



November 20, 2025

Ms. Debbie-Anne A. Reese, Secretary  
Federal Energy Regulatory Commission  
888 First Street NE  
Washington, DC 20426

**Re: Comments of the U.S. Chamber of Commerce in Response to the Federal Energy Regulatory Commission's Notice Inviting Comments; Interconnection of Large Loads to the Interstate Transmission System, Docket No. RM26-4-000**

Dear Secretary Reese:

The U.S. Chamber of Commerce appreciates the opportunity to submit these comments in response to the Federal Energy Regulatory Commission's ("FERC" or "Commission") October 27, 2025, Notice Inviting Comments issued in response to the Secretary of Energy's October 23, 2025 letter, promulgated under Section 403 of the Department of Energy Organization Act, which proposes to FERC an advance notice of proposed rulemaking relating to the interconnection of large loads to the FERC-jurisdictional transmission system (the "ANOPR"). We commend the Commission for initiating this important proceeding to address the challenges and opportunities associated with the interconnection of large loads to the electric grid.

The Chamber brings the unique perspective of counting among its members not just many of the electricity providers and technology companies that are key stakeholders to the large load interconnection process, but also the numerous electricity customers who count on affordable and reliable energy to support their businesses and livelihoods. As such, the Chamber presents a broad voice across the expansive ecosystem of entities that stand to benefit from the modernization and expansion of the power grid driven by emerging and anticipated increases in electricity demand.

The interconnection of large loads, such as data centers, advanced manufacturing plants, and other high-demand facilities, represents a critical component of the evolving energy landscape. These facilities are essential to supporting economic growth and technological innovation. With respect to data

centers, in particular, the ability to support and grow the infrastructure necessary to sustain global leadership in artificial intelligence (AI) is nothing short of a national security imperative. Winning the AI race is the only option. However, the integration of these large loads into the grid requires careful planning, coordination, and regulatory oversight to ensure reliability, resource adequacy, and affordability for all electricity customers.

The Chamber is generally supportive of the Commission's efforts, in part due to the Department of Energy's entreaty, to explore reforms that have the potential to enhance the interconnection process for large loads. It should be recognized, however, that the preexisting process, handled primarily on a state-level basis, is not broken everywhere. Many large loads have been and continue to be connected at the transmission level nationwide. Thus, any reforms proposed or implemented because of this proceeding should be mindful to not upend the progress that is currently being made to interconnect large loads across the country; new delays should not inadvertently be imposed by reforms intended to achieve the opposite result. As such, the Chamber supports FERC's judicious use of its rulemaking authority, potentially applied on a regional versus national scope, as ultimately deemed just and reasonable, to remove identified barriers to the interconnection of large loads.

#### **A. General Considerations to Support Large Load Interconnections**

Certain underlying concepts should be followed as the Commission formulates a rulemaking in this proceeding because the interconnection of large loads – and especially data centers – represents a far broader scope of policy considerations across different sectors of the government and the economy. The below principles are offered to guide the Commission's development of a formal rulemaking proposal aimed to accelerate the interconnection of large loads:

1. **Streamlined Interconnection Processes:** The Commission should prioritize reforms that reduce delays and administrative burdens in the interconnection process, including through the potential adoption of AI technologies to support the automation and acceleration of required studies, consistent with prudent utility practice. Consistent with the need for broader permitting reform across the federal government, streamlined procedures from FERC will enable large loads to come online more quickly, supporting economic development and grid modernization. Overall permitting reform can facilitate the electric transmission infrastructure that is necessary to support these new interconnections and the economic development that these new facilities will provide. The Chamber strongly supports predictability,

efficiency, transparency, and stakeholder input as key principles upon which such reforms should be built.<sup>1</sup>

2. **Cost Allocation Transparency:** It is essential that the costs associated with interconnecting large loads are allocated in a fair and transparent manner. Clear cost allocation methodologies will provide certainty to large load customers and generation and transmission developers and ensure that costs are equitably allocated, as appropriate, across relevant stakeholder constituencies. When consistent with reliable utility operations, the adoption of advanced grid management technologies such as dynamic line ratings and high-performance conductors should be considered when cost-effective.
3. **Grid Reliability and Resilience:** The integration of large loads must not compromise grid reliability or resilience. The Commission should ensure the grid can accommodate these loads without adverse impacts on existing customers or the overall integrity of the grid.
4. **Stakeholder Engagement:** The Commission should continue to engage with a broad range of stakeholders, including utilities, large load developers, state regulators, and consumer advocates, to ensure that any forthcoming proposed and final rules reflect diverse perspectives and addresses practical implementation challenges.
5. **Support for Innovation:** The interconnection process should encourage the adoption of innovative technologies and practices, such as expanded use of voluntary demand response programs, energy storage, hybrid facilities, and advanced grid management systems, provided that such options are amenable to all directly impacted entities, to optimize the integration of large loads.

The Chamber also encourages the Commission to consider the interplay between this ANOPR and other ongoing and recently completed rulemakings, such as those related to regional transmission planning and generator interconnection within regions and more broadly. In addition, to develop additional clarity regarding large load interconnections, the Commission should promptly finalize its pending proceeding regarding the colocation of generation with such large loads. A holistic approach is

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<sup>1</sup> The Chamber's "Permit America to Build" initiative is focused on bolstering America's strength and competitiveness by modernizing the permitting process necessary to build critical infrastructure. See <https://www.uschamber.com/major-initiative/permit-america-to-build>.

necessary to ensure that the Commission's policies are aligned and mutually reinforcing.

## **B. Specific Recommended Enhancements to the ANOPR**

The ANOPR sets forth a set of fourteen principles from the Department of Energy that are intended to guide the Commission's development of a formal rulemaking addressing the interconnection of large loads. The Chamber provides suggestions, based upon its conversations across the key stakeholder groups implicated by the ANOPR, as to modifications and enhancements that would enhance large load interconnections and fulfill the intended goals outlined therein.

The second principle within the ANOPR proposes to align the application of new large load interconnection policies and procedures with the 20MW floor provided for the Commission's *pro forma* large generator interconnection agreement and procedures. Given the realities of the typical characteristics of a new "large load," and to ensure that any new "large load" interconnection queue is not overwhelmed by the quantity of requests, the Chamber recommends that the floor for "large load" interconnections be raised to 75 or 100 MW. An increased minimum threshold would better reflect the scale of modern large load projects, ensuring that regulatory frameworks are aligned with current and future industry needs. Moreover, large loads at the 75-100 MW level, have a greater potential to significantly impact grid operations. Establishing a higher minimum threshold will allow grid operators to focus their resources and attention on what are more likely to be truly impactful interconnections, avoiding unnecessary administrative burdens for smaller loads that may not pose the same challenges.

The ANOPR's fourth principle should be strengthened to include study deposits, readiness requirements, and withdrawal penalties that enhance the veracity and transparency of the load growth currently anticipated across the power grid. These thresholds should not serve to deter legitimate entry into interconnection queues, but they should be designed to disincentivize the submission of multiple interconnection requests for what will ultimately result in a single large load – either across one or multiple different transmission providers. The timing and supply chain challenges of meeting new demand is significant enough; duplicative and illusory large loads should not proliferate in a manner that leads to the inefficient distribution of the intellectual and physical resources necessary to meet unprecedented demand growth.

With respect to hybrid facilities more generally, stakeholders agree that many of these configurations may be best implemented as temporary – rather than permanent – solutions to bring large loads online in a timely fashion. Such hybrid options should be available on a voluntary basis when the sought "speed to power" for a large load is not otherwise available, and the simultaneous study of load and

generation behind a single point of interconnection has merit. Stakeholders agree on the unsurpassed reliability, efficiency, and power quality value of the interconnected power grid. Thus, while temporary and more limited electricity offtake might initially be required, full grid interconnection and reliable electric service are often the preferred final results on both sides of a large load interconnection.

Regarding the ANOPR's eighth principle, our members agree that all stakeholders should pay their attributed share of any large load interconnection. The devil may be in the details of any specific interconnection of load to the transmission system, but large loads are committed to paying their full cost of service for the energy and infrastructure supporting the electric service they require. Ultimately, large load interconnections should result in lower, rather than elevated, electricity rates for all other customers. The Commission's efforts to streamline large load interconnections should ensure that costs are allocated commensurate with the benefits received from any needed network upgrades.

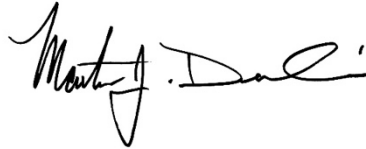
In addition, the thirteenth principle foreshadows the complexities that could emerge if a new, more standardized large load interconnection process is implemented in real time as preexisting requests progress toward their individual connections to the grid. As it moves forward with the rulemaking process, it is important that the Commission be mindful that reforms aimed at shortening the interconnection of large loads could result in lengthened timelines for such requests that are already pending. To counteract any such unintended consequences, the Commission should commit specific attention to ensuring that any new interconnection queues or processes not be developed or implemented in a way that unduly delays or interrupts pending requests. Moreover, flexibility should be provided – consistent with the final paragraph of the ANOPR – to ensure that equivalent or superior solutions to large load interconnection can be continued or newly developed on a utility-specific or larger regional bases, as appropriate.

### **C. Conclusion**

In conclusion, we commend the Department of Energy and the Commission for their leadership in addressing the interconnection of large loads. This ANOPR represents a valuable step toward ensuring that the grid can accommodate the demands of a rapidly changing energy landscape while maintaining reliability and affordability. We look forward to continuing to engage with the Commission on this important issue.

If you have any questions or need additional information, please contact Heath Knakmuhs, Vice President and Policy Counsel of the U.S. Chamber of Commerce's Global Energy Institute, at [hknakmuhs@uschamber.com](mailto:hknakmuhs@uschamber.com) or (202) 463-5874.

Sincerely,

A handwritten signature in black ink, appearing to read "Marty Durbin". The signature is fluid and cursive, with the first name "Marty" and last name "Durbin" clearly distinguishable.

Marty Durbin  
Senior Vice President, Policy  
President, Global Energy Institute  
U.S. Chamber of Commerce