

MEMORANDUM

TO: NEPOOL Transmission Committee
FROM: NEPOOL Counsel (Eric Runge, Margaret Czepiel)
DATE: August 3, 2026
RE: **Summary of ISO/RTO Motions for Abeyance in Response to FERC’s Large-Load Show Cause Orders** (Docket Nos. EL26-67-000 (PJM), EL26-68-000 (SPP), EL26-69-000 (NYISO), EL26-70-000 (MISO), EL26-71-000 (CAISO), and EL26-72-000 (ISO-NE))

On June 18, 2026, FERC issued a suite of six tailored show cause orders under Section 206 of the Federal Power Act to all six RTOs/ISOs, addressing the integration of large loads (such as data centers). Each order directed the RTO/ISO to respond within 60 days (by August 17, 2026) and invited each to move to hold the Section 206 proceeding in abeyance for up to 90 days to allow it to work through its stakeholder process and develop a filing under FPA Section 205. FERC instructed that a successful abeyance request should include: (1) a robust description of the content of the potential future Section 205 filing and (2) a reasoned and specific explanation of when the filing is expected to be made. This memorandum summarizes each of the six motions for abeyance, focusing for each ISO on (i) what it anticipates including in its Section 205 filing and (ii) when it expects to submit that filing. The ISOs are addressed in alphabetical order. Of the ISOs, CAISO provided the least details about the expected content of its Section 205 filing.

Please contact Eric Runge, (ekrunge@daypitney.com) or Margaret Czepiel (mzczepiel@daypitney.com) with questions about this matter.

I. CAISO (Docket No. EL26-71-000)

Anticipated Section 205 Filing

CAISO requested a 90-day abeyance and expects that, by the end of the abeyance period, it will submit an FPA Section 205 filing that, together with simultaneous Section 205 filings from its Participating Transmission Owners, will address all the preliminary findings and the five categories of reform in the Order to Show Cause, as appropriate for the CAISO region. CAISO expects most of its tariff revisions to become effective as soon as approved by the Commission.

CAISO’s ongoing “Large Loads” stakeholder initiative will serve as the vehicle for the reforms. CAISO posted an issue paper in January 2026 and a straw proposal in June 2026, addressing large load interconnection, co-location of generation and large loads, transmission service offerings, cost allocation and responsibility, technical requirements and standards, and operational requirements. CAISO is coordinating with its Participating Transmission Owners so that matters within their purview are also addressed in the future Section 205 filings.

Expected Filing Timing

CAISO expects to make its FERC filing on November 16, 2026 (90 days from the response deadline). The expedited stakeholder schedule includes: a straw proposal posted August 12, 2026; stakeholder workshop August 19, 2026; comments due September 2, 2026; draft final proposal posted September 21, 2026; workshop September 28, 2026; comments due October 12, 2026; Western Energy Market Governing Body consideration (if necessary) October 20, 2026; CAISO Board of Governors October 28, 2026; and FERC filing November 16, 2026.

II. ISO New England Inc. (Docket No. EL26-72-000)

Anticipated Section 205 Filing

ISO-NE and the Participating Transmission Owners Administrative Committee (PTO-AC), on behalf of the PTOs, filed a joint motion requesting a 90-day abeyance starting on the August 17, 2026, compliance deadline. The future FPA Section 205 filing will address all the Commission's concerns in each of the five categories of reform: (1) efficient study processes, (2) cost transparency, (3) co-location rules, (4) flexible load service, and (5) generation studies. It will also answer the briefing questions posed in the Show Cause Order.

With respect to efficient study processes, the filing will include a definition of large load (load size and interconnection voltage threshold), an application process for Eligible Customers seeking transmission service on behalf of large loads, study procedures, ongoing operational requirements (hourly forecasts, telemetry, remote disconnection, ramp-rate/ride-through), and a pro forma transmission service agreement. Cost transparency provisions will require systematic posting of network upgrade needs and cost estimates, along with a pro forma cost recovery agreement. Co-location rules will address behind-the-meter generation (BTMG), including that BTMG cannot be netted against load for Regional Network Service charges. The filing will also propose interim and permanent flexible load service options and a process to study generating facilities serving electrically proximate and co-located large loads.

Additionally, ISO-NE anticipates including resource adequacy statements putting Eligible Customers on notice that large loads must "bring your own new generation" (BYONG) and that large loads will be excluded from the capacity market's Installed Capacity Requirement; detailed implementing rules are anticipated to be filed in 2027.

Expected Filing Timing

ISO-NE and the PTOs will submit the FPA Section 205 filing on November 16, 2026. ISO-NE plans to present proposals at the NEPOOL Markets and Transmission Committee meetings through the fall, with the NEPOOL Participants Committee voting on the proposal at its November 12, 2026, meeting.

III. MISO (Docket No. EL26-70-000)

Anticipated Section 205 Filing

MISO and the MISO Transmission Owners filed a joint motion requesting a 90-day abeyance up to and including November 16, 2026. MISO will address the issues through a series of Section 205 filings during the abeyance period, including:

- A Zero Injection Generator Interconnection Agreement (ZGIA) and related study process, to facilitate faster interconnection of generation serving load at the same substation (co-location).
- Large load Interconnection Reliability Requirements (IRR): operational requirements including basic facility data, modeling, telemetry, forecasting, PMU requirements, and ramp/ride-through requirements.
- A Load Addition and Resource Study (LARS) process: a parallel study of large load and associated generation using shared assumptions, finishing within approximately 120 days.
- A firm transmission service step-up option to energize a portion of a large load prior to full interconnection.
- A non-firm large load service option for large loads willing to limit their energy withdrawals.
- Additional solutions addressing the application process, study procedures (including alternative transmission technologies), ongoing operational requirements, and cost transparency/cost-shift concerns.

Expected Filing Timing

- ZGIA filing: expected by the end of August 2026.
- LARS filing: expected by November 16, 2026, or earlier if feasible.
- Firm transmission service step-up option: Section 205 filing expected by November 16, 2026, or earlier if feasible.
- Remaining/additional solutions: anticipated in a November 2026 Section 205 filing addressing any directives not addressed in a prior filing.

The overall abeyance period runs through November 16, 2026.

IV. NYISO (Docket No. EL26-69-000)

Two separate motions for abeyance were filed in the EL26-69 proceeding: one by NYISO itself, and one by certain NYISO transmission owners. Each motion is summarized separately below.

A. NYISO Motion

Anticipated Section 205 Filing

NYISO filed its motion requesting a 90-day abeyance until November 16, 2026, so that it may pursue an FPA Section 205 filing through its shared governance and stakeholder process to address the Show Cause Order in a manner tailored to the NYISO region. NYISO has determined that several of its existing Tariff provisions should be expanded or clarified, and its anticipated filing would propose revisions to the NYISO Tariffs (both the Open Access Transmission Tariff and the Market Administration and Control Area Services Tariff).

Based on the proposal NYISO presented to stakeholders on July 23, 2026, the filing is expected to create a new large load study process that would replace and improve NYISO's existing load interconnection rules, with NYISO and the New York transmission owners collaborating to complete large load integration studies within expedited time periods. NYISO would make firm and non-firm variants of its existing financial reservation transmission service available to transmission customers serving large loads, subject to transmission security and resource adequacy requirements, so that flexible large loads could take non-firm withdrawal service to the extent their flexibility mitigates their system impact. The filing would also develop detailed Tariff provisions addressing co-located load arrangements, the treatment of proximate generators, operating requirements, and the Commission's cost-shifting and transparency concerns—including sunseting NYISO's BTMG program and replacing it with a new co-located resource participation model that treats load and generation as separate market entities, along with transition rules to avoid disrupting existing commercial arrangements.

Expected Filing Timing

NYISO requested that the Commission act on its motion by August 13, 2026, and hold the show cause proceeding in abeyance for 90 days until November 16, 2026. If the abeyance is granted, NYISO will conduct an intensive stakeholder process with meetings as frequently as weekly, beginning with a meeting scheduled for August 13, 2026. NYISO will seek approval from its Business Issues Committee and Operating Committee in October (currently scheduled for October 14 and 15, 2026), followed by its Management Committee on October 28, 2026, and then its independent Board of Directors. Provided that Management Committee and Board approvals are secured, NYISO will submit its Section 205 proposal on November 16, 2026, along with a Show Cause Order response to the extent necessary.

B. NTOs Motion

Anticipated Section 205 Filing

This motion for abeyance in EL26-69 was filed by the Non-Incumbent Transmission Owners (LS Power Grid New York Corporation I and New York Transco LLC, collectively "NTOs"), coordinating with NYISO and the NYISO Transmission Owners. The NTOs requested a 90-day abeyance until November 16, 2026.

According to the NTOs, addressing the Show Cause Order will require substantial revisions to the NYISO Open Access Transmission Tariff, potentially including new pro forma contract(s), incorporating study and application processes tailored to transmission service to Eligible Customers on behalf of large loads. The NTOs expect to propose revisions addressing the application process, study procedures, and ongoing operational requirements. Those revisions are expected to concern, among other matters: the definition of a large load; readiness and information

requirements; evaluation of alternative transmission technologies; a pro forma service agreement memorializing operational terms; transparency; cost recovery with associated financial security and rate treatment provisions to mitigate cost shifting; and a reasonable implementation period and effective date to minimize disruption to existing commercial arrangements.

The NTOs anticipate that a single filing by NYISO and NYISO TOs will be submitted in response to the Show Cause Order, though individual transmission owners may submit supplemental filings on some briefing questions.

Expected Filing Timing

The NTOs seek an abeyance until November 16, 2026, and understand that NYISO plans to file responsive tariff amendments in November 2026 (assuming its abeyance request is granted). The NTOs will coordinate with NYISO and complete necessary internal approvals in time to comply with the Commission's directives by November 16, 2026.

V. PJM (Docket No. EL26-67-000)

Anticipated Section 205 Filing

PJM Interconnection, L.L.C. requested a 90-day abeyance starting August 17, 2026. PJM's Section 205 filing is being developed in conjunction with its overlapping Co-Located Load compliance proceeding (Docket Nos. EL25-49-000, et al.); PJM intends to make a compliance filing in the Co-Located Load docket on August 17, 2026 (including Tariff language on Interim Network Integration Transmission Service).

The intended Section 205 filing will address all other categories for reform identified in the Large Load Order not addressed in the Co-Located Load compliance filing. The filing will advance a proposal that: (1) achieves efficient transmission service application and study processes, including consideration of alternative transmission technologies; (2) prevents cost shifting and enhances transparency into transmission costs (developed with the PJM Transmission Owners under their Section 205 filing rights); (3) provides new transmission services for flexible large loads, building on the Co-Located Load work; and (4) enhances study processes for generating facilities that serve electrically proximate large loads.

Expected Filing Timing

PJM anticipates submitting the Section 205 filing by early to mid-November 2026. Stakeholder engagement sessions are scheduled for August 18, and September 16, 2026, with the goal of an advisory stakeholder vote at the Members Committee meeting on October 28, 2026. After the required Transmission Owner consultation (at least seven days before filing), PJM will be positioned to file its proposal early to mid-November.

VI. SPP (Docket No. EL26-68-000)

Anticipated Section 205 Filing

SPP and various Transmission Owners filed a joint motion requesting a 95-day abeyance (up to and including November 20, 2026)—five days more than the 90 days contemplated—to accommodate SPP's full stakeholder process culminating in a Board of Directors meeting on

November 17, 2026. SPP will submit a comprehensive Section 205 filing or a package of filings addressing the following principal subject areas:

- Transmission service to Eligible Customers on behalf of large loads: incorporating evaluation of alternative transmission technologies into the High Impact Large Load (HILL) study process and revising pro forma transmission service agreements to memorialize ongoing operational requirements for HILLs.
- Cost-shifting risk among transmission customers: new Tariff provisions for public posting of network upgrade and transmission service information, and a pro forma cost recovery agreement requiring a minimum contribution and credit support/financial security.
- Co-location arrangements and BTMG: greater clarity on treatment of co-located resources and BTMG, including terminology/definitions, applicable study processes, and overlap among transmission service, interconnection, and market registration requirements.
- Extending new transmission services to flexible large loads: the Price Adaptive Load / Price Adaptive Load Service (PAL/PALS) proposal (a new market participation model and non-firm transmission service for dispatchable, price-responsive large loads), plus potential enhancements to the Conditional High Impact Large Load Service (CHILLS).

Expected Filing Timing

SPP requests an abeyance until November 20, 2026, and proposes that date as the deadline for a comprehensive Section 205 filing. The schedule includes: draft Revision Requests posted for stakeholder review in early August 2026; working group votes during September and October; Markets Operation and Policy Committee consideration in October; Regional State Committee review (where applicable) in November; final Board consideration on November 17, 2026; and filing shortly thereafter by November 20, 2026.