UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

ISO New England Inc. Central Maine Power Company The Connecticut Light and Power Company Fitchburg Gas and Electric Light Company Green Mountain Power Corporation Maine Electric Power Company The Narragansett Electric Company New England Power Company New Hampshire Transmission, LLC NSTAR Electric Company Public Service Company of New Hampshire The United Illuminating Company Unitil Energy Systems, Inc. Vermont Electric Power Company, Inc. Vermont Transco LLC Versant Power	)	Docket No. EL26-72-000

JOINT MOTION OF ISO NEW ENGLAND INC. AND THE PARTICIPATING TRANSMISSION OWNERS ADMINISTRATIVE COMMITTEE ON BEHALF OF THE PARTICIPATING TRANSMISSION OWNERS TO HOLD PROCEEDING IN ABEYANCE AND REQUEST FOR SHORTENED COMMENT PERIOD AND EXPEDITED TREATMENT

Pursuant to Rule 212 of the Rules of Practice and Procedure[1] of the Federal Energy Regulatory Commission ("Commission" or "FERC"),[2] and the Commission's Order Instituting Proceeding Under Section 206 of the Federal Power Act[3] ("FPA") issued on June 18, 2026 in the above-captioned proceeding, ISO New England Inc. ("ISO-NE") and the Participating Transmission Owners Administrative Committee ("PTO-AC") on behalf of the Participating

[1] 18 C.F.R. §§ 385.209, 385.213 (2026).

[2] Capitalized terms used but not defined in this filing are intended to have the meaning given to such terms in the ISO New England Transmission, Markets and Services Tariff ("Tariff").

[3] *ISO New England Inc.*, 195 FERC ¶ 61,215 (2026) ("Show Cause Order").

Transmission Owners ("PTOs")[4] submit this motion to request that the Commission hold the Section 206 proceeding initiated by the Show Cause Order in abeyance for 90 days, starting on the Show Cause Order's compliance deadline, August 17, 2026. Since the issuance of the Show Cause Order, ISO-NE and the PTOs have been working diligently to consider the design of Tariff updates that will address the Commission's concerns and facilitate the integration of large loads and co-located loads in a manner consistent with the needs of the New England region. The abeyance will allow ISO-NE and the PTOs to work through the stakeholder process to develop and refine a FPA Section 205 filing that will address the issues raised in the Show Cause Order. ISO-NE and the PTOs will submit the FPA Section 205 filing to the Commission on or before November 16, 2026.

Because the response to the Show Cause Order is due on August 17, 2026, ISO-NE and the PTO-AC respectfully request that the Commission shorten the comment period for this motion to five days and grant expedited treatment to rule on this motion within 10 days of its submission (*i.e.,* by August 13, 2026).

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[4] The PTOs include: Town of Braintree Electric Light Department; Central Maine Power Company; Chicopee Municipal Lighting Plant; Connecticut Municipal Electric Energy Cooperative; Connecticut Transmission Municipal Electric Energy Cooperative; Eversource Energy Service Company on behalf of The Connecticut Light and Power Company, Public Service Company of New Hampshire and NSTAR Electric Company; Fitchburg Gas and Electric Light Company; Green Mountain Power Corporation; The City of Holyoke Gas and Electric Department; Town of Hudson Light and Power Department; Maine Electric Power Company; Massachusetts Municipal Wholesale Electric Company; Town of Middleborough Gas & Electric Department; The Narragansett Electric Company d/b/a Rhode Island Energy; New England Power Company d/b/a National Grid; New Hampshire Electric Cooperative, Inc.; New Hampshire Transmission, LLC; Town of Norwood Municipal Light Department; Town of Reading Municipal Light Department; Shrewsbury Electric and Cable Operations; Town of Stowe Electric Department; Taunton Municipal Lighting Plant; The United Illuminating Company; Unitil Energy Systems, Inc.; Vermont Electric Cooperative, Inc.; Vermont Electric Power Company, Inc.; Vermont Public Power Supply Authority; Vermont Transco LLC; Versant Power; and Town of Wallingford, CT, Department of Public Utilities, Electric Division.

I. BACKGROUND

The Show Cause Order is one of six show cause orders that the Commission simultaneously issued to all six Regional Transmission Organizations/Independent System Operators to address large and co-located load issues. In the Show Cause Order, the Commission directed ISO-NE and the PTOs, within 60 days of the order, to either:

(1) show cause as to why the Tariff remains just and reasonable and not unduly discriminatory or preferential without provisions addressing:

(a) the application process, study procedures, and ongoing operational requirements that apply to Eligible Customers seeking transmission service on behalf of large loads;

(b) additional transparency concerning the network upgrade costs to provide transmission service to Eligible Customers on behalf of large loads, a *pro forma* cost recovery agreement between ISO-NE, the relevant transmission owner and Eligible Customer taking transmission service on behalf of the large load to mitigate the risk of cost shifting among transmission customers, and a mechanism to ensure such payments are appropriately credited towards transmission owners' transmission revenue requirements consistent with the Commission's cost-of-service regulations;

(c) the rates, terms, and conditions of service that apply to co-location arrangements;

(d) transmission services that reflect Eligible Customers taking transmission service on behalf of co-located loads, load with behind the meter generation, and flexible large loads that are willing and able to limit their use of the transmission system under certain conditions; and

(e) the rates, terms, and conditions of service applicable to interconnection customers serving electrically proximate large load or co-located load; or

(2) explain what changes to the Tariff would remedy the identified concerns if the Commission were to determine that the Tariff has in fact become unjust and unreasonable or unduly discriminatory or preferential and, therefore, proceeds to establish a replacement Tariff.[5]

The Commission also recognized that ISO-NE and/or the PTOs (to the extent the matters addressed in the Show Cause Order implicate aspects of the Tariff over which the PTOs have

[5] Show Cause Order at P 32.

the filing rights) may elect to address some or all of the issues discussed in the Show Cause Order by proposing revisions to the Tariff pursuant to their applicable FPA Section 205 filing rights.[6] The Commission strongly encouraged this.[7] The Commission stated that it would consider requests to hold, for up to 90 days, all or certain aspects of the Show Cause Order proceeding in abeyance, including the deadline to respond to the Show Cause Order to provide ISO-NE and the PTOs time to work through the stakeholder processes to develop FPA Section 205 filings to revise the Tariff to address the issues raised in the Show Cause Order.[8]

Although ISO-NE and the PTOs have been actively discussing New England-specific Tariff revisions that will address the concerns that the Commission identified in the Show Cause Order, additional time is needed to develop those proposals and present them for stakeholder review. ISO-NE and the PTOs respectfully request a 90-day abeyance of all aspects of the Show Cause Order proceeding for the purpose indicated, *i.e.,* sufficient time to work through the New England stakeholder process to develop and refine a FPA Section 205 filing to revise the Tariff to address all the issues raised in the Show Cause Order. This request is consistent with the long-standing history of stakeholder engagement in New England. As required in the Show Cause Order, Section II of this request for abeyance includes: (1) a robust description of the content of a future filing under FPA Section 205; and (2) a reasoned and specific explanation of when the FPA Section 205 filing is expected to be made.

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[6] *Id.* at P 35.

[7] *Id.*

[8] *Id.* at P 36.

II. REQUEST FOR ABEYANCE OF ALL ASPECTS OF THE SHOW CAUSE ORDER PROCEEDING

A. Content of Future FPA Section 205 Filing

As detailed below, ISO-NE's/the PTOs' future FPA Section 205 filing will address all of the Commission's concerns in each of the five categories of reform of the Show Cause Order (*i.e.,* efficient study processes, cost transparency, co-location rules, flexible load service, and generation studies).[9] The details of the future FPA Section 205 filing will be subject to development and input received in the stakeholder process. Additionally, the filing will contain answers to the briefing questions that the Commission posed in the Show Cause Order.[10]

1. Efficient Study Processes

To address this category of reform, the FPA Section 205 filing will address the need for a transmission service application process and study procedures, including the evaluation of alternative transmission technologies.[11] The filing will encompass:

a. *Definition of large load*. This definition will be based on the characteristics of ISO-NE's transmission system and will include load size and an interconnection voltage threshold.

b. *Application process that applies to Eligible Customers seeking transmission service on behalf of large loads*. This process will address

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[9] Pursuant to the Show Cause Order, ISO-NE's/the PTOs' future FPA Section 205 filing will address requests for unbundled retail transmission service requests by end-use large load customers (as allowed by state law or voluntary utility rules) as well as by Eligible Customers on behalf of large loads. Show Cause Order at note 119.

[10] *See* Show Cause Order at P 124, stating that any filings or Tariff changes submitted in response to the Show Cause Order should address the Commission's briefing questions.

[11] As part of the stakeholder process, ISO-NE and the PTOs will identify the respective roles of ISO-NE and the PTOs at each stage of the application process and study procedures.

accepting Eligible Customers' applications for transmission service on behalf of large loads, requiring a non-refundable application fee, and sufficient readiness requirements to deter duplicative or speculative requests for transmission service, as well as information and data requirements that Eligible Customers must submit to ISO-NE and/or the PTOs regarding the characteristics of the large load on behalf of which the Eligible Customer is taking transmission service (including disclosure to ISO-NE of substantially similar pending transmission service requests on behalf of the same large load customer). The FPA Section 205 filing will also address the specific financial assurance, readiness, and information requirements applicable to entities serving as Eligible Customers (including the large load itself, where permitted).

c. *Study procedures that apply to Eligible Customers seeking transmission service on behalf of large loads*. Consistent with the Show Cause Order, the study procedures will address (1) evaluating whether a large load may be interconnected to the transmission system and served by the Eligible Customer, and (2) determining whether network upgrades are necessary to provide transmission service. The studies will contemplate evaluation of the transmission system's ability to withstand risks observed from analyzed large load behavior created by the large load at the point of interconnection. Furthermore, the study process will consider the unique operational characteristics of large loads that are willing and able to limit their energy withdrawals under certain conditions, which may thereby lessen or potentially avoid the need for certain network upgrades. Proposed rules will also consider requiring accurate models, including Electromagnetic Transient ("EMT") studies, as well as the evaluation of alternative transmission technologies as potential solutions to accommodate an Eligible Customer's request for transmission service on behalf of a large load (with the results of such evaluation included in the report to the Eligible Customer with a demonstration of why they are not feasible or would not result in lower costs or a faster timeline for accommodating the transmission service request).

d. *Ongoing operational requirements that apply to Eligible Customers seeking transmission service on behalf of large loads.* These requirements will address the need for hourly forecasts, telemetry data and other data to ensure sufficient visibility, as well as maintaining communication channels. The requirements will contemplate the installation of equipment to enable ISO-NE to monitor large loads for impacts of, for example, fast-ramping load that may impact the transmission system too quickly to be captured by conventional data acquisition systems (*e.g.*, phasor measurement units or similar equipment). The requirements will also address the need for ISO-NE to remotely disconnect a large load to maintain reliability of the transmission system. In addition, the rules will contemplate ramp-rate or ride-through requirements, as well as requirements for control technologies and/or protection systems that may be necessary to limit withdrawals from the transmission system as appropriate.

e. *Pro forma transmission service agreement*. This agreement will memorialize the definition of large load, application process, study process, and operational requirements.

2. Cost Transparency

To address this category of reform, ISO-NE and the PTOs will develop rules that prevent cost shifting and require transparency into transmission costs. These will include:

a. *Rules for transparency concerning the network upgrade costs to provide transmission service to Eligible Customers on behalf of large loads.* The rules will address requiring robust, accurate, and systematic provision of data on the ISO-NE website in a single location and in an easily accessible format that is searchable and allows users to filter the data, regarding the need for network upgrades to provide transmission service to Eligible Customers on behalf of large loads, as well as the costs of those network upgrades. Specifically, the rules will establish the posting of information such as: (i) aggregate amounts of proposed large load additions in ISO-NE's footprint, including the aggregate amounts in each load zone; (ii) the planned network upgrades needed to provide transmission service to Eligible Customers on behalf of large loads, identified by type of equipment and network upgrades (*e.g.*, new substation, reconductoring, a new high-voltage transmission line) for each transmission service request; and (iii) cost estimates for those network upgrades. The amount of information that ISO-NE and the PTOs can share may be limited by data confidentiality. Any such concerns will be mitigated to the extent possible.

b. *Pro forma cost recovery agreement between ISO-NE, the relevant transmission owner, and Eligible Customer taking transmission service on behalf of the large load.* This *pro forma* agreement will be consistent with the Show Cause Order and the Commission's cost-causation and beneficiary-pays principles.

3. Co-location Rules

As part of their FPA Section 205 filing, ISO-NE and the PTOs will submit rules that accommodate co-location agreements between load and behind-the-meter generation ("BTMG"). The rules will ensure that BTMG, as defined in part by a MW threshold, cannot be netted with load behind the same point of interconnection for the purpose of determining Regional Network Service charges for co-located loads configured in a BTMG arrangement. ISO-NE plans to develop transmission services available to Eligible Customers on behalf of co-located loads that recognize the ability of co-located loads to limit withdrawal from the transmission system under certain conditions, as discussed below.

4. Flexible Load Service

To address this category of reform, ISO-NE and the PTOs will develop rules for flexible transmission services, such as: (i) interim non-firm network transmission service (*i.e.,* transmission service to be provided while network upgrades are being constructed); (ii) permanent firm contract demand transmission service (*i.e.,* transmission service up to a specified MW quantity – the contract level – on a firm basis); and (iii) permanent non-firm contract demand transmission service (*i.e.,* transmission service up to a specified MW quantity – the contract level – on a non-firm basis).

5. Generation Studies

To address this category of reform, ISO-NE and the PTOs will develop a process to study generating facilities serving electrically proximate and co-located large loads. This will include:

a. *Definition of electrically proximate large load*, which will be appropriately tailored to New England's transmission system.

b. *Generator interconnection study process and/or generator interconnection service.* The rules will address allowing an interconnection customer to seek the generation interconnection service(s) that reflects the operational dynamics of serving either an electrically proximate large load, or a co-located load that has a high peak load. In the development of these rules, the following will be considered: (i) an interconnection customer's commitment in an interconnection agreement to limit a generating facility's output to match the hourly forecast of an electrically proximate large load or large co-located load; and/or (ii) a generating facility with necessary control technologies and/or protection systems, which may include a special protection scheme, that ensure that the injection does not exceed the limit in the existing or new interconnection agreement.

6. Additional Content of FPA Section 205 Filing Related to Resource Adequacy

In order to address the Commission's concerns related to resource adequacy, as explained in ISO-NE's Informational Filing submitted in this docket on July 20, 2026,[12] ISO-NE anticipates including statements in the FPA Section 205 filing that will put Eligible Customers on notice that large loads must "bring your own new generation" and that large loads will be excluded from the capacity market's Installed Capacity Requirement. Following a robust stakeholder process and resolution of operational issues, ISO-NE anticipates filing the detailed supporting rules implementing these concepts in 2027.

B. Timing for Filing of FPA Section 205 Filing

If granted, the 90-day abeyance period would end on November 15, 2026, which is a Sunday. Accordingly, ISO-NE and the PTOs will submit the FPA Section 205 filing on Monday, November 16, 2026. This filing date will allow ISO-NE and the PTOs to present a proposed design and Tariff provisions, as needed, to the New England Power Pool ("NEPOOL") Transmission Committee[13] and Markets Committee. ISO-NE and the PTOs anticipate presenting their proposals at the following regularly scheduled NEPOOL committee meetings:

COMMITTEE/MONTH	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER
Markets Committee	11-12	9-10	6-7	4-5
Transmission Committee	18-19	15	14	
Participants Committee				12

Additional Transmission Committee and/or Markets Committee meetings may be scheduled, if needed, in the months of September, October, or November 2026. The PTO-AC

[12] Available at https://www.iso-ne.com/static-assets/documents/100037/ferc_informational_rpt_resource_adequacy_large_loads.pdf

[13] On July 16, 2026, ISO-NE made an initial presentation to the Transmission Committee in which it described this request for abeyance and the stakeholder process for the Section 205 filing to be submitted on November 16, 2026.

plans to take action on Tariff revisions in October 2026. As shown in the table, the NEPOOL Participants Committee would vote on the Section 205 proposal at its November 12, 2026 meeting.

III. REQUEST FOR SHORTENED COMMENT PERIOD AND EXPEDITED TREATMENT

ISO-NE and the PTO-AC respectfully request that the Commission establish a shortened comment period of five days for this motion and act on this motion within 10 days of its submission (*i.e.,* by August 13, 2026).[14] Good cause exists to grant these requests. A shortened comment period and expedited Commission action on this motion will provide ISO-NE and the PTOs certainty regarding the need to submit a response to the Show Cause Order on August 17, 2026, which in turn will facilitate a more efficient allocation of resources between ISO-NE, the PTOs, and stakeholders. Without expedited Commission action, ISO-NE and the PTOs will be required to spend critical time and resources preparing a response to the Show Cause Order that may be unnecessary, as opposed to further advancing the FPA Section 205 proposal discussed herein.

[14] The Commission directed that requests for a full or partial abeyance be submitted prior to the deadline to respond to the Show Cause Order, specifically within 45 days of the issuance of the Show Cause Order, to allow time for the Commission to act on the abeyance request. *See* Show Cause Order at P 36.

IV. CONCLUSION

For the foregoing reasons, ISO-NE and the PTO-AC respectfully request that the Commission grant their motion to hold the instant Section 206 proceeding in abeyance for 90 days.

Respectfully submitted,

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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 3rd day of August 2026.

/s/ Julie Horgan

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