTF to move electricity into or within the New England Control Area to serve load in the area. In return for this service, a Network Customer pays a monthly transmission rate based on its share of the Local Network’s aggregate Monthly Regional Network Load, as measured by the Network Customer’s hourly demand during the Local Network’s peak.

Load seeking service while connecting to non-PTF transmission facilities proceeds under the Local Service (“LS”) process,<sup>5</sup> where studies performed to support LS requests are administered by the applicable Participating Transmission Owner, as the Transmission Service Provider.

Prior to the FERC Order Nos. 2023 and 2023-A-related OATT revisions, the RNS process included a serial study framework that was coordinated with the studies for other service requests included in the ISO-NE interconnection queue. Under the OATT revisions made to comply with FERC Order Nos. 2023 and 2023-A, which became effective on

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<sup>3</sup> See *Improvements to Generator Interconnection Procs. & Agreements*, Order No. 2023, 184 FERC ¶ 61,054, *order on reh’g*, 185 FERC ¶ 61,063 (2023) (“FERC Order No. 2023”), *order on reh’g*, Order No. 2023-A, 186 FERC ¶ 61,199, *errata notice*, 188 FERC ¶ 61,134 (2024) (“FERC Order No. 2023-A”). See also *ISO New England Inc.*, 191 FERC ¶ 61,018 (2025).

<sup>4</sup> The OATT is Section II of the ISO-NE Tariff.

<sup>5</sup> See Schedule 21 to the OATT, which provides the terms and conditions for local service from the various Participating Transmission Owners.

August 12, 2024, RNS requests are included in the regional Cluster Study Process framework used for requests for Interconnection Service pursuant to ISO-NE's Large Generator Interconnection Procedures,<sup>6</sup> Small Generator Interconnection Procedures,<sup>7</sup> and Elective Transmission Upgrade Interconnection Procedures.<sup>8</sup> RNS requests requiring study must follow the process and procedures of the Cluster Study and Facilities Study. If ISO-NE determines that upgrades are required to accommodate the RNS request, the costs of the upgrades required will be allocated to the Eligible Customer in a manner consistent with how costs for Generator Interconnection Related Upgrades are allocated to Interconnection Customers under Schedule 11 of the OATT. These new constructs can inform the development of proposed reforms to facilitate the implementation of the ANOPR's Principle 3, which is discussed further below.

### III. COMMENTS ON PRINCIPLES

1. **Principle 1:** The Commission's jurisdiction should be limited to interconnections directly to transmission facilities, consistent with the Commission's seven factor test.

**ISO-NE Comment:** While the ANOPR does not request comments on this principle, ISO-NE recommends that the Commission clarify whether the Commission's jurisdiction is asserted solely for the process of reviewing large load interconnections (*i.e.*, clarity is needed on whether the Commission's jurisdiction extends to the provision of transmission service). If the Commission's jurisdiction is asserted solely for the process of reviewing large load interconnections, then clarity is also needed on whether the Commission's jurisdiction is solely based on where a large load or hybrid

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<sup>6</sup> Schedule 22 to the OATT.

<sup>7</sup> Schedule 23 to the OATT.

<sup>8</sup> Schedule 25 to the OATT.

facility is interconnecting to the existing transmission system (in the case of New England, the Administered Transmission System, which comprises PTF and Non-PTF), regardless of whether the large load or hybrid facility is eligible to take wholesale service under the OATT (*i.e.*, regardless of whether the large load or hybrid facility is pursuing wholesale service, retail service, or another form of service). Clarity with respect to the jurisdictional lines will facilitate implementation, especially given that state laws in each of the New England states may impact ISO-NE's ability to provide transmission service to interconnected large loads. In addition, if the Commission concludes that the seven-factor test should be used to determine the interconnection of large loads, ISO-NE submits that clarity should be provided on who would apply the test to make that determination. The Commission should provide flexibility for the New England region to formulate interconnection procedures that apply to transmission facilities that are already classified as PTF or Non-PTF.

2. **Principle 2:** Consistent with the Commission's *pro forma* Large Generator Interconnection Procedures and Large Generator Interconnection Agreement, the reforms should only apply to new loads greater than 20 MW and, for hybrid facilities, where the load is greater than 20 MW. FERC seeks comments on alternative thresholds, including whether such a threshold is necessary at all.

**ISO-NE Comments:** ISO-NE is generally supportive of applying a MW threshold for the application of a FERC-jurisdictional interconnection process. A MW threshold, however, should be clearly defined. For example, is the proposed 20 MW threshold based on the maximum load, average load, or something else, and where is the load level measured? In addition, rules for interconnection of large loads should address

interconnection of projects in stages. For example, consider a large load customer's proposal to interconnect 30 MW in two stages of 15 MW each. ISO-NE submits that the aggregate total of 30 MW should be captured in the supporting interconnection study to fully evaluate the system impacts of the total amount of load (in the example, 30 MW).

3. **Principle 3:** To the extent practicable, load and hybrid facilities should be studied together with generating facilities. Such an approach will allow for efficient siting of loads and generating facilities and thereby minimize the need for costly network upgrades. For example, siting a large load near or at the same point of interconnection as a new generating facility could reduce the network upgrades needed to interconnect only the load or only the generating facility.

**ISO-NE Comments:** While the ANOPR does not request comments on this principle, ISO-NE offers that this construct exists in New England for RNS requests for new load that require study. Specifically, those requests are included in Cluster Studies conducted pursuant to ISO-NE's Interconnection Procedures. The principle should also establish that upgrades identified in the Cluster Studies (and the corresponding cost responsibility for such upgrades) will be limited to the requests for projects that were part of the same Cluster that included the load and/or hybrid facility. Without this limitation, there could be a potential increase of restudies of previously completed Cluster Studies. For instance, if a new load is proposed for the ongoing Cluster Study, an Interconnection Customer for a generator project included in a previously completed Cluster Study could seek restudy of that Cluster Study in order to possibly reduce previously identified upgrades for the generator. This could negatively impact the

management and efficiency of the interconnection process.

4. **Principle 4:** Like generating facilities, load and hybrid facilities should be subject to standardized study deposits, readiness requirements, and withdrawal penalties. These provisions deter speculative projects and provide transmission providers with more useful information to more accurately forecast demand on their systems. FERC seeks comments on the extent to which the existing study deposits, readiness requirements, and withdrawal penalties can be adopted. FERC also seeks comments on whether additional commitments or financial penalties would be appropriate.

**ISO-NE Comments:** ISO-NE agrees with this principle. In addition, non-financial readiness requirements, such as site control, permits, and equipment orders, should also be included to ensure that only requests for “first ready,” viable, large load and hybrid facility projects enter the interconnection process. Requests for speculative projects will slow down interconnection process activities, as identified and discussed in FERC Order No. 2023.<sup>9</sup>

5. **Principle 5:** Hybrid facilities should be studied based on the amount of injection and/or withdrawal rights requested. For example, a hybrid facility consisting of a 500 MW load and a 600MW generating facility may seek no withdrawal rights and 100 MW of injection rights. This provides incentives for co-location with new generation facilities and ensures efficient buildout of the transmission system.

**ISO-NE Comments:** While the ANOPR does not request comments on this principle, ISO-NE is supportive of this principle, the impacts of which would be reflected in study assumptions. ISO-NE also notes that this principle would not negate the need for

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<sup>9</sup> See FERC Order No. 2023 at PP 48-49, 59.

Interconnection Studies. While this principle may reduce the need to conduct thermal analysis (which are typically straightforward and less time-consuming), other types of analysis such as short circuit, voltage, stability, and electromagnetic transient analyses (which are listed in increasing order of typical complexity and time needed to be conducted) would still be needed. Moreover, some thermal analyses may be needed for proposed hybrid facilities in order to understand the impacts to the system when peak load or generation at a hybrid facility is lost (*see* ISO-NE Comments on Principle 6). Finally, this principle introduces the term “withdrawal rights.” ISO-NE respectfully submits that clarity is needed with respect to how the concept of “withdrawal rights” fits with the currently established transmission service concepts and constructs.

6. **Principle 6:** Any hybrid interconnection shall be required to install the system protection facilities necessary to prevent unauthorized injections or withdrawals that exceed the respective rights. FERC seeks comments on whether other operational limitations should be considered. FERC also seeks comments on the minimum technical requirements for such system protection facilities, whether a hybrid interconnection customer should be subject to penalties for unauthorized injections or withdrawals, how any such penalties should be designed, and how such penalties should be allocated to other transmission customers.

**ISO-NE Comments:** In order for ISO-NE to provide comments regarding whether operational limitations should be considered, ISO-NE respectfully submits that clarity is needed on what those limitations would entail. With respect to the technical requirements for protection facilities, ISO-NE believes that protection schemes must be simple, straightforward, and standardized. In addition, protection schemes should

only act behind a Point of Interconnection for conditions at the Point of Interconnection. Using more complex schemes would be unmanageable for operators, adding operational complexity risks. For large loads and hybrid facilities seeking to interconnect, impacts of the protection equipment's failure to operate when required to do so, or to operate when not required to do so, must be considered to inform protection design and redundancy.

7. **Principle 7:** The interconnection study of large loads that agree to be curtailable and hybrid facilities that agree to be curtailable and dispatchable should be expedited. The system operator's ability to control such facilities through curtailment and/or dispatch must be sufficient for the system operator to integrate the facility into both operations and system planning. This ensures the timely and orderly addition of large loads to the transmission system in a safe, reliable, and non-discriminatory manner. FERC seeks comment on whether this should be accomplished through a serial interconnection study process or by some other means. FERC also seeks comments on appropriate deadlines for such an expedited study process, including whether such studies can be completed in 60 days.

**ISO-NE Comments:** In order to accomplish an expedited large load study process for curtailable large loads, the terms and conditions related to when load is curtailed should be simple and clear as they will inform the study methodology. An expedited large load study should be available only if the load is fully curtailable. In addition, a large load that agrees to be curtailed should participate in a wholesale-market based program (e.g., as a Demand Response Resource or Dispatchable Asset Related Demand). This is preferable to having a protocol for manual, out-of-market curtailment for large loads

(e.g., an action prior to or within emergency operations such as those listed in ISO-NE's Operating Procedure No. 4<sup>10</sup>). The ability for the load to participate in the wholesale market would also have to be reconciled with the need for the load to have transmission service. With respect to the proposed study timeline, ISO-NE is concerned that 60 days may not be enough time to complete required studies. Although an expedited process may be achieved by reducing the need for certain thermal analyses, other analyses performed in the regular (*i.e.*, non-expedited) interconnection process would still need to be performed for the expedited process (e.g., in order of increasing typical complexity, short circuit, voltage, stability, and electromagnetic transient analyses). As with regular interconnection studies, the ability to complete expedited studies will depend on how many requests are in the queue. Furthermore, any expedited studies may still require coordination with the underway Cluster Study if injections and/or withdrawals from the system would be allowed, even under limited conditions.

8. **Principle 8:** Load and hybrid facilities should be responsible for 100% of the network upgrades that they are assigned through the interconnection studies. FERC seeks comment on whether such costs should be offset through a crediting mechanism and, if so, over how many years.

**ISO-NE Comments:** ISO-NE agrees with the principle that load and hybrid facilities should be fully responsible for upgrades needed to support their interconnections. This construct exists today for RNS.<sup>11</sup> The methodology used to assign responsibility for

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<sup>10</sup> Available at: [https://www.iso-ne.com/static-assets/documents/rules\\_proceeds/operating/isono/op4/op4\\_rto\\_final.pdf](https://www.iso-ne.com/static-assets/documents/rules_proceeds/operating/isono/op4/op4_rto_final.pdf)

<sup>11</sup> See Section 5 of Schedule 11 to the ISO-NE OATT.

upgrades and any crediting mechanism should be simple.

9. **Principle 10:** An existing generating facility that seeks to enter a partial suspension to serve a new load at the same location must go through a system support resource (SSR)/reliability must run (“RMR”) type study. The study must consider system conditions, including forecasted load growth, at least three years after the proposed suspension date. The partial suspension can only proceed after any network upgrades needed to ensure reliability are placed into service. Any such network upgrades shall be the responsibility of the generating facility. FERC invites comments on whether and how resource adequacy should be considered in the SSR/RMR type study.

**ISO-NE Comments:** FERC should provide clarity as to what is intended by this principle. To the extent this principle relates to resource retirements, ISO-NE notes that its current processes for resource retirement requests do not consider resource adequacy as part of those requests. Further clarity will help ascertain how this principle would fit within the existing New England constructs. ISO-NE further notes that, while a resource retirement is usually related to a resource being uneconomic, a partial suspension to serve new load could be related to commercial potential. Clarity is also needed regarding the definition of “partial suspension,” the consequences to a generating facility’s existing Interconnection Service, and the impact that changes to that service would have on the generating facility’s ability to participate in the energy and capacity markets.

10. **Principle 13:** There must be a plan to implement these proposed reforms. FERC seeks comments on appropriate transition plans, including the treatment of large load interconnections that are already being studied for interconnection.

**ISO-NE Comments:** ISO-NE agrees that there must be a plan to thoughtfully, efficiently, and properly implement any necessary changes resulting from the proposed reforms. The following questions will need to be answered: (1) will the proposed reforms result in significant changes to the rules and constructs in the current ISO-NE Tariff? (for example, will changes be needed to address interactions with, and potential conforming changes to, the current Interconnection Service and transmission service related rules, and will changes be needed to address interactions with capacity market rules?); (2) will the proposed reforms require transition of ongoing studies from one entity to another? (for example, will the proposed reforms require transition of ongoing studies from a Transmission Owner currently performing a study to an Independent System Operator?); and (3) will the proposed reforms introduce new types of transmission service and/or interconnection service?

11. **Principle 14:** Utilities serving large loads must meet all applicable NERC reliability standards and OATT provisions. Utilities and we must be prepared to revise large load interconnection procedures and agreements, as necessary. NERC should review its reliability standards to determine if new registration categories or new or modified reliability standards are required to ensure reliability of the BES.

**ISO-NE Comments:** While the ANOPR does not request comments on this principle, ISO-NE agrees with it, and submits that it should also include regional reliability criteria (*e.g.*, NPCC criteria). ISO-NE also believes that the Commission should provide clarity regarding who are the “utilities serving large loads” (is it the RTO as transmission service provider if the load is receiving RNS, the Transmission Owner if the load is receiving Load Network Service, or is it the ISO’s Regional Transmission

Service customer that provides retail service to the load?).

#### **IV. CONCLUSION**

ISO-NE appreciates the opportunity to provide comments on the ANOPR and looks forward to working with the Commission on these important reforms.

Respectfully submitted,

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Dated: November 21, 2025

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Holyoke, Massachusetts this 21<sup>st</sup> day of November 2025.

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