

**UNITED STATES OF AMERICA
BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION**

**Advance Notice of Proposed Rulemaking,)
Ensuring the Timely and Orderly)
Interconnection of Large Loads)**

Docket No. RM26-4-000

COMMENTS OF THE INSTITUTE FOR PROGRESS

The Institute for Progress hereby files comments pursuant to the Federal Energy Regulatory Commission (Commission or FERC)'s Advance Notice of Proposed Rulemaking (ANOPR) on Ensuring the Timely and Orderly Interconnection of Large Loads.

I. Introduction

The Institute for Progress (IFP) is a non-partisan research and policy organization dedicated to accelerating scientific, technological, and industrial progress. IFP strongly supports the Principles identified in the Commission's ANOPR. This ANOPR is a necessary step to address the interconnection of artificial intelligence data centers, which are critical for the United States' economic growth, security, and scientific innovation. Our comments focus on two primary and interconnected points:

First, American AI leadership. The ANOPR's principles directed at accelerating and standardizing large load interconnection are needed to maintain United States leadership in both AI research and development as well as AI deployment.

Second, the need for enhanced security. The ANOPR's Principle 14 identifies the need for security for large loads such as AI data centers, but it does not go far enough. The unique features of these users require mandatory grid safety and cybersecurity requirements to protect

the bulk power system (BPS) from novel, sophisticated threats. We urge the Commission to move swiftly to a final rule that both enables innovation and hardens our grid infrastructure.

II. Background

A. Procedural Background

On October 23, Department of Energy (DOE) Secretary Chris Wright issued a letter directing the FERC to consider an ANOPR¹ to establish rules for the interconnection of large electricity loads to the transmission system.² DOE's letter directed FERC to take final action by April 30, 2026. This is an ambitious timeline for a significant new rule.

FERC docketed the ANOPR (RM2-6-4000) and requested an initial round of comments by November 14, 2025, and reply comments by November 28, 2025.³ On November 4, 2025, the Organization of MISO States, Inc. filed a motion requesting an extension of time from November 14, 2025, to November 28, 2025. The motion was granted on November 7, with the comment period extended to November 21, 2025, and reply comments due December 5, 2025.⁴

After reviewing comments on the ANOPR, FERC may issue a notice of proposed rulemaking (NOPR) and solicit public comments. After reviewing the comments, FERC may

¹ An Advanced Notice of Proposed Rulemaking is an optional step in the regulatory process in which an agency outlines general concepts and solicits public input that can form the basis of a more concrete and specific Notice of Proposed Rulemaking.

² U.S. Dep't of Energy, *Secretary Wright Acts to Unleash American Industry and Innovation with Newly Proposed Rules* (Oct. 24, 2025), <https://www.energy.gov/articles/secretary-wright-acts-unleash-american-industry-and-innovation-newly-proposed-rules>.

³ *Ensuring the Timely and Orderly Interconnection of Large Loads – Advance Notice of Proposed Rulemaking*, Docket No. RM26-4-000 (Fed. Energy Regulatory Comm'n, Draft Issued Oct. 23, 2025), <https://www.energy.gov/sites/default/files/2025-10/403%20Large%20Loads%20Letter.pdf>.

⁴ Fed. Energy Regulatory Comm'n, *Notice Granting Extension of Time*, Docket No. RM26-4-000 (Nov. 7, 2025), <https://www.ferc.gov/news-events/news/ferc-issues-notice-extending-comment-period-proposed-anopr-interconnection-large>.

issue a final rule, which would presumably include deadlines by which regulated entities must comply with the final rule.⁵ Affected parties may then request rehearing of the final rule. Following FERC's response to any comments, FERC may issue a rehearing order that could include changes to the original rule. This order would then be final and subject to challenge in court by a party with standing.

B. Legal Background

The ANOPR arises under Section 403 of the DOE Organization Act, which authorizes the Secretary of Energy to propose rules for consideration and final action by FERC.⁶ Section 201(b) of the Federal Power Act (FPA) grants the Commission jurisdiction over “the transmission of electric energy in interstate commerce” and “the sale of electricity at wholesale in interstate commerce.”⁷ States retain jurisdiction over matters such as local distribution, generation facilities, and intrastate transmission; however, the Commission has previously established that interconnection to the transmission system is within the Commission's jurisdiction under the FPA.

Specifically, in Order No. 2003, the Commission required standardized interconnection procedures and agreements for large generators, defined as those greater than 20 MW.⁸ In that order, the Commission determined that generator interconnection is a “critical component of open access transmission service”⁹ and that standardization was necessary to limit opportunities

⁵ FERC generally provides utilities with substantial time to submit compliance filings (often taking more than one round of review) and following approval to implement any necessary operational changes.

⁶ 42 U.S.C. § 7173.

⁷ 16 U.S.C. § 824(b).

⁸ *Standardization of Generator Interconnection Agreements and Procedures*, Order No. 2003, 104 FERC ¶ 61,103 (2003).

⁹ *Id.* at 9.

for undue discrimination, reduce costs and time for competitors, and encourage needed infrastructure investment.

Consistent with Order No. 2003, the ANOPR reasons that interconnection for large loads, as with large generators, is critical to open access transmission service. Moreover, large load interconnections represent a “practice directly affecting Commission-jurisdictional wholesale electricity rates.”¹⁰ This activity thus falls within the Commission’s authority to ensure wholesale rates are just, reasonable, and not unduly discriminatory or preferential.¹¹

Because any large load connects to the transmission system to obtain transmission service and its appurtenant benefits, regulating such interconnections falls within the FPA’s core purpose and the Commission’s exclusive authority over the rates, terms, and conditions of that service.

The ANOPR does not assert jurisdiction over any retail sales (even if the large load is an end-use customer) or the siting or expansion of generation facilities; those roles remain reserved to the States, consistent with the FPA.¹²

III. Rapid access to electric power is needed to maintain US AI R&D leadership, economic competitiveness, national security, and scientific innovation.

American firms currently lead the world in AI development, having developed approximately 70% of the world’s most compute-intensive AI models since 2020.¹³ Domestic AI firms have also attracted over \$470 billion in investment, dwarfing competitors.¹⁴ AI capital

¹⁰ See *FERC v. Elec. Power Supply Ass’n*, 136 S.Ct. 760, 764 (2016)).

¹¹ 16 USC. § 824d.

¹² 16 USC. § 824(b)(1).

¹³ Tim Fist & Arnab Datta, *How to Build the Future of AI in the United States* (Inst. for Progress, Oct. 23, 2024), <https://ifp.org/future-of-ai-compute/>.

¹⁴ AI Index Steering Committee, Inst. for Human-Centered AI, Stanford Univ., *The AI Index 2025 Annual Report* (Apr. 2025), <https://www.energy.gov/sites/default/files/2025-10/403%20Large%20Loads%20Letter.pdf>.

expenditures are a major source of recent GDP growth,¹⁵ with trillions likely to be invested over the next decade.¹⁶ However, this leadership can only be maintained if we have the physical grid capacity to build and power the next generation of computing infrastructure.

In addition to its economic importance, the strategic value of AI is a core national security interest. DOE's 2025 Resource Adequacy report warns that "a failure to power the data centers needed to win the AI arms race... could result in adversary nations shaping digital norms and controlling digital infrastructure, thereby jeopardizing US economic and national security."¹⁷ Concentrating AI development in the United States not only captures economic value but, critically, places these high-value assets under the protection of US intelligence and security frameworks. If power and interconnection bottlenecks are not addressed, US companies may be compelled to relocate AI infrastructure abroad. This would compromise the US' competitive advantage and significantly increase national security risks as securing advanced AI compute becomes far more challenging in foreign countries, where oversight and control are more limited and the risk of intellectual property theft is greater.¹⁸

Maintaining US leadership on AI R&D is also crucial to maintaining our position as the

¹⁵ *AI Has Added \$160 Billion to 'True GDP' Since 2022, Goldman Sachs Says*, *Fortune* (Sept. 17, 2025), <https://fortune.com/2025/09/17/how-much-gdp-artificial-intelligence-goldman-sachs-160-billion/>.

¹⁶ Lareina Yee & Noshir Kaka, *The Cost of Compute: A \$7 Trillion Dollar Race to Scale Data Centers* (McKinsey & Co., Oct. 21, 2024), <https://www.mckinsey.com/industries/technology-media-and-telecommunications/our-insights/the-cost-of-compute-a-7-trillion-dollar-race-to-scale-data-centers>.

¹⁷ U.S. Dep't of Energy, *Evaluating the Reliability and Security of the United States Electric Grid* (July 2025), <https://www.energy.gov/sites/default/files/2025-07/DOE%20Final%20EO%20Report%20%28FINAL%20JULY%207%290.pdf>.

¹⁸ Konstantin F. Pilz, Yusuf Mahmood & Lennart Heim, *AI's Power Requirements Under Exponential Growth: Extrapolating AI Data Center Power Demand and Assessing Its Potential Impact on U.S. Competitiveness*, RAND Corp., RR-A3572-1 (2025), https://www.rand.org/pubs/research_reports/RRA3572-1.html.

global scientific leader. AI is already enabling scientific progress, such as in protein folding, for which the AlphaFold team was awarded the nobel prize. As impressive as AI-enabled scientific progress has been to date, it is merely the prologue to even greater progress in future.¹⁹ By leading the development and implementation of advanced AI tools, platforms, and underlying hardware, the US ensures that its researchers possess the foundational computational infrastructure necessary to drive the next wave of breakthroughs across medicine, energy, and fundamental research, thereby securing its position at the global scientific forefront.

IV. Under current rules, lack of electricity threatens American leadership on AI R&D

The computational demands of next-generation, frontier AI models are scaling faster than our current energy ecosystem can support. Projections for new energy demand from AI are massive. DOE's 2025 Reliability Report assumes 50 GW of new data center load by 2030.²⁰ A RAND Corporation report, extrapolating from current trends in AI chip supply, projects that to host 75% of global AI compute, the US would need to make about 51 GW of power capacity available by 2027.²¹ IFP has estimated that if the US is to continue hosting the majority of AI data centers, the power demand would grow by 105 GW between 2024 and 2030.²² Without decisive intervention, the nation's power grid will be unable to meet this projected demand, threatening the technological innovation that AI promises.

¹⁹ The Institute for Progress's recent series *The Launch Sequence* highlighted AI-enabled scientific projects like "Scaling Materials Discovery with Self-Driving Labs" which proposes closed-loop systems where AI rapidly designs novel materials and autonomous robots perform real-world synthesis and testing, drastically compressing decades of R&D time in critical fields like clean energy. Other proposals in this Sequence include "A Million-Peptide Database to Defeat Antibiotic Resistance" and "The Replication Engine" which seek to use AI to unlock vast, high-quality biological data and fix structural flaws in scientific validation, respectively. Inst. for Progress, *The Launch Sequence* (Aug. 11, 2025), <https://ifp.org/the-launch-sequence/>.

²⁰ U.S. Dep't of Energy, *supra* note 17.

²¹ Pilz et al., *AI's Power Requirements*, *supra* note 18.

²² Fist et al., *Future of Compute*, *supra* note 13.

Moreover, as previous research by IFP has found, staying at the forefront of AI development will likely require the ability to build data centers at a scale previously unseen – potentially as large as five gigawatts (GW) for a single facility – within the next five years.²³ Under current policies, the US is structurally unprepared to meet this demand and thus the US risks ceding the future of AI – and the economic and national security advantages that come with it – to nations with more coordinated and streamlined industrial energy policies.

Our domestic electrical system struggles in multiple ways to accommodate the load growth described above. Despite our country’s abundant natural gas resources, utility-scale generation using natural gas is constrained by a lack of turbines.²⁴ Emerging technologies that can provide baseload power – like geothermal and advanced nuclear – are promising but remain years to decades away. Meanwhile, over two terawatts of wind, solar, and storage projects sit in interconnection queues, and the total timeline to interconnection now averages more than five years.²⁵ Delivery infrastructure is also constrained, with transformer wait times now stretching to as much as five years.²⁶ The result is that new data centers and other large loads wait while utilities and grid operators prepare to accommodate their demand.

These problems are not hypothetical. In Northern Virginia, the world’s largest data center

²³ *Id.*

²⁴ Jesse Cohen, Tyler Fitch & Lauren Shwisberg, *Gas Turbine Supply Constraints Threaten Grid Reliability; More Affordable Near-Term Solutions Can Help* (RMI, June 18, 2025), <https://rmi.org/gas-turbine-supply-constraints-threaten-grid-reliability-more-affordable-near-term-solutions-can-help/>.

²⁵ Brian Potter, *Inside the Interconnection Queue* (Construction Physics, Jan. 31, 2023), <https://www.construction-physics.com/p/inside-the-interconnection-queue>.

²⁶ Nat'l Infrastructure Advisory Council, *Addressing the Critical Shortage of Power Transformers to Ensure Reliability of the US Grid* (CISA, June 11, 2024), https://www.cisa.gov/sites/default/files/2024-09/NIAC_Addressिंग%20the%20Critical%20Shortage%20of%20Power%20Transformers%20to%20Ensure%20Reliability%20of%20the%20US%20Grid_Report_06112024_508c_pdf_0.pdf.

market, Dominion Energy has warned that new connections could face wait times of up to seven years.²⁷ American Electric Power has paused new data center service agreements in 2023 due to grid constraints.²⁸ Even in Texas, equipment procurement and grid connection challenges are delaying some data center delivery dates for years.²⁹

Our strategic rivals do not have the same constraints. China is implementing a centrally planned AI and energy policy designed to pair new AI data centers with new, dedicated power sources.³⁰ The inability to build and power gigawatt-scale AI infrastructure on American soil is a strategic failure. Without fundamental, fast-acting reform to how we approve, permit, and build energy and data infrastructure, the US is on track to lose its lead in AI R&D.³¹

V. Reforms to Planning, Interconnection, and Flexibility Can Unlock US Electricity and Maintain US AI Leadership

The ANOPR's proposals are needed to help solve the problems described above. The principles proposed for future rulemaking directly address these challenges by establishing a dedicated, standardized, and accelerated framework for large load interconnection and providing a policy pathway to avoiding unnecessary buildout of generation and transmission assets. We highlight several of the ANOPR's principles that are most critical to responding to these

²⁷ Naureen S. Malik, *Data Centers Face Seven-Year Wait for Power Hookups in Virginia*, Bloomberg News (Aug. 29, 2024), <https://www.bloomberg.com/news/articles/2024-08-29/data-centers-face-seven-year-wait-for-power-hookups-in-virginia>.

²⁸ *Regulator Approves AEP Ohio's Landmark Data Center Tariff*, Power Mag. (Oct. 15, 2024), <https://www.powermag.com/regulator-approves-aep-ohios-landmark-data-center-tariff/>.

²⁹ *Why the Future of DFW's Data Center Market Is Moving West*, D Mag. (Aug. 2025), <https://www.dmagazine.com/commercial-real-estate/2025/08/why-the-future-of-dfws-data-center-market-is-moving-west/>.

³⁰ State Council, P.R.C., *China Outlines Actions to Accelerate Digital Economy Development* (Sept. 8, 2025), https://english.www.gov.cn/news/202509/08/content_WS68be8c3ec6d0868f4e8f566d.html.

³¹ Amy Hamilton, *OpenAI Pushes White House to Tackle China's Power Dominance in AI, Energy Sectors*, Utility Dive (Nov. 14, 2024), <https://www.utilitydive.com/news/openai-white-house-china-energy-dominance/803967/>.

problems below.

A. Improving Planning and Prioritizing Viable Projects

A key failure of the current system is the inability of transmission providers to get accurate demand forecasts, leading to reactive, slow planning. The generator interconnection queues are a clear example of this problem, as they are clogged with speculative projects that delay viable ones.

The ANOPR is appropriately modeled on Order No. 2023 to address this problem. Principle 4, which calls for standardized study deposits, readiness requirements, and withdrawal penalties, is a necessary means of filtering out speculative projects, providing transmission providers with more useful information to more accurately forecast demand on their systems. This will allow grid planners to focus finite study resources on viable, large-scale AI projects and plan long-term transmission upgrades with confidence.

B. Enabling Speed and Certainty Through Siting and Cost Efficiency

To build the gigawatt-scale AI clusters needed to maintain US AI leadership, developers need financial certainty and pathways for rapid construction. The ANOPR provides several tools to achieve this.

First, efficient siting, as described in principles 3 & 5.³² The ANOPR's focus on studying hybrid facilities (load paired with generation) is critical. Principle 3 encourages the co-location of new loads and generation, which can minimize the need for costly network upgrades. Principle 5 would allow hybrid facilities to be studied based on the amount of injection and/or withdrawal rights requested; for example, a 900 MW data center co-located with a 1000 MW generator could request only 100 MW of net injection rights, dramatically reducing its grid

³² *Advance Notice of Proposed Rulemaking, supra* note 3.

impact and avoiding years of delays associated with upgrades. This co-located infrastructure is critical for deploying next-generation infrastructure.

Second, Principle 8 proposes that large loads should be responsible for 100% of the network upgrades assigned to them.³³ This is appropriate because – though it places an additional financial burden on the large loads – such loads are well capitalized and this cost is small compared to the overall costs of their projects. Moreover, allocating responsibility in this way provides the cost certainty that developers, and their investors, critically need to finance multi-billion dollar projects. The current, often-socialized cost allocation is opaque and creates unpredictable delays.

Third, Principle 9 grants the interconnection customer the “option to build,” similar to the right afforded to generators.³⁴ This, too, could be a powerful accelerator, allowing an AI developer to leverage its own capital and construction expertise to build its own interconnection facilities (like substations) rather than waiting in a utility’s construction queue.

C. Unlocking Flexibility as the Key to Near-Term Deployment

The most powerful proposal for immediate impact is Principle 7, which proposes that “the interconnection study of large loads that agree to be curtailable... should be expedited.”³⁵ As discussed in Section III, building new generation and transmission takes years, but AI demand is arriving now. Load flexibility is the essential bridge. This flexibility – a commitment by a load to cease drawing energy from the grid at the direction of the system operator – can create numerous benefits to the bulk power system and to US AI leadership. The potential impact of this single policy change is profound. Research from Duke University’s Nicholas Institute has estimated

³³ *Id.*

³⁴ *Id.*

³⁵ *Id.*

that with even very low levels of curtailment – an “average annual load curtailment rate of 0.25%”³⁶ – the US grid could integrate “76 GW of new load” with minimal expansion of the existing power system. This approach is the most viable path to accommodating near-term AI demand without compromising grid reliability or affordability.

Accelerating interconnection for large loads conditioned on demand curtailment yields multiple benefits. Most importantly, it provides the essential grid capacity to accommodate these loads at all, maintaining US leadership in AI.

This flexibility directly also addresses the resource adequacy shortfalls³⁷ that the DOE and NERC have warned are threatening the grid, because it allows utilities to avoid or reduce new generation capacity procurements that would otherwise be needed to serve the new load. A related benefit is that rate payers and utilities also benefit, as they no longer need to construct network upgrades that are costly sources of interconnection delays. Moreover, by avoiding or deferring multi-billion-dollar investments in both transmission and generation capacity, this approach has the potential to counterfactually reduce rates for all existing customers.

In sum, by combining mechanisms to filter speculative projects (Principle 4), provide financial certainty and siting efficiency (Principles 3, 5, 8, and 9), and – most critically – unlock a “speed-to-power” pathway for curtailable loads (Principle 7), the ANOPR’s framework creates a viable, rapid, and workable process for deploying gigawatt-scale AI infrastructure, maintaining the US’s AI leadership while maintaining the reliability of the BPS. Adopting these reforms is one of the most direct policy actions the US can take to ensure its energy grid acts as an

³⁶ Tyler H. Norris et al., *Rethinking Load Growth: Assessing the Potential for Integration of Large Flexible Loads in US Power Systems*, Nicholas Inst. for Energy, Env't & Sustainability, NI R 25-01 (2025), <https://nicholasinstitute.duke.edu/publications/rethinking-load-growth>.

³⁷ U.S. Dep't of Energy, *supra* note 17.

accelerator, not a critical bottleneck, for maintaining America’s leadership in artificial intelligence.

VI. Forthcoming Rules Should Mandate Security for Large Loads, a New Threat Vector

IFP strongly supports the ANOPR’s focus on economic access and reliability. But we believe the Principles described therein fail to adequately address the profound security implications of this new load. AI data centers are high-value, critical national security assets. Concentrating gigawatts of controllable load onto the grid creates a novel threat vector that our strategic adversaries can exploit.

Principle 14 of the ANOPR states that “utilities serving large loads must meet all applicable NERC reliability standards and OATT provisions. . . NERC should review its reliability standards to determine if new registration categories or new or modified reliability standards are required to ensure reliability of the BES.”³⁸

This step is insufficient. A simple review is not enough. The Commission should use this rulemaking to ensure security is incorporated into these new facilities from the start. As discussed in greater depth below, and as documented in a new white paper from NERC’s own Large Loads Task Force,³⁹ AI data centers are loads that are not just large, they are networked, digitally-controlled, and present unique risks to the BPS.

A. The Unique Threat Profile of AI Infrastructure

AI data centers present a distinct and severe class of reliability and cybersecurity risk. As these facilities become integral to both the American economy and defense industrial base, they

³⁸ *Advance Notice of Proposed Rulemaking, supra* note 3.

³⁹ N. Am. Elec. Reliability Corp., *Large Loads Task Force (LLTF)* (2025), <https://www.nerc.com/who-we-are/committees/reliability-and-security-technical-committee-rstc/subcommittees-working-groups-and-task-forces/large-loads-task-force-lltf>.

present an increasingly attractive target for nation-state adversaries seeking to undermine US technological leadership. Recent analysis from the Center for a New American Security (CNAS) emphasizes that maintaining leadership in AI requires not merely building infrastructure, but actively bolstering data center security against adversaries who face mounting incentives to steal capabilities or disrupt operations.⁴⁰ Research from the Center for Security and Emerging Technology (CSET) further discusses how as AI systems become integral to cyber operations, sophisticated state actors may seek to sabotage AI infrastructure.⁴¹ Without robust security standards, the Commission risks leaving the engine of US innovation vulnerable to state-sponsored disruption, potentially ceding the decisive technological advantage of the 21st century to strategic competitors. A recent NERC white paper, “Characteristics and Risks of Emerging Large Loads” also provides empirical evidence for the threats to the BPS posed by AI data centers.⁴² We highlight two specific reliability risks that are not merely hypothetical, and that could be exploited by an adversary below.

First, a “Flash Load” attack. An adversary could target a data center’s load management system and, by compromising this system, an attacker could deliberately “flash” the load – repeatedly initiating and halting a gigawatt-scale job.⁴³ This would inject malicious load

⁴⁰ Janet Egan, Paul Scharre & Vivek Chilukuri, *Promote and Protect America’s AI Advantage*, Ctr. for a New Am. Security (Jan. 20, 2025), <https://www.cnas.org/publications/commentary/promote-and-protect-americas-ai-advantage>.

⁴¹ Wyatt Hoffman, *AI and the Future of Cyber Competition*, Ctr. for Security and Emerging Technology, (January 2021), <https://doi.org/10.51593/2020CA007>

⁴² N. Am. Elec. Reliability Corp. Reliability & Security Technical Comm., *Characteristics and Risks of Emerging Large Loads* (May 2024), <https://www.nerc.com/globalassets/who-we-are/standing-committees/rstc/whitepaper-characteristics-and-risks-of-emerging-large-loads.pdf>.

⁴³ Dylan Patel & Daniel Nishball, *AI Training Load Fluctuations at Gigawatt Scale & Risk of Power Grid Blackout* (SemiAnalysis, Nov. 21, 2024), <https://newsletter.semianalysis.com/p/ai-training-load-fluctuations-at-gigawatt-scale-risk-of-power-grid-blackout>.

dynamics directly into the BPS. NERC identifies this type of cybersecurity risk as “bad-actor control of large load demand (e.g., tripping or rapid ramping),”⁷ and warns that “[b]ad-actor control of a single site that large [over 1 GW] could affect BPS reliability.”

Second, a “LVRT Cascade” attack, an even more dangerous threat that comes from exploiting the facility’s own protective systems. This is not a theoretical risk. The NERC Task Force white paper documents a July 10, 2024, event where a transmission fault in the Eastern Interconnection caused the simultaneous loss of approximately 1,500 MW of voltage-sensitive load, primarily from data centers.⁴⁴ This happened because the data centers’ internal protection systems decreased consumption, switching some of their facility power to backup systems in response to the transient voltage disturbance. This sudden, massive load trip caused a dangerous frequency spike across the grid. An adversary could seek to trigger this exact response through a cyber-attack, effectively weaponizing the data center’s own protective settings to destabilize the grid and cause a cascading, system-wide failure.

B. Required Security Hardening Measures Should Be Included in the Rule

ANOPR Principle 14 calls on NERC to evaluate whether “new or modified reliability standards are required.”⁴⁵ We contend they are required. The Commission should use this rulemaking to mandate such reliability and, crucially, security standards – both cyber and physical – and ensure they attach to large loads that seek accelerated interconnection.

Specifically, FERC should establish a new registration category and direct NERC to undertake a standards-development process to address the risks of large loads, pursuant to FPA § 215(d)(5).⁴⁶ Specifically, the Commission should:

⁴⁴ NERC, *Characteristics and Risks of Emerging Large Loads*, *supra* note 42.

⁴⁵ *Advance Notice of Proposed Rulemaking*, *supra* note 3.

⁴⁶ 16 U.S.C. § 824o(d)(5).

- **Establish a New Registration Category:** Create a new, mandatory registration category (e.g., “Large Load Data Center Operator”) for all entities owning or operating loads above a defined threshold that are connected to the BPS and pose the specific data center risks identified.
- **Develop New, Mandatory Standards:** Direct NERC to develop new or modified Reliability Standards, including applicable Critical Infrastructure Protection (CIP) standards, that apply directly to this new category of registered entity. These standards must address, at a minimum, risks identified by the NERC LLTF, mandating secure load management controls and validated voltage/frequency ride-through capabilities. The standards should also address physical and cyber security risks to associated with these users.
- **Condition accelerated interconnection for flexible loads on adherence to enhanced security and reliability standards:** Propose a pro forma Large Load Interconnection Agreement (LLIA) that conditions accelerated interconnection on adherence to these forthcoming NERC standards and any other security practices the Commission finds are just and reasonable.

NERC’s ongoing “Large Loads Action Plan,” executed through its LLTF, should inform this work. The LLTF’s white paper has already successfully completed its first phase: identifying the risks, including cyber risks.⁴⁷ The LLTF’s planned next steps include an “Assessment of Gaps in Existing Practices, Requirements, and Reliability Standards” and a “Reliability Guideline: Risk

⁴⁷ NERC, *Characteristics and Risks of Emerging Large Loads*, *supra* note 42.

Mitigation for Emerging Large Loads.”⁴⁸

Therefore, IFP strongly urges the Commission to expand Principle 14. The proposed rule should explicitly direct NERC to establish new, mandatory reliability standards for the cybersecurity and physical security of large loads. Furthermore, the Commission should use the incentive of this rulemaking – access to an expedited interconnection process – to drive adoption. Adherence to these new, robust security standards should be a non-negotiable precondition for any large load to receive the “speed-to-power” benefits (Principle 7) proposed in this ANOPR.

IV. Conclusion

The Institute for Progress urges FERC to swiftly advance this proposed rulemaking as contemplated by Secretary Wright’s October 23, 2025 Letter. Promulgating new rules that standardize and expedite interconnection procedures for large loads can support US grid reliability and power American AI innovation. And the Commission should take this opportunity to integrate mandatory cybersecurity and reliability hardening measures as a precondition for expedited interconnection, protecting the BPS from novel threats and securing strategically critical AI technology from our adversaries.

Respectfully Submitted,

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⁴⁸ *Id.*

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