



NPCC Reliability Forum

Large Loads, Data Center, and Artificial Intelligence

Facilitators:

Gerry Dunbar and Faisal Nahian

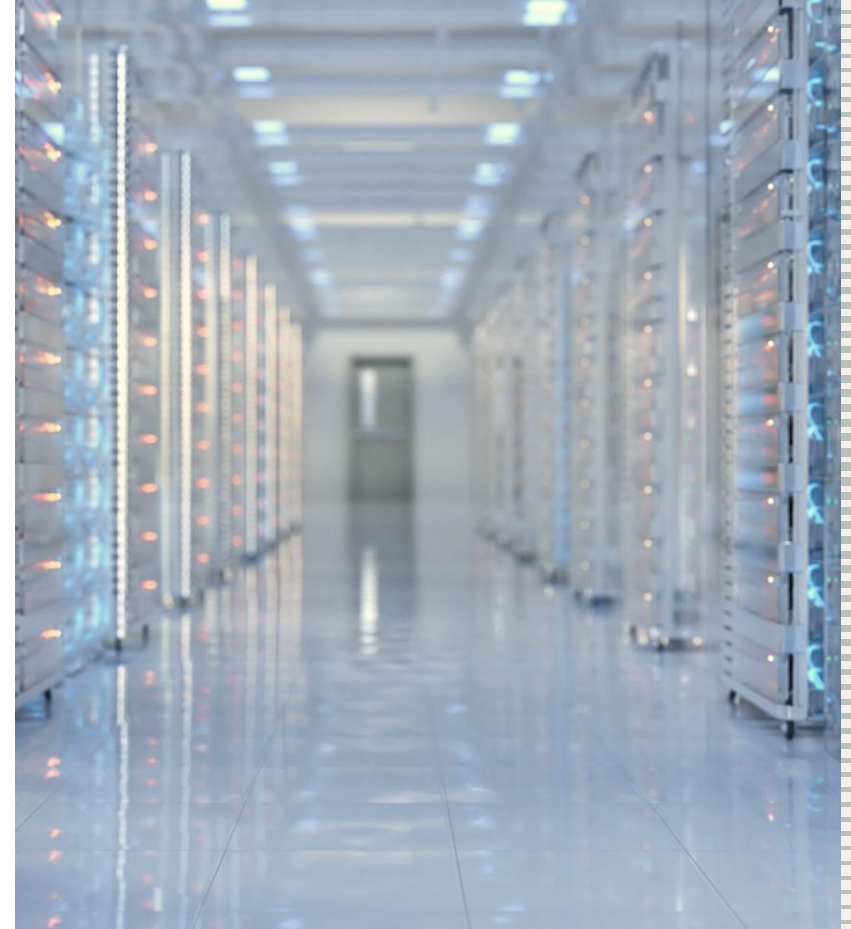
03/26/2026

Public



Agenda

- Safety Message, Forum Disclaimer, NPCC 2026 Outreach Activities – Gerry Dunbar and Faisal Nahian
- NERC’s Plan to Address Reliability Risks from Emerging Large Loads – Latrice Harkness
- Dynamic Data Center Performance, Monitoring, & Interconnection Updates – Katelyn Vance
- Challenges and Experiences with Integrating Large Loads – Chris Pilog
- Recent FERC Actions on Large Loads – Valerie Teeter
- Forum Survey and Closing Remarks – Gerry Dunbar





Safety Message

- Bicycle Safety



Reliability Forum Disclaimer

Webinar Logistics

- Participants are muted.
- Use the “Q&A” feature to submit questions.
- Questions will be addressed at the end of each presentation.
- The forum will be recorded.
- Presentation materials will be posted on the NPCC website.

Public Advisory

- This is a public webinar.
- Audience may include press and government representatives.
- Speakers should be mindful of the diverse audience.

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- Information shared is for informational purposes only.
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- Views expressed do not necessarily reflect NPCC’s position.

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- Discussions do not imply NPCC endorsement.
- NPCC does not promote specific technologies, products, or vendors.
- Questions about vendor offerings should be directed to the vendors.
- Users of vendor services assume full responsibility.





NPCC Long Term Strategy

2026 Outreach Activities

- **State and Provincial Outreach Topics**
 - NERC and NPCC Seasonal Reliability Assessments
 - NERC Long-Term Reliability Assessment (LTRA) and NPCC Long Range Adequacy Overview (LRAO)
- **Reliability Forums - March, May, Oct.**
 - Various Reliability Topics
 - Regional Transmission, Large Loads, Resource Adequacy
- **Regional Webinars/Workshops**
 - Spring and Fall Compliance and Reliability Conference
 - Physical and Cyber Security
 - Extreme Weather Preparedness
- **Gas-Electric Interdependency**



NERC's Plan to Address Reliability Risks from Emerging Large Loads

NPCC Reliability Forum

Latrice Harkness, Director of Engineering

March 26, 2026

Advancing Efforts Related to Large Loads Risks

- Analysis conducted through the following have underscored that risks related to emerging large loads, specifically “computational loads”, require mitigation:
 - The Large Loads Working Group and its White Papers and Reliability Guidelines
 - NERC’s Level 2 Alert
 - Incident Reviews
 - Collaborative workshops and roundtables
- **NERC is advancing a three-pronged approach:**
 1. **Registration**
 2. **Reliability Standards**
 3. **Technical Justification**

Reliability and Security Technical Committee

Large Load Working Group and Load Modeling Working Group

Technical Justification Efforts

- Reliability and Security Technical Committee (RSTC) Subgroups
 - **Large Loads Working Group (LLWG)** developing additional white papers and likely initiating new Standards (i.e., developing SARS)
 - **Load Modeling Working Group (LMWG)** developed a model for data centers and will be finalizing a technical reference document and hosting meetings/workshops
- NERC Engineering
 - Releasing a **report on the NERC Level 2 Alert** on 3/17
 - Drafting for release in the next three months an **Essential Action Level 3 Alert** to share near-term mitigation actions that currently registered entities should take to address critical reliability risks.

Registration

Registration Criteria for Large Loads – Next Steps

- Seeking registration of “computational” large loads, including data centers and cryptocurrency mining
- NERC will work with industry to define the scope of what entities, based on specific physical and electrical criteria, would be required to register with NERC and comply with NERC Reliability Standards
- **Standards – to be developed**
- **Draft registration criteria will be posted in early April (targeting April 1st), and this will initiate a formal and public comment (feedback) period lasting 45 days**
- **Comments will be carefully considered**

Standards

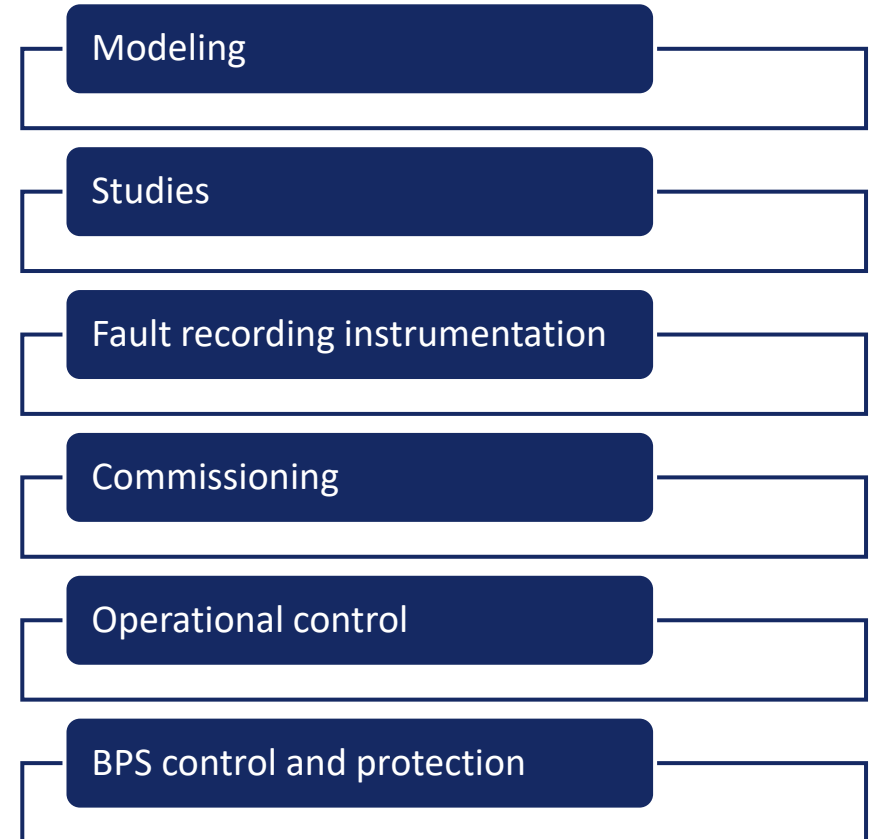
- New and updated standards are needed to close gaps
 - Some for existing registered entities, some for new computational loads
- Key next steps:
 - NERC submitted volunteers for a Standard Drafting Team to NERC's Standards Committee on March 18th for review and approval; data centers are included
 - NERC submitted a SAR to the Standards Committee that included:
 - The creation of new Glossary definitions for Computational Loads that follows the development of changes to registration criteria; and
 - The development of a blanket Reliability Standard that will address essential actions needed in the near-term.
 - The SAR is expected to be released for a 30-day comment period on April 1st

Technical Justification

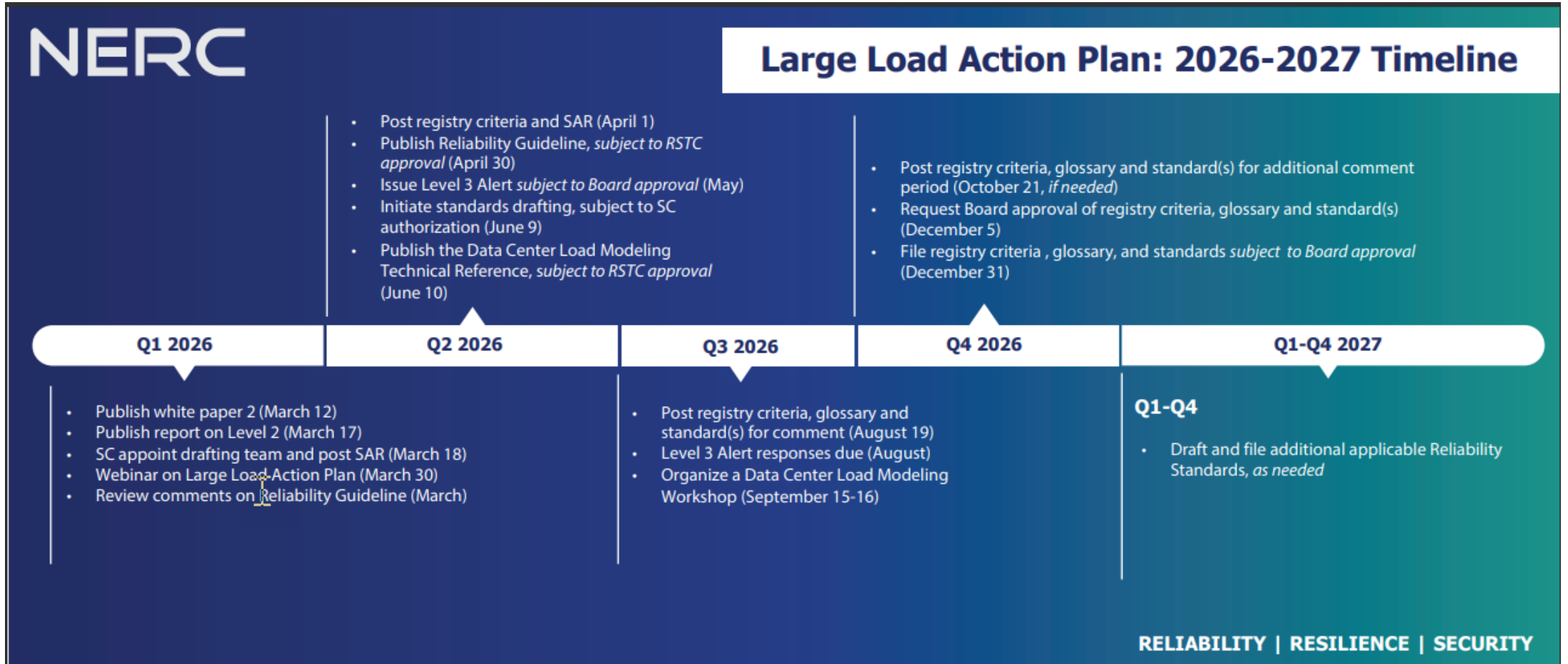
Overview of Technical Justification Efforts

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- Many entities at the time of this Alert do not have specific procedures to handle the unique challenges associated with large loads
 - Models
 - Commissioning Practices
 - Operational Readiness
 - Near-term and Long-term planning
- Many entities do not have a process to coordinate with TOs and DPs to establish protection coordination requirements for large loads.
- Many entities report waiting on or coordinating with a separate entity, primarily their ISO or RTO.
- **Alert Level 3 in development**

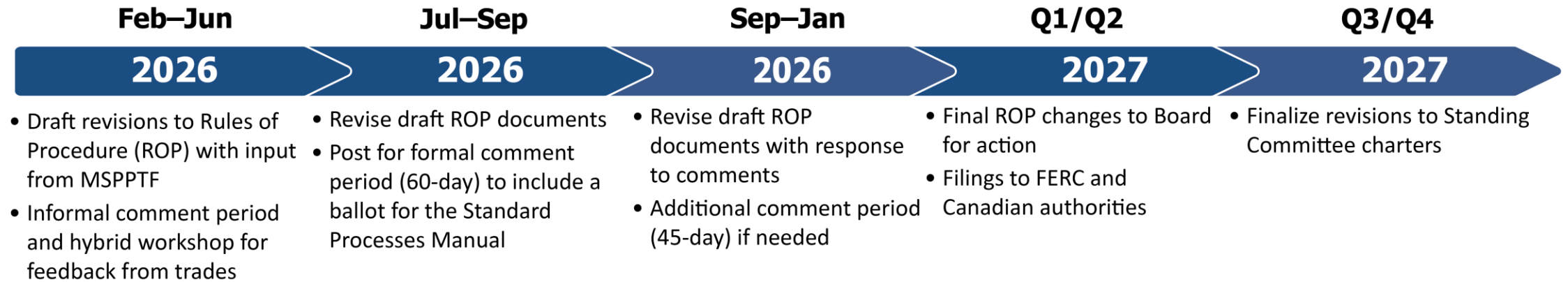


Timelines & Engagement Opportunities



Areas of Focus

Governance (Partner with Legal)	ROP/Charter Revisions Standards Committee Transition RISC Subcommittee RSTC
Tools (Partner with IT)	Comment and Ballot System Enterprise Document Library AI Tools Website Enhancements Standards Initiation Request and Term Sheet
Pilot (Owner Standards)	AI Tools <ul style="list-style-type: none">• Comment summary• Standard draft Short-Term Advisory Group <ul style="list-style-type: none">• Computational Load Solicit SARs Biannually Increase Stakeholder Engagement Standards Initiation Request and Term Sheet



Communications & Engagement

- General communications to and broad engagement with industry and stakeholders
- Updates to NERC’s Board, MRC, Standing Committees and Industry Groups



NERC

Discussion

Dominion Energy Virginia

Dynamic Data Center Performance, Monitoring, & Interconnection Updates

NPCC Reliability Forum
March 26, 2026

Katelynn Vance, Ph.D. – Manager, Electric Transmission Planning & Strategic Initiatives

Dominion Energy Virginia at a Glance

Virginia, North Carolina, West Virginia

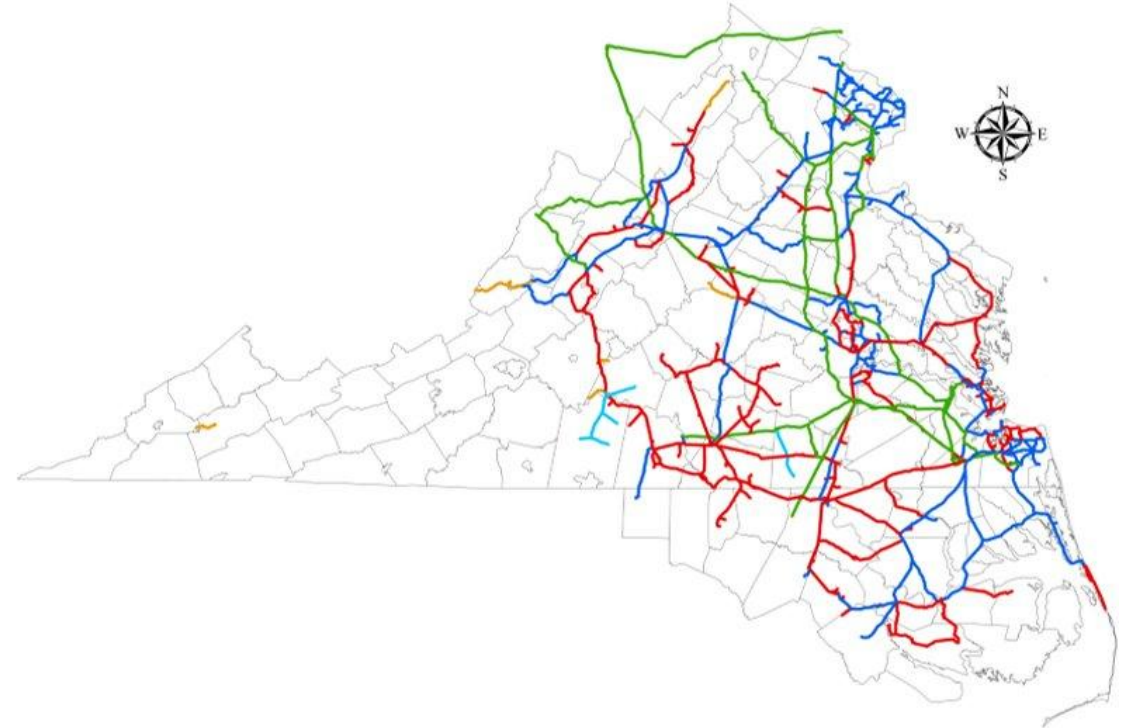
6,800 miles of transmission lines

- **500 kV** – 1,315 miles
- **230 kV** – 2,979 miles
- **138 kV** – 64 miles
- **115 kV** – 2,309 miles
- **69 kV** – 78 miles

1000+ substations

~50,000 transmission structures

Own distribution and generation assets



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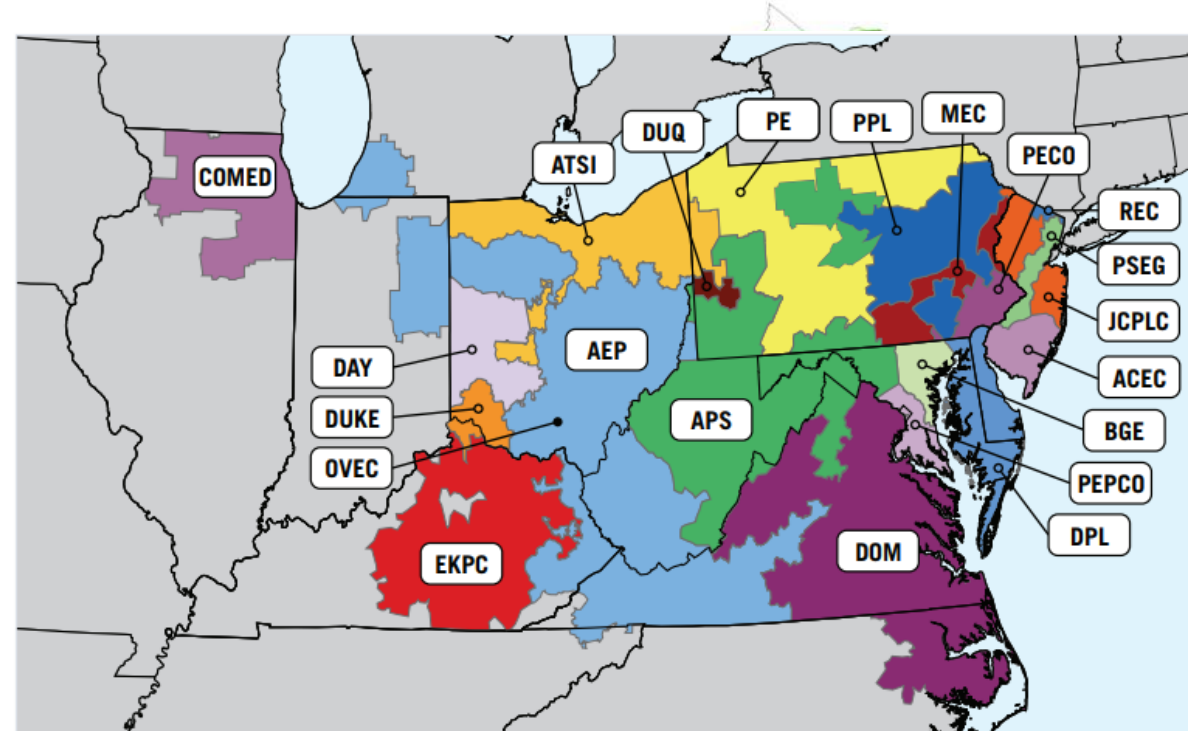
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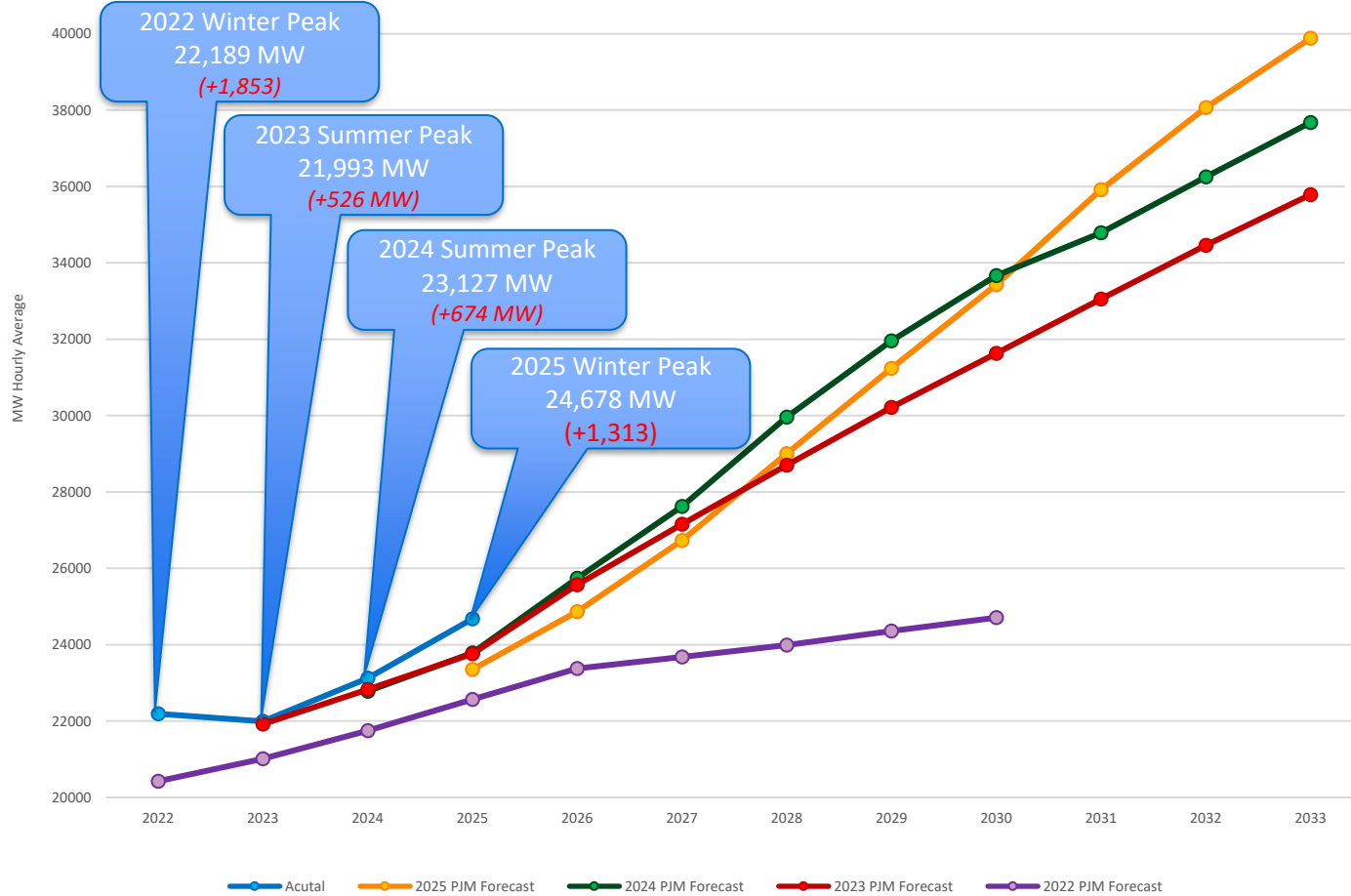
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Own distribution and generation assets

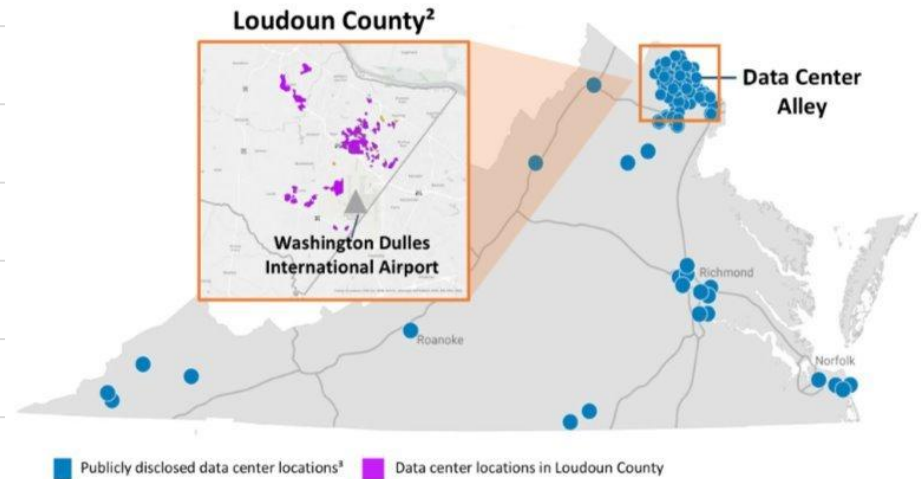


Year-over-year PJM DOM Zone forecast

PJM DOM Zone Load Forecast Year-over-Year

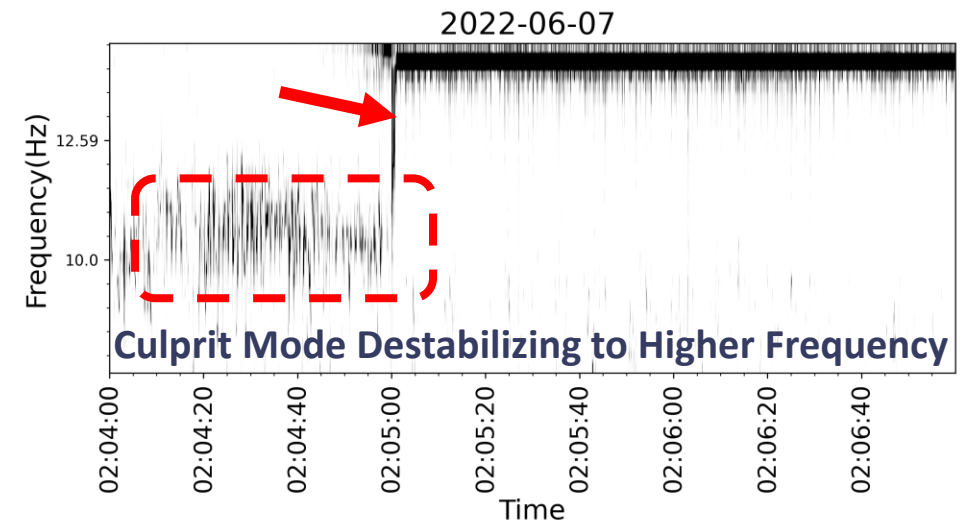
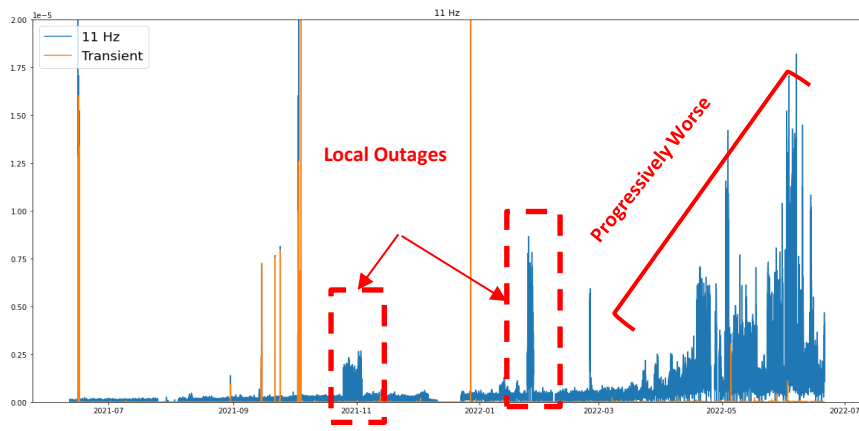
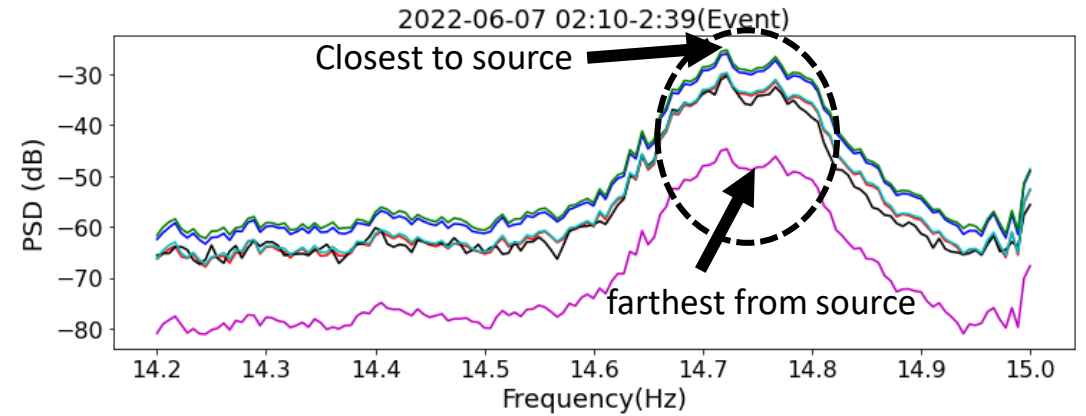
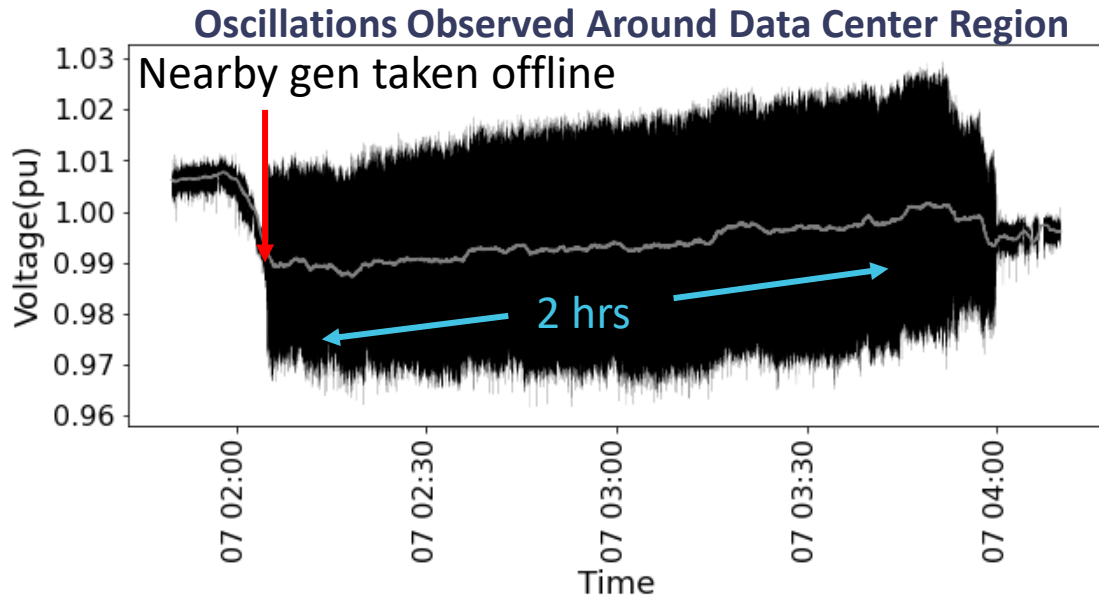


Zonal 10/15 Year Load Growth		
SUMMER	5.6%	4.8%
WINTER	5.1%	4.3%



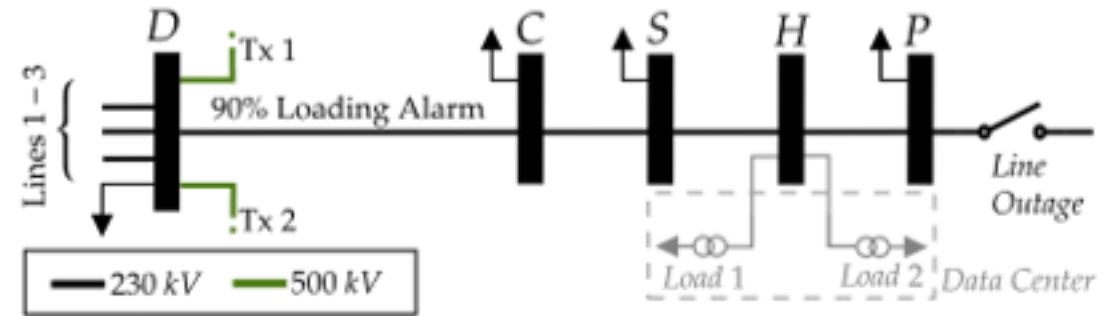
²February 2022 Loudoun County Data Center Land Study
³Data Center locations provided by Data Center Hawk

Data Center Oscillation

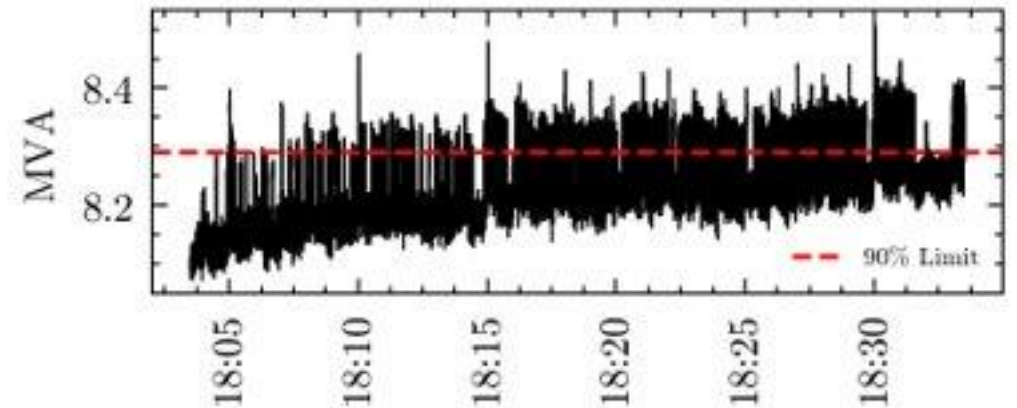


AI Training Loads

- Due to line outage, observed intermittent 90% loading on transmission line due to AI training with SCADA data
- Not problematic in this case, but we wanted to discuss with customers
- Will be working on setting megawatt AND frequency bands to avoid
 - Need to ensure no torsional interaction with generators



Heavily Loaded Line



Load Transfer Events

Multiple load transfer events from 500 – 1700 MWs since July 2024

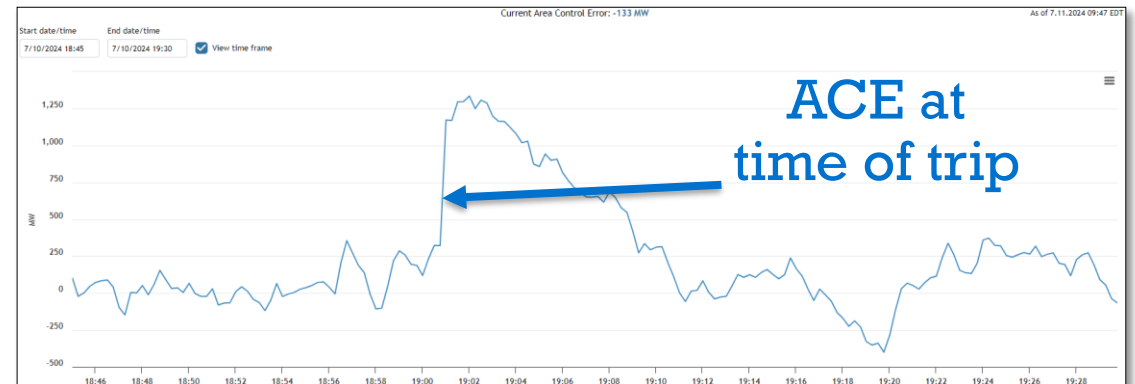
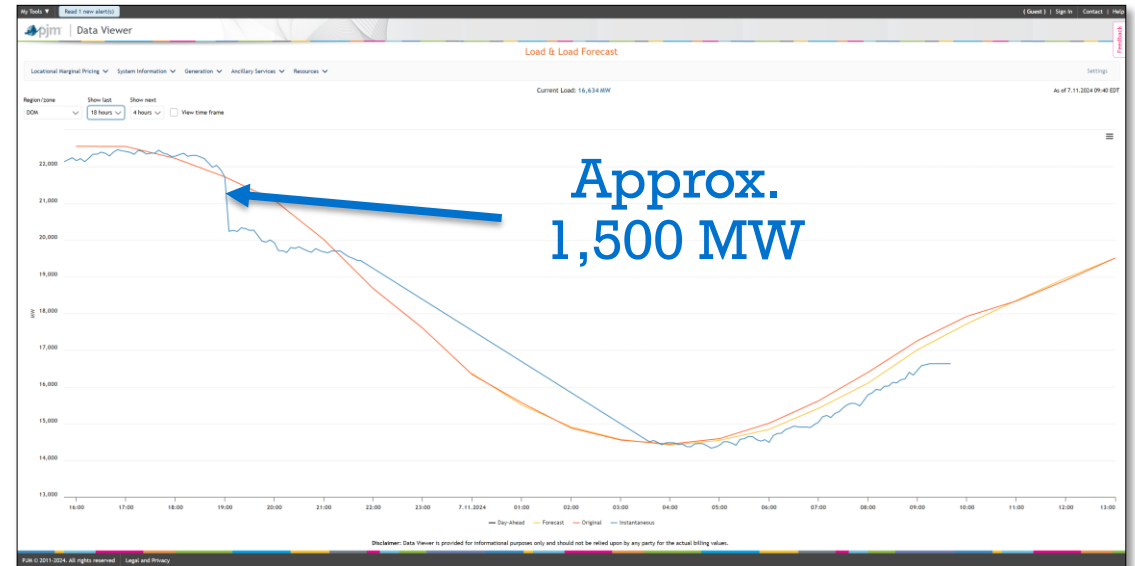
- All events were line lockouts in general Northern VA area
 - Inside and outside of Loudoun County data center alley area
 - All transmission protection functioned exactly as designed
- First two events: Transferred load returned after 3+ hours
 - Other events saw the majority of load return in ~1 – 15 minutes
- Impacted between 18 – 40 substations depending on event
- Data center recovery profile differed across customers
 - Some differences in the same customer based on design of facility
- Required many meetings across customers to understand variation in responses

July 10, 2024 Event Overview & System Impacts

Fault Cause: Failed Arrestor

Fault Isolation:
5 reclosing attempts and line lockout

PJM and DEV SOC determined ~1,500 MW of load removed from the system and determined it was data centers transferring to backup generation *unexpectedly*



July 10, 2024 Event Overview & System Impacts

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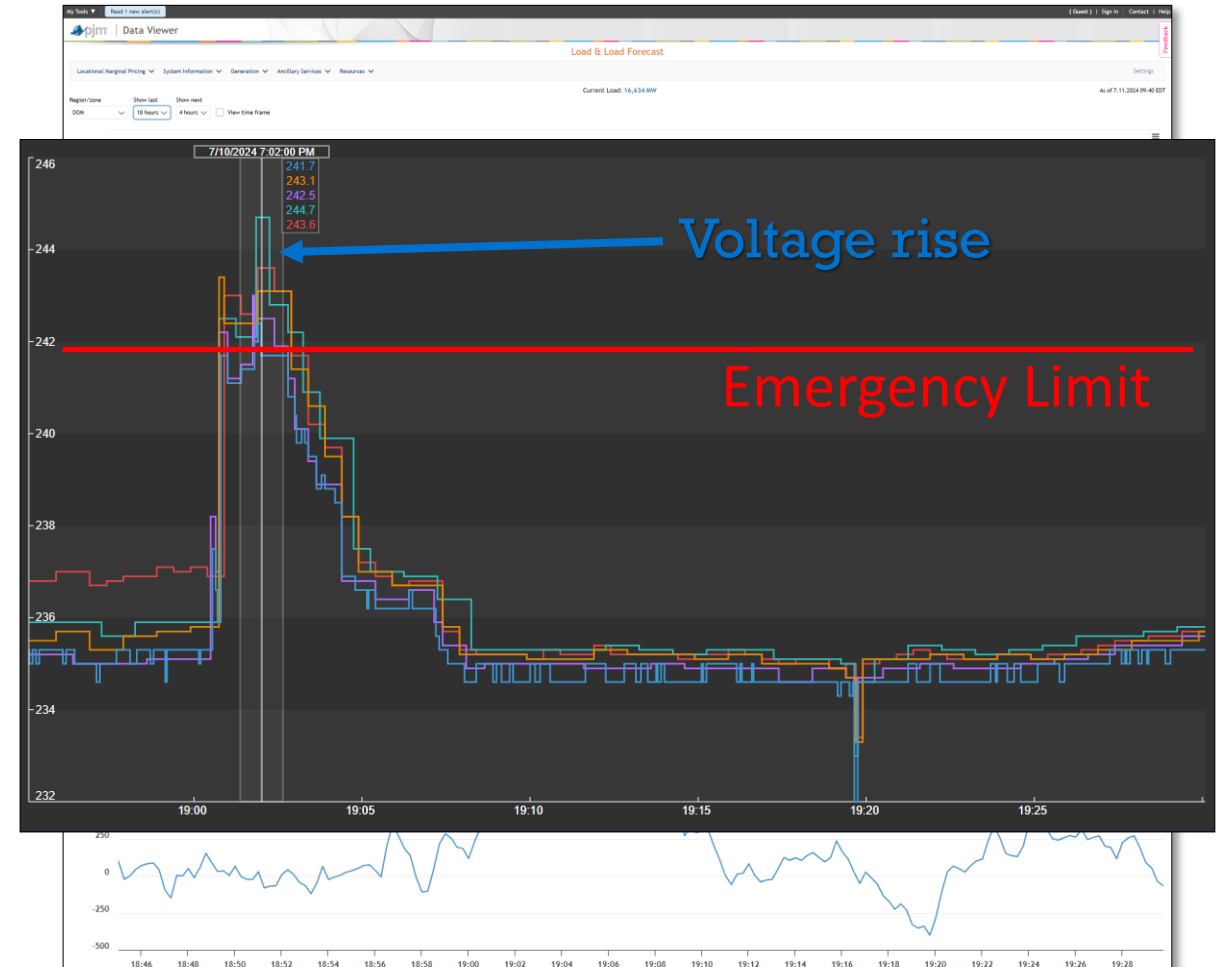
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System Operators experienced 10kV voltage rise

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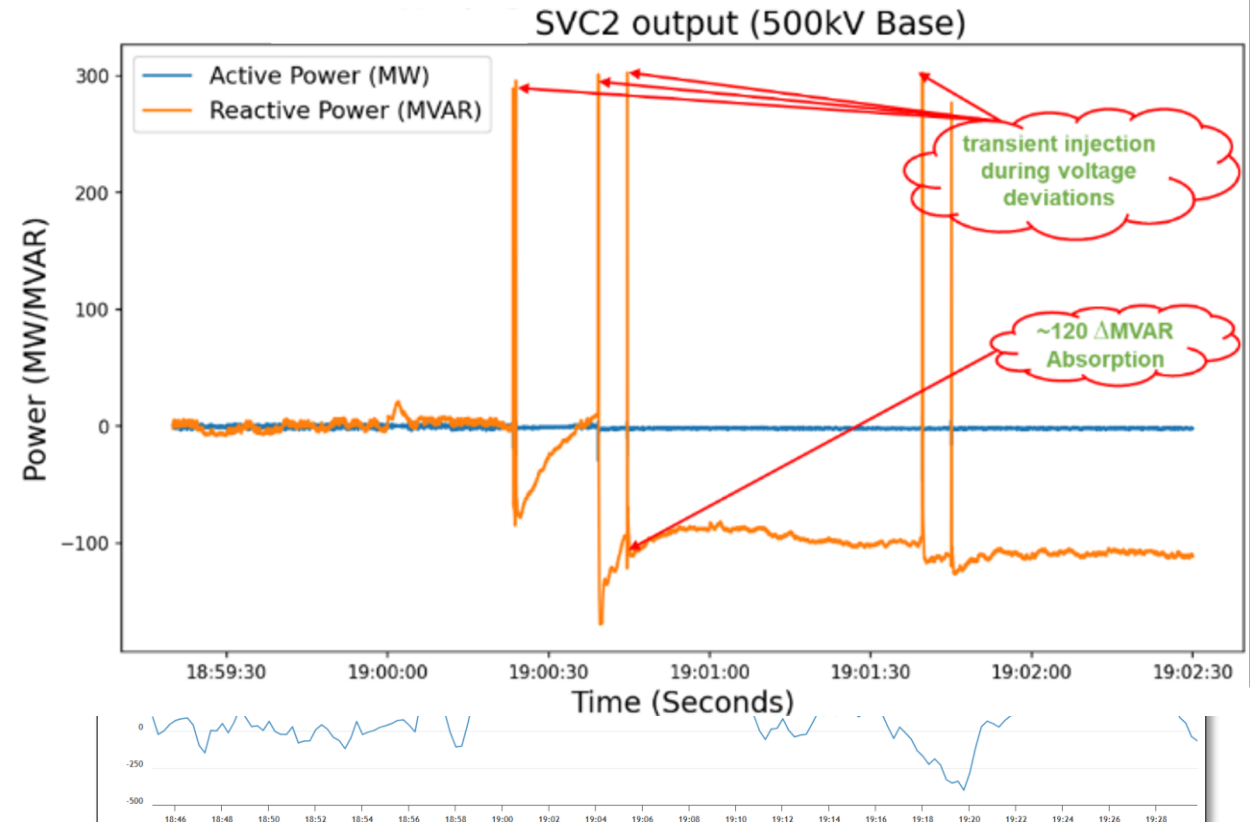
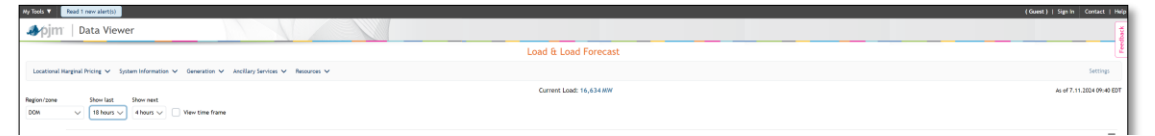
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- SOC took immediate action by removing **nine** 230 kV capacitor banks within seven minutes to return to nominal voltage
- **Nearby SVCs both absorbed ~120 MVAR each**



How did individual data centers react?

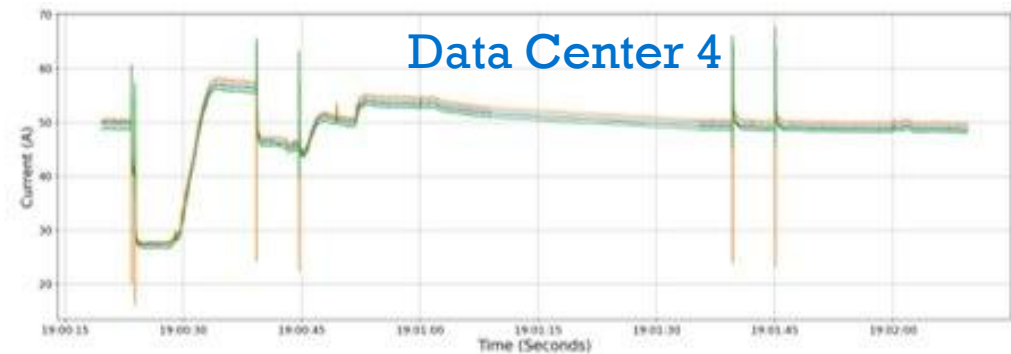
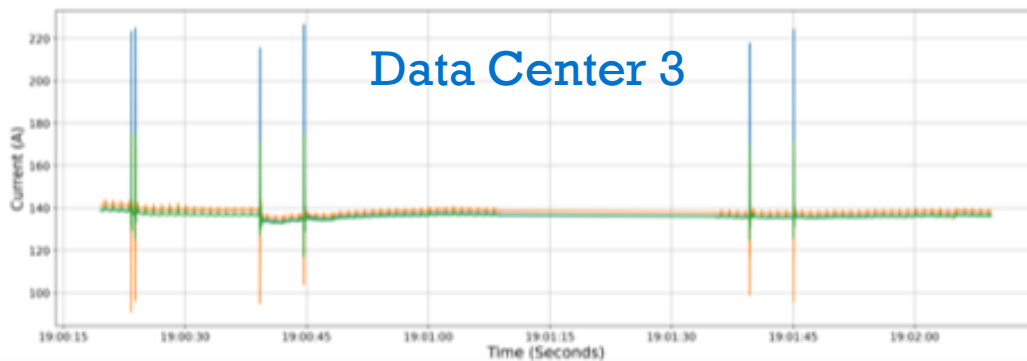
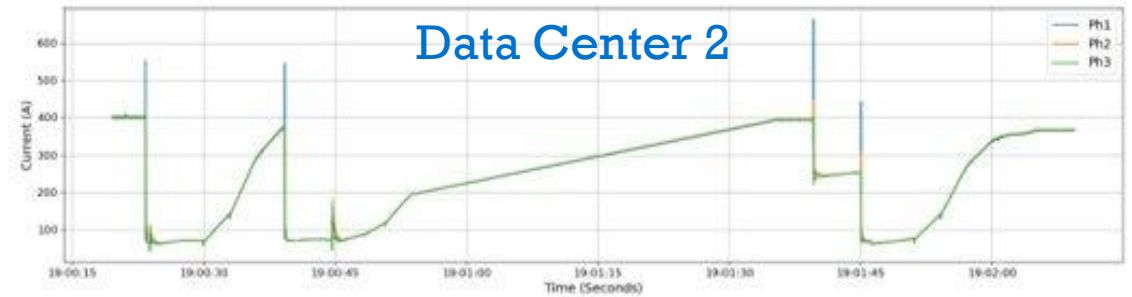
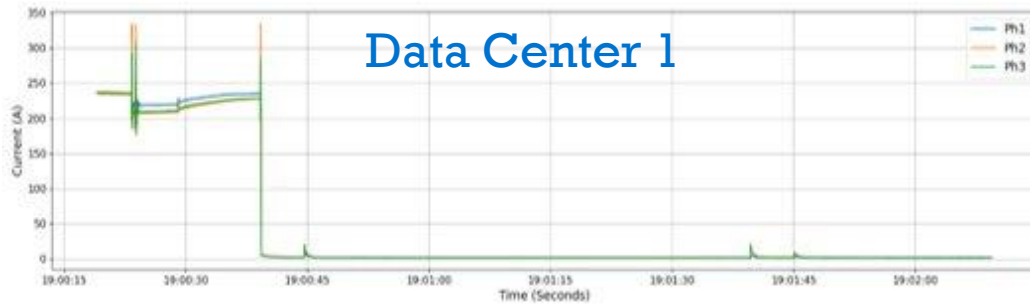
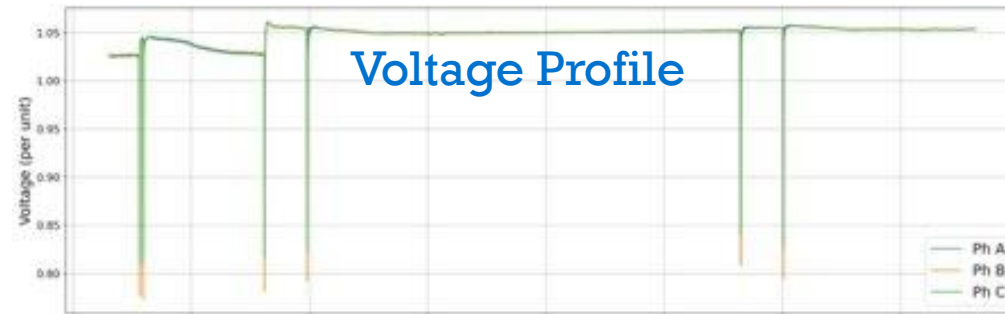
- ET network is fully observable with synchrophasor and/or digital fault recorder point-on-wave metering
 - Transmission substation-level metering (high side, lines mainly)
 - Insufficient to determine individual data center response
- Point-of-interconnection (POI) metering
 - PQ meters installed at POI of 51 data centers
 - POI is next to the revenue meter (not transmission level data)

Some companies' responses differed across facilities even if the voltage depressions/durations were similar

Effective RCA requires the ability to isolate behavior of individual facilities based on customer and location. Some RCAs complicated by difficulty correlating data center location to transmission station at time of event.



Selection of Data Center Responses

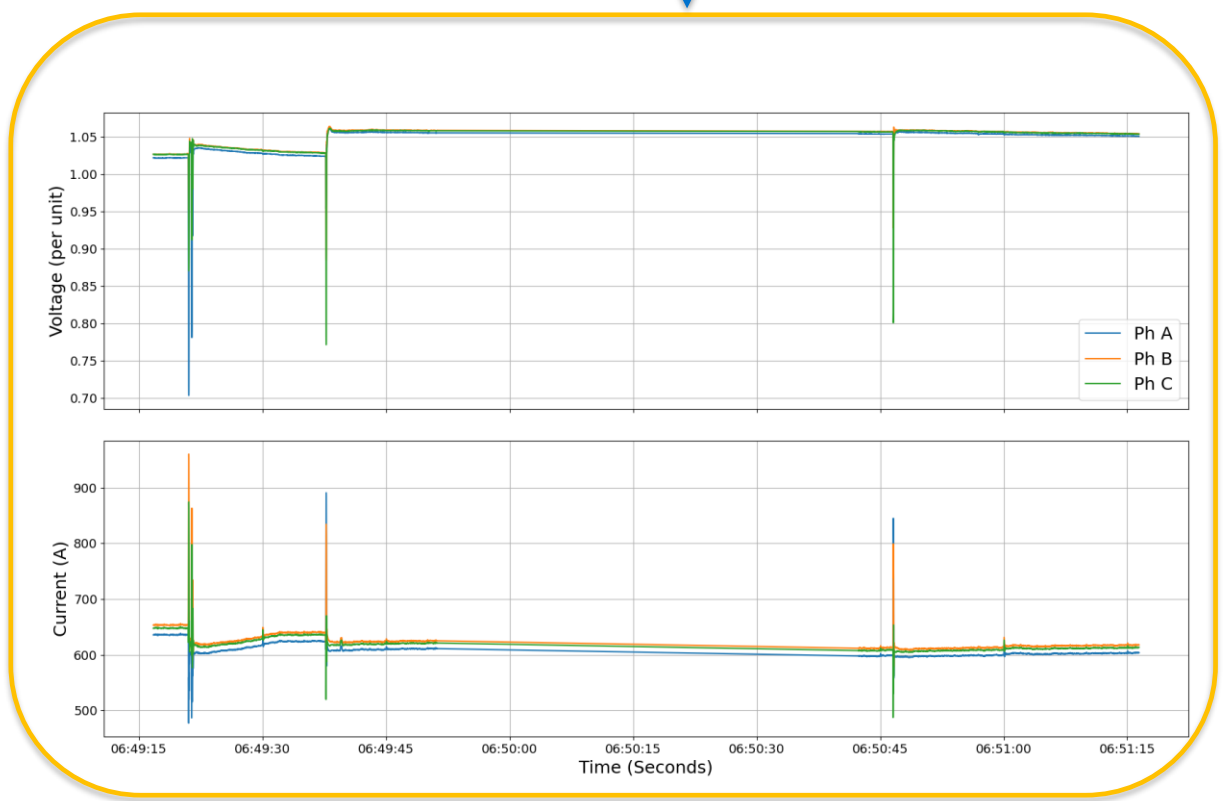
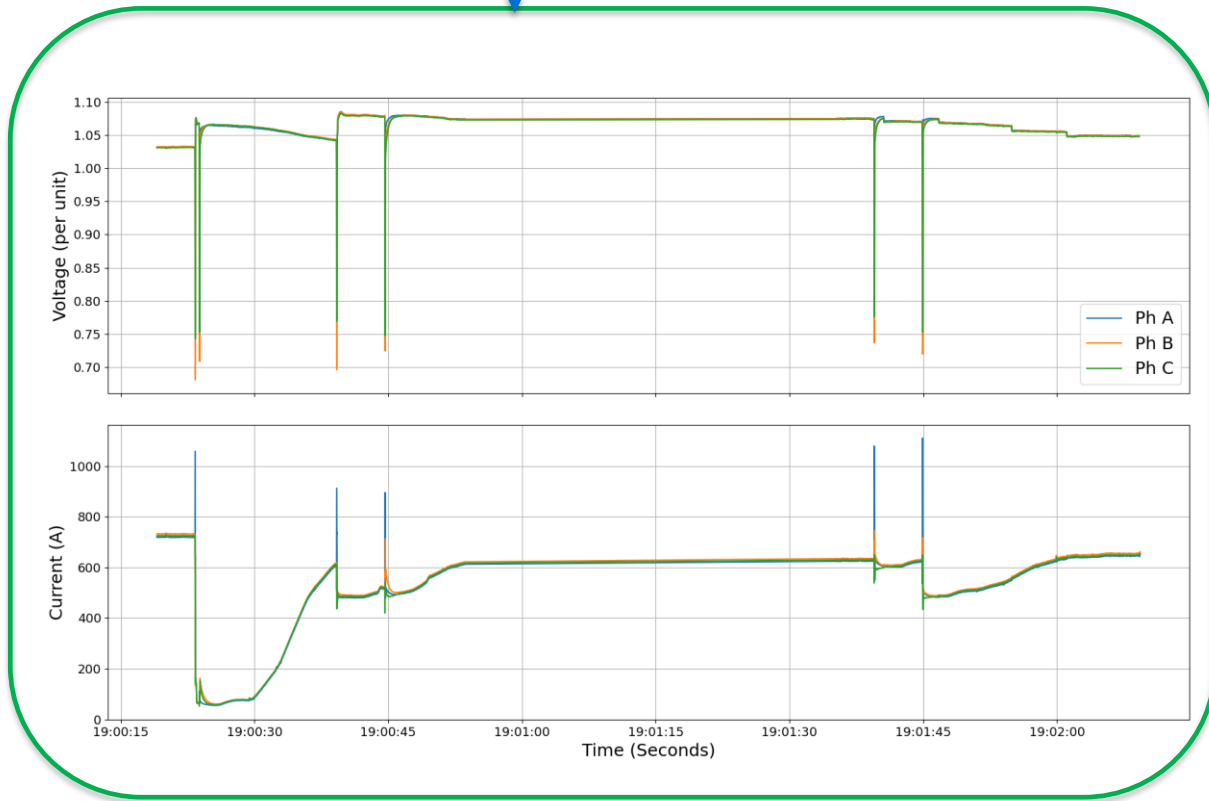


Data Center 6

July 10: Total load transfer during the initial fault but load recovered

	Min Phase Voltage (pu)	Max Voltage Sag Duration (ms)
10-Jul	0.6805	66
17-Feb	0.7033	91

Feb 17: Load rode through the event

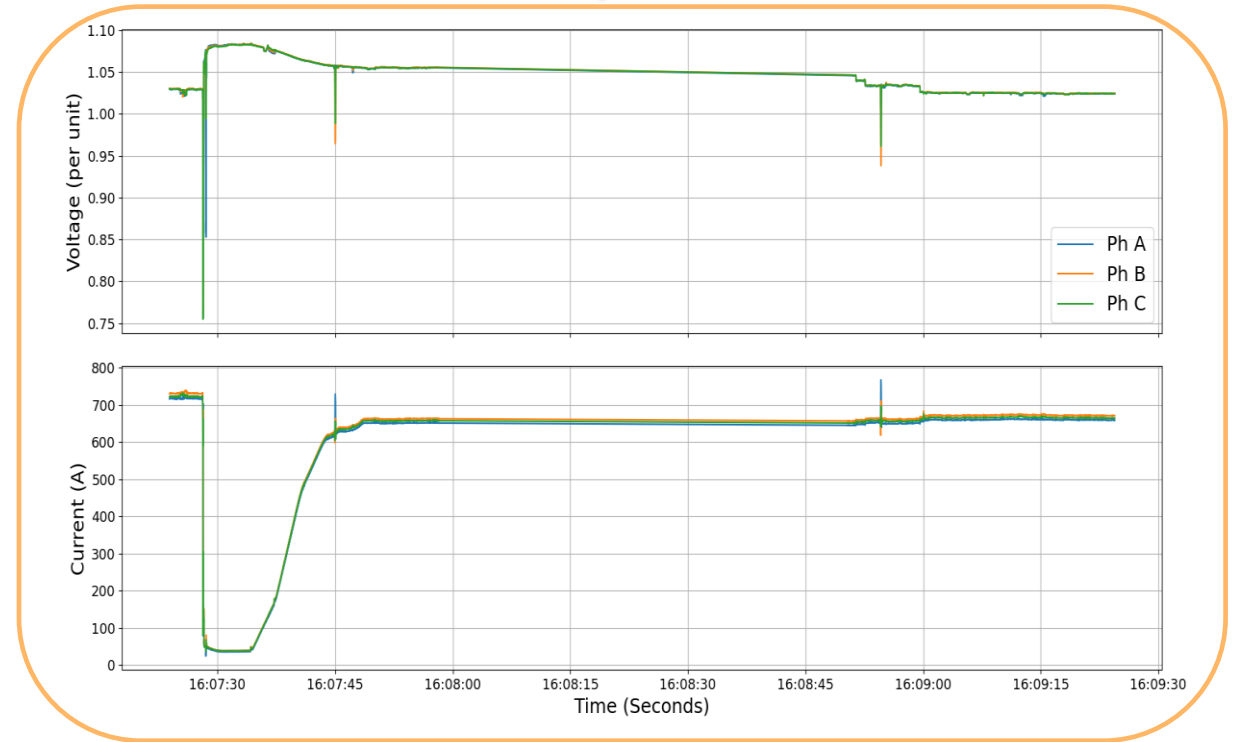
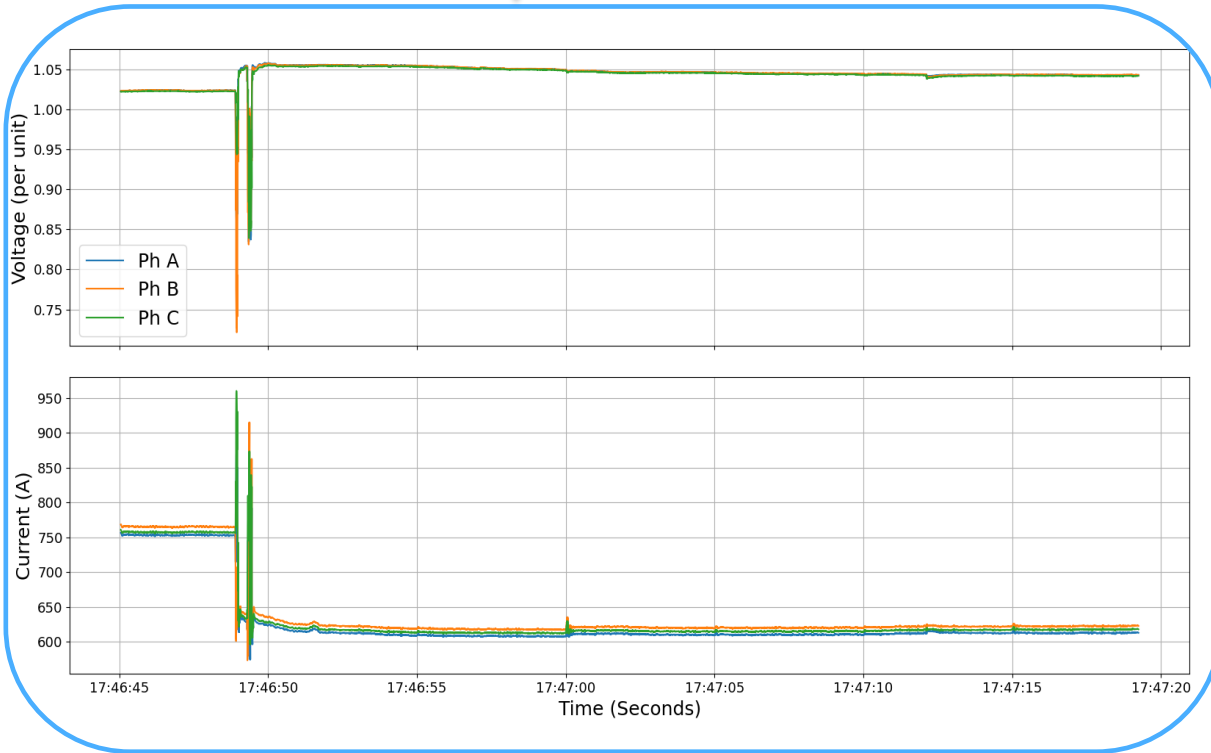


Data Center 6

May 3: About 20% load transfer but recovered within 5 mins

	Min Phase Voltage (pu)	Max Voltage Sag Duration (ms)
May 3	0.7205	67
June 19	0.7538	75

June 19: Total load transfer during the initial fault but load recovered



Note: On June 19, third and fourth voltage depression did not dip below 0.9pu

Key Findings


- Data centers responded with varying degrees of load transfer and recovery
- Customer conversations were critical to deeper understanding of load behavior
- A subset of data centers rode through the fault without any load transfer, irrespective of their distance from the fault position
- **Impossible** to determine behavior of individual facility without high-resolution POI data

Facility Interconnection Requirement (FIR) Updates

The FIR dictates performance and standards for transmission connected loads* and generation

- Oct 2024 update requires detailed load info
 - Attachment 2 – Customer Request Form
 - [NERC Data Center Information Collection Questionnaire](#)
 - Submission required 90 days ahead of energization
 - Phasor-domain data center dynamic model
 - Belt & suspenders approach to collecting facility info

* **Note:** Load is still connected at distribution level, but requirements set for customers > 50 MWs

	Dominion Energy Virginia - Electric Transmission Customer Request Form		
	Electric Transmission Planning	REVISION 1.0	Effective Date: 09/01/2024

Composite Load Model (CLM)

Total installed load (kW):	kW
Total installed distributed generation (kW):	kW
Total installed low side capacitor bank demand (kVar):	kVar
Total synchronous motor load (kW)	kW
Motor start type	
Motor speed control method	

Data Center Load Information

Total rated load including IT, power distribution and cooling (kW)	kW
Overall Data Center Power Factor (Lead/Lag)	Lead/Lag

Load Percentages

	Summer Daytime	Summer Nighttime	Winter Daytime	Winter Nighttime
Computing/Server Load:				
Lighting Load:				
Power Distribution Losses:				
Cooling load:				

Data Center Cooling System

Forced cooling system:	<input type="checkbox"/> None <input type="checkbox"/> Computer Room Air Conditioners (CRACs) with internal compressors <input type="checkbox"/> Computer Room Air Handlers (CRAHs) supplied with chilled water. <input type="checkbox"/> Air-Handling Units (AHUs) dedicated to the data center space <input type="checkbox"/> Other:
Cooling system motor driven components:	<input type="checkbox"/> Single-speed motors that are operated across the line (Motors connected directly to the AC supply) <input type="checkbox"/> Motors controlled by variable/adjustable speed drives or electronically commutated motors (ECMs) <input type="checkbox"/> Other:

FIR Updates Continued – October 2025

Attachment 8 sets dynamic performance requirements for data centers **over** 50 MWs

- Data centers required to ride-through six **50 – 70 ms** voltage depressions **without transferring to long-term backup generation**
 - Six depressions from fault through all reclosing cycles
 - Review of 5 years of clearing time data, shows this time range is realistic
 - *DEV to set voltage thresholds for ride-through (DE specific ITIC curve)*
- Sets frequencies at which data centers must not oscillate to avoid AI training impacts on generators
 - DEV to set MW thresholds
- Requires monitoring at the POI (for alternate **and** primary feeders at distribution level)
- Recommends setting low voltage thresholds for system events to 85% to reduce sensitivity (not the same as ITIC curve with time/voltage thresholds)

POI Monitoring & Data Use

- Varied use of normal and alternate distribution feeders to serve load makes it difficult to determine what load is be fed from where and when – **so DEV is requiring PQ monitoring on all feeds that could be used to serve the customer.**
 - Enables verification of compliance with ride-through standards
 - Supports model validation
 - Reduces complexity of RCAs
 - Upcoming FIR update will include detailed diagrams to avoid confusion from current language
- How are we going to manage all of this data effectively?
 - Automating data ingest across all different streams/time scales (SCADA, synchrophasor, power quality, point on wave)
 - Already have robust synchrophasor data analysis platform to leverage
 - *Ease of access to data is almost as key as having the data*

Utility Side Recommendations

- Review historical transmission fault clearing time data to ensure timing you recommend to data centers for ride through is consistent with what you see in the field
- It is also recommended for utilities to replace any electromechanical relays in their system near where data centers are located.
 - *Electromechanical relays can operate variably when compared to digital relays depending on the condition of the electromechanical relays and other factors like temperature within the control enclosure that can lead to timing variably during reclosing cycles and make coordinating with data centers difficult.*
 - *Especially true in areas with large number of data centers clustered together*
- Install high-fidelity monitoring at the appropriate location to discern individual data center behavior

Ongoing Efforts

- Continued FIR updates
 - Does not go through the same stakeholder consensus processes associated with RTOs/ISOs
 - Allows for consistent, incremental progress since it is updated every 6 months
 - Plans to include voltage ride through curves, magnitude and frequency limits for (dynamic) ramp rates
- Interrogation of reactive power management (FACTs, generator settings, etc)
- Automating data retrieval across streams/platforms for model development/validation/RCA
- Benchmarking of system and load models against data
- Continued customer engagement



**Dominion
Energy[®]**

Powering Your Every Day.SM

BREAK



10 Minutes



Return: 10:40 AM

Integrating Large Loads in Operations

Chris Piong

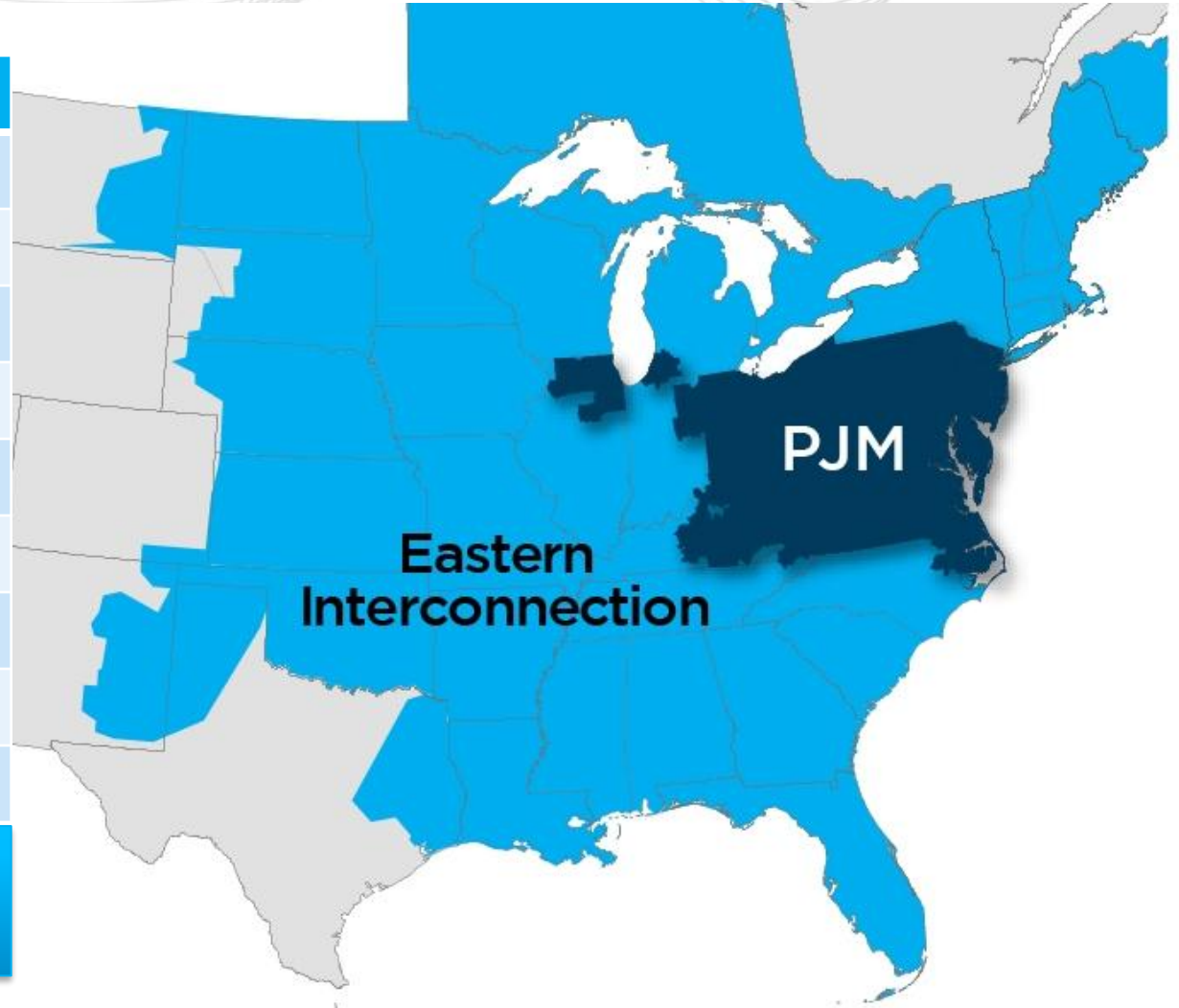
Sr Director, Operations Planning

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Key Statistics

Member companies	1,116
Millions of people served	67+
Peak load in megawatts	165,563
Megawatts of generating capacity	185,989
Miles of transmission lines (BES)	88,333
Gigawatt hours of annual energy	828,161
Generation sources	1,673
Square miles of territory	368,906
States served	13 + DC

- 25.6% of generation in Eastern Interconnection
- 25.2% of load in Eastern Interconnection



As of 2/2026

PLANNING



Planning for the future like...



OPERATIONS



Matches supply with demand like...



MARKETS



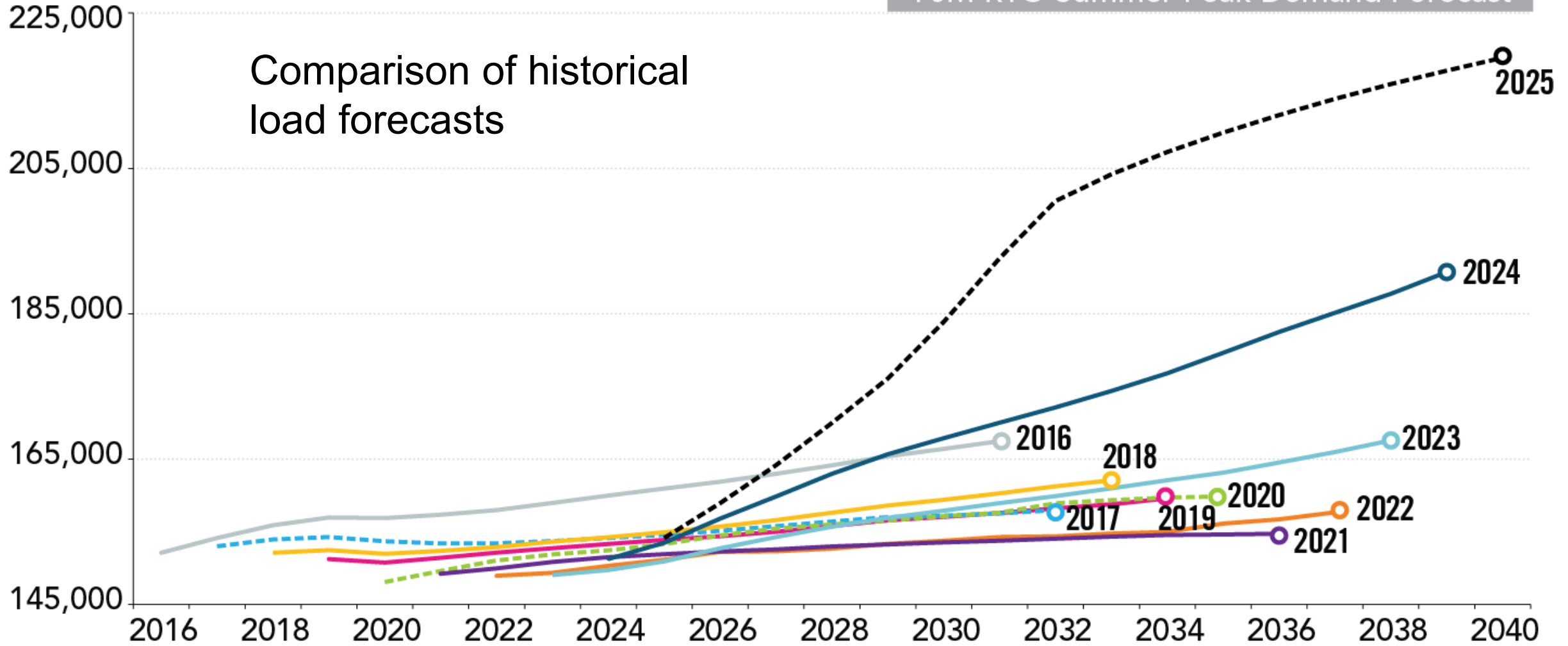
By Zone	
AE	\$20.59
AFP	\$25.55
APS	\$25.10
ATSI	\$25.46
RC	\$37.91
COMED	\$25.68
DAYTON	\$26.22
DFOK	\$25.38

Energy Market Pricing like...



PJM RTO Summer Peak Demand Forecast

Load (MW)

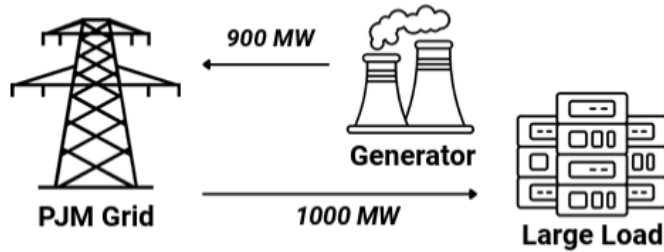


- Transmission Build
- Resource Adequacy
- Operational complexities

- RTEP continues to identify significant upgrades and new build to support
 - Challenging timelines due to siting/permitting and supply chain limitations
 - Outage coordination between multiple TOs (MTOPOC)
 - Multiple concurrent outages or major transmission paths, with limited ability to recall
 - Load growth continuing

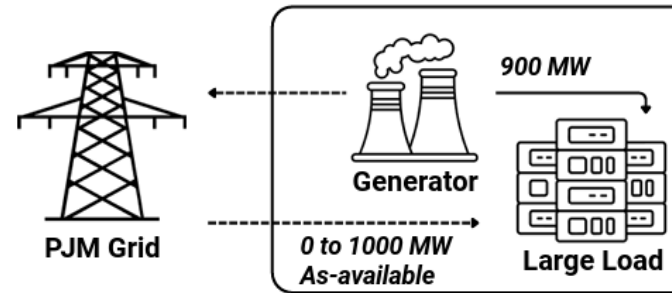
- The Base Residual Auction (BRA) has cleared 6.5GW short of IRM '27/28 DY
- Actions in play to address Resource Adequacy concerns
 - Connect and Manage: Permit load to connect, but have procedures to curtail
 - Expedited Interconnection Track (EIT) for new supply
 - Co-Location FERC Order to permit load to connect
 - Helpful if new generation comes with the load
 - Backstop Auction to procure additional supply

Figure 1: “Front-of-Meter” Network Integration Transmission Service



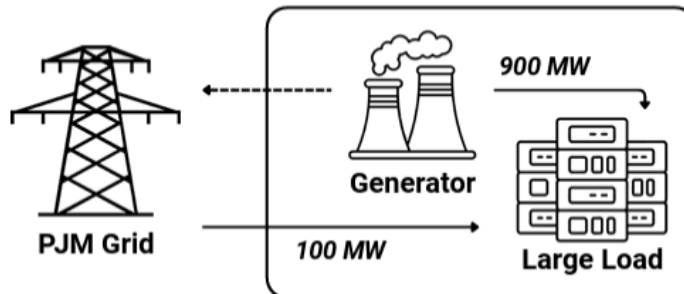
- PJM plans all transmission and generation to serve load
- Requires more transmission infrastructure and can take longer, but provides the broadest benefits

Figure 3: New Non-Firm Contract Demand Transmission Service



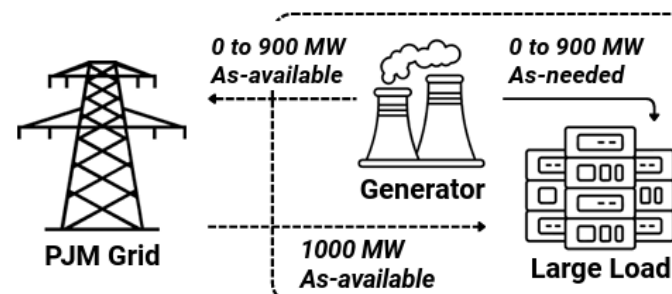
- Load pays for non-firm transmission service on an as-reserved basis
- PJM has no obligation to serve load if grid is unavailable
- All or portion of the generator is devoted to co-located load

Figure 2: New Firm Contract Demand Transmission Service



- Load pays for 100 MW of firm transmission service
- PJM has no obligation to serve load above 100 MW
- All or portion of the generator is devoted to co-located load

Figure 4: New Interim Network Integration Transmission Service



- Load & Generator get non-firm service ASAP, and convert to firm service (Fig. 1) when grid upgrades are complete
- Generator can serve load while awaiting grid connection or when grid is unavailable

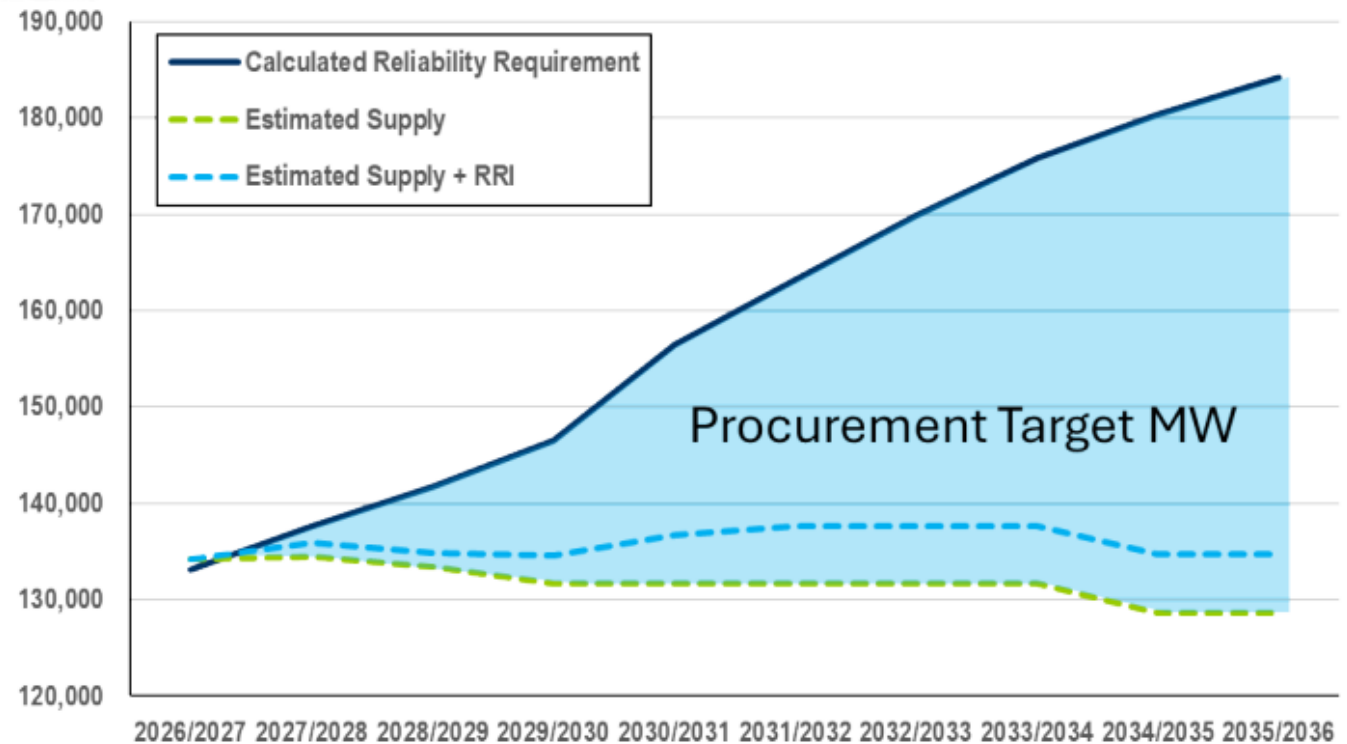


PJM Is Procuring Backstop Supply To Meet Growing Resource Adequacy Challenges

As part of PJM’s Board multifaced roadmap,¹ and in concert with the White House and PJM governors’ January 16 directive,² PJM plans to procure additional sources of energy to meet growing demand.

PJM Capacity Delivery Year	Estimated Reliability Requirement	Estimated Supply*	Potential Backstop Procurement
2026/2027	133,000	134,000	0
2027/2028	138,000	134,000	4,000
2028/2029	142,000	133,000	9,000
2029/2030	147,000	132,000	15,000
2030/2031	156,000	132,000	24,000
2031/2032	163,000	132,000	31,000
2032/2033	170,000	132,000	38,000
2033/2034	176,000	132,000	44,000
2034/2035	180,000	129,000	51,000
2035/2036	184,000	129,000	55,000

*Estimated Supply is 27/28 Committed Capacity, less that of announced retirements



(1) <https://www.pjm.com/-/media/DotCom/about-pjm/newsroom/2026-releases/20260116-pjm-board-outlines-plans-to-integrate-large-loads-reliably.pdf>,

(2) <https://www.energy.gov/documents/statement-principles-regarding-pjm>

- Large Load dynamics
 - System Disturbance response (volt/freq ride through)
 - Potential RAS design under FERC co-location rules
- Lack of consistent interconnection Standards/Requirements
 - NERC letter to FERC 3/20
 - Level 3 Alert to be issued in May
 - Revised Standards submitted by 12/31/2026



Recent FERC Actions on Large Loads

March 26, 2026



Disclaimer

I am speaking on my own behalf, and my comments do not necessarily reflect the views of the Commission, individual Commissioners, or other Commission staff members.



What is FERC?

The Federal Energy Regulatory Commission, or FERC, is an independent agency that, among other responsibilities:

- Regulates the rates, terms, and conditions of the transmission and wholesale sale of electricity in interstate commerce; and
- Protects the reliability of the high voltage interstate transmission system through mandatory reliability standards.



FERC's Mission

Assist consumers in obtaining reliable, safe, secure, and economically efficient energy services at a reasonable cost through appropriate regulatory and market means, and collaborative efforts



FERC's Obligations under the Federal Power Act

Among FERC's enabling statutes is the Federal Power Act (or FPA), under which FERC must ensure that the rates, terms, and conditions of transmission service that public utilities propose are just and reasonable and not unduly discriminatory or preferential.

- **FPA Section 205:** FERC reviews public utilities' filings.
- **FPA Section 206:** Upon its own motion or a complaint, FERC initiates proceedings to determine whether existing rates, terms, and conditions of transmission service are just and reasonable and not unduly discriminatory or preferential. If FERC finds that they are not, FERC will establish just and reasonable and not unduly discriminatory or preferential replacement rates, terms, and conditions for such service.



Co-Located Load Arrangements

- In June 2024, PJM filed an Amended Interconnection Services Agreement (Amended ISA) among itself, Susquehanna Nuclear, LLC, and PPL Electric Utilities Corporation in Docket No. ER24-2172.
 - The Amended ISA included revisions concerning the treatment of load located behind the generator's point of interconnection to the transmission system.
- In November 2024, FERC rejected the Amended ISA, finding that PJM did not demonstrate that the proposed non-conforming provisions were necessary due to specific reliability concerns, novel legal issues, or other unique factors.



November 2024 Technical Conference

- In November 2024, FERC held a Commissioner-led technical conference regarding co-located loads at generating facilities.
- Discussion topics included:
 - An overview of the issues surrounding large loads co-located at generating facilities, as well as approaches other than co-location to serve large loads;
 - Potential issues associated with the development and operation of large loads co-located at generating facilities; and
 - State policy issues relating to large co-located loads, including the interaction between state and federal jurisdiction.



February 2025 Show Cause Order

- On February 20, 2025, FERC issued an order finding that PJM's tariff did not appear to sufficiently address the rates, terms, and conditions of service that apply to co-location arrangements, thus leaving generators and loads unable to determine what steps they can take to set up co-location arrangements.
- The order directed PJM and the PJM Transmission Owners to explain why the PJM tariff remained just and reasonable or, alternatively, to propose changes to remedy the identified concerns.



December 2025 PJM Co-Location Order

- On December 18, 2025, FERC issued an order finding PJM's tariff unjust and unreasonable because it does not include transmission services that reflect Eligible Customers taking service on behalf of Co-located Loads that are willing and able to limit their energy withdrawals from the transmission system under certain conditions.
- The order required the creation of three new transmission services:
 - Interim, non-firm transmission service
 - Firm Contract Demand transmission service
 - Non-Firm Contract Demand transmission service



December 2025 PJM Co-Location Order (Cont.)

The order also required PJM to:

- File a detailed informational report on the status of the proposals considered in the Critical Issue Fast Path stakeholder process;
- Identify any problem statements, issue charges, or other ongoing stakeholder processes that aim to increase the pace of adding generating capacity in the PJM region; and
- Specify which of these initiatives would support the addition, on an expedited basis, of new generation that is sufficient to serve large loads, like data centers, while meeting PJM's near-term system resource adequacy needs.



Department of Energy

ANOPR

- On October 23, 2025, the Secretary of Energy directed FERC to consider an Advance Notice of Proposed Rulemaking (ANOPR) focused on the timely and orderly interconnection of large loads to the interstate transmission system.
- Initial comments were due to FERC on November 21, 2025, and reply comments were due on December 5, 2025.



SPP HILL and HILLGA Filing

In January 2026, the Commission accepted SPP's proposed High Impact Large Load study process and High Impact Large Load Generation Assessment process.

- SPP's HILL study process describes the necessary studies and operational requirements for large loads to interconnect to SPP's transmission system.
- SPP's HILLGA process establishes an expedited study process and new limited interconnection service for generating facilities that support a HILL.



Other Large Load-Related Filings

- Agreements to study new large load interconnections
- Agreements under which large load customers agree to pay to accelerate needed network upgrades
- Agreements pursuant to which large load customers agree to contribute fixed amounts towards the costs of network upgrades if their loads fail to come online as quickly as planned or to materialize at all
- Conditional transmission service for new large loads



Questions?





Forum Survey and Closing Remarks

Survey



- We invite you to complete a brief survey about your experience with the NPCC Reliability Forum. The questionnaire will take approximately two-three minutes to complete.

2026 Outreach Activities



State & Provincial Outreach

- NERC and NPCC Seasonal Reliability Assessments
- NERC Long-Term Reliability Assessment (LTRA) and NPCC Long Range Adequacy Overview (LRAO)

Reliability Forums

- Various Reliability Topics
- Regional Transmission, Large Loads, Resource Adequacy

Regional Webinars/Workshops

- Spring and Fall Compliance and Reliability Conference
- Physical and Cyber Security
- Extreme Weather Preparedness





QUESTIONS?

Contact Us: npcc.org/contact

Gerry Dunbar and Faisal Nahian
NPCC Communications

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03/26/2026

