FERC'S LARGE-LOAD SHOW-CAUSE ORDERS: WHAT THE SIX RTOS MUST ANSWER, AND BY WHEN.

On June 18, 2026, FERC opened six Federal Power Act section 206 proceedings, one per RTO and ISO (PJM EL26-67, SPP EL26-68, NYISO EL26-69, MISO EL26-70, CAISO EL26-71, ISO-NE EL26-72): show cause why the tariff is just and reasonable without large-load provisions, or say what would fix it. They follow DOE's October 23, 2025 proposal (RM26-4); abeyances moved the answers to November 16 and 20, 2026.

WHAT FERC ASKED · THE FOUR PRONGS

One directive, four prongs, two ways to answer.

- Within 60 days, each RTO (PJM with its Transmission Owners) must show cause why its tariff "remains just and reasonable and not unduly discriminatory or preferential" without four provisions, or "explain what changes to the Tariff would remedy the identified concerns".
- **(a)** "the application process, study procedures, and ongoing operational requirements" for service to large loads. **(b)** Network Upgrade cost transparency and "a pro forma cost recovery agreement" among the RTO, the transmission owner and the customer serving the load. **(c)** service for "flexible large loads that are willing and able to limit their use of the transmission system under certain conditions". **(d)** terms for interconnection customers serving "electrically proximate large load or co-located load".
- **The working definition** (P 58): a new commercial or industrial customer at a single site with "a peak load of 50 MW or greater", connected "at a voltage level of greater than 69 kV", not in a co-location arrangement. Electrically proximate, by FERC's example: load within two substations of the generator.
- **Also due in 30 days:** a report on how the RTO will ensure "adequate generation will be available to serve existing and new large loads".
- FERC "strongly encourage[s]" section 205 filings instead. Abeyances are "limited to 90 days" (SPP received 95); extensions draw "great disfavor".

WHERE EACH REGION STANDS · OCTOBER 2026

Five answer on November 16, SPP on November 20.

- **PJM (EL26-67).** Co-location rules set December 18, 2025 (EL25-49); Interim Resource Adequacy Service filed August 13 (ER26-3515); section 205 filing targeted for November 16, the day its response is due.
- **MISO (EL26-70).** Large-load package filed August 28 (ER26-3650, requested effective December 4) and a zero-injection agreement (ER26-3552); response November 16.
- **SPP (EL26-68).** High Impact Large Load studies accepted January 14, 2026; Conditional HILL Service effective July 1; abeyance to November 20.
- **CAISO (EL26-71).** Flexible Interim Load Interconnection, 50 MW or greater with no voltage test, to the Board October 28; filing by November 16.
- **ISO-NE (EL26-72).** 50 MW above 60 kV, 90-day studies, bring-your-own-new-capacity, firm, interim and non-firm service; filing by November 16.
- **NYISO (EL26-69).** Firm and non-firm concept; response November 16; tariff filing targeted around March 2027. **ERCOT** is outside these dockets; NOGRR 282 has been in effect since August 1, 2026.

WHAT TO DO NOW

Plan to the 50 MW line and the November answers.

- **Assume a large-load process in every region** at 50 MW or more above 69 kV. The RTO's answer or filing sets the study window, the data list and the service choices.
- **Pick the service shape now:** firm, interim (SPP's CHILLS, CAISO's FILI, ISO-NE's interim service) or non-firm, which means limiting use when the system is short. Prong (c) answers name the terms.
- **Co-locating with generation:** FERC's orders define co-located load by the December 2025 PJM order, and prong (d) asks each RTO for interconnection service shaped to serve co-located and electrically proximate load.
- **Prepare the model data.** NERC's May 4, 2026 Level 3 alert lists what Transmission Owners and Planners will ask of a computational load: size and power factor by season, UPS and ride-through settings, composition, ramp rate, protection. GridStrong's clients file that package with the interconnection request.
- **Budget for prong (b):** a cost-recovery agreement for Network Upgrades, and public posting of your project's costs. Comments follow 30 days after each response; a section 205 filing on November 16 starts FERC's 60-day clock, into mid-January 2027.

Oct 23, 2025
DOE sends FERC the large-load proposal (RM26-4).

Jun 18, 2026
Six show-cause orders, EL26-67 to EL26-72; responses due in 60 days.

Aug 14, 2026
FERC grants abeyances; responses move to Nov 16 and Nov 20.

Nov 16, 2026
Five RTOs respond, or file section 205 proposals that suspend the response (PJM, CAISO, ISO-NE plan to).

Nov 20, 2026
SPP responds.

Dec 2026
Comments on the responses, 30 days after each filing.

Sources (quotations verbatim): FERC, PJM Interconnection, L.L.C., 195 FERC ¶ 61,211 (June 18, 2026), Docket No. EL26-67-000, and the companion orders 195 FERC ¶ 61,212 (MISO), 61,213 (SPP), 61,214 (CAISO), 61,215 (ISO-NE), 61,216 (NYISO) · DOE, Advance Notice of Proposed Rulemaking, Docket No. RM26-4-000 (October 23, 2025) · FERC abeyance orders in EL26-67 through EL26-72 (August 14, 2026) · MISO ER26-3650 and ER26-3552, PJM ER26-3515 (August 2026) · SPP HILL order, 194 FERC ¶ 61,031, and CHILLS order, 195 FERC ¶ 61,196 · CAISO draft final proposal and ISO-NE Large Loads Integration summary (September 24, 2026) · NERC Level 3 Alert, Computational Load (May 4, 2026). Status as of October 11, 2026. Educational material, not legal advice.

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