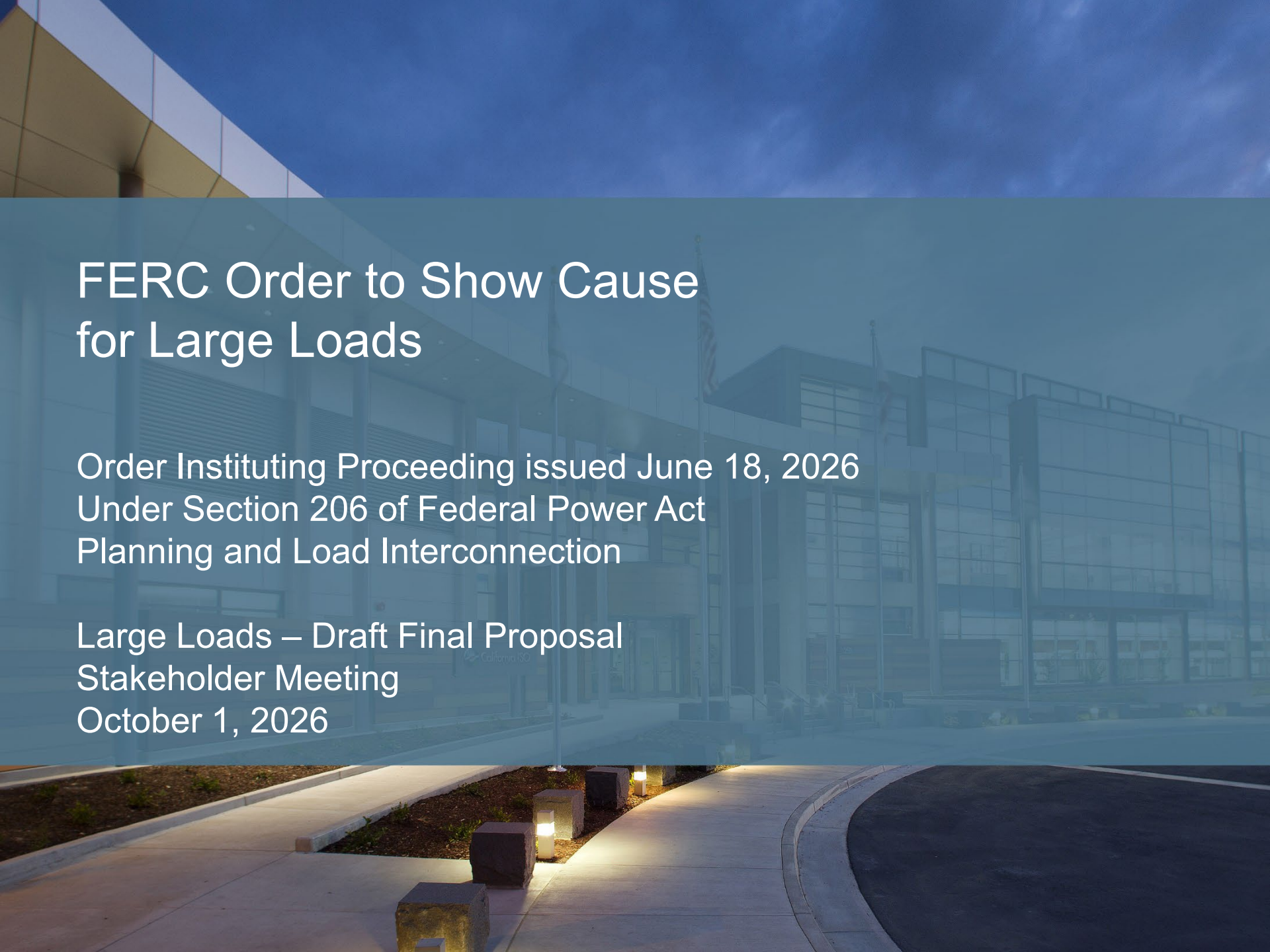




FERC Order to Show Cause for Large Loads

Order Instituting Proceeding issued June 18, 2026
Under Section 206 of Federal Power Act
Planning and Load Interconnection

Large Loads – Draft Final Proposal
Stakeholder Meeting
October 1, 2026

Engagement Best Practices



This call is being recorded for informational purposes and will be available on the ISO website. Any related transcriptions should not be reprinted without the ISO's permission.



Today's meeting is designed to encourage open dialogue and diverse perspective. Your participation is valued.



Please engage in a respectful and professional manner.



Please keep comments brief and avoid repeating points already made so we can manage time and ensure everyone has an opportunity to participate.



You can access Closed Captioning and the Transparency Viewer using the controls located at the bottom of the Webex screen.

Instructions for Raising Your Hand to Ask a Question



If you are connected to audio through your computer or used the 'call me' option, select the raise hand icon located on the bottom of your screen.



If you are connected on the phone line only and not the Webex dial *3 to be added to the raise hand queue.



Please remember to state your name and affiliation before making your comment.



You may also send questions via chat to all panelists. Open the "Direct" tab, and select "All Panelists" from the dropdown menu.



If you need technical assistance during the meeting, please send a chat to the event producer at Intellor Events.

CAISO Policy Initiative Stakeholder Process



[Learn more in the Stakeholder Process Guide.](#)

Agenda – October 1, 2026

Time	Topic	Presenter
9:00-9:10	Introduction and housekeeping	Yelena Kopylov-Alford
9:10-9:20	Background and related issues	Danielle Mills
9:20-10:20	Large load application and study process, operational requirements	Danielle Mills
10:20-11:00	Framework to prevent cost-shifting	Danielle Mills
11:00-12:00	Requirements for co-located arrangements	Danielle Mills
12:00-1:00	Lunch	
1:00-2:00	Interconnection service for flexible large loads	Danielle Mills
2:00-2:30	Electrically proximate large loads	Danielle Mills
2:30-2:40	Next Steps	Yelena Kopylov-Alford

Background on the Large Load Stakeholder Initiative

- Participating Transmission Owners (PTOs) and stakeholder discussions began in 2025, including formation of Large Loads Technical Requirements Working Group (LLTRWG) to explore operational requirements.
- [Issue Paper](#) posted January 25, 2026.
- [Large Loads Technical Requirements Straw Proposal](#) posted June 15, 2026.
- FERC Show Cause Orders issued June 18, 2026; shifted the focus of this initiative to the 205 filing.

Background on the order to show cause:

- FERC issued tailored show cause orders under section 206 of the Federal Power Act to each of the six regional grid operators, including the ISO and PTOs within the ISO Transmission Control Area.
- The ISO must justify or reform the rules that govern how large loads connect to the transmission grid.
- Submitted an [informational report](#) describing how the ISO is ensuring that adequate generation will be available to serve existing and new large loads. (*July 20, 2026*)
- Submitted a motion for abeyance for 90 days from the deadline to conduct a stakeholder process ahead of its 205 filing response. (*Granted August 14, 2026*).
 - Section 205 filing must be filed by the ISO and PTOs by November 16, 2026.
- [Large Loads Straw Proposal](#) posted August 11, 2026.

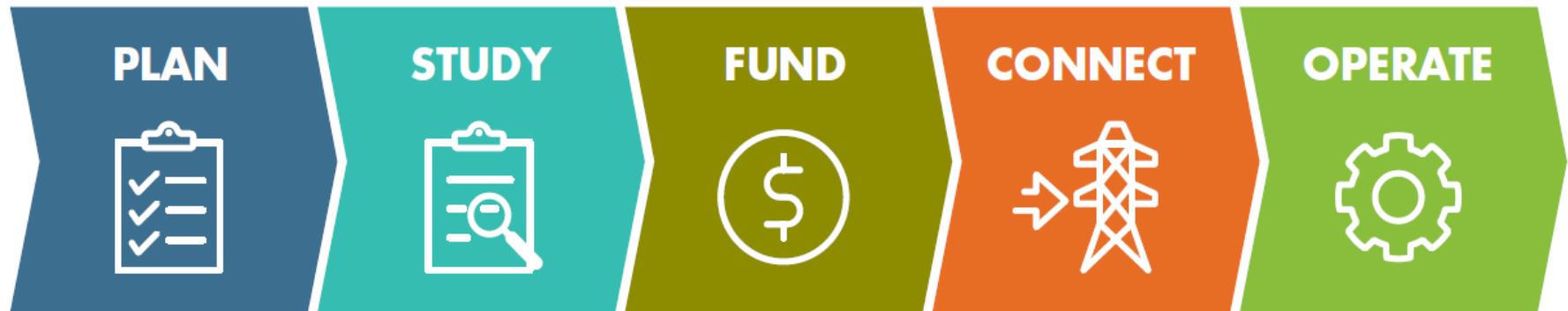
ISO's ongoing stakeholder engagement on large loads

- Recognize need for continued engagement on implementation details for items in draft final proposal.
- Consider potential refinements of operational and technical requirements, enhancements to large load market participation, provisions for serving proximate loads, and other matters in existing or new stakeholder initiatives.
- Continue to work with state energy agencies and PTOs to address statutory requirements from recently enacted legislation related to data centers.
- Explore, as a risk mitigation tool for capacity constraints, a concept through which LRAs, LSEs, UDCs, MSSs, and PTOs would work with the ISO to develop a framework for curtailing large loads under tight grid conditions before a reliability event.
 - Concept is separate and distinct from the ISO's response to the Order, and discussions will continue in a future policy initiative.

Topics addressed in the draft final proposal

- A. Procedures to improve information visibility for operational awareness and new technical standards for continued reliability
- B. Framework to prevent cost-shifting
- C. Parallel information and application requirements for co-located arrangements
- D. Framework for a flexible interim load interconnection (FILI) service to expedite interconnection
- E. Service to electrically proximate large loads

Collaboration between the ISO and PTOs will drive a holistic large load integration framework



Plan proactively

Incorporate viable large load growth into CAISO transmission planning and resource interconnection process.

Study consistently

Establish consistent, transparent and timely study processes across PTOs to support efficient interconnection and system reliability.

Protect customers

Allocate costs and financial risks appropriately, improve cost transparency, and protect existing customers from unreasonable cost shifting.

Connect faster

Enable expedited Flexible Interim Load Interconnection (FILI), using enforceable flexibility until required network upgrades are complete.

Operate reliably

Establish the forecasting, visibility, coordination and operational capabilities necessary to reliably integrate large loads.

Overview of ISO's Large Loads Draft Final Proposal

- The ISO, in coordination with State energy agencies, utilities, and stakeholders, have been and will continue to coordinate on ensuring timely access to power for new large loads.
- The ISO's Large Loads Draft Final Proposal addresses the topics for which ISO is responsible:
 - Transmission planning;
 - Generator interconnection; and
 - Reliability of the ISO system
- The ISO is coordinating closely with the PTOs and expects PTOs to develop consistent and conforming policies and procedures under their transmission tariffs.
 - In some areas the ISO identifies consistent minimum expectations

Stakeholder feedback largely sought more detail from both the ISO and PTOs

- The draft final proposal is responsive to stakeholder feedback by providing greater detail to justify, enhance, or continue exploration of certain proposals.
- A comprehensive program to address large load interconnection requires consistent and complementary treatment across the PTOs.
- The ISO will continue coordinating with PTOs and stakeholders on implementation details and expects the PTOs to avail themselves to stakeholder inquiries regarding their efforts to update tariffs.

A. Load interconnection application, study procedures, and operational requirements

- Definition: End User located at a single site whose Point(s) of Interconnection is/are connected to the CAISO Controlled Grid, and that has a peak load of 50 MW or greater.
- The ISO does not propose changes to the ISO/PTO interconnection roles and responsibilities but encourages consistency among the PTOs in large load interconnection processes.
 - Expects that the PTOs' tariff revisions will sufficiently deter speculative or duplicative large load requests.
 - Expects PTOs to develop *pro forma* provisions in transmission service agreements.

A. Load interconnection application, study procedures, and operational requirements

- PTOs must conduct load interconnection studies within 60-90 days. The ISO must support this timeline within the transmission planning process (TPP).
 - Monthly review of new load interconnection requests
 - Transmission planning study results will determine eligibility for FIL

A. Load interconnection application, study procedures, and operational requirements

- Operational requirements modifications in the draft final proposal clarify ISO expectations:
 - Require submitted schedules to reflect outages, de-rates, and operating limits, including operating envelopes, to ensure that they remain aligned with expected operating conditions.
 - Clarify implementation timing, with software changes proposed to begin in 2027, and with automation capabilities being deployed in phases, with full automation targeted to be complete by 2030.

A. Load interconnection application, study procedures, and operational requirements

- Technical and operational requirements to support reliable integration of large loads, while remaining informed by and complementary to ongoing NERC standards development efforts:
 - ISO tariff: ramp rate; frequency and voltage and ride-through standards; hourly forecasts, telemetry and other data need for ISO visibility; communications protocols for ISO to coordinate with PTO to remotely disconnect large loads when necessary to maintain system reliability; maintain communication channels between the ISO and transmission customer serving large loads.
 - PTO tariffs: updates that complement ISO tariff updates; require high-speed monitoring equipment with costs assigned to transmission customer; control technologies/protection system to limit withdrawals from the transmission system.

A. Load interconnection application, study procedures, and operational requirements

- Establish a framework for applying technical and operational requirements across a range of large load operating characteristics, including flexible and co-located configurations, while providing flexibility for future refinement as operational experience and stakeholder discussions evolve.

B. Mitigate risk of cost shifting among transmission customers

- Describe how the existing Transmission Access charge (TAC), coupled with enhanced PTO cost-allocation rules, can sufficiently prevent cost-shifting.
- Transparency regarding assignment of network upgrades and associated costs attributable to Eligible Customers taking transmission service on behalf of large loads. Publicly post:
 - Aggregate large load additions in the ISO operating area and by transmission pricing zone;
 - Planned network upgrades needed to serve large loads; and
 - Cost estimates for each planned network upgrade
- *Pro forma* cost recovery agreement between PTO, eligible customer, and in some cases the ISO.
- Mechanism to ensure that co-located loads pay for ancillary services from which they benefit.

B. Mitigate risk of cost shifting among transmission customers

- The ISO is emphasizing the need for consistent terms in PTO tariffs, otherwise FERC could require a single set of rules.

C. Accommodate co-location agreements and behind-the-meter generation

- Clarify interconnection and operational requirements for co-located large loads and generation, including how these will be studied in the ISO interconnection process and coordinated with the PTO tariffs.
 - Co-located loads with exporting generation must provide load and generation information in both the ISO generator interconnection process and PTO load interconnection process
 - The ISO tariff will apply to the generation component, and the PTO tariff will apply to the large load component. Existing generators adding co-located large loads will interconnect under PTO tariffs.
 - New co-location applications can remove the large load component, with the ISO and PTO determining whether the change can be accommodated or requires queue re-entry.
- Require sub-metering of co-located large loads to appropriately meter and assess ancillary service rates.
- Consider implications for existing generation “leaving the grid” with requests to connect load onsite.
- Section A of draft final proposal includes additional operational requirements for these arrangements.

D. Provide new “transmission services” for flexible large loads to interconnect faster or cheaper

- Propose to create Flexible Interim Load Interconnection (FIL) service offering for faster load interconnection.
- Could include Remedial Action Schemes (RAS), PTO operator curtailment, or managing to a present schedule.
 - PTO may request automated schemes for FIL that are limited by transmission overload under N-1-1, with ISO and RC concurrence or the PTO will do its own load curtailment for FIL that is limited by transmission overload under N-1-1 after the first N-1 were to occur.
 - The ISO will not enable RAS as an option if it cannot be reliably operated or is found to have significant market operations.
- If a RAS is considered but cannot be reliably operated, or is found to have significant market implications, the ISO will not enable that option.

E. Future consideration of a process to study generating facilities that serve electrically proximate large loads and co-located loads

- The ISO intends to prioritize stand-alone and co-located load and generator interconnections in this response to the Order, and will focus on proximate load and generation arrangements once the process for co-location is underway.

Summary of key changes from straw proposal

Section	Changes
Large Load Application and Study Process, Operational Requirements	Updated definition of large load Additional detail: • Interaction between the PTO load interconnection studies and the ISO transmission planning process. • Framework for applying technical and operation requirements for a range of large load operating characteristics. • Updates to what submitted schedules must reflect and implementation timing.
Framework to prevent cost-shifting	Description of how the TAC can be used to minimize cost shifting from one PTO to the next.
Requirements for co-located arrangements	Clarifying how co-located large loads and generation may interconnect and operate within the ISO-controlled grid.
New interconnection services for flexible large loads	• Detail on Flexible Interim Load Interconnection (FILI) framework • Future consideration of the flexible load interconnection – permanent (FLIP) offering option to a future initiative
Serving electrically proximate large loads	Further exploration of proximate load and generation arrangements to a future initiative

NEXT STEPS

Next steps

- Continued coordination with State energy agencies
- Weekly coordination discussions with PTOs
- Additional policy concepts to be explored in parallel or future stakeholder initiatives.
- Questions? Please email ISOStakeholderAffairs@caiso.com
- Additional information is available on the CAISO website at: <https://stakeholdercenter.caiso.com/StakeholderInitiatives/Large-loads>

Compliance schedule

Calendar days (0=6/18/2026)	Date	Requirement
30 days	July 20, 2026	30-day report on resource sufficiency. ISO with input from CPUC, PTOs
45 days	August 3, 2026	ISO petition for extra 90 days for stakeholder initiative and 205 filings
	August 12, 2026	Post straw proposal
	August 19, 2026	Stakeholder workshop on straw proposal
	September 2, 2026	Comments on straw proposal due
	September 24, 2026	Post draft final proposal
	October 1, 2026	Stakeholder workshop on draft final proposal
	October 15, 2026	Comments on draft final proposal due
	October 28, 2026	Board of Governors consideration
150 days	November 16, 2026	Section 205 tariff filings from the ISO and PTOs

This Week at the ISO – 9/28/26

Stakeholder Meetings *For an overarching view of where each initiative is in the development process, view the [Policy Initiatives Timeline](#).*

All public stakeholder meetings are also listed on the [CAISO Calendar](#)

- Monday, September 28, 2026 – [Extended Day-Ahead Market \(EDAM\) Market Performance](#)
 - 1:00pm – 3:00pm PT ([link](#))
- Tuesday, September 29, 2026 – [Release User Group Forum](#)
 - 10:00am – 11:00am PT ([link](#))
- Tuesday, September 29, 2026 – [Interconnection Customer User Group](#)
 - 1:00pm – 2:00pm PT ([registration required](#))
- Tuesday, September 29, 2026 – [Greenhouse Gas \(GHG\) Enhancements Overview](#)
 - 2:00pm – 4:00pm PT ([registration link](#))
- Wednesday, September 30, 2026 – [Congestion Revenue Rights Enhancements](#)
 - 9:00am – 4:00pm PT ([link](#))
- Wednesday, September 30, 2026 – [Interconnection Process Enhancements 5.0 - Draft Tariff Language](#)
 - 2:00pm – 4:00pm PT ([link](#))
- Thursday, October 1, 2026 – [Large Loads - Draft Final Proposal](#)
 - 9:00am – 4:00pm PT ([link](#))
- Thursday, October 1, 2026 – [Market Update](#)
 - 10:00am – 10:30am PT ([link](#))
- Thursday, October 1, 2026 – [2026 Market Policy Catalog and Roadmap Process](#)
 - 2:00pm – 4:00pm PT ([link](#))

Comment Submission Deadlines

- Monday, September 28 – [Interconnection Process Enhancements 5.0 - Draft Tariff Language](#)
- Thursday, October 1 – [2026 ISO Planning Standards](#)
- Thursday, October 1 – [2026 Transmission Economic Assessment Methodology \(TEAM\) Update](#)

This Week at the ISO continued

DAME/EDAM Resources

FAQ & Training:

- [EDAM FAQ Guide](#) - Designed to address general EDAM related questions
- [EDAM Training Resources](#) - A comprehensive set of EDAM training materials is available, offered in both instructor-led and computer-based training (CBT) formats. These resources include courses covering:
 - Bids and Base Schedule
 - EDAM Bidding Basic Concepts
 - Scheduling Infrastructure Business Rules (SIBR)
 - EDAM Scheduling Coordinator responsibilities
 - Intertie Scheduling
- [EDAM Business Requirements Specifications](#) - Describes EDAM's business processes and the associated business requirements.
- [DAME Business Requirements Specifications](#) - Describes DAME's business processes and the associated business requirements.
- [EDAM Scheduling Coordinator Decision Matrix](#)

Settlements:

- [Settlements BPM Walkthrough](#)
- Known Issues List

BPMs:

- [Extended Day-Ahead Market BPM](#)
- [Market Instruments BPM](#)
- [Reliability Requirements BPM](#)
- [Market Operations BPM](#)
- [BPM Change Management Process \(PRRs\)](#)

EDAM Stakeholder Initiative:

- Meeting materials and recordings can be accessed through the stakeholder initiative page [here](#).

This Week at the ISO continued

Trainings

- Tuesday, September 29, 2026 – [Greenhouse Gas \(GHG\) Enhancements Overview](#)
 - 2:00pm – 4:00pm PT ([registration link](#))

Who should attend?

- This course is designed for EDAM and WEIM market participants, particularly entities impacted by the Washington State GHG changes. The intended audience includes policy staff, marketers responsible for submitting GHG bids, and staff responsible for resource modeling.

What topics will be covered?

- This training will include the following topics:
- Describe the GHG Market Model and upcoming geographic boundary changes.
- Explain the purpose and role of the GHG Handbook.
- Summarize GHG bid eligibility, verification, mapping, and submission requirements.
- Identify initial modeling and technical preparations for implementation.
- Recognize upcoming outreach and opportunities for continued engagement.

Market Simulations

Please refer to our [Release Schedule](#) for the most recent updates of initiatives scheduled for MAP- and Production- stage market sims

To participate in the DAME and EDAM Implementation pre-Market Simulation meeting series, please follow these steps:

Submit a CIDI Request:

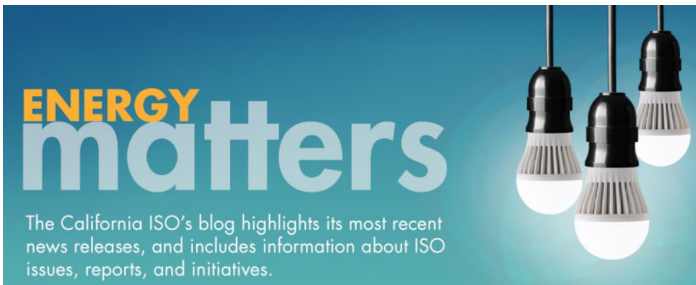
- Log in to the CAISO Customer Inquiry, Dispute, and Information (CIDI) system.
- Create a new request with the 'Functional Environment' set to "Market Simulation."
- In the request, specify your intent to participate in the DAME & EDAM Market Simulation.
- Include the following information:
 - Market Simulation initiative(s) you will participate in.
 - Any specific resources or systems you plan to test.
 - Contact names and email addresses for coordination.

Email Option:

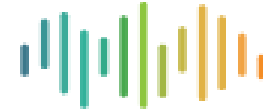
- If you do not have access to CIDI, you may send an email to marketsim@caiso.com with the subject line "DAME & EDAM Market Simulation Registration."

Business Practice Manual (BPM) Updates

- The status of all PRRs and updated BPMs in the [BPM Library](#) are published on the [BPM Change Management Website](#).



Listen and subscribe:   



FREQUENCY BAND

The *Energy Matters* blog provides timely insights into ISO grid and market operations as well as other industry-related news and a new energy podcast, *Frequency Band*.



Story | Transmission

**SWIP-North construction underway;
provides key link in Western
transmission connectivity**

By ISO Staff

09/16/2026



Story | Leadership

**ISON: A valuable network for
international information sharing,
innovation and best practices in
grid management**

By Elliot Mainzer

09/03/2026



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in markets transparency and effectiveness**

By Eric Hildebrandt

08/13/2026

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Announcing the launch of a new publication series:



Western Energy Markets Observations

This new periodical offers concise and accessible insights into notable developments across the western power markets. [Read the first issue](#) for highlights on market performance during the first weeks of Extended Day-Ahead Market (EDAM) operations.

The document will be posted on the [EDAM Overview page of WesternEnergyMarkets.com](#) website.

REGISTRATION CLOSES ON SEPT. 30

2026 STAKEHOLDER SYMPOSIUM

Welcome reception - Oct. 5 at Kimpton Sawyer Hotel, Sacramento, CA

Symposium program - Oct. 6 at SAFE Credit Union Convention Center, Sacramento, CA

7:30-9:00 a.m. Registration and networking breakfast

9:00-9:15 a.m. Welcome and opening remarks

9:15-9:45 a.m. Opening Keynote

9:45-10:30 a.m. The EDAM experience: Perspectives from the first movers

Break

11:00-11:45 a.m. The Road to ROWE: Navigating the 2027 transition

1:30-2:15 p.m.

2:15-3:00 p.m.

Break

3:30-4:30 p.m.

4:30-4:45 p.m.

5:00-7:00 p.m.

Power Shifts: Short talks on big change

Success through partnership: Building the future together

CAISO's strategy for the next 5 years

Closing remarks

Networking reception

