

CC: LT



Southern Renewable Energy Association
11610 Pleasant Ridge Rd., Suite 103 #176, Little Rock, AR 72223

June 18, 2026

RECEIVED BY FAX

JUN 18 2026

Via Fax and FedEx

Louisiana Public Service Commission
Attn: Krys Abel / Records Division
602 N. 5th Street, 12th Floor
Baton Rouge, Louisiana 70802
Fax: 225-342-0877

LOUISIANA PUBLIC SERVICE COMMISSION

**Re: LPSC Docket X-37921: Repository Docket For Large Load Additions
Non-Binding Guidelines**

Dear Ms. Abel:

Please find enclosed for filing in the above-referenced proceeding an original and two (2) hard copies of the **Southern Renewable Energy Association's Comments on the Commission's Large Load Additions Non-Binding Guidelines**. This filing is public and contains no confidential information.

Please contact me if you have any questions. Thank you for your assistance with this matter.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Whit Cox", is written above a horizontal line.

Whit Cox
Regulatory Director
Southern Renewable Energy Association
11610 Pleasant Ridge Road, Suite 103 # 176
Little Rock, AR 72223
whit@southernrenewable.org
(501) 701-0874

Enclosures

cc: All parties of record in this docket (*via e-mail*)

RECEIVED BY FAX

JUN 18 2026

BEFORE THE

LOUISIANA PUBLIC SERVICE COMMISSIONLOUISIANA PUBLIC SERVICE COMMISSION

IN RE: REPOSITORY DOCKET FOR)
LARGE LOAD ADDITIONS)
NON-BINDING GUIDELINES)

DOCKET NO. X-37921

SOUTHERN RENEWABLE ENERGY ASSOCIATION'S
COMMENTS ON THE COMMISSION'S
LARGE LOAD ADDITIONS NON-BINDING GUIDELINES

The Southern Renewable Energy Association (SREA) is a nonprofit trade association for the promotion and development of large-scale renewable energy generation resources, and the battery and transmission solutions that support additional generation. Our organization works throughout the southeast and has engaged in Louisiana Public Service Commission (PSC) proceedings regarding integrated resource plans, transmission development, certificates of public convenience and necessity, and others. We welcome the opportunity to provide feedback on the Non-Binding Guidelines Related to Large Load Customers in this repository docket.

The incorporation of large loads has become a major topic of interest across the energy industry. Ever since the release of large language models to the public in 2022, discussions and plans for new data centers and other large loads have heavily dominated policymaking at the local, state, regional, and federal levels of government. SREA has been involved in tracking these large load issues in Louisiana, neighboring states, and at the regional transmission organization levels at both MISO and SPP. The time is ripe for the Commission to evaluate the needs of large loads, while simultaneously weighing the roles and responsibilities of all parties.

We urge the Commission to continually review these voluntary guidelines for potential improvements over time based on input from stakeholders in this repository docket.

We respect the intent of the Lightning Amendment to facilitate expedited integration of large loads that carry significant economic development benefits for the state of Louisiana, but we caution that care must be taken to ensure that speed does not sidetrack reliability or competition as a priority.

Inverter-based resources (IBRs) such as wind energy, solar power, and batteries, all have value to help serve new large loads, especially when incorporating grid-forming inverter technology. IEEE 2800 IBR Performance Requirements are newly integrated into MISO's BPM-015 which facilitates much of the benefits of these resources.¹ IBRs have fast-acting response times that better enable service to computational large loads. These energy resources are commercially available, can be constructed and begin operations quickly, all while keeping electricity costs lower than alternatives.

There are clear benefits for pairing IBRs with large loads. For example, IBRs can provide frequency regulation and voltage ride-through during grid disturbances. Grid disturbances can occur due to extreme weather, power generation interruptions, and grid faults or reliability problems. Most importantly, IBRs can react on the sub-second (millisecond) timescale, better matching load and generation needs of large loads. Large computational loads themselves are functionally inverter-based loads, where power surges can cause significant load swings, both up, and down, on a sub-second basis.

With this in mind, we offer these comments into the record to provide information, as well as a broad recommendation to facilitate greater integration of renewable energy to serve new large loads, and especially computational loads. Doing so will position Louisiana with a grid that provides access to a cost-competitive generation portfolio that is also able to respond flexibly to the demands of a modern digital economy.

¹ MISO,
<https://cdn.misoenergy.org/20260319%20IBR%20Modeling%20Requirements%20Workshop%20Presentation746367.pdf>

I. IBR Advantages

IBRs have an inherent response-time advantage compared to synchronous generators, such as thermal power stations reliant on natural gas, coal, or nuclear fuel for generation. The large thermal generation resources take time to build up steam, pressure, and speed to be fully dispatchable at maximum levels, which may take several minutes, hours, or sometimes days to reach maximum output. These synchronous generator technologies can provide support; however, the response time from synchronous generators for ramping both up and down does take longer than IBRs, and potentially longer than necessary to properly serve computational large loads. We urge that the Commission considers a diverse portfolio of resources, so that no single resource type is shouldering the burden of complex computational processes that stress synchronous generation resources, as well as the Bulk Power System (BPS).

IBRs do not have fuel cost variability. For a natural gas power station to provide firm, continuous power, the facility requires an equally firm delivery of fuel. Natural gas power stations that do not have firm fuel transportation contracts should not be treated as "firm" generation resources with high accreditation. Recent historical events show that natural gas resources, even potentially with firm pipeline contracts, suffer lapses in reliability during extreme weather events, like winter storms.² These issues are included in the nonbinding guidelines, Section VIII regarding Fuel Supply & Infrastructure Risk and warrant additional scrutiny.

Over the next five years, only four technologies are readily available for construction: wind turbines, solar farms, battery energy storage systems, and natural gas generation.³ No other sources of power generation technologies are readily available, nor in the various generation interconnection queues in Louisiana. Without IBRs, Louisiana will not be able to meet its economic development potential. IBRs can be built quickly. Currently, wind, solar, and battery

² See Telos Energy, *Winter Storm Elliott, An independent review of Southern Company's performance during the historic events of December 22-25, 2022*, available at https://drive.google.com/file/d/1N8W60AN1jbnFPmFXCaKOV_N-TCFeKNmo/view.

³ <https://www.eia.gov/todayinenergy/detail.php?id=67205>.

storage technologies are some of the fastest technologies for construction. The estimated price of constructing new natural gas power plant has already doubled in some cases.

Fig. 1: Natural Gas Power Plant Prices have Increased Significantly

Plant/Unit	Owner	Region	COD	MW	Capital Cost (\$/kW, nom. / COD)
Orange County	Entergy Texas	MISO (TX)	2026	1,215	\$1,300
Mill Creek 5	LGEKU	Kentucky	2027	640	\$1,427
Cooper CCGT	EKPC	PJM (KY)	2030	745	\$1,768
Legend Power Station	Entergy Texas	MISO (TX)	2028	754	\$2,125
Brown 12	Kentucky Utilitie	Kentucky	2030	645	\$2,144
Mill Creek 6	LGEKU	Kentucky	2031	645	\$2,194
Homer City	Homer City Ger	PJM (PA)	2028/29	4,500	\$2,222
McNew Gen.	Evergy Kansas	SPP (KS)	2030	710	\$2,255
Cayuga CC	Duke Indiana	MISO (IN)	2029/30	1,476	\$2,256
ELL CCGT proposed	Entergy La.	MISO (LA)	2031	1,466	\$2,332
ELL CCGT proposed	Entergy La.	MISO (LA)	2031	733	\$2,705

Source: Adapted from L. Sisung 2026⁴

Battery energy storage systems (BESS) have their own unique value. While BESS can provide sub-second dispatch of generation, it can also provide sub-section load. Imagine a large data center that trips offline due to an internal control problem; instantly the grid can go into shock from a state of delivering hundreds of megawatts to a large customer, to having generation in excess of the need. Balancing authorities measure deviation between load and generation through the Area Control Error (ACE) metric. If an ACE value is positive, the area is providing more power than needed at that time; negative values show a deficiency. When the ACE value is too high or too low for too long, it can record negative effects on grid frequency; during Winter Storm Uri the frequency deviation measured in the ERCOT system almost caused other generation resources to trip offline, potentially creating a cascading blackout.⁵ Batteries can

⁴ <https://lpscpubvalence.lpsc.louisiana.gov/portal/PSC/ViewFile?fileId=52z5rrwJkQQ%3D>.
⁵ https://www.ercot.com/files/docs/2021/03/03/Texas_Legislature_Hearings_2-25-2021.pdf.

provide power or be a source to "dump" excess generation to help maintain system balance, something no generator can provide.

We encourage the Commission to consider these benefits, and any others, of IBRs for service to large loads and ensure fairness and competition that enables their use.

II. Issues Raised at the May 7th Technical Conference

Several stakeholders, including SREA, participated in the in-person May 7th Technical Conference related to large loads. These stakeholders represented a diverse set of expertise, experience, and interests, and we encourage the Commission to continue supporting broad stakeholder engagement in the topic.

a. Federal and Jurisdictional Context

We agree with the comments at the Technical Workshop regarding FERC respecting the role of states and their jurisdiction over how load is met within the states. However, we also see the role of FERC as important on the topic of large loads given the impacts to the interstate BPS. Currently in Louisiana, large load integration is already impacting resource and transmission development in neighboring states. These inter-state influences may benefit from a federal framework that coincides with state-level decision making.

A current example is the Smalling to El Dorado 500kV transmission project submitted into MISO's Expedited Project Review (EPR) process. This proposed project serving the META Hyperion Campus, stretches from the Smalling substation currently under construction in Holly Ridge, LA to El Dorado Substation in El Dorado, AR. It is currently a part of the META Expansion Application before the LPSC, but these projects are under technical evaluation by MISO in their EPR process to ensure there is no harm to the BPS, and that they serve the needs of the META Expansion.

However, MISO recently responded that their evaluation of the West Fork Creek 500-230 kV

Station, West Fork Creek to St Landry 500kV Project, and El Dorado to Smalling 500 kV Project, submitted in April as EPRs, were still under study. We believe that this is due to the size and impact of these projects, which likely extend beyond one RERRA jurisdiction.

For this reason, we believe that there is an important middle ground for the LPSC to take stock of regarding federal and state jurisdiction. Per Article IV, Section 21 of the Louisiana State Constitution, the Commission's role and responsibility is oversight of common carriers and public utilities. The Commission does not have jurisdiction over municipal utilities, like Lafayette Utilities System, nor load or generation systems unconnected to a common carrier or public utility.

FERC is currently evaluating large load issues in its Advanced Notice of Proposed Rulemaking (ANOPR), Docket No. RM26-4-000.⁶ FERC will take up this matter at their June 18, 2026 meeting, which may necessitate this docket opening additional comments for FERC issues.

b. Regional Transmission Organization Large Load Policy Developments

SPP and MISO have been active in generation and large load interconnection policy and we support policy that does not exclude IBRs.

i. SPP's Large Load Topics

SPP is a thought leader on large load integration and has developed a suite of policies to help better enable both new load as well as new generation including its policies on High Impact Large Load (HILL), High Impact Large Load Generation Assessment (HILLGA), Conditional HILL Service (CHILLS), and Price Adaptive Load (PAL). These policies are described more fully, below:

High Impact Large Load (HILL)

- **Definition:** Commercial or industrial load, or increase in commercial or industrial load, at a single site connected through one or more shared Points of Interconnection (POIs) or delivery points

⁶ <https://www.ferc.gov/news-events/news/ferc-act-large-load-interconnection-docket-june-2026>.

- **MW Threshold:** For connections less than or equal to 69 kV: load greater than or equal to 10 MW, for connections greater than 69 kV: load greater than or equal to 50 MW
- **Requirements:** HILL must register in market, evaluated by existing Tariff study processes and under new supplemental study processes, and must comply with SPP ride-through requirements.
- **Must Perform within 90 Calendar Days:** Transient Stability considering SPP HILL ride through requirements, Electromagnetic Transient (EMT) Screening, Short-Circuit Ratio and Critical Clearing Time, If issues occur, perform full EMT analysis

High Impact Large Load Generation Assessment (HILLGA)

Behind-the-Meter (BTMG)

- **Interconnection Study:** 90 days by SPP or an equivalent stability study provided by TO. If there are found to be impacts to the transmission system the generator must move to full GI process or sponsor necessary upgrades.
- **Market Registration:** Greater than 10MWs must be registered in market
- **Metering:** Separate metering required for each load and generator
- **Transmission Billing:** No net metering for billing purposes

HILLGA Load Limited Interconnection Service (LLIS)

- **Service:** HILLGA requires a path to firm service within 5 years for load and generation to be considered planned sites subject to GRID-C under SPP's Consolidated Planning Process. There must be a proven relationship like a contract between HILL and requested HILLGA.
- **Siting of Gen and Load:** Using no more than 5 substations, 2 transmission lines, each load must be no more two substations from generation, generation can connect to more than one HILL
- **Generation and Load:** Generation is required to limit output to the amount of HILL in agreement.
- **Total Capacity of HILLGA in Request:** $HILL \leq HILL \text{ Request load} \times \text{Max (110\%+PRM, 125\%)}$

Conditional HILL Service (CHILLS)

Option 1 Definition: Transmission service provided to HILL on an as available basis. Connect CHILL to system if it has adequate generation but is contingent on transmission upgrades

- **Conditions:** Must demonstrate that they can be curtailed. After 1 year, must provide a path to Long Term Service (up to 7 years)

Option 2 Definition: Require accredited equivalent HILLGA generation for CHILL.

- **Conditions:** CHILL would not have service until HILLGA reached Commercial Operations. CHILL curtailed if generation is not available and/or if there was a net impact to the transmission system during system CHILL curtailments.

Price Adaptive Load (PAL)

- **Definition:** A policy proposal under consideration by SPP that Could be effectuated through price as "price sensitive" or through projected dispatch stack.
- **Conditions:** To avoid resource adequacy impacts, this load could not negatively impact generation that is permit hours limit (i.e. load studied in the LOLE but no increase to the planning reserve margin)

Broadly, SREA believes the SPP policies accepted by FERC, do well to enable large load integration along with new generation resources. Louisiana policies should be complementary, and not opposed, to FERC-approved processes.

ii. MISO's Large Load Topics

Not to be outdone, MISO has also begun developing policies around large loads. Under the recently developed Large Load Working Group (LLWG), MISO and stakeholders are considering several issue submissions including the Firm Service Step Up for Large Load Interconnections, Reserve Enhancements for Large Load, Large Load Interconnections, Reliability Requirements, model and forecasting improvements, and others.⁷ MISO is also working on its Zero Injection Generator Interconnection Agreement (ZGIA), that may enable large loads to be interconnected quicker, by agreeing to conditions to *not* inject into MISO's system. These "bring-your-own-energy" style policies are becoming more popular to enable

⁷ MISO, <https://www.misoenergy.org/engage/MISO-Dashboard/>.

speed to power deployment, as well as potentially helping resolve ratemaking cost causation disputes.⁸

iii. Georgia Power Customer Identified Resources

In 2025, SREA participated with other intervening parties in the Georgia Power Company IRP. Part of the final orders for that proceeding included a new pathway for customers to gain access to clean energy resources. Historically, Georgia Power has relied on competitive solicitation processes for selecting new renewable energy generation resources, a process SREA strongly supports. The new CIR program allows large customers, and even aggregations of customers, to specifically identify a new generation resource for use. While this program does not reform local interconnection processes, it does allow for customers to identify and pay for specific generation resources, at their direction.

III. Guideline Review

a. Non-Binding Guidelines

Due to the fluidity of the large load industry, technological changes, and policy changes, we support non-binding guidelines currently. However, we do encourage the Commission to use existing processes to incorporate discussions around large loads, especially with regards to integrated resource planning (IRP). IRPs have the potential to be excellent tools to help with large load integration, and resource planning, but only if the IRPs are taken seriously. Major large load announcements have been made for Louisiana, without being reflected in current IRP processes; which begs the question regarding the value of the current IRP processes. If the current processes are no longer suited to the industries involved, it is incumbent upon the Commission to expeditiously improve its processes.

Meanwhile, the non-binding guidelines do need clarity around how the information requested in the guidelines are provided to the Commission. Currently, there are no formal docket

⁸ Forbes, <https://www.forbes.com/sites/johnwerner/2026/03/22/bring-your-own-energy-5-insights-on-data-center-deployment/>.

processes for a large load to submit the requested information. Presumably the first time the Commission may see the guideline materials requested may be at a CPCN application by a serving utility. There is likely value in the Commission being made aware of large load prospecting before a CPCN filing. The Georgia PSC requires Georgia Power to file a quarterly report regarding load addition forecasts and estimates.⁹ This reporting requirement bridges a gap with the current non-binding guidelines for the LPSC by providing more timely information. Georgia Power is enabled to provide confidential information directly to the Commissioners and staff, without jeopardizing trade secrets, while also providing some information publicly for stakeholders.

Fig. 2: Georgia Power Quarterly Large Load Data Example

Table 2. Summary of Pipeline Changes (approximate MW)

Date	2023 IRP Update Filing		Q4 2025		Q1 2026		Q1 vs Q4 Change		Q1 vs Initial Filing Change	
	2028/2029	Mid-2030s	2028/2029	Mid-2030s	2028/2029	Mid-2030s	2028/2029	Mid-2030s	2028/2029	Mid-2030s
Total Pipeline	11,600	17,000	24,100	69,100	26,200	76,200	2,100	7,100	14,600	59,200
Large Load Pipeline	10,500	16,000	21,500	65,900	23,600	73,100	2,100	7,100	13,100	57,100
Commitments	2,700	3,600	6,500	11,300	7,800	12,400	900	500	5,100	8,800
Broken Ground	2,000	2,900	5,800	8,000	6,200	8,500	600	500	4,800	5,600

Source: Georgia Power 2026¹⁰

b. Defining Large Load for Commission Purposes (Section I)

The non-binding guidelines require data regarding maximum demand (MW), annual energy consumption (MWh), load factor and operating profile, coincident peak contribution, and expected ramp schedule. While gaining this information may be valuable, it is highly likely that

⁹ Georgia PSC Docket No. 55378, Order Adopting Stipulated Agreement for Georgia Power Company's 2023 IRP Update at 13, available at <https://psc.ga.gov/search/facts-document/?documentId=218484> ("As set forth in the Stipulation, the Commission finds that the Company's 2023 IRP Update Load Forecast is approved as filed, with the caveat that such approval shall not constitute approval of the methodologies used in creating such forecast and shall not be precedent in future proceedings. Additionally, in order to keep the Commission informed during this period of extraordinary economic growth, the Company agrees to file quarterly reports that will include pertinent information about large load economic development activity in the 2023 IRP Update Load Forecast and any changes since the previous update. These reports will be filed quarterly beginning May 15, 2024, and will continue through the Commission's decision on Georgia Power's 2025 Integrated Resource Plan ("2025 IRP").")

¹⁰ See also: Docket No. 55378 - Quarterly Large Load Economic Development Report <https://psc.ga.gov/search/facts-docket/?docketId=55378>

given the dynamic nature of data center loads, some of this information will need to be updated over time. For instance, a data center may *plan* on predominately serving as a cloud storage facility, which has mostly flat and continuous power needs, but due to market changes, may change focus to large language modeling for artificial intelligence purposes. Such a change could potentially drastically change the operating parameters of a data center. Similarly, data centers may opt for multiple types of computing at one site to optimize usage or profitability. For example, the Colossus facility in Memphis is operated by xAI, a subsidiary of SpaceX, but also has Anthropic and Google as separate customers. A recent announcement shows Google will lease compute power at the xAI facility for the next five years.¹¹ In the meantime, xAI is also using the facility for its own chatbot, Grok. At the time of construction, xAI could not have perfectly anticipated specifically what its future uses or customers would use the facility for. SREA encourages flexibility in reporting requirements to enable the Commission to be kept up to date on project status, without unnecessarily restricting project activity.

Similarly, the definition of a "Large Load" is not set, as it's documented in Idaho National Labs 'Characterizing Large Loads', load taxonomy can be very nuanced¹² and the impacts of a "large load" are dependent on the local grid topology. Connecting a large load to a 115kV transmission line will have different impacts than on a 500kV transmission line. Further, large loads that are successful at providing local generation also have a different impact on the local grid and generation resources. We encourage the Commission to consider a more narrative approach for individual large loads at the time of CPCN filing for more specific details, in addition to quarterly capacity need forecasts.

c. Resource Adequacy & Capacity (Section II)

¹¹ Data Center Dynamics, <https://www.datacenterdynamics.com/en/news/google-to-pay-920-million-to-spacex-monthly-for-ai-capacity/>.

¹² Idaho National Labs, 'Characterizing Large Loads: Taxonomy to Support Large Load Integration' <https://inl.gov/content/uploads/2023/07/Characterizing-Large-Loads-A-Taxonomy-to-Support-Large-Load-Integration.pdf>.

The non-binding guidelines also request information regarding resource adequacy and capacity. Typically, utilities should provide this sort of information through IRP proceedings or CPCN filings. By requiring the utilities to file annual capacity shortfall projections, the Commission can stay informed of potential problems ahead of time.

The guidelines encourage "firm, deliverable capacity". IBRs like wind, solar, and batteries can provide firm deliverable service, and are accredited as such via the MISO and SPP processes. SREA encourages the Commission to recognize the value of accredited resources without predetermining any single technology currently. As mentioned previously, natural gas units are becoming higher costs, and have their own weather-related variability, and should not be assumed as "firm" resources. As mentioned previously, the Commission should request information on firm pipeline capacity and contracts associated with gas units, along with any water consumption requirements.

a. Operational Profile

As mentioned previously, millisecond response times are important for new generation resources serving large loads. According to supplier GE Vernova, ramp of gas turbines lag behind that of IBRs which can respond in a millisecond time range.¹³

On the topic of ramp rate itself and whether this should be a fixed MW/minute value measured at the POI, we do not offer a value that we can confidently stand behind as the correct up/down ramp requirement, but we believe that there should be a speed limit applied, unless there is BTM or co-located BESS included in an application.

As it has been documented in National Lab of the Rockies studies in test environments looking a 7MW computational load, 2.5 MVA Gas Generator Turbine, and a 1MW/1MWh BESS, the following conclusions were documented:

- "When the synchronous generator supplies the emulated data center load without

¹³ GE Vernova, <https://www.gevernova.com/gas-power/products/gas-turbines/7ha>.

any support from BESS, its shaft experiences large oscillations, as observed from the generator output frequency.

- Such large variations in the speed of a conventional generator can result in fatigue-induced shaft failure.
- The output of the synchronous generator remains almost flat when the fluctuations in the datacenter load profile are absorbed by the BESS.
 - This eliminates torsional oscillations in the conventional generator, thereby reducing risks of fatigue-induced shaft failure.
 - The effectiveness of a BESS in absorbing load fluctuations depends on the speed of load monitoring system, the control bandwidth of BESS, and its electrical distance from the load.¹⁴

Another configuration by a data center developer shows promise as well. In a 'digital twin' test environment where they simulated the July 2024 incident in Northern Virginia's 'Data Center Alley' where the instant disconnection of 1,500MW's occurred due to a 230kV line in the Eastern Interconnect, the value of integrated BESS is demonstrated clearly in a test environment with 70MW load that trips. In the example below, with the support of integrated BESS, the voltage ride through is nearly seamless with sub-second response time, whereas without this support, the data center struggles to handle the event.¹⁵

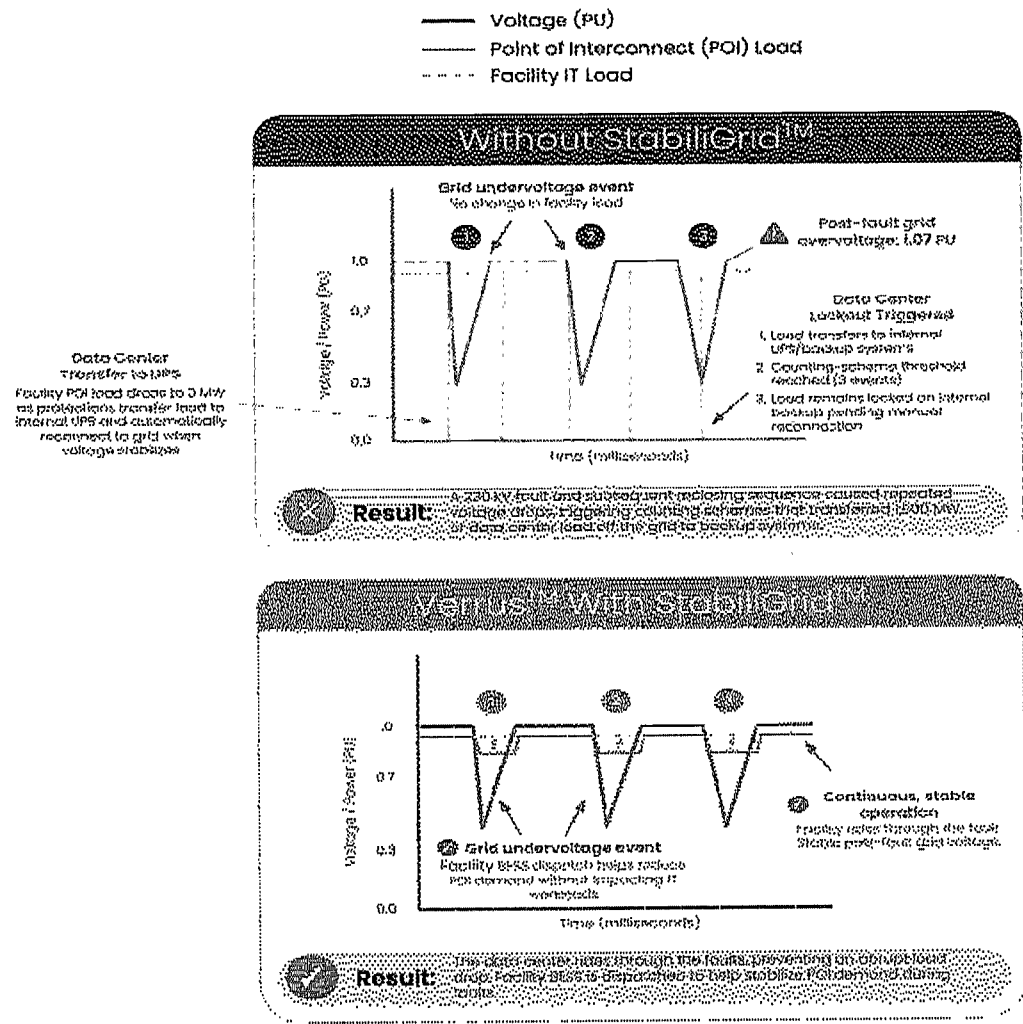
Given the evidence, the Commission should acknowledge that there are clear, documented benefits to BESS integration whether co-located or integrated into a computational load. Studies indicate that loads which the Commission have already approved may struggle to meet ramp rates and ride through requirements, and it may be advisable to consider BESS integration for computational loads in a separate rulemaking for both existing and future loads. SREA believes that data centers with BESS integration, whether co-located or integrated into the data center itself behind the meter should be given priority to other applications. Ramp capability and system responsiveness is an important part of this reasoning.

¹⁴ National Lab of the Rockies, Data Center Power Systems: Architectures, Impact on Grid Reliability, Modeling Considerations, and Megawatt-Scale Hardware Testing, March 2026, slides 29-33, <https://docs.nlr.gov/docs/fy26osti/96746.pdf>.

¹⁵ The Grid-Stabilizing Data Center: Real-Time Resilience with Verrus StabiliGrid, <https://www.verrusdata.com/news/stabiligrid>.

StabiliGrid™ in Action:
Same Fault. Different Outcome.

Replicating July 2024 Virginia event: Cascaded undervoltage events, each ~0.7 PU, within an 87 second window



b. Transmission & Interconnection (Section III)

The non-binding guidelines require that "The utility needs to identify all required transmission upgrades that need to be constructed or have their planned construction accelerated due to the new load." SREA has seen a significant increase in the number of Expedited Project Review processes in the MISO process, predominately to serve new large loads. These EPR projects often do not benefit from holistic transmission planning like Long Range Transmission

Planning and are frequently bespoke "one-off" projects that may not be right-sized or future-proof. Oftentimes, these EPRs are shared publicly at MISO meetings many months before state PSC filings. Utilities should file these EPRs as informational material to the PSCs at the same time they are filed with the grid operators.

The non-binding guidelines also state that, "The utility needs to demonstrate that queue priority and interconnection treatment are consistent with tariff requirements and do not disadvantage existing customers." However, this request runs counter to the Commission's support of the Expedited Resource Addition Study (ERAS) process, which effectively creates a higher tier queue designed to jump over existing projects. The ERAS process is inherently discriminatory against independent power producers, including SREA's members, as it provides preferential treatment to projects that are developed by vertically integrated public utilities. The Commission has previously recognized the economic benefits of competition, including having a competitive solicitation process for generating capacity that does not provide any "preferential treatment" to utility-self build or self-supply options.¹⁶ Therefore, consistent with the policy adopted in the Market Based Mechanism General Order, SREA discourages the Commission from supporting utility self-build or self-supply projects through the ERAs process. Similarly, this guideline is vague and may apply to generation as well as customer interconnection, necessitating improved clarity.

c. Stranded Asset & Exit Risk, Rate Design & Cost Recovery (Sections IV-V)

The non-binding guidelines request "reasonable protections exist against stranded generation, transmission, and fuel infrastructure" and relatedly, rate design and cost recovery. To more fully expand on these issues, SREA recommends the Commission evaluate President Trump's Ratepayer Protection Pledge and find ways to incorporate and codify the Pledge's

¹⁶ See GENERAL ORDER 10-14-2024 (R-34247), Docket No. R-34247, In re: Rulemaking to consider changes to Commission General Order dated October 29, 2008 (Docket No. R-26172 Subdocket C) (Market Based Mechanisms Order) to incorporate formal complaint procedures.

protections in regulatory form.¹⁷

d. **Operational Control, Ancillary Services, Fuel Supply, Load Ramp Management (Sections VI-IX)**

Sections VI-IX in the non-binding guidelines cover several topics that may be best informed by the grid operators (MISO, SPP), in addition to materials provided by the local utility and large load. SREA encourages the Commission to proactively seek feedback from the grid operators to determine which information is useful to include in the guidelines, and which information may be missing from collection.

e. **Market & Planning Impacts (Section X)**

The non-binding guidelines only request that large load impacts be evaluated regarding resource adequacy, capacity markets, long-term system planning, and impacts on energy markets. However, these issues are best handled in IRP processes and require more than evaluation. As currently written, the guidelines could allow an evaluation showing long-term planning suffers, without a clear remedy or cost assessment. SREA encourages a multi-value, multi-scenario based evaluation process that includes cost and benefit analysis for load, generation, and transmission planning. The IRP processes could be used for this sort of assessment; however, oftentimes utilities ignore the IRP rules, especially as they pertain to transmission related planning. Without further improvements in the IRP process, and incorporation of the large load guidelines into the IRP process, the Commission will lose valuable opportunities to evaluate large load integration.

f. **Environmental & Local Impacts (Section XI)**

Section XI of the non-binding guidelines includes an environmental impact assessment and mitigation plan. Both of these requests can already be served in the IRP process; however, the IRP rules would benefit from explicit requirements and improvements regarding large loads.

¹⁷ White House, Ratepayer Protection Pledge, <https://www.whitehouse.gov/fact-sheets/2026/03/fact-sheet-president-donald-j-trump-advances-energy-affordability-with-the-ratepayer-protection-pledge/>.

g. Ongoing Oversight (Section XII)

As mentioned previously, the Georgia PSC requires quarterly reporting for estimated load growth additions from Georgia Power Company. The quarterly reporting requirement necessitated Georgia Power to create its own evaluation process for determining the likelihood of large loads coming online and stages of development. Some large loads are speculative until certain milestones are met including land leases, deposits for equipment purchases, or other local and state permit requirements. The current Louisiana IRP process does not contain enough metrics and filing requirements to adequately address ongoing oversight on a quarterly basis; however, the Commission is enabled to require such reporting.

IV. **Additional Considerations**

As SREA has already commented that we believe there is value in developing formal requirements prioritizing the integration of BESS into computational loads, but we urge that the Commission be open to other opportunities that help streamline compliance with NERC and possible forthcoming FERC standards related to Large Load Definitions, Ramp Requirements, and Market Participation.

Furthermore, SREA encourages the Commission to proactively evaluate Louisiana Legislative Bill SB490 regarding private use networks. Private use networks for large loads could be an innovative solution to speed-to-power challenges, cost insulation for other customers, and insulation from potential reliability issues. For example, Prado AI submitted a request for a Declaratory Opinion to the Mississippi PSC earlier this year.¹⁸ The request explained that Prado AI would own a campus including an AI data center, semiconductor fabrication facility, and be served by a self-owned 350 MW natural gas-fired electric generation facility off-grid. Prado AI requested clarity regarding the Commission's jurisdiction to regulate self-generation facilities. In May 2026, the Mississippi PSC declined to issue a declaratory order, which Prado interprets as

¹⁸ See MS PSC Docket No. 2026-AD-10, filed March 2, 2026.

"allowing private companies to generate electricity for their own facilities without being classified as a public utility."¹⁹ Louisiana PSC Docket R-37905 regarding private use networks may benefit from the commentary in this docket and SREA encourages the Commission to cross-apply materials here to Docket R-37905.

V. Conclusions

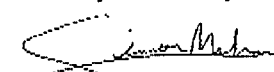
In conclusion, SREA appreciates the opportunity to provide comments into the record broadly on the timely issue of large load integration in Louisiana and are always appreciative and eager to provide input into the record on topics before the Commission. We strongly recommend that the Commission evaluate the existing integrated resource planning rules to determine any gaps in the current processes as they may pertain to integration of large loads. Some of the IRP improvements may be adopted from Georgia PSC processes and methodologies, specifically adapted to Louisiana. SREA further recommends the Commission request information from the grid operators on large load policies under development and opportunities to engage.

WHEREFORE, SREA respectfully requests that the LPSC Staff and the Commission consider SREA's Comments on the Large Load Additions Non-Binding Guidelines.

Respectfully submitted this 18th day of June, 2026.


Whit Cox, Regulatory Director


Andy Kowalczyk, Transmission Director


Simon Mahan, Executive Director

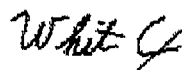
¹⁹ Clarion Ledger, <https://www.clarionledger.com/story/business/2026/06/01/mississippi-ruling-clears-path-for-private-ai-data-center-power-plants/90350818007/>.

Southern Renewable Energy Association
11610 Pleasant Ridge Road, Suite 103 # 176
Little Rock, AR 72223
(501) 701-0874
whit@southernrenewable.org
andy@southernrenewable.org
simon@southernwind.org

REPRESENTATIVES FOR
SOUTHERN RENEWABLE ENERGY
ASSOCIATION

CERTIFICATE OF SERVICE

I hereby certify that I have served all parties with the foregoing document by electronic mail on this 18th day of June, 2026.



Whit Cox
Regulatory Director
Southern Renewable Energy Association
11610 Pleasant Ridge Road, Suite 103 # 176
Little Rock, AR 72223
whit@southernrenewable.org
(501) 701-0874

Appendix A Further Materials for Consideration

Brattle Group. *Large Loads: Interconnection, Tariff Designs, and State Actions*. Presented at the American Public Power Association Business & Financial Conference. September 8, 2025. <https://www.brattle.com/wp-content/uploads/2025/09/Large-Loads-Interconnection-Tariff-Designs-and-State-Actions.pdf>.

Duke University Nicholas Institute for Energy, Environment & Sustainability. *Rethinking Load Growth: Assessing the Potential for Integration of Large Flexible Loads in U.S. Power Systems*. February 2025. <https://nicholasinstitute.duke.edu/sites/default/files/publications/rethinking-load-growth.pdf>.

Electric Power Research Institute. *Powering Intelligence: Data Center Load Growth in Context*. 2026. <https://powering-intelligence.epri.com/load-growth.html>.

Elevate Energy Consulting & GridLab. *Practical Guidance and Considerations for Large Load Interconnections*. March 2025. <https://gridlab.org/wp-content/uploads/2025/03/GridLab-Report-Large-Loads-Interim-Report.pdf>.

Energy Futures Group. *Review of Large Load Tariffs to Identify Safeguards and Protections for Existing Ratepayers*. Prepared for Earthjustice. January 2025. <https://energyfuturesgroup.com/wp-content/uploads/2025/01/Review-of-Large-Load-Tariffs-to-Identify-Safeguards-and-Protections-for-Existing-Ratepayers-Report-Final.pdf>.

Federal Energy Regulatory Commission. *Interconnection of Large Loads to the Interstate Transmission System*, Docket No. RM26-4-000. 2025–2026. <https://www.ferc.gov/rm26-4>.

Fitzmaurice, Peter, Jonathan Tacke, Ryan Cobey, and Layne Nelson. *Characterizing Large Loads: A Taxonomy to Support Large Load Integration*. Idaho National Laboratory, INL/RPT-25-88356, Rev. 0. October 2025. <https://inl.gov/content/uploads/2023/07/Characterizing-Large-Loads-A-Taxonomy-to-Support-Large-Load-Integration.pdf>.

Georgia Power Company. *2025 Integrated Resource Plan*. Filed with the Georgia Public Service Commission. January 31, 2025. <https://www.georgiapower.com/content/dam/georgia-power/pdfs/company-pdfs/2025-Integrated-Resource-Plan.pdf>.

Georgia Power Company. *Large Load Economic Development Report for Q3 2025*. Georgia Public Service Commission Docket No. 55378, Document Filing No. 224615. Filed November 21, 2025. <https://psc.ga.gov/search/facts-document/?documentId=224615>.

Gevorgian, Vahan, and Yingchen Zhang. *Wind Generation Participation in Power System Frequency Response*. National Renewable Energy Laboratory, NREL/CP-5D00-67287. January 2017. <https://docs.nrel.gov/docs/fy17osti/67287.pdf>.

Grid Strategies. *Forecasting for Large Loads*. December 2025. <https://gridstrategiesllc.com/wp-content/uploads/ESIG-Large-Loads-Forecasting-report-2025.pdf>.

Grid Strategies. *Power Demand Forecasts Revised Up: Data Centers and Industry Drive 2025 Forecast Growth*. December 2025. <https://gridstrategiesllc.com/wp-content/uploads/Grid-Strategies-National-Load-Growth-Report-2025.pdf>.

International Energy Agency Photovoltaic Power Systems Programme. *Provision of Frequency Related Services from PV Systems*. IEA PVPS Task 14, Report IEA-PVPS T14-17:2024. August 2024. <https://iea-pvps.org/wp-content/uploads/2024/08/IEA-PVPS-T14-17-2024-REPORT-Frequency-Services.pdf>.

Lawrence Berkeley National Laboratory. *2024 United States Data Center Energy Usage Report*. December 2024. https://eta-publications.lbl.gov/sites/default/files/2024-12/lbnl-2024-united-states-data-center-energy-usage-report_1.pdf.

Lawrence Berkeley National Laboratory. *Electricity Rate Designs for Large Loads: Evolving Practices and Opportunities*. January 2025. https://eta-publications.lbl.gov/sites/default/files/2025-01/electricity_rate_designs_for_large_loads_evolving_practices_and_opportunities_final.pdf.

Lawrence Berkeley National Laboratory. *Large Load Literature Review*. December 2025. <https://emp.lbl.gov/publications/large-load-literature-review>.

Lawrence Berkeley National Laboratory. *2026 Large Load Literature Review and Data Sources*. Updated monthly. <https://emp.lbl.gov/publications/2026-large-load-literature-review>.

Midcontinent Independent System Operator. *Large Load Interconnection: MISO Solutions for Fast, Reliable Power*. 2026. <https://www.misoenergy.org/planning/large-loads--container-page/large-load-additions/>.

Midcontinent Independent System Operator. *Firm Service Step-Up for Large Load Interconnections*. 2026. <https://www.misoenergy.org/engage/MISO-Dashboard/firm-service-step-up-for-large-load-interconnections/>.

National Association of Regulatory Utility Commissioners. *Resolution Urging the Federal Energy Regulatory Commission to Preserve State Retail Regulatory Authority and Protect Retail Customers in Large Load Interconnection Proceedings*. Adopted November 11, 2025. <https://pubs.naruc.org/pub/2C526A94-D533-BE0A-336A-178A366C7A91>.

National Association of Regulatory Utility Commissioners. *Load Growth Resources*. 2025–2026. <https://www.naruc.org/core-sectors/electricity-energy/load-growth/>.

National Association of Regulatory Utility Commissioners. *Large Load Tariffs and Load Forecasting*. 2025. <https://pubs.naruc.org/pub/85205501-DD6C-ABD4-D8EB-B2AC6C7BD0BC>

National Laboratory of the Rockies. *Data Center Power Systems: Architectures, Impact on Grid Reliability, Modeling Considerations, and Megawatt-Scale Hardware Testing*. March 2026. <https://docs.nlr.gov/docs/fv26osti/96746.pdf>.

North American Electric Reliability Corporation. *Large Loads Frequently Asked Questions: Addressing Large Loads on the Grid*. May 2026. <https://www.nerc.com/globalassets/initiatives/large-loads-action->

[plan/large-loads-faqs.pdf](#).

North American Electric Reliability Corporation. *Reliability Guideline: Risk Mitigation for Emerging Large Loads*. April 30, 2026. https://www.nerc.com/globalassets/our-work/guidelines/reliability/RG_Risk-Mitigation-For-Emerging-Large-Loads.pdf.

North American Electric Reliability Corporation. *White Paper: Characteristics and Risks of Emerging Large Loads*. July 2025. <https://www.nerc.com/globalassets/who-we-are/standing-committees/rstc/whitepaper-characteristics-and-risks-of-emerging-large-loads.pdf>.

Rocky Mountain Institute. *Fast, Flexible Solutions for Data Centers*. July 17, 2025. <https://rmi.org/resources/fast-flexible-solutions-for-data-centers/>.

Rocky Mountain Institute. *Large Load Tariff Principles*. June 2025. <https://rmi.org/resources/large-load-tariff-principles/>.

Southwest Power Pool. *High Impact Large Load Interconnection Solutions*. 2026. <https://www.spp.org/markets-operations/high-impact-large-load-hill-integration/>.

United States Federal Energy Regulatory Commission. *Commissioner Rosner's Concurrence to Order Accepting Tariff Revisions Subject to Condition, Southwest Power Pool High Impact Large Load and High Impact Large Load Generation Assessment Processes*. January 14, 2026. <https://www.ferc.gov/news-events/news/commissioner-rosners-concurrence-order-accepting-tariff-revisions-subject>.

Recipient Information

To: Kris Abel
Company: Louisiana Public Service Commission
Fax #: 2253420877

fax

Sender Information

From: Whit Cox
Company: Southern Renewable Energy Association
Email address: whit@southernrenewable.org (from 2601:c1:400:1650:69c7:dc46:ea85:e47f)
Phone #: 5017010874
Sent on: Thursday, June 18 2026 at 12:52 PM EDT

RECEIVED BY FAX

JUN 18 2026

LOUISIANA PUBLIC SERVICE COMMISSION

This fax was sent using the FaxZero.com fax service. Please send your response directly to the sender, not to FaxZero.

FaxZero.com has a zero tolerance policy for abuse and junk faxes. If this fax is spam or abusive, please e-mail support@faxzero.com or send a fax to 855-330-1238, or phone 707-400-6360. Specify fax #37839032. We will add your fax number to the block list.

1/1