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June 22, 2026

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JUN 22 2026

LOUISIANA PUBLIC SERVICE COMMISSION

Notice of repository docket for Large Load Additions Non-Binding Guidelines. (LPSC
DOCKET NO. X-37921)

Dear Ms. Abel:

Please find the Comments of UCS, AAE, and Earthjustice in the above-referenced matter. Please file this motion in the record in accordance with the Commission's mail-in filing procedures. The original and two (2) copies will be submitted via FedEx. Thank you for your attention to this matter.

Respectfully submitted,



Paul Arbaje
Union of Concerned Scientists

**Comments of UCS, AAE, and Earthjustice in response to the LPSC technical conference
re: large load additions non-binding guidelines**

These comments are submitted on behalf of the Union of Concerned Scientists, Alliance for Affordable Energy, and Earthjustice in response to the Louisiana Public Service Commission's ("LPSC" or "Commission") proposed large load additions non-binding guidelines. We appreciate the LPSC hosting a technical conference and soliciting written comments from interested parties on this critically important topic.

The Union of Concerned Scientists ("UCS") is a leading science-based advocacy nonprofit with more than half a million supporters nationwide, including more than 1,000 in Louisiana. We put rigorous, independent science into action, developing solutions and advocating for a healthy, safe, and just future. As part of this effort, UCS's Climate and Energy Program is engaged in several venues to ensure robust requirements are established to reliably connect new large loads while ensuring the system costs associated with serving new large loads are properly allocated to the causers of those costs. These venues include the Federal Energy Regulatory Commission ("FERC"), as well as state utility commissions in Michigan, Pennsylvania, Wisconsin, Illinois, and here in Louisiana.

Alliance for Affordable Energy ("AAE") is a non-profit advocacy organization based in Louisiana, working for over 40 years to represent the interests of residential energy customers. Among the values that serve our mission to make home energy both affordable and environmentally responsible, good governance and equitable processes are among our top priorities. AAE is a member based organization, and has participated in hundreds of regulatory proceedings in the state.

Earthjustice is a nonprofit environmental law firm with offices and staff throughout the nation, including on the Gulf Coast, as well as around the Lower 48, Alaska, and Hawaii. For the past decade, Earthjustice has advocated for the affordability and reliability of clean energy technologies in regulatory proceedings before the Louisiana Public Service Commission and Council of the City of New Orleans. Earthjustice prioritizes protecting everyday Louisianans from risks created by integrating new large loads into the electric grid.

In April 2026, UCS released *Data Center Threats in Louisiana: Protecting Communities from Big Tech's Costly Impacts*¹ that modeled the potential system costs and public health impacts from meeting Louisiana's projected data center-driven demand growth without appropriate ratepayer and community protections in place. UCS also released two other analyses in the past year on the topic of data center interconnection and service:

¹ Available at: <http://www.ucs.org/sites/default/files/2026-04/Data-Center-Threats-in-Louisiana-issue-brief-4-14.pdf>.

- *Data Center Power Play: How Clean Energy Can Meet Rising Electricity Demand While Delivering Climate and Health benefits*²
- *Connection Costs: Loophole Costs Customers Over \$4 Billion to Connect Data Centers to Power Grid*³

I - The LPSC should not finalize guidelines or requirements without a robust understanding of the issues and additional stakeholder dialogue on the appropriate solutions.

While we appreciate the LPSC hosting a technical conference on these issues and soliciting written comments, this should be the start, not the end of the LPSC's transparent consideration of the issues and engagement with interested parties to find workable solutions. Interconnection and service of new loads of this size and scale, as well as the unique operating characteristics of data centers, is unprecedented and the industry (along with its regulators at the state and federal levels) is just now beginning to understand what is necessary and what is possible to meet this moment in a way that protects reliability and ratepayers. NERC's Large Load Task Force has several efforts underway.⁴ Several ISOs and RTOs, including MISO,⁵ SPP,⁶ and ERCOT⁷ now have Large Load Working Groups developing requirements for large load connection to the bulk power system. Further, industry advisory groups and standards-making bodies are also taking action, such as the Energy Systems Integration Group ("ESIG")⁸ and the Institute for Electrical and Electronics Engineers ("IEEE").⁹

The discussions surrounding large load interconnection and the identification of critical needs and best practices are dynamic and rapidly evolving. The LPSC's one-day technical conference and this comment opportunity are not enough to enable the robust dialogue and vetting of available information necessary for well-informed policy making.

To that end we have two recommendations for the LPSC's consideration:

- 1) Create a large load interconnection working group comprised of LPSC staff and consultants, regulated utilities, technical experts, and other interested parties to develop a

² Available at: <https://www.ucs.org/sites/default/files/2026-01/Data-Center-Power-Play-report-final.pdf>.

³ Available at: <https://www.ucs.org/sites/default/files/2025-09/PJM%20Data%20Center%20Issue%20Brief%20-%20Sep%202025.pdf>.

⁴ <https://www.nerc.com/initiatives/large-loads-action-plan>.

⁵ <https://www.misoenergy.org/engage/committees/large-load-working-group/>

⁶ <https://www.spp.org/markets-operations/high-impact-large-load-hill-integration/>

⁷ <https://www.ercot.com/committees/tac/llwg>

⁸ <https://www.esig.energy/working-groups/large-loads/>

⁹ IEEE. "Review of Industry Efforts and Standards of Grid Readiness for Data Center Deployment," January 29, 2026. <https://ieeexplore.ieee.org/document/11366058/>.

statewide approach to managing the reliability risks associated with new large load interconnections. This working group would be tasked with staying abreast of research, policymaking, and real-world experience with new large load integration issues, identifying best practices and regulatory gaps, and making recommendations to the LPSC.

- 2) Provide opportunities for ongoing input from stakeholders and other interested parties, including on the planned staff report coming out of this proceeding prior to its finalization.

A new large load interconnection working group and ongoing opportunities for stakeholder input would go a long way towards ensuring responsible, durable, and workable solutions to serving new large loads while protecting reliability and minimizing harms to Louisiana communities.

II - Protecting ratepayers necessitates a mandatory tariff to dictate conditions for LPSC approval rather than “non-binding guidelines”.

While we appreciate Mr. Sisung’s opening comments at the May 7th technical conference that the proposed guidelines should put parties on notice as to what the LPSC wants to see prior to deciding on a certification application, non-binding guidelines are not sufficient when it comes to ensuring system reliability or protecting ratepayers from shouldering unnecessary costs. To fulfill its responsibility to ratepayers and Louisiana communities, the LPSC should be moving, similar to other jurisdictions¹⁰, to enact mandatory interconnection criteria that need to be met before new large loads can connect to the Louisiana grid. Doing so will better protect reliability, facilitate more efficient and timely consideration of new large load interconnection proposals and is squarely within the authority of the LPSC. A mandatory tariff would also allow the Commission to move beyond one-off, bilateral contracts between utilities and large loads, which created a host of problems in Docket U-37425 including limited transparency and questionable legal enforceability.¹¹

In addition to supporting grid reliability, developing technical standards and interconnection requirements can create a pathway for data centers to interconnect to the grid more quickly. NERC’s reliability guideline for large loads points out that with a robust set of reliability standards and technical interconnection requirements in place, data centers can connect to the grid more quickly:

Reliable integration of emerging large loads is not only essential for protecting the BPS but also to accommodate additional large loads faster. When interconnection and

¹⁰ See: <https://sepapower.org/large-load-tariffs-database/>.

¹¹ See, for example, the Alliance for Affordable Energy and Union of Concerned Scientists’ Opposition to the July 11, 2025 Contested Settlement in Docket U-37425: <https://lpscpubvalence.lpsc.louisiana.gov/portal/PSC/ViewFile?fileId=p9LfpUINYbk%3D>.

operational processes are structured to ensure reliability from the outset, emerging large loads can connect faster and in greater magnitude.¹²

The current body of research, actions by other states, and UCS experience in several other jurisdictions convinces us that the LPSC can establish minimum large load interconnection requirements without dissuading new large load investments. Maintaining a reliable system is not “non-binding”. It should be a core principle of the LPSC deliberations over new interconnection requests, and it warrants minimum mandatory requirements.

Lastly, we want to emphasize the importance of robust planning in successfully accommodating large load demand going forward. To be blunt: the LPSC’s current Integrated Resource Planning (IRP) process is not up to the task. The use of outdated planning assumptions, a lack of formal discovery processes,¹³ and an inability or unwillingness to hold regulated utilities accountable leaves Louisiana effectively rudderless as it attempts to navigate these dynamic times. Going forward, a more robust and transparent IRP process will be critical to prepare the state for future demand on the electric system and identify system investments that can both accommodate new large loads while delivering reliability, resilience, economic benefits, and public health benefits to Louisiana ratepayers and communities.

As part of this process, we strongly encourage the LPSC to consider reforms to its IRP processes that will complement new guidelines or requirements for large load interconnection and ensure that system investments approved today provide benefits to all ratepayers in the years to come.

III - Reliability considerations must be front and center in LPSC deliberations over large load interconnection.

Much of Ms. Shelton’s comments during the first half of the technical conference focused on the desire of the LPSC to maintain jurisdiction over reliability requirements for new large loads. While we support efforts at the federal and regional levels to ensure interconnection requirements are standardized and robust across the bulk power system, we also agree that the LPSC has jurisdiction over state requirements and a responsibility to establish robust and workable reliability requirements for large loads. Most importantly, the LPSC has the authority to implement these requirements immediately while discussions of the limits of other regulatory authorities is ongoing.

¹² NERC. “Risk Mitigation for Emerging Large Loads: Large Loads Working Group Reliability Guideline,” May 2026. https://www.nerc.com/globalassets/our-work/guidelines/reliability/RG_Risk-Mitigation-For-Emerging-Large-Loads.pdf. Page vi.

¹³ An administrative law judge only ruled very recently in Entergy Louisiana’s IRP (Docket U-37764) that discovery is permitted in IRPs: <https://lpscpubvalence.lpsc.louisiana.gov/portal/PSC/ViewFile?fileId=fjdq62Jxtlo%3D>.

Maintaining reliability can start with resource adequacy considerations – making sure there are enough resources with the appropriate attributes connected to the system to meet system needs at all times. But reliability – particularly in the context of meeting this moment of surging demand from dynamic computational loads, requires much more.

III.I - Large data centers are bringing new grid-reliability challenges

NERC summarizes the existing gaps in reliability standards for new large loads in its Large Load Task Force white paper¹⁴: “Currently, developers, owners, and operators of large loads are not required to be NERC registered entities under NERC’s Registry Criteria Rules of Procedure. This means that large loads are not required to adhere to Reliability Standards. Operators have already cited multiple events in the Eastern Interconnection (EI) and ERCOT systems that involved large loads in which it was difficult to obtain information from the large load customer, impeding the operator’s ability to investigate loss-of-load events. While load currently does not need to register or be involved in the investigation, the magnitude of these loads poses a risk to system stability if the loads behave unexpectedly.”

There are five characteristics unique to large data centers that exacerbate their risk to grid reliability, as described by Elevate Energy Consulting in their recent report: Practical Guidance and Considerations for Large Load Interconnections¹⁵:

1. **Size.** Large data centers may exceed historical large loads by orders of magnitude, as evidenced by Entergy Louisiana’s current proposal for as much as 5 GW of new generating resources to serve the Richland Parish Meta facility. If the data center indeed grows this large, this demand will exceed four times the peak demand of the city of New Orleans. Multiple data centers may also be in close proximity, amplifying their impact.
2. **Prevalence:** Compared to the wide distribution and slow growth of historical large loads, data center interconnection requests are rapidly increasing, compounding risks to reliability and exacerbating the challenges of ensuring grid stability as more large loads seek to interconnect over a relatively short period of time.
3. **Difficulty in sharing data:** For grid planners and operators to accommodate large loads, detailed data is required about how they interact with the grid. Several challenges have prevented the sharing of this information, including concern about trade secrets,

¹⁴ Available at: https://www.nerc.com/globalassets/who-we-are/standing-committees/rstc/3_doc_white-paper-characteristics-and-risks-of-emerging-large-loads.pdf (at p. 15).

¹⁵ Ryan Quint et al., Practical Guidance and Considerations for Large Load Interconnections (Elevate Energy Consulting, GridLab, May 2025), 3, <https://gridlab.org/portfolio-item/practical-guidance-and-considerations-for-large-load-interconnections/>.

sensitivity, and security. Data gaps are also prevalent as technology is advancing quickly and the necessary data may not even be available or fully understood.

4. **Load characteristics.** Unlike traditional large industrial loads which are dominated by motors, up to 80% of the load within a data center may be from information technology equipment and power electronics.¹⁶ Recent research from Microsoft, OpenAI, and NVIDIA describe how the nature of operations at data centers results in “high variability in power consumption” resulting in “large power swings,” and that the “frequency spectrum of these power swings” is capable of “causing physical damage to the power grid infrastructure.”¹⁷
5. **Sensitivity to grid disturbances:** Data center loads are very sensitive to fluctuations in voltage and frequency and typically utilize uninterruptible power supplies (“UPS”) and/or backup power supplies, allowing them to quickly disconnect from the grid when they observe a power quality issue. A July 2024 event in Northern Virginia illustrated the potential impact of such large load disconnections; around 60 data centers totaling over 1,500 MW of load disconnected in response to voltage fluctuations, triggering even greater disturbances to grid voltage and frequency.¹⁸ Such events are expected to become more frequent and trigger more severe consequences if the risks are not properly mitigated.

NERC’s Large Loads Task Force white paper summarizes the challenges and their implications:

“Large loads pose risks in both the planning and operations horizons. Their quick interconnection timelines and large peak demands drive generation and transmission adequacy risks. The fast ramp rates and variability of the loads could exhaust reserves for balancing and contribute to voltage and frequency instability. If system planners and operators lack accurate dynamic models, they may be unable to predict ride-through and system behaviors during events. Much of the [power electronics load] can contribute to harmonics and voltage fluctuations. Large loads like data centers can also be susceptible to cyber-attacks that could trigger load ramps. Additionally, the rapid pace of load integration with large loads’ magnitude could negatively impact system resilience. Large

¹⁶ Brett A. Ross and James D. Follum, Electromagnetic Transient Modeling of Large Data Centers for Grid-Level Studies (Pacific Northwest National Laboratory (PNNL), Richland, WA (United States), January 15, 2026), doi:10.2172/3013288.

¹⁷ Esha Choukse et al., “Power Stabilization for AI Training Datacenters” (arXiv, August 21, 2025), doi:10.48550/arXiv.2508.14318.

¹⁸ NERC, Incident Review: Considering Simultaneous Voltage-Sensitive Load Reductions, January 8, 2025, https://www.nerc.com/pa/rm/ea/Documents/Incident_Review_Large_Load_Loss.pdf.

loads must be considered in load-shed obligations, [under-frequency load shed] program design, and blackstart restoration.”¹⁹

Point 4 above regarding the high variability of data center loads that can cause large power swings on the system is particularly relevant in Louisiana where the system is heavily dependent on thermal resources and, at least at present, looking primarily to additional thermal resources to meet new data center demand.²⁰

Broadly speaking, the power sector operates within an environment of routine patterns of power consumption changes across each hour and day, known as the “load profile”. The “load ramp rate” is the change in power demand over time. The change in aggregated load on a utility system is mostly predictable, with patterns for the morning ramp, a peak in demand at the end of the day and a ramp down at night. At best, new fossil gas power plants can only ramp at a rate of 75 MW per minute²¹, while older plants are limited to as little as 19 MW per minute²². In contrast, data centers can shift load by hundreds of MW *per second*.²³ Such high ramp rates, combined with data centers’ unpredictable behavior, exacerbate the challenges of matching supply and demand on the power system.

EPRI reports that the utility industry has already seen variations in demand from existing data center operations affecting the power system. EPRI surveyed electric utilities about their experience serving data centers and reported utilities have already experienced operational impacts from connected data centers. The most common impact being reported is increased load ramp rates (26% of responding utilities).²⁴ Reports from two regions with large amounts of data center load already connected to the power system, ERCOT²⁵ and Virginia²⁶, note substantial variability in demand in short time periods (e.g. less than one minute). These reports describe

¹⁹ NERC, Characteristics and Risks of Emerging Large Loads: Large Loads Task Force White Paper (NERC, July 2025), at 38.

https://www.nerc.com/comm/RSTCReviewItems/3_Doc_White%20Paper%20Characteristics%20and%20Risks%20of%20Emerging%20Large%20Loads.pdf.

²⁰ See Direct Testimony of Nicholas W. Miller in LPSC Docket U-37425:

<https://lpscpubvalence.lpsc.louisiana.gov/portal/PSC/ViewFile?fileId=DiczS5o8p5o%3D>.

²¹ <https://www.governova.com/gas-power/products/gas-turbines/7ha>

²² EPRI. 2018. Unit Ramp Rate Optimization Guidelines: methodology and Technical Approach. Available at <https://www.epri.com/research/products/3002012979>.

²³ NERC. 2025. Characteristics and Risks of Emerging Large Loads. Available at https://www.nerc.com/globalassets/who-we-are/standing-committees/rstc/3_doc_white-paper-characteristics-and-risks-of-emerging-large-loads.pdf.

²⁴ Utility Experiences and Trends Regarding Data Centers: 2024 Survey. EPRI, Palo Alto, CA: 2024. 3002030643. <https://www.epri.com/research/products/000000003002030643>.

²⁵ ERCOT Stakeholder presentation - March 4, 2025.

https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.ercot.com%2Ffiles%2Fdocs%2F2025%2F02%2F28%2FLL_Oscillation_LFLTF_Mar2025_Final.pptx&wdOrigin=BROWSELINK

²⁶ Pre-Technical Conference Statement of Kyle Hannah, Director of Electric Transmission Strategic Initiatives, Dominion Energy Inc. Docket AD24-11-000.

“imbalances between energy supply and demand [which] requires immediate action by our system operators”.

At the same time as the industry is only beginning to understand and categorize the variability of data center loads, data centers’ energy use is increasing for processing larger and more complex individual tasks, increasing the amplitude of energy demand variations.²⁷ ERCOT’s recent discussion with stakeholders included details of a 300 MW drop in data center demand in twenty four seconds, and oscillations of 25 MW repeatedly up and down in under one second, recurring again with 50 MW oscillations three days later.²⁸

These sorts of load variability create imbalances that grow more quickly than generators can correct, resulting in the voltage disturbances, thermal overloads and stability issues described by grid operators and NERC.²⁹

Because the Louisiana grid is largely dependent on thermal resources, its capacity for managing fluctuations in power demand from data centers (commonly referred to as “ancillary services”) may be limited, requiring deliberate study of the issue and the installation of new resources – whether new, more flexible generators or power system controls – that will add complexity and cost to successfully accommodate new data center demand.

III.II - LPSC efforts should begin with defining “large loads” in this context

As a first step to navigating these dynamics, the LPSC should adopt a definition of “large loads” specific to data centers and other computational loads and implement reliability requirements for all loads which fall under this definition. Notably, the nature and characteristics of this definition may differ from what is used to address the cost implications of large loads which we discuss later. That is to say, there may be cases where a large load:

- Carries reliability risks only;
- Carries reliability and cost risks;
- Carries cost risks only.

Thus, it is important to consider the reliability risks and cost risks separately, so that the appropriate interventions for each scenario can be appropriately applied.

²⁷ Forbes Business Insight. High Performance Computing Market Size, Growth Report [2032]. See also P. Patel, E. Choukse, C. Zhang, I. n. Goiri, B. Warriar, N. Mahalingam, and R. Bianchini, “Characterizing Power Management Opportunities for LLMs in the Cloud,” in Proceedings of the 29th ACM International Conference on Architectural Support for Programming Languages and Operating Systems, Volume 3, ser. ASPLOS ’24, vol. 3. New York, NY, USA: Association for Computing Machinery, Apr. 2024, pp. 207–222. “In larger-scale training, such power swings are correlated across thousands of GPUs running the training job, which could cause challenges in the power delivery infrastructure.”

²⁸ ERCOT Stakeholder presentation - March 4, 2025.

²⁹ Howard Gugel. Statement of the North American Electric Reliability Corporation. Technical Conference on Large Loads Co-Located at Generating Facilities Docket No. AD24-11 000 November 1, 2024.

Regarding the reliability risks of large loads specifically, a recent white paper from NERC's Large Loads Task Force, states: "Any commercial or industrial individual load facility or aggregation of load facilities at a single site behind one or more point(s) of interconnection that can pose reliability risks to the BPS due to its demand, operational characteristics, or other factors. Examples include, but are not limited to, data centers, cryptocurrency mining facilities, hydrogen electrolyzers, manufacturing facilities, and arc furnaces."³⁰

Given the unique characteristics of modern data centers and the risks they pose to grid reliability as detailed above, NERC has proposed a two-part approach to defining and addressing these risks. First, "computational load" ("CL") is defined as "[l]oad comprised of electric power demand from information technology equipment, such as servers, storage, and networking hardware," and "computational load entity" ("CLE") is defined as "the end-user or the entity that hosts end-users that receives electric power for Computational Load."³¹ Second, NERC has proposed thresholds for CL and CLE, above which such entities would be required to register with NERC and be subject to associated reliability requirements. NERC proposes that such requirements apply to any CLE meeting the following criteria: total load of at least 20 MW; connected to the transmission system at a single point of interconnection; and hosting at least 1 MW of CL.³²

While these definitions and criteria have not yet been finalized, they represent a good starting point, as they have been developed through an established, nationwide stakeholder process. For the purposes of maintaining grid reliability, we recommend the LPSC adopt a similar definition while continuing to track the NERC process and adapt as needed. We also note that Entergy has responded to NERC's proposal, providing only minor comments on the specific terminology used.³³ While lack of comment by Entergy on the definitions and thresholds themselves do not necessarily constitute support of NERC's proposal, it does indicate the lack of strong objection. We also reiterate that adoption of this definition for the purpose of establishing reliability requirements does not necessarily mean that other requirements (such as contract and financial terms) should also be applied to any customers which meet this definition.

Once a definition is established, we recommend the LPSC start with the following four resources to develop specific reliability requirements:

³⁰ NERC, Characteristics and Risks of Emerging Large Loads: Large Loads Task Force White Paper, at 1.

³¹ NERC, "Computational Load Entity: Proposed Rules of Procedure Revisions Summary," April 1, 2026. <https://www.nerc.com/globalassets/who-we-are/rules-of-procedure/proposed/computational-load-entity-summary-of-changes-april-2026-posting.pdf>.

³² Ibid.

³³ NERC, "Comments Submitted on Proposed Revisions to the NERC Rules of Procedure," May 28, 2026. https://www.nerc.com/globalassets/who-we-are/rules-of-procedure/proposed/cle-rop-comments_redacted-5-26-revision-3.pdf.

- Elevate Energy's "Practical Guidance and Considerations for Large Load Interconnections." Chapter 5 of the report introduces 18 categories of technical requirements (supplemented with additional detail in Appendix B of the report).³⁴
- NERC's "Risk Mitigation for Emerging Large Loads: Large Loads Working Group Reliability Guideline," which covers eight categories of requirements.³⁵ The document notes that the "guidelines provide key information while the regulatory process moves forward." In other words, while the guidelines are not yet mandatory, they provide a preview of the types of requirements that NERC is looking to enforce in the future.
- MISO's Large Load Interconnection Reliability Requirements, which build on developing NERC guidelines and suggest specific requirements for categories such as ramp rates and voltage and frequency ride-through.³⁶
- ESIG's "Interconnection Processes for Large Loads: Current Practices and Recommendations," which describes the current state of interconnection requirements, highlighting gaps which should be addressed at various regulatory levels.³⁷

When reviewing the above documents and developing requirements, the LPSC should consider the following four categories of requirements (as detailed in the Elevate report mentioned above):

- **Data sharing requirements:** This includes both model sharing, where large loads must provide data up-front for utilities to use in planning for interconnection, and data recording and monitoring requirements for large loads to provide timely and accurate data to support utility operations, event analysis, and model validation. Operations and maintenance requirements ensure that large loads periodically update utilities with data such as load forecasts, equipment specifications, scheduled maintenance, and planned outages or events. These data requirements must be supported by communication with utilities defining both technical communication protocols and personnel details.

³⁴ Quint, Ryan, Kyle Thomas, Jiecheng Zhao, Andrew Isaacs, and Casey Baker. *Practical Guidance and Considerations for Large Load Interconnections*. Elevate Energy Consulting, GridLab, May 2025. <https://gridlab.org/portfolio-item/practical-guidance-and-considerations-for-large-load-interconnections/>.

³⁵ NERC. "Risk Mitigation for Emerging Large Loads: Large Loads Working Group Reliability Guideline," May 2026. https://www.nerc.com/globalassets/our-work/guidelines/reliability/RG_Risk-Mitigation-For-Emerging-Large-Loads.pdf.

³⁶ MISO Large Load Working Group. April 2026: <https://cdn.misoenergy.org/20260420%20LLWG%20Item%2006%20Large%20Load%20Interconnection%20Reliability%20Requirements751448.pdf>.

³⁷ Energy Systems Integration Group. *Interconnection Processes for Large Loads: Current Practices and Recommendations*. Large Loads Task Force, June 2026. <https://www.esig.energy/wp-content/uploads/2026/06/ESIG-Large-Loads-Interconnection-Process-report-2026a.pdf>.

- **Power stability requirements:** Voltage and frequency ride-through requirements, power factor and reactive power requirements, power quality requirements, oscillation requirements, and short-circuit requirements are all needed to ensure that large loads behave in predictable ways and do not create reliability challenges for the grid. While some of these requirements may already be defined, the need for stricter limits for large loads should be evaluated given their outsize influence on grid stability.
- **Operations and control requirements:** Operations and control requirements must be defined, including operational ramp rate limits, both during normal operations and when returning to the grid. Several requirements are needed to coordinate between large load customers and the utility to handle abnormal situations such as outages or periods when the grid is constrained. This includes protection requirements and backup generation requirements to ensure the utility has visibility into how the load will respond to faults, reclosing events, and trip conditions. Ongoing emergency response and coordination is also needed so that utilities and customers can coordinate in clear, defined ways during emergencies. Demand response requirements are needed for customers participating in these programs either at the utility or RTO level, defining load curtailment expectations and reporting. Cybersecurity measures are needed to protect from cyber threats.
- **Monitoring and Enforcement:** All these requirements must be supported by the utility's right to monitor and enforce compliance. In addition to collecting and validating data as described above, utilities must have authority to inspect the site, perform compliance testing, and mandate corrective actions as needed. These requirements must be supported by the ability to disconnect the facility from the grid.

III.III - A starting point for new reliability requirements

Developing a robust understanding and establishing criteria to address all these considerations will take time. Considering the LPSC's need to be responsive to current proposals for large load interconnection, we recommend an immediate focus on four specific areas:

- Voltage ride-through requirements
- Operational ramp rate limits
- Response during high-impact, low-frequency events
- Curtailment and flexibility requirements

Voltage-ride through and operational ramp rate requirements should be considered because they are simple and straightforward to implement, have industry precedent, and can protect against many near-term reliability risks caused by large data center loads. Further, Entergy currently does not have such requirements for large loads.³⁸

³⁸ See ELL's response to UCS 1-3 in Docket U-37782 attached as Exhibit at the end of this document.

Without voltage ride-through requirements, data centers may disconnect from the grid unexpectedly in response to system disturbances, which can exacerbate the disturbance and lead to further challenges. These requirements are more urgent than others because incidents have already been documented of data centers disconnecting from the grid in response to voltage excursions (see, for example the NERC incident review). Similarly, excessive ramping of data centers has also been observed, as described in NERC's white paper "Characteristics and Risks of Emerging Large Loads". This excessive ramping can threaten the grid's ability to maintain adequate voltage and frequency regulation, potentially leading to unplanned outages.

We recommend that the LPSC implement ramp rate limits and ride-through requirements that are consistent with MISO's current proposed requirements.³⁹ Specifically, operational ramp rates should be limited to 30 MW per minute, and voltage and frequency ride-through requirements should be consistent with IEEE 2800 and NERC PRC-029. While these standards were developed for and apply to inverter-based resources, they provide a valid basis for data center requirements.

Because MISO's requirements have not been finalized, it may be appropriate to use slightly modified requirements, and/or allow for the requirements to be updated in the future, depending on the outcome of MISO's process. However, MISO's proposed requirements have been developed through a stakeholder process with consideration of requirements elsewhere in the industry, and they represent a reasonable starting point.

The response of new large loads during high-impact, low-frequency events such as extreme weather must also be considered due to the strain such events place on the system beyond normal operating conditions and the outsize impact of large loads. This begins with requirements during the application phase to study how large loads will interact with the grid during emergency events. This will require study of the system under both N-1 and N-1-1 conditions to ensure adequate system stability when under duress.

The consideration of reliability under emergency conditions also raises the need for clear curtailment obligations when it is needed to maintain system stability. At the technical conference the feasibility and appropriateness of large load curtailment requirements was discussed, including whether new large loads should receive a reduced rate for adopting curtailment obligations.

³⁹ MISO. "Large Load Interconnection Reliability Requirements." Presented at the Large Load Working Group, April 20, 2026.
<https://cdn.misoenergy.org/20260420%20LLWG%20Item%2006%20Large%20Load%20Interconnection%20Reliability%20Requirements751448.pdf>.

A requirement for large loads to curtail when it is necessary to avoid a broader load shed that should be mandatory without any reduced rate for compliance. Reliability, particularly during extreme events, is paramount as widespread and/or long-duration power outages can have devastating impacts on Louisiana communities.⁴⁰ SPP, the states of Texas and Michigan, and PJM have all recently taken steps to explore or implement a flexible interconnection framework:

- SPP's HILL process is specifically designed to "ensure that the ability to shed a HILL is available, if needed."⁴¹
- In Texas Senate Bill No 6, utilities are required to "develop a protocol, including the installation of any necessary equipment or technology before the customer is interconnected, to allow the load to be curtailed during firm load shed."⁴²
- At PJM, The Board of Managers of recently issued a letter supporting, among other things, a "connect and manage" approach which would allow large loads to connect even in situations where insufficient generation is available, in exchange for being "subject to curtailment prior to the deployment of pre-emergency Demand Response"⁴³; and
- In Michigan the Public Service Commission required curtailment protocols as a condition for approval of a data center interconnection in DTE's service territory. In response, DTE took steps to apply these requirements to all new data center interconnection requests.⁴⁴

While large load curtailment should be required under emergency conditions to avoid load shed, the LPSC should also consider rate incentives for large loads that agree to flexible interconnection frameworks that can minimize system stress during normal operating conditions, reduce necessary system investments, and enable faster interconnection. Under a flexible interconnection framework, a large load would not receive guaranteed service at all times but would instead have an agreement with the utility whereby demand is reduced at specific times or under specific conditions, similar to interruptible or non-firm service. A recent study found that

⁴⁰ Gomberg, S, R. Licker, S. Sathia, and P. Worth. 2025. Keeping Everyone's Lights On: How to Build an Equitable, Climate-Resilient Power Grid. Union of Concerned Scientists. Available at <https://www.ucs.org/sites/default/files/2025-05/Keeping-Everyones-Lights-On-Full-Report.pdf>.

⁴¹ Federal Energy Regulatory Commission, Order Accepting Tariff Revisions, Subject to Condition re Southwest Power Pool, Inc., Docket ER26-247-000 (FERC January 14, 2026), at 11.

⁴² Phil King, Relating to the planning for, interconnection and operation of, and costs related to providing service for certain electrical loads and to the generation of electric power by a water supply or sewer service corporation., 9 at 10.

⁴³ PJM Board of Managers, "Board Decisional Letter on Critical Issue Fast Path - Large Load Additions," January 16, 2026, 4, https://www.pjm.com/-/media/DotCom/about-pjm/who-we-are/public-disclosures/2026/20260116_pjm-board-letter-re-results-of-the-cifp-process-large-load-additions.pdf.

⁴⁴ Michigan required this as a condition for approval of DTE's first data center in case U-21990, and in U-22059, DTE decided to apply this across all data centers.

implementing flexible interconnection could allow the U.S. to accommodate close to 100 GW of new large loads, and summarized the approach this way:

“Flexibility [...] refers to the ability of end-use customers to temporarily reduce their electricity consumption from the grid during periods of system stress by using on-site generators, shifting workload to other facilities, or reducing operations. When system planners can reliably anticipate the availability of this load flexibility, the immediate pressure to expand generation capacity and transmission infrastructure can potentially be alleviated, mitigating or deferring costly expenditures.”⁴⁵

Flexible interconnection is also discussed in several other industry reports, white papers, and case studies.⁴⁶

IV – The LPSC must protect ratepayers from shouldering the costs of data centers.

In addition to ensuring data centers and other large loads do not weaken grid reliability, the LPSC must also protect other ratepayers from shouldering the wide array of costs that can be triggered by these large Customers’ demands. This includes financial costs in the form of higher monthly bills, as well as public health and environmental costs, all of which are projected by researchers to be significant in the absence of forward-thinking policies.⁴⁷

In Louisiana specifically, UCS found in a recent capacity-expansion analysis that adding about 5 GW of data center load between 2026 and 2041 could trigger a cumulative \$26 billion in additional state electricity system costs and \$3 billion in public health costs from nitrogen oxide

⁴⁵ Tyler H. Norris et al., *Rethinking Load Growth: Assessing the Potential for Integration of Large Flexible Loads in US Power Systems* (Durham, NC: Nicholas Institute for Energy, Environment & Sustainability, Duke University, February 2025), 2, <https://nicholasinstitute.duke.edu/publications/rethinking-load-growth-assessing-potential-integration-large-flexible-loads-us-power>.

⁴⁶ EPRI, *Reconciling the Value of Grid Interconnection and Speed to Power: Strategies for Powering Data Centers in the AI Era*; Chris Cox, Aaron Schwartz, and Derek Stencik, *Bringing Data Center Flexibility into Resource Adequacy Planning: A Case Study of NV Energy* (Saratoga Springs, NY: Telos Energy and Berkeley CA: GridLab, September 2025), <https://gridlab.org/portfolio-item/data-center-flexibility-nv-energy-case-study-report/>; Emilia Chojkiewicz et al., *Utilizing Noncoincident Needs to Site Data Centers with Solar+Storage at Existing Gas Plants*, White paper (Energy Institute at Haas, February 2026), <https://haas.berkeley.edu/wp-content/uploads/WP356.pdf>; Cody Davis et al., *Flexible Grid Connections Implementation Guide* (CHARGED, January 2026), <https://chargedinitiative.org/wp-content/uploads/2026/01/CHARGED-Flexible-Grid-Connections-Implementation-Guide.pdf>.

⁴⁷ See, for example: B. Haley and L. Walter, *U.S. Data Center Emissions Through 2040*, 2025. Available at <https://www.evolved.energy/posts/u-s-data-center-emissions-through-2040>; S. Clemmer et al. *Data Center Power Play: How Clean Energy Can meet Rising Electricity Demand While Delivering Climate and Health Benefits*. Union of Concerned Scientists. 2026. Available at [Data-Center-Power-Play-report-final.pdf](#) and Jeremiah X Johnson *et al* 2026 *Environ. Res. Lett.* **21** 114007DOI 10.1088/1748-9326/ae6c3d, available at [Power system costs and emissions from data center and cryptocurrency mining expansion in the United States - IOPscience](#).

and sulfur dioxide pollution.⁴⁸ The Commission must require tech and utility companies to mitigate these types of looming impacts and internalize the costs as comprehensively as possible to protect the public interest.

IV.I - New LPSC rules should adhere to cost-causation principles and close existing loopholes.

The Non-Binding Guidelines broadly contemplate an adherence to principles of cost-causation, including an avoidance of “cross-subsidization by existing customers” in Section V, and a demonstration by the utility that “Network and interconnection costs caused by the load are fully assigned to the load” in Section III. As discussed above, the risks posed by large loads necessitate the Commission to go beyond non-binding guidelines and develop a mandatory tariff, among other protections for ratepayers. The Commission should more robustly adhere to cost-causation principles and close existing loopholes that currently allow ratepayers to subsidize large load customers. To accomplish this, new binding Commission rules should 1) avoid cross-subsidization of generation capital costs and stranded assets, 2) insulate ratepayers from increased operating costs such as fuel, and 3) assign new transmission costs to large loads that cause them.

Avoid cross-subsidization of generation capital costs and stranded assets – The Commission should require utilities to recover the full revenue requirement associated with new generation and other infrastructure from the large load causing such infrastructure to be built. The “Lightning Amendment” falls far short of this as it requires only half of the fixed revenue requirement to be covered for 15 years, leaving the remaining costs to other ratepayers. To protect ratepayers from stranded-asset risk, full recovery of the annual revenue requirement for new infrastructure needed to reliably connect new large loads should be required for the entirety of the depreciable life of the new infrastructure, in the same spirit as Bullet 1 of the Guidelines’ Section IV, which states that the utility must demonstrate that “contract terms align with asset lives.”

We reiterate, however, that the Commission should move beyond one-off, bilateral contracts between utilities and large loads, and toward a Commission-enforceable, mandatory tariff that secures firm financial backing for the full depreciable lives of assets being built to supply those large customers.

The Commission should not accept Bullet 2 of the Guidelines’ Section IV as an adequate mitigation of stranded-asset risk. The bullet states that a utility must demonstrate that “excess

⁴⁸ P. Arbaje et al. Data Center Threats in Louisiana: Protection Communities from Big Tech’s Costly Impacts. Union of Concerned Scientists. 2026. Available at [Data Center Threats in Louisiana | Union of Concerned Scientists](#).

generation at end of contract can be economically used by remaining load...” Any such demonstration would be inherently speculative, as it would require the utility to rely on load forecasts a decade, or multiple decades, into the future to determine the “remaining load” that would absorb the generation costs. Long-term electricity demand is notoriously difficult to predict, and forecasters have made significant overestimations in the recent past.⁴⁹

The future landscape of artificial intelligence is highly uncertain, and the current data center buildout could also result in a significant overestimation of future load. Though PJM Interconnection’s capacity market construct is different than the mechanisms utilized by MISO and SPP, the former’s market monitor has described the data center load forecasts fueling its recent extreme capacity-price increases as not just “uncertain”, but also “unsubstantiated”.⁵⁰ There is no reason to believe that Louisiana utilities in MISO or SPP have more long-term certainty or substantiation of future data center load. The Commission should therefore not rely on uncertain load forecasts and simply “cross its fingers” that there is enough remaining load to absorb excess generation and prevent cost shifts to other ratepayers.

ELL suggested during the Stakeholder Conference that stranded assets could end up being a “blessing” because of the economic development that may or may not come to the state as a result of a hypothetical 3 to 5 GW of surplus generation. This notion is an even purer form of speculation and wishful thinking that should be outright rejected by the Commission in crafting new protections from large loads. Once new generation assets are built and become stranded, the negotiating leverage, in ELL’s hypothetical scenario, would sit squarely with the new potential load that would be in a position to procure service from the stranded asset for pennies on the dollar while other ratepayers would be left to shoulder the remaining costs. The Commission should stick with its original intent made clear in the Non-Binding Guidelines to protect ratepayers from stranded-asset costs and make such protections ironclad through binding rules.

To protect ratepayers from generation capital costs during and after a large load’s operations, the large customer should be required put up firm financial collateral and have adequate, legally enforceable guaranties in place (e.g., from a creditworthy parent company). This will be a crucial piece of ensuring that the utility is able to recoup the costs from the large customer in the event of early terminations, bankruptcies, or other unforeseen events.

The LPSC should also not permit the data center facility to serve as the sole collateral, as the chips in data centers depreciate quickly and only have a useful life of somewhere between two

⁴⁹ E. Gimon, M. O’Boyle, and M. Solomon. Meeting Growing Electricity Demand Without Gas. Energy Innovation. N.D. Available at <https://energyinnovation.org/wp-content/uploads/MEETING-GROWING-ELECTRICITY-DEMAND-WITHOUT-GAS.pdf>.

⁵⁰ Monitoring Analytics, LLC. State of the market Report for PJM. 2026. Available at https://www.monitoringanalytics.com/reports/PJM_State_of_the_Market/2026/2026q1-som-pjm.pdf.

and six years.⁵¹ Further, the financial health of companies involved in data center development (e.g., credit ratings, off-balance-sheet debt) should be accounted for and interrogated when determining the adequacy of collateral and financial guaranties in shielding other customers from capacity investments. Interrogation of such issues, among others,⁵² would be frustrated at best without the large load owners and/or operators formally at the table as parties to the docket. The Commission should therefore take all actions within its authority to require large load owners and/or operators to be indispensable parties to the relevant utility application proceedings.

Insulate ratepayers from increased operating costs such as fuel – In addition to capital costs, protections from higher operating costs arising from large loads should be addressed in new Commission rules. Louisiana utilities currently recover their fuel and market purchase costs, including those incurred to serve large loads, through the fuel adjustment clause (“FAC”). This current arrangement clears the way for other ratepayers to pay higher FAC charges than they would have without the large load and the associated generating capacity, creating an unfair subsidy risk.⁵³

We are glad that Commission staff believe the Commission needs to “factor in fuel,” as expressed by Mr. Sisung during the Technical Conference. To close the FAC loophole, the Commission should explore how to best estimate what the FAC would be to other ratepayers were it not for 1) the operation of assets that were constructed to serve the large load, and 2) the large load itself, since its demands could potentially impact market prices. One way to accomplish this would be to conduct a periodic nodal simulation with and without the data center load and associated generating resources. The difference in expected energy costs could then be applied as a FAC credit to all other ratepayers.⁵⁴ This analysis or similar analyses would need to be open for independent verification by LPSC stakeholders. Such a measure would be in alignment with Section V of the Non-Binding Guidelines, which states that the utility must demonstrate that its rates and financial terms for the large load “avoid cross-subsidization by existing customers.”

In recent data center-related applications, the FAC has not been included in the minimum charges that would supposedly be paid by the large customer (or its guarantor) for the remainder

⁵¹ K. Leswing. The question everyone is AI is asking: How long before a GPU depreciates. CNBC. 2025. Available at <https://www.cnbc.com/2025/11/14/ai-gpu-depreciation-coreweave-nvidia-michael-burry.html>.

⁵² See Alliance for Affordable Energy and Union of Concerned Scientists’ Peremptory Exception and Motion to Declare Laidley, LLC and Meta Platforms, LLC as Parties Necessary for Just Adjudication in this Proceeding and Supporting Memorandum. March 5, 2025. Available at <https://lpscpubvalence.lpsc.louisiana.gov/portal/PSC/ViewFile?fileId=rxlwamnnu4k%3D>

⁵³ Direct Testimony and Exhibits of Catherine Kunkel on Behalf of the Alliance for Affordable Energy and Union of Concerned Scientists. LPSC Docket No. U-37425. 2025. Available at <https://lpscpubvalence.lpsc.louisiana.gov/portal/PSC/ViewFile?fileId=GX0cy8lCeK4%3D>.

⁵⁴ Ibid.

of the contract even after early termination.⁵⁵ The Commission should ensure that other ratepayers are protected from higher FAC charges potentially resulting from a large load no longer paying its share of the charges due to early termination of its agreements.

This assurance is important given a few different factors, the first being the expected increases in gas prices, as ELL has forecasted for its new plants approved last year, which will already put FAC-related pressures on Louisiana ratepayers.⁵⁶ Second, data center leases are growing very short in length. Meta, for example, is now only committed to a four-year lease within the Laidley data center; if the tech company leaves after four years, three new gas plants will have been built and operational, but the data center would no longer be paying into ELL's FAC charge. Lastly, data centers exhibit large oscillations in load, which federal researchers found in a simulation can result in fatigue-induced failures of gas turbines and other conventional generators.⁵⁷ Data centers could therefore potentially be the customers most responsible for wear and tear of generators over time, but may not be required to pay for any of the resulting major maintenance if they end their electricity service. All else equal, such a scenario would leave ratepayers with higher costs through the FAC if the Commission were to approve the inclusion of major maintenance costs, as ELL has proposed.⁵⁸

The Commission should therefore implement mechanisms for relieving the burden of higher operating costs, such as fuel and maintenance, on ratepayers resulting from large loads. This should include both during the operating term of the large load, such as a nodal simulation, and in the event the large load terminates service. For the latter, utilities should be required to secure financial backing from new large loads to contribute to the costs of any expected major maintenance, and estimated increases in net energy costs.

Default to assigning new transmission costs to large loads that cause them – As a starting point, the LPSC should default to assigning all of the costs of new transmission projects to the large load that causes them. This was not the Commission's approach with the Mount Olive to Sarepta line approved in the Laidley data center docket last year, which had an initial estimated cost of \$546 million and will now be spread to all ELL customers. ELL acknowledged "but for

⁵⁵ Transcript of the LPSC Business and Executive Open Session. February 25, 2026. Available at <https://lpsc.louisiana.gov/docs/transcripts/February-25-2026-BE.pdf>.

⁵⁶ Application of Entergy Louisiana, LLC for Approval of Generation and Transmission Resources Proposed in Connection with Service to a Single Customer in North Louisiana. Docket No. U-37425. 2026. Available at <https://lpscpubvalence.lpsc.louisiana.gov/portal/PSC/ViewFile?fileId=ENeczHV0S4E%3D>.

⁵⁷ National Laboratory of the Rockies. Data Center Power Systems: Architectures, Impact on Grid Reliability, Modeling Considerations, and Megawatt-Scale Hardware Testing. 2026. Available at <https://docs.nlr.gov/docs/fy26osti/96746.pdf>.

⁵⁸ Direct Testimony of Ryan D. Jones on Behalf of Entergy Louisiana, LLC. LPSC Docket U-37425. 2026. Available at <https://lpscpubvalence.lpsc.louisiana.gov/portal/PSC/ViewFile?fileId=d1b%2BdemCmsM%3D>.

the Customer Project, there is no immediate need for Mt. Olive to Sarepta 500 kV line,” without giving a detailed breakdown of the benefits.⁵⁹

This approach is in conflict with the goals of the Non-Binding Guidelines, which state in Section III that the utility must demonstrate:

- Network and interconnection costs caused by the load are fully assigned to the load, and
- No material transmission costs are shifted to existing customers that they otherwise might not bear or for which they do not receive commensurate benefits.

Ratepayers should be paying only for transmission investments that are rigorously demonstrated to benefit them. The Commission will need new processes to ensure that transmission investments are allocated to customers causing them to be made, in line with cost-causation principles. This is where a new mandatory tariff and customer class for data centers will be necessary. The legacy industrial tariff currently being used fails to prevent cross-subsidization risk.⁶⁰

Once a new customer class for large data centers is created through a mandatory tariff, the Commission should ensure that costs are being appropriately allocated to the cost-causers. Currently, the costs of data-center-driven transmission additions are being spread to all customers. However, as one utility in a different state explained in a formal inquiry, the utility *revenues* from data centers are only credited to transmission-level customers and do not lower rates for other customers.⁶¹ Simply creating a new customer class for data centers is therefore only half a solution; the costs must be assigned to that class as well, as those customers are causing the costs to be incurred. Further, this status quo dynamic, among others, makes it very unlikely that new large loads that trigger large new infrastructure investments provide a net benefit to ratepayers by spreading out costs over more load, even if new large customers can theoretically accelerate recovery of a narrow set of other costs such as storm charges.

If a utility applies to recover transmission costs from customers other than the large load customer, the applicant should be required to demonstrate through analyses that that other customers would receive “commensurate benefits,” as the Guidelines intend. For example, if data center customers per contract provide more revenues for transmission than their incremental transmission costs, those excess revenues should be credited among all other customer classes, as

⁵⁹ Direct Testimony of R. Lane Sisung on Behalf of the Staff of the Louisiana Public Service Commission. LPSC Docket U-37425. 2025. Available at

<https://lpscpubvalence.lpsc.louisiana.gov/portal/PSC/ViewFile?fileId=tegXEb8UbKE%3D>.

⁶⁰ Direct Testimony and Exhibits of Catherine Kunkel on Behalf of the Alliance for Affordable Energy and Union of Concerned Scientists. LPSC Docket No. U-37425. 2025. Available at

<https://lpscpubvalence.lpsc.louisiana.gov/portal/PSC/ViewFile?fileId=GX0cy8ICeK4%3D>.

⁶¹ En Banc Hearing on Interconnection and Tariffs for Large Load Customers. Pennsylvania Public Utility Commission Docket M-2025-3054371. 2025. Available at <https://www.puc.pa.gov/pdocs/1882372.pdf>, (page 7).

has been done in other states.⁶² The methodology of such analyses and a detailed break-out of results should be made transparent to stakeholders for verification and feedback. In Section V of these comments, we discuss why the Commission should planning more holistically in coordination with the diverse range of Louisiana stakeholders to measure and provide benefits to ratepayers, which necessitates more robust transmission processes.

IV.II - Costs beyond bill impacts: the ongoing buildout of natural gas infrastructure carries significant public health burdens for Louisiana communities.

Section XI of the Non-Binding Guidelines is titled “Environmental & Local Impacts,” which states that a utility “needs to demonstrate that environmental and local system impacts associated with the utility serving the load have been identified, and to the extent mitigation is required, a mitigation plan is developed and that compliance costs are appropriately assigned.” This was not discussed at the Technical Conference but is a critical piece to protecting Louisianans. Commission requirements on what assurances are necessary to meet this criteria, and robust stakeholder participation to review and comment on proposed mitigation plans, is essential for protecting the public interest in line with the LPSC’s mandate.

We remain very concerned about the continued growth of natural gas-fired power plants Louisiana utilities are proposing to power data centers and other large loads. The state relies on gas for 76% of its electricity generation and continues to approve more gas plants.⁶³ The 2,262 MW of combined-cycle gas capacity approved for the Laidley data center last year are slated to emit an estimated 308 metric tons of annual nitrogen oxides (NOx), according to a UCS tool.⁶⁴ NOx emissions contribute to particulate matter and ozone pollution; these three pollutants can lead to wide array of negative health outcomes including the development of asthma, irregular heartbeat, and nonfatal heart attacks, with children and the elderly being the most vulnerable.⁶⁵

The continued buildout of gas plants is particularly worrying given the environmental burdens already facing Louisianans as a result of gas production that emits pollutants like volatile organic compounds and other industrial-sector pollution. into the air.⁶⁶ Research suggests that cancer

⁶² See Order, IURC Cause No. 46322, June 17, 2026, at pp. 4, 7. Available at <https://iurc.portal.in.gov/docketed-case-details/?id=70a66328-3ebe-f011-bbd3-001dd80846ac>

⁶³ Energy Information Administration. Louisiana Analysis. 2025. Available at <https://www.eia.gov/states/LA/analysis>.

⁶⁴ J. Rogers, M. Fernanda Chavez, J. McNamara. Beyond the Smokestack. Union of Concerned Scientists. 2024. Available at <https://www.ucs.org/resources/beyond-smokestack>.

⁶⁵ U.S. Environmental Protection Agency. Basic Information About NO2. N.D. Available at <https://www.epa.gov/no2-pollution/basic-information-about-no2>; U.S. Environmental Protection Agency. Health and Environmental Effects of Particulate Matter (PM). N.D. Available at [Health and Environmental Effects of Particulate Matter \(PM\) | US EPA](https://www.epa.gov/health-environmental-effects-of-particulate-matter); U.S. Environmental Protection Agency. Ground-Level Ozone Basics. N.D. Available at <https://www.epa.gov/ground-level-ozone-pollution/ground-level-ozone-basics>.

⁶⁶ Synapse Energy Economics, Inc. Methan Waste and Pollution in Louisiana. N.D. Available at <https://www.synapse->

rates in certain areas within the industrial corridor known as “Cancer Alley” are seven times higher than the national average.⁶⁷ Adding more gas plant pollution will exacerbate the harms residents are already facing, yet utilities continue to propose—and the LPSC approves—more gas plants to power large loads, including within Cancer Alley.⁶⁸

The Commission needs to require mitigation plans for public health environmental impacts associated with serving new large loads, as contemplated in the Guidelines. This starts with the qualitative and quantitative accounting of such impacts, which should be made transparent to stakeholders and the general public as part of any utility application. Further, the cost-causation principles discussed above should also broadly apply to these costs, which would require the utility to recover compliance costs from the large load, not other ratepayers. We nevertheless emphasize that the best way to mitigate the impacts of fossil fuel pollution is to diversify Louisiana’s energy resource mix with lower-impact resources.

V – The Commission should go beyond one-off applications and toward holistic coordination for system-wide solutions.

To date, the LPSC’s approach to large loads has been a series of one-off, ad-hoc applications by utility companies seeking to supply power to those loads. This is an inefficient route of regulatory review that leaves a wide range of more holistic solutions inadequately examined. By coordinating with investor-owned and municipal utilities, co-ops, regional grid operators, and other stakeholders, the Commission can take advantage of system-wide solutions that not only protect ratepayers but also provide additional benefits.

Regional and interregional transmission – By engaging more deeply in MISO and SPP processes for regional and interregional transmission planning, Louisiana can modernize its grid and capture economies of scale and diversification of resources, reducing costs and improving the reliability of the electricity supply. MISO is beginning the process of studying load pockets in Louisiana and Texas as part of its Long-Range Transmission Planning process⁶⁹ and is working with SPP to identify to identify new transmission projects along the border between the two RTOs that can provide a wide range of benefits via stronger connections between SPP and

energy.com/sites/default/files/Louisiana%20Methane%20Waste%20and%20Pollution%20Factsheet%2022-098_0.pdf.

⁶⁷ Johns Hopkins Bloomberg School of Public Health. Louisiana’s ‘Cancer Alley’ is More Deadly Than Previously Imagined. 2025. Available at <https://publichealth.jhu.edu/2025/the-shocking-hazards-of-louisianas-cancer-alley>.

⁶⁸ The LPSC approved ELL’s Waterford 5 gas unit last year for the Laidley data center project (Docket U-37425), and the utility proposed the Waterford 6 gas unit in February 2026 (Docket U-37853). The Waterford plant is in Kilona, LA, northwest of New Orleans.

⁶⁹ MISO presentation to stakeholders at the October 7, 2025 E-RSC Open Meeting. 2025. Available at <https://cdn.misoenergy.org/20251007%20ERSC%20WG%20Item%2004%202025%20South%20Transmission%20Planning721588.pdf>.

MISO South.⁷⁰ Embracing these planning processes will allow for more holistic, system-wide analyses compared to ad-hoc applications limited to one utility service territory.

Diversifying the state's generation mix – Louisiana has more than 1,000 GW of wind and solar resource potential⁷¹, yet it has no wind power and only a small amount of solar capacity online.⁷² The LPSC and utilities should be taking advantage of the state's untapped resource potential, which will reduce pollution and help insulate ratepayers from gas price spikes that have been one of the main drivers of bill increases in recent years.⁷³ Moreover, better regional and interregional transmission connections described above will allow large loads and other ratepayers to access an even more diverse set of resources, thereby reducing costs even further.⁷⁴

VI - Conclusion:

We appreciate the LPSC's commitment to protecting ratepayers and ensuring the reliability of the state's electricity supply as it develops new criteria for managing large load interconnections. We reiterate our recommendations to (1) enact mandatory interconnection requirements for new large loads rather than "non-binding guidelines" and (2) to create a Large Load Working Group to ensure the state maintains requirements that are aligned with industry best practices as they are identified during this dynamic time.

Thank you for the opportunity to provide these comments. We look forward to ongoing efforts to transparently and collaboratively develop reliability criteria and cost-protections for Louisiana ratepayers and communities.

⁷⁰ SPP-MISO 2024-25 Coordinated System Plan Study Report. 2026. Available at [https://cdn.misoenergy.org/SPP-MISO%202024-25%20Coordinated%20System%20Plan%20\(CSP\)%20Draft%20Study%20Report744849.pdf? t_id=yc_656HkYA_d4ukAH2anXOW%3d%3d& t_uuid=ZfMLUIy7RUObNo4W1Va5gA& t_q=spp& t_tags=language%3aen%2csiteid%3a11c11b3a-39b8-4096-a233-c7daca09d9bf%2candquerymatch& t_hit.id=Optics_Models_Find_RemoteHostedContentItem/744849& t_hit.pos=1](https://cdn.misoenergy.org/SPP-MISO%202024-25%20Coordinated%20System%20Plan%20(CSP)%20Draft%20Study%20Report744849.pdf? t_id=yc_656HkYA_d4ukAH2anXOW%3d%3d& t_uuid=ZfMLUIy7RUObNo4W1Va5gA& t_q=spp& t_tags=language%3aen%2csiteid%3a11c11b3a-39b8-4096-a233-c7daca09d9bf%2candquerymatch& t_hit.id=Optics_Models_Find_RemoteHostedContentItem/744849& t_hit.pos=1).

⁷¹ Lopez, Anthony, Zuckerman, Gabriel, Pinchuk, Pavlo, et al., "Renewable Energy Technical Potential and Supply Curves for the Contiguous United States: 2024 Edition," (2025), <https://doi.org/10.2172/2500362>.

⁷² Energy Information Administration. Louisiana Analysis. 2025. Available at <https://www.eia.gov/states/LA/analysis>

⁷³ R. Wiser et al. Retail Electric Price Trends and Drivers: Data update-2026 Edition. 2026. Available at [retail_price_trends_2026_edition.pdf](https://www.eia.gov/states/LA/analysis).

⁷⁴ C. Hausman. Power Flows: Transmission Lines, Allocative Efficiency, and Corporate Profits. National Bureau of Economic Research. 2025. Available at <https://www.nber.org/papers/w32091>.

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Certificate of Service

I hereby certify that I have, on this 22nd day of June 2026, served the required number of copies of the foregoing correspondence upon all other known parties of this proceeding, by USPS or electronic mail.



Paul Arbaje
Union of Concerned Scientists

Exhibit

ENTERGY LOUISIANA, LLC
LOUISIANA PUBLIC SERVICE COMMISSION
Docket No. U-37882

Response of: Entergy Louisiana, LLC to
the First Set of Data Requests of
Requesting Party: Union of Concerned
Scientists

Question No.: UCS 1-3

Part No.:

Addendum:

Question:

- a. Has the Company developed, or is the Company planning to develop operating parameters which large load customers must abide by? Such parameters may include operational ramp rate, oscillation and harmonic limitations, and voltage and frequency ride-through requirements.
 - b. If so, please provide a copy of the parameters.
-

Response:

ELL incorporates in full the General Objections served with these Requests. Subject to and without waiving the objections, the Company responds as follows.

- a. The Company has not established a set of operating requirements applicable to all large load customers. Instead, the Company requires each large load customer to provide detailed operational characteristics such as expected ramp rate, oscillatory behavior, and voltage/frequency ride-through capabilities, as part of the load interconnection study process. These customer-provided parameters are evaluated through transmission analyses to determine whether the proposed load behavior could adversely impact the transmission system or other customers. If the studies identify potential reliability concerns, the Company will impose project-specific performance requirements to ensure the load can be reliably served without degrading overall system performance. This process is currently ongoing with the Customer.
- b. See the response to subpart (a).

U-37882

EV169