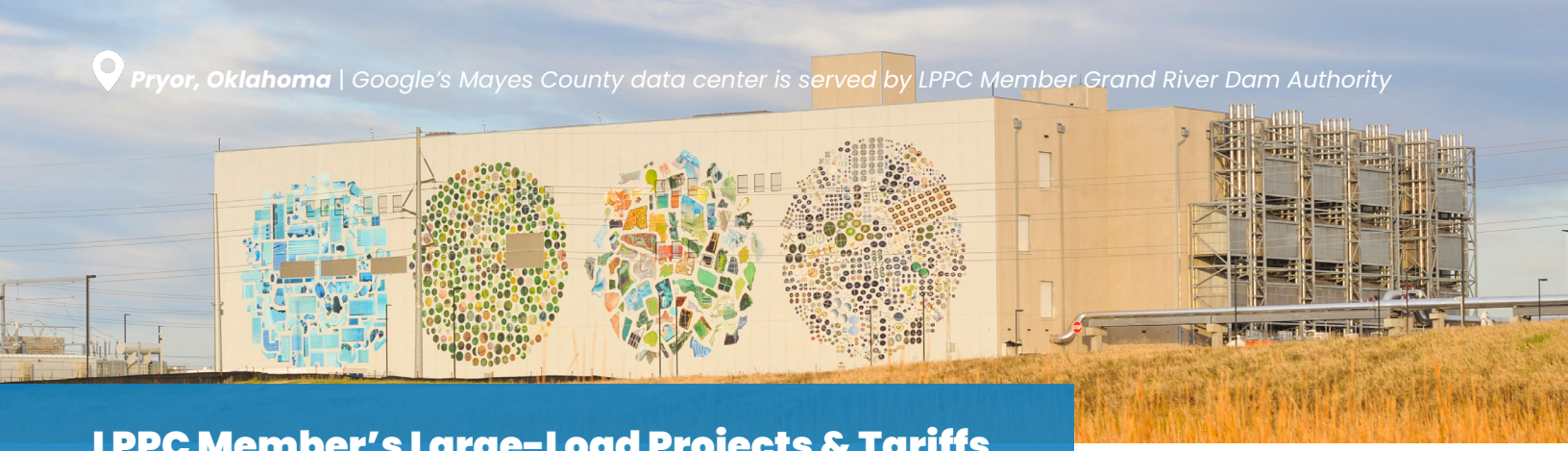


Pryor, Oklahoma | *Google's Mayes County data center is served by LPPC Member Grand River Dam Authority*

LPPC Member's Large-Load Projects & Tariffs

Executive Summary:

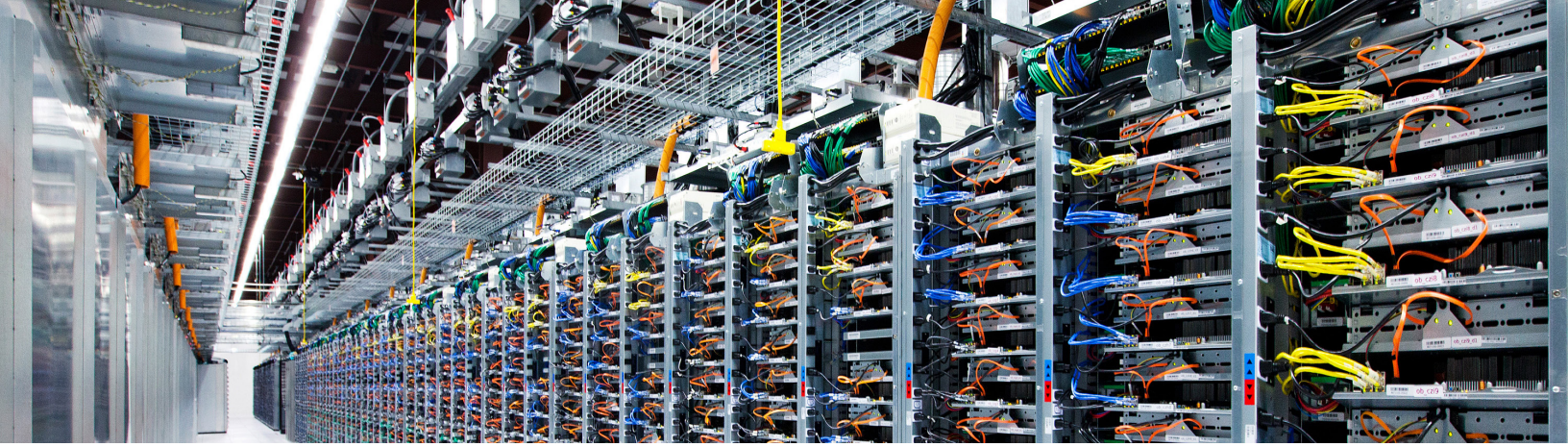
In its recent FERC Docket No. RM26-4 filing for its Advance Notice of Proposed Rulemaking (ANOPR), LPPC underscored that its member utilities have **long employed public power tariffs, special contracts, and bilateral service agreements to integrate large loads while protecting all customers from undue cost-shifting**.

Based on data collected from LPPC members in early 2026, the highlights of this snapshot are as follows:

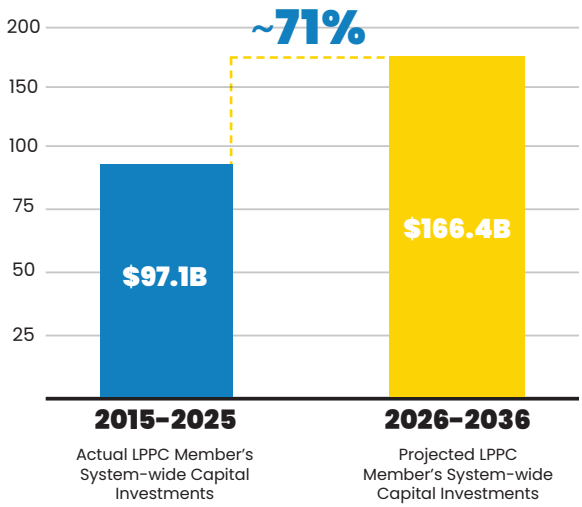
- LPPC member utilities collectively report more than **50 gigawatts of large load requests across committed projects and speculative, early-stage inquiries**, spanning data centers, manufacturing, and other industrial facilities. These requests contribute more than **$166 Billion in capital investments**.
- LPPC-member utilities currently serve over **18% of the nation's data centers** and are projected to serve **more than a third of new data centers anticipated over the next five years**.
- Select member utilities with publicly citable projects represent billions of additional dollars in customer investment and thousands of megawatts of new connected load being developed in partnership with public power utilities.
- LPPC member utilities are employing a variety of customer-protective mechanisms, including dedicated substations, upfront infrastructure funding requirements, take-or-pay provisions, minimum billing demand charges, exit fees, and bring-your-own-power arrangements, to ensure large load growth does not burden existing ratepayers.
- Both approved tariffs and contract-based structures are in active use across multiple states, demonstrating that states and utilities have developed effective frameworks before any federal mandate.

We continue to underscore the importance of crafting federal policies that build upon, rather than disrupt, this progress. LPPC member utilities look forward to continuing to work with the Commission, state regulators, and large load customers to advance the nation's economic and national security interests.

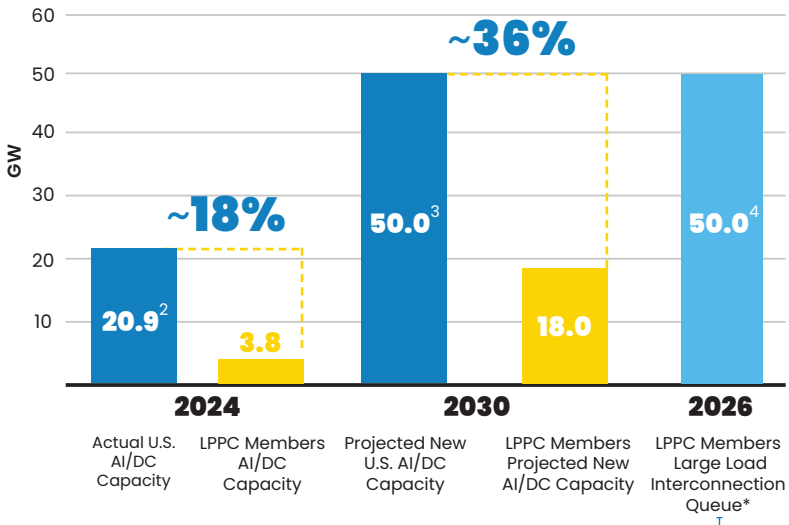
LPPC LARGE PUBLIC POWER COUNCIL



Capital Expenditure[1]



Current/Projected AI, Data Center, & Large Load Interconnections



**Committed projects and speculative, early-stage inquiries including AI/Data Center, Advanced, and Industrial Manufacturing*

Categories of Load

Committed Load	Probable Load	Speculative Load
Backed by executed contracts, deposits, collateral, take-or-pay obligations, or other binding financial commitments by the requesting large-load customer;	Supported by concrete development evidence, such as site control, permitting milestones, construction timelines, or customer-specific development milestones, but not yet backed by binding commitments to fund utility infrastructure.	Reflected in early-stage inquiries, placeholder requests, nonbinding expressions of interest, or multiple competing large-load customer requests across jurisdictions.

[1] *LPPC Member Current & Projected Large-Load Capacity | Capital Investment and Large Load Growth Survey, November 2025*

[2] *2024 National AI/Data Center Capacity | Energy & AI, World Energy Outlook Special Report, International Energy Agency, April 2025*

[3] *2030 National Projected AI/Data Center Load Growth | Department of Energy Resource Adequacy Report, July 2025*

[4] *LPPC Member Current Interconnection Queue | Large Load Projects and Tariffs Survey, March 2026*

LPPC Member's Large-Load Projects

The following table compiles select large load projects that are underway within LPPC member utility service territories and have been publicly announced or may be described in aggregate form. This information has been compiled from member survey responses. Projects are included where load is approximately 20 MW or larger.

LPPC Member Utility	Customer Type	Status	Key Details
Chelan County PUD (Washington)	Data Centers	Under Construction	• Four active data center projects totaling 1,150 MW at full buildout. • Customers funded 100% of required infrastructure and are required to bring their own power supply.
Colorado Springs Utilities (Colorado)	Data Center	Under Construction	• 50 MW data center; targeted in-service date July 2026. • Customer-funded; served via market power purchase. • Generation or dedicated supply arrangement required.
Grand River Dam Authority (Oklahoma)	Data Centers	In Development	• 1,930 MW of actionable data center projects are in development with signed contracts • Requires additional generation, transmission, and substation infrastructure. • Combination of single or multi-phase buildouts
	Other Projects	Projected	• Another 900 MW of speculative inquiries in the pipeline.
Grant County PUD (Washington)	Data Centers	In Development	• 330 MW data center in development • Requires a transmission expansion project beyond existing capital plans, plus new substations.
	Data Centers	Projected	• Project in concept; final peak load not yet finalized.
	Manufacturing	In Development	• 65 MW manufacturing project • Single-phase buildout requiring a new substation

Lincoln Electric System (Nebraska)	Data Center - Google	Completed	• Google is the first customer under LES's Large Power with Market Energy rate. • Service required the construction of a new dedicated substation at 115-kV. • Google and LES entered into an agreement to source generation contracts; the arrangement has produced two wind capacity contracts to date. • Rate design protects existing customers from the financial risk associated with large load service.
Los Angeles Department of Water and Power (California)	Data Centers	In Development (Under Contract)	• 100 MW announced project
	Industrial	Under Construction	• Two plants totaling 408 MW (+25 MW auxiliary); currently under construction with an expected in-service date of June 2026.
Lower Colorado River Authority (Texas)	Data Center	In Development	• Four data center projects totaling more than 2,750 MW. • Infrastructure needs include design and engineering of a 345-kV line and substation upgrades. • Opportunities for behind-the-meter builds with customer-owned generation
	Manufacturing	In Development	• Two facilities totaling 2,700 MW. • Infrastructure requirements include design and engineering of a 345-kV line and substation upgrades. • Phased load ramp schedule.
	Cryptocurrency	In Development	• 220 MW cryptomining facility

LPPC Member Utility	Customer Type	Status	Key Details
Nebraska Public Power District (Nebraska)	Data Centers	Under Construction	• 70 MW data center (two phases) currently under construction; first phase targeted for January 2027. • Transmission upgrades required.
	Manufacturing	In Development	• 135 MW facility; two phases with expected in-service date December 2029. • $1 billion investment; investor-funded transmission upgrades.
	Industrial	In Development	• 50 MW industrial project in development; expected in service September 2028. • $500 million customer investment.
Long Island Power Authority (New York)	Industrial	Under Construction	• Phase Two buildout of existing national laboratory loads, increasing the existing facility to 120 MW (increase of 63 MW)
New York Power Authority (New York)	Data Center	Under Construction	• Capacity expansion from 168.8 MW to 435 MW; project currently under construction. • Two-phase buildout; expected in service January 2027. • Substation and transmission upgrades required.
	Data Centers	Projected	• Nine additional data centers (totaling ~5 GW) are in the speculative inquiry stage for the North Country region.
Omaha Public Power District (Nebraska)	Data Centers	In Development	• Two data center projects totaling 200 MW anticipated in-service 2031. • Transmission and distribution upgrades are likely required; generation arrangements are also under consideration.
Orlando Utilities Commission (Florida)	Data Center	In Development	• 100MW facility in development requiring substation upgrades
	Manufacturing	In Development	• 30MW facility in development requiring substation upgrades

Platte River Power Authority (Colorado)	Data Centers	Projected	• Two data center projects in: 50 MW (two phases) and 90 MW (three phases). • Requires existing distribution to full transmission line, substation expansion, and new generation.
Salt River Project (Arizona)	Data Center	In Development (Under Contract)	• • 100 MW announced project
	Data Center	Completed	• 2,570 MW completed project as of December 2025. • Required combinations of substation, transmission, and generation upgrades.
	Data Center	Under Construction	• 3,660 MW additional data center capacity currently under construction; expected completion through 2032. • Requires combinations of substation, transmission, and generation upgrades.
	Data Center	In Development (Under Contract)	• Multiple projects totaling 960 MW; expected in service by 2035. • Requires combinations of substation, transmission, and generation upgrades.
	Manufacturing	Completed	• 980 MW project was completed in 2025.
	Manufacturing	Under Construction	• Two projects totaling 250 MW; expected completion in 2026 and 2027.
	Manufacturing	Projected	• 350 MW manufacturing project; expected completion through 2035.
Sacramento Municipal Utility District (California)	Data Centers	In Development (Under Contract)	• 50 MW of data centers with expected in-service dates in 2028 • Distribution upgrades required for data center projects
	Commercial	In Development (Under Construction)	• Two projects totaling 90 MW • $250 million customer investment
Seattle City Light	Data Center	Under Study	• Applications for three projects totaling 249 MW • Under cluster planning study

LPPC Member's Large-Load & Tariffs

LPPC member utilities across the country have approved or are developing large load tariffs, service regulations, or special contract structures that define pricing terms unique to large load customers and include protections to ensure they cover their full cost of service. As of March 2026, the following member utilities have implemented or are developing such frameworks.

State	LPPC Member Utility	Status	Summary
Arizona	Salt River Project	Approved	E-67 Price Plan - Requires 20MW load (or reasonably expected to achieve 20MW five years from date of service) with milestone payments and minimum demand payments.
California	Sacramento Municipal Utility District (SMUD)	Under Development	In the process of developing a large load tariff.
Colorado	Colorado Springs Utilities	Approved	Electric Large Load (ELL) Tariff - Effective April 2026 and applicable to all loads over 10MW, requires a minimum 10-year contract with specific load requirements, retail service costs, and interim service through PPAs/CPAs.
Nebraska	Lincoln Electric System	Approved	Large Power with Market Energy - Effective January 2026, requires a dedicated substation at 115-kV for customers over 20 MW. Customer funds generation through separate contracts.
Nebraska	Nebraska Public Power District	Under Development	Will be applicable to all large load customer types
Nebraska	Omaha Public Power District	Approved	No. 261M - The Large Power - High Voltage Transmission Level tariff applies to all loads over 20 MW (161 kV) or 200 MW (345 kV).
New York	Long Island Power Authority	Approved	Electric Tariff & Interconnection Agreement - · Projects where the NYISO load interconnection procedures are applicable follow the NYISO deposits and study requirements. Projects that are not applicable require study by the Transmission Owner with study agreement(s). Large Loads over 20 MWs require screening for the application of a performance requirement. Transmission Connected loads (23KV+) require an Interconnection Agreement. Additional payments & milestones will be identified in the Interconnection Agreement.

New York	New York Power Authority	Approved	Manual 23 - Follows NYISO load interconnection procedures last updated in 2017 (≥10 MW at 115 kV or ≥80 MW below 115 kV).
Oklahoma	GRDA	Approved	Large General Use Supplemental Rider - approved in April 2024 with an effective date of October 2026, this rider applies to customers taking service at the transmission level once demand exceeds 380MW.
Texas	Austin Energy	Approved	Large General Service Tariffs - Effective November 2025, large load customers fall into one of four buckets determined by power consumption and voltage. Additional tariffs being developed.
South Carolina	Santee Cooper	Approved	Experimental Large Load Schedule (L-25-LL) - adopted and effective April 2025, and is mandatory for all customers using more than 50 MW/month.
Washington	Seattle City Light	Under Development	Large Load policy for new and expanding services over 10 MVA at a single service entrance. 2026 target launch.
Washington	Snohomish County PUD	Approved	Schedule 37 - New Single Large Loads - Effective Jan 2010, applies to all customers using more than 10 MW/month. All existing customers who met this criterion at the time of adoption were transferred to this rate schedule.
Washington	Tacoma Power	Approved	Schedule VLL - Very Large Load Service - For loads that average more than 10MW per month, and includes minimum demand charge for 10 MW.

Common Elements of Large Load Tariffs and Contracts

LPPC member utilities have developed several common protective elements. The table below summarizes key provisions and how they protect everyday customers.

Tariff Element	How it Protects Everyday Customers
Eligibility / MW Threshold	• Defines the type of large load customer that qualifies, such as a minimum power demand (ranging from 5 MW to 75+ MW across LPPC members). • Ensures unique terms apply only to the largest customers and creates transparency around costs to serve them.
Customer-Funded Infrastructure	• Requires the large load customer to pay upfront for dedicated substations, distribution upgrades, transmission lines, and other required facilities. • Ensures grid upgrades needed for large loads do not burden existing ratepayers.
Bring-Your-Own Generation Requirements	• Requires large load customers to procure or contract for their own generation supply. • Insulates other customers from capacity cost impacts and ensures the customer is accountable for its own energy needs.
Minimum Billing Demand / Take-or-Pay	• Bills the customer at a minimum demand level (e.g., fixed percentage of expected peak demand), even if actual usage falls short. • Ensures large load customers pay for the infrastructure built to serve them, regardless of fluctuating usage.

Tariff Element	How it Protects Everyday Customers
Contract Term and Exit Fees	• Commits the large load customer to a minimum service term and assesses fees for early termination. • Reduces the risk of stranded assets that would otherwise be borne by all customers.
Financial Assurance / Creditworthiness	• Requires the customer to post collateral or demonstrate creditworthiness prior to construction. • Ensures the large load customer can cover its costs, including bills and any exit fees.
Dedicated Substation / Separate Rate Class	• Requires construction of a dedicated substation or creates a separate customer class for large loads. • Isolates cost accounting for large load service, making it easier to ensure fair cost allocation.

We continue to underscore the importance of crafting federal policies that build upon, rather than disrupt, current and planned developments, reflecting state and local processes and stakeholder efforts. LPPC member utilities are committed to ensuring the timely interconnection of large loads while also ensuring benefits and protection for all customers and the grid. We look forward to working with the Commission and others on this national priority.

San Antonio, Texas | *CyrusOne's San Antonio V, 20MW data center facility served by LPPC Member CPS Energy*