194 FERC ¶ 61,031
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Laura V. Swett, Chairman;
David Rosner, Lindsay S. See,
Judy W. Chang, and David LaCerte.

Southwest Power Pool, Inc. Docket No. ER26-247-000

ORDER ACCEPTING TARIFF REVISIONS, SUBJECT TO CONDITION

(Issued January 14, 2026)

1. On October 24, 2025, pursuant to section 205 of the Federal Power Act (FPA)[1] and Part 35 of the Commission's regulations,[2] Southwest Power Pool, Inc. (SPP) submitted proposed revisions to its Open Access Transmission Tariff (Tariff) to add a High Impact Large Load (HILL) study process and High Impact Large Load Generation Assessment (HILLGA) process. As discussed below, we accept the proposed Tariff revisions,[3] effective January 15, 2026, as requested, subject to condition, and direct SPP to submit a compliance filing within 30 days of the date of this order.

I. Background

A. Order No. 2003

2. In Order No. 2003,[4] the Commission required public utilities that own, control, or operate transmission facilities to file standard generator interconnection procedures and a standard agreement to provide interconnection service to generating facilities with a capacity greater than 20 megawatts (MW). To this end, the Commission adopted the

[1] 16 U.S.C. § 824d.

[2] 18 C.F.R. pt. 35 (2025).

[3] See Appendix for tariff records accepted in this order.

[4] *Standardization of Generator Interconnection Agreements & Procs.*, Order No. 2003, 104 FERC ¶ 61,103 (2003), *order on reh'g*, Order No. 2003-A, 106 FERC ¶ 61,220, *order on reh'g*, Order No. 2003-B, 109 FERC ¶ 61,287 (2004), *order on reh'g*, Order No. 2003-C, 111 FERC ¶ 61,401 (2005), *aff'd sub nom. Nat'l Ass'n of Regul. Util. Comm'rs v. FERC*, 475 F.3d 1277 (D.C. Cir. 2007).

pro forma Large Generator Interconnection Procedures (LGIP) and *pro forma* Large Generator Interconnection Agreement (LGIA) and required all public utilities subject to Order No. 2003 to modify their tariffs to incorporate the *pro forma* LGIP and *pro forma* LGIA.[5]

3. The Commission permitted transmission providers to seek variations from the *pro forma* LGIP and *pro forma* LGIA if those variations were "consistent with or superior to" the terms of the *pro forma* LGIP and *pro forma* LGIA.[6] In addition, the Commission indicated that it would allow regional transmission organizations and independent system operators (RTO/ISO), such as SPP, to propose independent entity variations for pricing and non-pricing provisions, stating that RTOs/ISOs have different operating characteristics due to their sizes and locations and that an RTO/ISO is less likely to act in an unduly discriminatory manner than a transmission provider that is also a market participant.[7] The Commission found that RTOs/ISOs "shall therefore have greater flexibility to customize [their] interconnection procedures and agreements to fit regional needs."[8] Under the independent entity variation standard, an RTO/ISO must demonstrate that proposed variations from the Commission's *pro forma* LGIP and *pro forma* LGIA are just and reasonable and not unduly discriminatory or preferential and accomplish the purposes of the Commission's final rules on generator interconnection, including Order Nos. 2003 and 2023.[9]

B. Overview of SPP's Attachments AQ, AX, and V Processes

4. SPP evaluates a transmission customer's request to add or modify delivery point facilities associated with load additions under existing Attachments AQ (Delivery Point

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[5] Order No. 2003, 104 FERC ¶ 61,103 at PP 1-2.

[6] *Id.* PP 825-826. The Commission also permitted transmission providers to justify a variation from the *pro forma* LGIP or *pro forma* LGIA based on regional reliability requirements and required transmission providers to submit these regional reliability variations to the Commission for approval under the relevant reliability standard. *Id.* PP 824, 826.

[7] *Id.* P 827.

[8] *Id.*

[9] *See, e.g.*, *Midcontinent Indep. Sys. Operator, Inc.*, 185 FERC ¶ 61,084, at P 11 (2023) (citing Order No. 2003, 104 FERC ¶ 61,103 at PP 26, 827); *Improvements to Generator Interconnection Procs. & Agreements*, Order No. 2023, 184 FERC ¶ 61,054, at P 1764, *order on reh'g*, 185 FERC ¶ 61,063 (2023), *order on reh'g*, Order No. 2023-A, 186 FERC ¶ 61,199, *errata notice*, 188 FERC ¶ 61,134 (2024).

Assessment Process) and AX (Provisional Load Process) of SPP's Tariff.[10] Under the Attachments AQ and AX processes, SPP studies the impacts of the requested delivery point addition or modification on the transmission system and determines what, if any, network upgrades are required to accommodate the request. The Attachment AQ process is available to a transmission customer that has sufficient existing Designated Resources to serve its forecasted load, while the Attachment AX process is available to a transmission customer that lacks sufficient existing Designated Resources.[11]

5. Under SPP's current generator interconnection procedures, contained in Attachment V (Generator Interconnection Procedures (GIP)) of its Tariff, SPP conducts its interconnection study process, the Definitive Interconnection System Impact Study (DISIS), for which the Commission has granted an independent entity variation.[12] The DISIS is divided into a two-phased system impact study in DISIS Phase One and DISIS Phase Two, which is followed by an interconnection facilities study. The system impact study is a cluster study that evaluates the impact of each proposed interconnection request on the reliability of SPP's transmission system. DISIS Phase One and DISIS Phase Two are each followed by an interconnection customer decision point (Decision Point One and Decision Point Two, respectively). The decision points provide interconnection customers opportunities to evaluate study results and decide whether to proceed with or withdraw their interconnection requests, including posting of financial security to continue.

II. Filing

A. Overview

6. SPP states that it is experiencing an unprecedented surge in requests for large-scale load interconnections to its transmission system from data centers, cryptocurrency mining operations, electrification of industrial processes, and other energy-intensive

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[10] SPP, Tariff, attach. AQ, § 1 (1.0.0); *id.* attach. AQ, § 2 (2.0.0); *id.* attach. AQ, § 3 (2.0.0); *id.* attach. AX, § 1 (0.0.0); *id.* attach. AX, § 2 (0.0.0).

[11] Transmittal at 14 n.26; *Sw. Power Pool, Inc.*, 193 FERC ¶ 61,018, at PP 3-5 (2025). Under Attachment AX, SPP will consider the transmission customer's planned generation, in addition to its existing Designated Resources, that will be used to serve its forecasted load. *Sw. Power Pool, Inc.*, 193 FERC ¶ 61,018 at PP 5, 41.

[12] SPP, Tariff, attach. V, § 8 (Definitive Planning Phase) (25.0.0), §§ 8.4, 8.10, 8.11; *see Sw. Power Pool, Inc.*, 191 FERC ¶ 61,230, at P 71 (2025); *Sw. Power Pool, Inc.*, 193 FERC ¶ 61,171, at P 4 (2025).

facilities.[13] Specifically, SPP explains that in every year since 2021, transmission customers, specifically large loads of over 100 MW, have submitted requests to interconnect, in the form of Attachment AQ requests, in SPP totaling multiple gigawatts (GW). SPP notes that this growing trend in large load interconnection request submissions peaked in 2022 at nearly 11 GW, but since that peak, there has been a relative drop to approximately 6 GW in 2024, which, according to SPP, could be due in part to SPP's inability to study and interconnect large loads quickly enough to meet their commercial needs.[14]

7. SPP contends that the emergence of large load developments, which frequently request transmission service within months rather than years of their intended commercial operation, strain the legacy regulatory frameworks, planning processes, and market mechanisms that were originally designed for incremental and predictable load growth.[15] SPP explains, for example, that large load customers are requesting faster deployment timelines for generating facilities supporting the load compared to typical interconnection study timelines.[16] In addition, SPP states that large loads are highly energy intensive and concentrated and pose unique challenges to maintaining the reliable and economic operation of the bulk electric transmission system.[17] SPP explains that these challenges will continue to grow absent additional processes to address the reliability and operational impacts of large loads.[18] SPP further contends that load-serving entities and states in the SPP region have stressed the need to expedite the process of interconnecting and serving large loads.[19]

8. SPP states that, to address these challenges, it proposes additional study and operational tools to integrate large loads into SPP's transmission system and to provide a limited pathway for the expedited interconnection of generating facilities that are limited and targeted to serve individual large loads. Specifically, SPP proposes to add two new

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[13] Transmittal at 1.

[14] *Id.* at 8-9, figs. 2, 3.

[15] *Id.* at 9-10.

[16] *Id.* at 11.

[17] *Id.* at 4. SPP explains that large loads present unique operational and reliability challenges because they may exhibit nonconforming load profiles, the ability to ramp rapidly and flutter, and sensitivity to power quality issues. *Id.* at 10.

[18] *Id.* at 4.

[19] *Id.* at 3.

processes to its Tariff: (1) the HILL study process, set forth in new Attachment BA, which includes studies and operational requirements for large loads to interconnect to SPP's transmission system; and (2) the HILLGA process, set forth in new Attachment BB, which establishes an expedited study process and new limited interconnection service for generating facilities that support a HILL.[20]

B. HILL Study Process

9. To assess and reliably manage the challenges associated with interconnecting large loads to its transmission system, SPP proposes to: (1) establish a new category of load, termed a "HILL;" (2) establish enhanced study requirements for HILLs to enable SPP to assess the load's reliability impacts on the transmission system; and (3) establish additional, on-going operational requirements for HILLs to ensure continued reliability of the transmission system.[21]

1. Definition of HILLs

10. SPP proposes to establish a new category of load, a HILL, which will be subject to the study and operational requirements of proposed Attachment BA. SPP proposes to define a HILL as:

> A new 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, where such load is either (1) 10 MW or more if connected to the Transmission System at a voltage level less than or equal to 69 [kilovolts (kV)]; or (2) 50 MW or more if connected to the Transmission System at a voltage level greater than 69 kV. An Electric Storage Resource is not considered a HILL. A load may be categorized as a HILL after the initial effective date of Attachment BA of the Tariff. High Impact Large Loads must register as such in accordance

[20] *Id.* at 11.

[21] *Id.*

with Attachment AE[22] of the Tariff and follow the processes specified in Attachment BA of the Tariff.[23]

11. SPP states that large loads can differ from traditional load in several ways, but they are primarily a facility requiring a large amount of energy at a single site.[24] To determine what qualifies as a "large" quantity of load, SPP consulted information gathered by the North American Electric Reliability Corporation (NERC) Large Load Task Force, which showed that survey participants qualified large load as load greater than 50 MW, though it may be relative to other factors such as the voltage level at the interconnection. To reflect that the size of the load may impact SPP's transmission system differently at different voltage levels, SPP proposes to also include as a HILL loads that are at least 10 MW that connect at or below 69 kV.[25] SPP explains that although the NERC definition of the Bulk Electric System includes only transmission elements of 100 kV or higher, the proposed additional 10 MW threshold is necessary due to the prevalence of 69 kV lines in the Eastern Interconnection portion of SPP's footprint.[26]

12. SPP argues that the proposed HILL definition is based on current industry thinking, tailored to address the topology characteristics of the SPP transmission system, and will be used to categorize the specific types of loads that will be subject to the additional studies and requirements discussed above. SPP asserts that loads that do not fall within the HILL definition will be properly excluded from these additional studies and requirements, as will preexisting loads that may meet the definition but are currently operating within the SPP transmission system. SPP argues that the proposed definition is

[22] Attachment AE in the Tariff contains provisions for SPP's Integrated Marketplace, which includes day-ahead and real-time energy and operating reserve markets and a transmission congestion rights market.

[23] SPP, Tariff, pt. I, § 1 (Definitions H) (1.0.0). Existing loads will not be considered HILLs or be subject to the requirements of Attachment BA unless they seek to increase load and otherwise meet the definitional requirements. Transmittal at 12-13.

[24] Transmittal at 13. Additionally, SPP asserts that large loads can have high ramp rates and the potential to exhibit sudden and rapid changes at unpredictable times. *Id.* at 12.

[25] *Id.* at 13.

[26] *Id.* (citing NERC, *Glossary of Terms*, Bulk Electric System (Oct. 1, 2025), https://www.nerc.com/pa/stand/glossary%20of%20terms/glossary_of_terms.pdf).

thus narrowly tailored and targeted to identify those loads that may present a significant operational or reliability risk to the transmission system.[27]

2. Enhanced Study Requirements

13. SPP states that, under the current Tariff, when a network customer or transmission customer (collectively, Transmission Customer)[28] applies for transmission service to serve a load, the load must undergo certain studies, as provided in Attachment AQ or Attachment AX. SPP proposes, in new Attachment BA, to require a series of up to three additional studies for Transmission Customers requesting to add or modify a delivery point associated with a HILL. SPP explains that these additional studies will assess the HILL's impact on SPP's transmission system.[29]

14. Specifically, SPP states that all requests to add or modify a delivery point to accommodate a HILL will require a HILL Delivery Point Study (HDPS), which is a broader, more rigorous set of analyses compared to those under Attachment AQ or Attachment AX due to the potential for more significant impacts to the transmission system.[30] SPP states that the HDPS will assess the impacts of the HILL delivery point on the transmission system using power flow and short circuit analyses, and any other analyses that may be appropriate in accordance with SPP Business Practice 7850.[31] SPP states that if these additional HDPS analyses identify weaknesses on the transmission system caused by the interconnection of the HILL, then SPP will also perform a supplemental Electromagnetic Transient (EMT) study.[32]

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[27] *Id.* at 21-22.

[28] A transmission customer is defined in part as "customers receiving transmission service under Part II and Part III of this Tariff." SPP, Tariff, pt. I, § 1 (Definitions T) (5.0.0). Part III of SPP's Tariff also refers to these customers as network customers, which is defined as "[a]n entity receiving transmission service pursuant to the terms of the Transmission Provider's Network Integration Transmission Service [(NITS)] under Part III of the Tariff." *Id.* § 1 (Definitions N) (3.0.0).

[29] Transmittal at 13-17.

[30] *Id.* at 15.

[31] *Id.* at 15-16 (citing SPP, Open Access Transmission Tariff Business Practices, Business Practice 7850 (Delivery Point Additions, Modifications, and Retirements Procedures)).

[32] *Id.* at 15. SPP explains that an EMT study may include EMT dynamic performance, sub-synchronous oscillation screening, converter-driven stability

15. For all requested HILL delivery point changes, SPP proposes to provide to the Transmission Customer a HILL Delivery Point Study Agreement (HDPS Agreement), and a request for any additional data or information required for the study.[33] SPP states that the Transmission Customer must return the HDPS Agreement, a $10,000 non-refundable application fee, and a $100,000 deposit to SPP within 30 calendar days, unless otherwise agreed upon, or SPP will deem the requested HILL delivery point change to be withdrawn.[34] Within 90 calendar days of receiving an executed HDPS Agreement, the study data, and deposit, SPP will complete the HDPS and issue a study report.[35] If SPP determines that an EMT study is necessary, it will require an additional $200,000 deposit from the Transmission Customer. SPP states that these deposit amounts reflect the estimated costs of performing the studies under new Attachment BA. SPP explains that it must refund any excess deposit funds to the Transmission Customer, and the Transmission Customer must reimburse SPP for any unpaid study costs in excess of the deposit.[36]

16. SPP states that the host transmission owner may also require additional analysis through a HILL Supplemental Load Connection Study (HSLCS), which will be coordinated through an agreement between the Transmission Customer and the host transmission owner.[37] SPP explains that the host transmission owner may require additional information from the Transmission Customer and an advance deposit of $25,000 to conduct the study, but the host transmission owner may also determine that the HSLCS is unnecessary due to the Load Connection Study that is already required

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assessments, power capability and control studies, emergency power control, fault ride-through, power quality evaluations, and model verification. *Id.* at 15 n.32.

[33] SPP, Proposed Tariff, attach. BA, § 2.1.3.4 (HILL Delivery Point Study) (0.0.0).

[34] Transmittal at 15; *see* SPP, Proposed Tariff, attach. BA, § 2.1.3.4 (HILL Delivery Point Study) (0.0.0), *id.* § 2.1.3.5 (Study Costs for HDPS) (0.0.0).

[35] SPP, Proposed Tariff, attach. BA, § 2.1.3.4 (HILL Delivery Point Study) (0.0.0). If SPP is unable to complete the HDPS within 90 days, it will notify the Transmission Customer and host transmission owner and provide an estimate of the time needed to reach a final determination. *Id*.

[36] Transmittal at 16; *see* SPP, Proposed Tariff, attach. BA, § 2.1.3.5 (Study Costs for HDPS) (0.0.0).

[37] Transmittal at 16; *see* SPP, Proposed Tariff, attach. BA, § 2.1.3.3 (HILL Supplemental Load Connection Study) (0.0.0).

under Attachment AQ or Attachment AX, as applicable.[38] SPP proposes that the host transmission owner must refund any excess deposit funds to the Transmission Customer, and the Transmission Customer must reimburse the host transmission owner for any unpaid study costs in excess of the deposit.[39]

17. SPP contends that while the HDPS and HSLCS study procedures are consistent with the current study processes outlined in Attachments AQ and AX, the studies are more complex and detailed to allow SPP and the host transmission owner to study the impacts of the HILL on the transmission system.[40] SPP states that the additional studies are necessary to capture the unique behaviors of, and risks posed by, large loads and ensure reliable system performance. According to SPP, these additional studies take significantly more time and resources due to their scope, complexity, and computational demands, which, in turn, drives higher study costs compared to traditional load interconnection studies.[41] SPP contends that the proposed study deposits are keyed to the anticipated costs of these HILL studies. SPP argues that the additional requirements also ensure that highly speculative HILLs are discouraged from applying to be studied.[42]

3. Ongoing Reliability Requirements

18. SPP states that HILLs' unique characteristics necessitate that HILLs comply with certain reliability requirements. With respect to the Integrated Marketplace, SPP proposes that the market participant registering a HILL must: (1) follow all non-conforming load requirements (e.g., additional load forecast requirements, including providing an hourly load forecast value);[43] (2) provide load data via telemetry in real

[38] Transmittal at 16-17; *see* SPP, Proposed Tariff, attach. BA, § 2.1.3.3 (HILL Supplemental Load Connection Study) (0.0.0); *id.* attach. AQ, § 3 (2.0.0), § 3.1 (Load Connection Study), *id.* attach. AX, § 2 (0.0.0), § 2.1 (Load Connection Study).

[39] SPP, Proposed Tariff, attach. BA, § 2.1.3.3 (HILL Supplemental Load Connection Study) (0.0.0).

[40] Transmittal at 17.

[41] *Id.*

[42] *Id.* at 22.

[43] SPP proposes to define non-conforming load as load that cannot be generally forecasted through a mathematically derived pattern using only weather, time, season, or other normal forecasting methods. SPP, Proposed Tariff, attach. AE, § 1.1N (Definitions N) (5.0.1). SPP explains that the proposed definition distinguishes non-conforming load from load that follows the types of patterns typically used in SPP's load forecasts.

time; (3) have remote capability to disconnect the load from the transmission system made available to the transmission operator; (4) have an up/down ramp rate not exceeding 20 MW per minute unless otherwise directed; (5) include additional information with registration; and (6) not have withdrawals from the transmission system without appropriate transmission service.[44]

19. Further, in order for the HILL to provide load data in real-time, SPP proposes to require the transmission owner, at the Transmission Customer's expense, to install a Phasor Measurement Unit (PMU) or similar equipment on the transmission owner's side of the HILL interconnection prior to the HILL's service commencement date.[45] SPP asserts that having this data is essential to ensuring reliability of the bulk power system and compliance with reliability standards, because it enhances SPP's ability to identify and respond to forced oscillations, monitor phase angles, assess voltage stability, and conduct post-event analysis. SPP explains that HILLs may have very fast changes in load and, because of their size and concentrated impacts, these changes can impact the transmission system so quickly that they cannot be captured by conventional supervisory control and data acquisition systems.[46]

20. Additionally, SPP proposes that the Transmission Customer will be required to comply with the ride-through requirement guidelines outlined in SPP's "[HILL] Ride-Through Requirements" document, a non-Tariff document that was separately approved by SPP stakeholder working groups.[47] SPP states that, absent these ride-through requirements, HILLs have the potential to cause disturbances to the transmission system

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Transmittal at 19.

[44] *See* SPP, Proposed Tariff, attach. AE, § 2.22 (High Impact Large Load Requirements) (0.0.0); *see also* SPP, Tariff, attach. AE, § 2.12 (Non-Conforming Load) (3.0.0) (imposing specific forecasting and data requirements for non-conforming load).

[45] Transmittal at 19; *see* SPP, Proposed Tariff, attach. BA, § 2.2.4 (Additional Requirements for Phasor Measurement Unit) (0.0.0). According to SPP, PMUs supply high-resolution, time-synchronized measurements that enable SPP to validate models, monitor dynamic performance, and detect disturbances that may otherwise lead to instability or widespread reliability impacts. Transmittal at 19.

[46] Transmittal at 19.

[47] *Id.* at 19-20. SPP is developing ride-through requirements for stand-alone HILLs, which include requirements for voltage and frequency ride through. *See* SPP documents, available at: https://www.spp.org/spp-documents-filings/?id=19845.

and the entire bulk power system. SPP states it will continue to modify its requirements as more defined requirements from NERC or the Commission become available.[48]

21. SPP argues that the proposed ongoing operational requirements for HILLs are just and reasonable because they will afford SPP the opportunity to maintain reliable operation of the transmission system in light of the addition of HILLs to the system. SPP states that the requirements will ensure that SPP has sufficient visibility into some of the most impactful loads on the system, ensure that the utilities in the RTO footprint can serve load in real time, and ensure that the ability to shed a HILL is available, if needed.[49]

C. HILLGA Process

22. SPP also proposes to implement the optional HILLGA process—a new generator interconnection service and related interconnection process—to facilitate the prompt interconnection of generating facilities that are specifically identified for and limited to serving a HILL.[50] SPP argues that the HILLGA process is just and reasonable and meets the independent entity variation standard by accomplishing the goals of Order Nos. 2003, 2023, and 2023-A by providing a path to ensure that HILLGA interconnection customers (HILLGA Customers) are able to interconnect to the transmission system, albeit on a limited basis, in a reliable, efficient, transparent, and timely manner.[51]

1. HILLGA Eligibility and Requirements

23. As part of the HILLGA process, SPP proposes to accept HILLGA Requests at any time.[52] SPP contends that this proposed feature of the HILLGA process differs from the DISIS process and encourages more efficient capacity additions, a recognized goal of the

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[48] Transmittal at 21 & n.58.

[49] *Id.* at 22.

[50] *Id.* at 23.

[51] *Id.* at 32-33 (citing Order No. 2003, 104 FERC ¶ 61,103 at PP 822-27; Order No. 2023, 184 FERC ¶ 61,054 at P 10).

[52] SPP proposes to define a HILLGA Request as "an Interconnection Request submitted, in the form specified in Appendix 1 to this Attachment BB, . . . to interconnect a new Generating Facility, or to increase the capacity of an Existing Generating Facility that is interconnected with the Transmission System." SPP, Proposed Tariff, attach. BB, § 1 (Definitions) (0.0.0).

Commission.[53] SPP also proposes to require that all HILLGA Requests include the following: (1) an executed HILLGA Study Agreement and executed HDPS Agreement; (2) a nonrefundable application fee of $20,000; (3) a study deposit of $250,000 for HILLGA Requests up to 500 MW and $500,000 for HILLGA Requests over 500 MW; (4) demonstration of site control; (5) a definitive POI; (6) the nameplate capacity, maximum injection capability, and network resource deliverability of the generating facility; (7) a security deposit equal to $8,000/MW of the requested maximum injection capability; (8) reasonable evidence that the HILLGA Customer satisfies at least one of the listed development milestones (i.e., executed contracts, attestation that the generating facility is included in a state resource plan, and application for a land use permit); and (9) if applicable, the charging parameters and control technologies of the generating facility. SPP also proposes that the commercial operation date of the new generating facility or increase in capacity of an existing generating facility must be within five years from the execution date of the HILLGA Study Agreement.[54]

24. SPP states that these requirements are similar to, but more stringent than, its existing requirements for the DISIS process. Specifically, SPP states that the application fee and security deposit for HILLGA Requests are double those in the DISIS process, and the study deposit for HILLGA Requests can reach up to $500,000, whereas the study deposits for the DISIS process are capped at $250,000 regardless of the size of the generating facility. Further, SPP states that the development milestone requirement for HILLGA Requests is at the beginning of the HILLGA process, whereas for the DISIS it is not until the end of the process.[55] SPP contends that these more stringent requirements will encourage the entry of commercially viable, shovel-ready generating facilities and deter speculative interconnection requests.[56]

25. SPP further proposes that a HILLGA Customer must submit a separate HILLGA Request for each generating facility associated with a HILL. SPP states that, due to the limited nature of the interconnection,[57] the POI identified in the HILLGA Request must

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[53] Transmittal at 24 (citing Order No. 2023, 184 FERC ¶ 61,054 at P 3).

[54] SPP, Proposed Tariff, attach. BB, § 8 (0.0.0), § 8.2 (Execution of HILLGA Study Agreement).

[55] Reasonable evidence of having satisfied at least one development milestone is required prior to the end of Decision Point Two in the DISIS process. SPP, Proposed Tariff, attach. V, § 8 (26.0.0), § 8.5.2 (Decision Point Two).

[56] Transmittal at 24-25.

[57] *See infra* P 66.

be no more than two substations away from the HILL at most.[58] In addition, SPP proposes that a generating facility may support multiple HILLs if no more than five substations are involved and no more than two existing transmission line segments are used between each substation. SPP states that these requirements are meant to ensure that the proposed generating facility can support the HILL(s) in a localized area.[59]

26. SPP also proposes to cap the HILLGA Customer's generating facility's projected capacity accreditation MW value, as determined pursuant to Attachment AA of the Tariff,[60] at the requested MW load amount of the associated HILL, multiplied by the higher of: (1) 110% plus the highest approved Planning Reserve Margin percentage effective at the time of the HILLGA Study Agreement and outlined in the SPP Planning Criteria; or (2) 125%.[61] SPP contends that this requirement will ensure that only the generation capacity necessary to serve the HILL is processed through the HILLGA process, while recognizing the load responsible entities' requirement to secure sufficient resources to cover the Planning Reserve Margin when the HILL receives long-term, firm transmission service.[62]

2. HILLGA Study Process

27. Under the HILLGA process, SPP proposes to study HILLGA Requests to determine whether any network upgrades are needed to accommodate the generating facility's injection to the local area. SPP proposes that HILLGA Requests, which will be studied serially, will not be considered higher queued than DISIS requests but will be treated like existing generators and incorporated into SPP's Integrated Transmission Planning (ITP) models through the normal process. SPP further notes that HILLGA Requests will not appear in DISIS studies until the DISIS models have been updated to

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[58] If the HILLGA Customer's generating facility is interconnecting to a 765 kV transmission line, the generating facility must be within one substation of the HILL. Transmittal at 27; *see* SPP, Proposed Tariff, attach. BB, § 3 (0.0.0), § 3.1.3 (HILLGA Requirements).

[59] Transmittal at 26-28.

[60] New thermal generating facilities in SPP have the option of using either their own design performance projections or a class average forced outage rate. New wind and solar generating facilities must either be submitted in time to be studied for the upcoming season or be assigned a default accreditation value. *See* SPP, Tariff, attach. AA, § 15 (Accredited Capacity) (4.0.0).

[61] Transmittal at 26.

[62] *Id.*

new ITP models and therefore cannot drive upgrade costs or restudies for those DISIS clusters. SPP contends that any upgrade costs required under the HILLGA process will be specific to the generating facility's injection for the local support of the HILL and will have limited impacts on other requests.[63]

28. To allow for more rapid study and decision-making, SPP proposes to conduct a system impact study for HILLGA Requests within 90 calendar days of the HILLGA Review Period.[64] SPP further proposes that if a HILLGA Request requires a restudy due to the withdrawal or modification of a higher-queued HILLGA Request or a change to the applicable HILLGA Request's POI, SPP will notify the HILLGA Customer of the need for a restudy within 30 calendar days and will complete the restudy within 60 calendar days after the notification.[65] SPP states that the HILLGA process can accommodate this shortened timeline because HILLGA Requests will be handled through a simplified, serial process, and the generating facilities will be studied only for the limited purpose of injecting within the local area of the HILL.[66]

29. SPP proposes to tender a draft HILL Generator Interconnection Agreement (HILLGIA) to the HILLGA Customer at the same time it posts the HILLGA system impact study report. SPP further proposes that the HILLGA Customer, the transmission owner, and SPP will then have 45 calendar days to negotiate the HILLGIA, unless the parties agree to a different timeline. SPP proposes that it will tender a final HILLGIA to the HILLGA Customer within 10 business days after the negotiation process concludes. Within 10 business days of receiving the final HILLGIA, the HILLGA Customer must either execute the HILLGIA or request that it be filed unexecuted with the Commission.[67]

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[63] *Id.* at 32.

[64] *Id.* at 30. The HILLGA Review Period is the time following SPP's receipt of the HILLGA Request through the time period allowed for the HILLGA Customer to cure any deficiencies in the request. SPP, Proposed Tariff, attach. BB, § 1 (Definitions) (0.0.0). During the HILLGA Review Period, SPP will validate HILLGA Requests within 15 calendar days. SPP will provide written notice of any deficiencies with the request, and the HILLGA Customer will then have 10 business days to cure any deficiencies. *Id.* § 8 (0.0.0), § 8.3 (HILLGA Review Period).

[65] SPP, Proposed Tariff, § 8 (0.0.0), § 8.8 (Restudy of HILLGA System Impact Study).

[66] Transmittal at 30-31.

[67] *Id.* at 31; *see* SPP, Proposed Tariff, attach. BB, § 11 (0.0.0), §§ 11.1 (Tender), 11.2 (Negotiation), 11.3 (Execution and Filing).

30. Additionally, SPP proposes to coordinate with affected system operators on any studies necessary to determine impacts from a HILLGA Request on an affected system.[68] SPP also proposes to determine whether a HILLGA Request has an impact on any Joint Targeted Interconnection Queue (JTIQ) upgrades.[69] If a HILLGA Request is determined to impact one or more JTIQ upgrades, SPP proposes to allocate to the HILLGA Customer a portion of the costs of a portfolio of JTIQ upgrades based on the amount of interconnection service requested in the HILLGA Request.[70]

31. SPP asserts that the proposed HILLGA study process represents a reasonable approach to address large load generation needs without disadvantaging requests in the DISIS queue because the modeling and queue priority of any pending DISIS interconnection requests will not be affected by the HILLGA process. In addition, SPP asserts that the HILLGA study process will not affect the timing of any pending DISIS interconnection requests because the HILLGA process will be predominantly completed by outside consultants paid for by the HILLGA Customer through the required study deposits. SPP also argues that the HILLGA framework is narrowly tailored and targeted to allow additional generating facilities to interconnect faster and more efficiently to the transmission system to support HILLs.[71]

3. Load Limited Resource Interconnection Service Available to Serve HILLs

32. SPP proposes to grant HILLGA Customers a new type of interconnection service, called Load Limited Resource Interconnection Service (LLRIS), which grants limited interconnection service solely to support the associated HILL.[72] Under LLRIS, the maximum economic capacity operating limits of the HILLGA Customer's generating

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[68] Transmittal at 31; *see* SPP, Proposed Tariff, attach. BB, § 3 (0.0.0), § 3.6 (Coordination with Affected Systems).

[69] The JTIQ process involves a joint study between SPP and the Midcontinent Independent System Operator, Inc. (MISO) that aims to identify transmission network upgrades along the MISO-SPP seam that will enable future generating facilities to interconnect to the transmission grid.

[70] SPP, Proposed Tariff, attach. BB, § 3 (0.0.0), § 3.6.4 (JTIQ Provisions).

[71] Transmittal at 35-38.

[72] *Id.* at 29; *see* SPP, Proposed Tariff, attach. BB, § 3 (0.0.0), § 3.2 (Load Limited Resource Interconnection Service). LLRIS is the only "Interconnection Product Option" available to HILLGA Customers in the HILLGIA. *See* SPP, Proposed Tariff, attach. BB, app. 2 (0.0.0), art. 4 (Scope of Service).

facility cannot exceed the hourly load forecast value of the corresponding HILL except when directed by the SPP Reliability Coordinator to mitigate emergency conditions or as specified in the HILLGIA.[73]

33. SPP proposes that the HILLGIA will automatically terminate under its own terms five years after the commercial operation date of a generating facility, which will correspondingly terminate any LLRIS granted by the HILLGIA.[74] SPP states that if the HILLGA Customer wishes for its generating facility to remain interconnected to the SPP transmission system beyond the five-year limit of LLRIS, it must submit a separate interconnection request through the DISIS process.[75] SPP asserts that the limited duration of LLRIS recognizes the importance of SPP's DISIS process and balances use of that process with the desire to interconnect HILLs in an expedited manner.[76]

34. SPP states that LLRIS does not convey any type of transmission service for generating facilities serving a HILL.[77] SPP states that HILLGA Customers must obtain transmission service outside the HILLGA process to deliver the output from a generating facility to the HILL. SPP explains that, in the short term, HILLGA Customers may obtain short-term service or non-firm point-to-point transmission service, based on available transfer capability, if the delivery point was established under Attachment

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[73] *See* SPP, Proposed Tariff, attach. AE, § 2.22.2 (Resource Supporting a HILL) (0.0.0). The maximum economic capacity operating limit, or economic MW level at or below a resource's maximum normal capacity operating limit used for constraining energy dispatch and contingency reserve clearing during normal system conditions, is used within SPP's algorithms when considering a resource's commitment in the day-ahead and intra-day reliability unit commitment executions in SPP's Integrated Marketplace. *See* SPP, Tariff, attach. AE, § 1.1M (Definitions), *id.* § 5.2.2 (Day-Ahead Reliability Unit Commitment Execution),); *id.* § 6.1.2 (Intra-Day Reliability Unit Commitment Execution).

[74] Transmittal at 36; *see* SPP, Proposed Tariff, attach. BB, app. 2 (0.0.0), art. 2.2 (Term of Agreement).

[75] Transmittal at 5, 29.

[76] *Id.* at 36.

[77] *Id.* at 20; *see* SPP, Proposed Tariff, attach. BB, §1 (Definitions) (0.0.0) (defining LLRIS); *see also* SPP, Proposed Tariff, attach. BB, app. 2 (0.0.0), art. 4.4 ("The execution of this HILLGIA does not constitute a request for, nor the provision of, any transmission delivery service under Transmission Provider's Tariff, and does not convey any right to deliver electricity to any specific customer or Point of Delivery.").

AX.[78] SPP explains that, to serve a HILL on a long-term basis, HILLGA Customers must obtain long-term point-to-point transmission service or NITS through the Aggregate Transmission Service Study process under Attachment Z1 of the Tariff.[79] SPP notes that, to obtain NITS, the HILLGA Customer must also change its generation injection rights from LLRIS to Energy Resource Interconnection Service (ERIS) or Network Resource Interconnection Service (NRIS) through SPP's GIP.[80]

III. Notice of Filing and Responsive Pleadings

35. Notice of SPP's filing was issued on October 27, 2025, with interventions and protests due on or before November 14, 2025 at 5:00 PM EST.

36. Timely notices of intervention were filed by the Louisiana Public Service Commission, the Missouri Public Service Commission, and the Public Utility Commission of Texas. Timely motions to intervene were filed by: American Clean Power Association and Advanced Power Alliance, jointly; American Electric Power Service Corporation (AEP), on behalf of its affiliates Public Service Company of Oklahoma, Southwestern Electric Power Company, AEP Oklahoma Transmission Company, Inc., and AEP Southwestern Transmission Company, Inc.; Arevon Energy, Inc.; Basin Electric Power Cooperative; Calpine Corporation; City Utilities of Springfield, Missouri; Constellation Energy Generation, LLC; EDF Power Solutions, Inc.; Electric Power Supply Association; The Empire District Electric Company; Evergy Companies;[81] Geronimo Power, LLC; GridStor LLC; Kansas Electric Power Cooperative, Inc.; Longroad Energy Holdings, LLC; LS Power Development, LLC; Monitoring Analytics, LLC, acting in its capacity as the Independent Market Monitor for PJM; Natural Resources Defense Council and Sustainable FERC Project, jointly; NextEra Energy Resources, LLC; Oklahoma Gas and Electric Company (OG&E); Omaha Public Power District; Orion Renewable Energy, LLC; Sierra Club; Sunflower Electric Power Corporation; Triple Oak Power LLC; Tri-State Generation and Transmission Association, Inc.; Western Farmers Electric Cooperative; and Xcel Energy Services Inc. (Xcel), on behalf of its affiliate Southwestern Public Service Company (SPS).

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[78] Transmittal at 29.

[79] *Id.* at 29-30.

[80] *Id.* at 29-30.

[81] Evergy Companies include the following subsidiaries of Evergy, Inc.: Evergy Kansas Central, Inc.; Every Metro, Inc.; and Evergy Missouri West, Inc.

37. On November 4, 2025, Eolian, L.P. (Eolian) filed a motion for extension of time to submit interventions and comments. On November 7, 2025, the SPP Transmission Owner Group (SPP TO Group)[82] submitted an answer opposing the motion. On November 12, 2025, the motion for extension of time was denied.[83]

38. Timely motions to intervene and comments in support of SPP's filing were filed by: Advanced Energy United (Advanced Energy); Eolian; ITC Great Plains, LLC (ITC Great Plains); Solar Energy Industries Association (SEIA); and SPP Market Monitoring Unit (SPP MMU). SPP TO Group filed timely comments in support of SPP's filing. Enchanted Rock, LLC (Enchanted Rock) filed a timely motion to intervene and comments requesting that the Commission accept SPP's filing subject to certain conditions.

39. On November 17, 2025, Electricity Consumers Resource Council filed an out-of-time motion to intervene. On November 24, 2025, Nebraska Public Power District filed an out-of-time motion to intervene.

40. On December 2, 2025, SPP TO Group filed a motion for leave to answer and answer. On December 4, 2025, SPP filed a motion for leave to answer and answer. On December 9, 2025, Eolian filed a motion for leave to answer and answer. On December 10, 2025, Enchanted Rock filed a motion for leave to answer and answer.

A. Comments and Answers

1. Comments

a. General Comments in Support

41. Several commenters argue that SPP's Tariff revisions to implement the HILL and HILLGA processes are just and reasonable and not unduly discriminatory or preferential.[84] Commenters assert that SPP's proposal provides a faster process for interconnecting large loads and generators serving those loads.[85] Commenters also

[82] SPP TO Group includes: AEP, Evergy Companies, OG&E, and Xcel, on behalf of SPS.

[83] *Sw. Power Pool, Inc.*, Notice Denying Extension of Time, Docket No. ER26-247-000 (issued Nov. 12, 2025).

[84] Advanced Energy Comments at 1; Eolian Comments at 3; ITC Great Plains Comments at 2; SEIA Comments at 4; SPP TO Group Comments at 2, 18.

[85] Advanced Energy Comments at 4, 9; Eolian Comments at 3-4; SEIA Comments

contend that SPP's proposed HILL study process appropriately addresses the unique operating characteristics of HILLs to ensure their reliable interconnection to SPP's transmission system.[86] In addition, commenters argue that the HILL reliability requirements will avoid adverse reliability impacts after a HILL is interconnected and provide proportionate and transparent tools to manage the risks that large loads pose to the reliability of the transmission system.[87] Commenters also contend that SPP's proposed higher application fees, study deposits, and financial security requirements will prevent speculative projects and ensure only shovel-ready projects enter the HILL study process.[88]

42. Commenters also assert that SPP's proposed HILLGA process addresses the need for new generation to serve large loads while ensuring that there are sufficient guardrails to avoid undue discrimination and prejudice.[89] In particular, commenters contend that SPP's proposal treats HILLGA Requests as existing generators and incorporates them into its ITP models, meaning that HILLGA Requests will not be incorporated into the DISIS models until after such models have been updated to reflect the new ITP models, which will prevent a HILLGA Request from increasing costs or restudies for interconnection customers in the DISIS.[90] Commenters also support SPP's proposed LLRIS because it does not provide transmission service, it is instead a narrower and more temporary interconnection service, and a HILLGA Customer will not be granted NRIS or ERIS unless it applies through SPP's standard interconnection processes.[91]

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at 6; SPP TO Group Comments at 1-2.

[86] Advanced Energy United Comments at 4-5; ITC Great Plains Comments at 3-4; SPP TO Group Comments at 13.

[87] Advanced Energy Comments at 5; SEIA Comments at 4-5; SPP TO Group Comments at 6.

[88] Advanced Energy Comments at 5; SPP TO Group Comments at 15-17.

[89] Advanced Energy Comments at 6; SPP TO Group Comments at 18.

[90] Advanced Energy Comments at 8; SEIA Comments at 5; SPP TO Group Comments at 10, 19.

[91] Advanced Energy Comments at 7; ITC Great Plains Comments at 6-7; SEIA Comments at 5; SPP TO Group Comments at 8-9.

b. Advanced Energy

43. In addition to its general support for the proposal as noted above, Advanced Energy asserts that SPP's proposed geographic requirements in the HILLGA process will minimize impacts on other interconnection customers by requiring the identification of the POI for the proposed generating facility and requiring that it be in close electrical proximity in the same area to the load. Advanced Energy explains that studying the local impacts and requiring that generation only serve the HILL will aim to reduce withdrawals that cause additional restudies.[92] Advanced Energy argues that SPP's proposed HILLGA process links the generating facility with the HILL, which ensures upgrade costs are associated with that project, rather than passed on to other customers. Advanced Energy explains that these geographic limitations will lead to fewer triggered upgrades and minimal impacts on other interconnection requests, while also minimizing congestion that could have broader adverse impacts.[93]

c. Eolian

44. Eolian generally supports SPP's proposal as noted above, but states that SPP should clarify that non-HILLGA generating facilities may serve as designated or planned generation to serve a HILL for purposes of Attachments AQ and AX.[94] Specifically, Eolian requests that SPP clarify that its Tariff revisions do not restrict non-HILLGA generating facilities from specifically serving a HILL for purposes of demonstrating adequate designated or planned generation pursuant to the relevant transmission service study. Eolian asserts that such clarification would remove any doubt that SPP's proposal would result in undue discrimination among HILLGA and non-HILLGA generating facilities that are equally technically capable of serving a HILL's needs and supporting a Transmission Customer's ability to establish transmission service for that load.[95]

d. SEIA

45. While SEIA generally supports SPP's proposal as discussed above, SEIA also urges SPP to actively monitor and periodically report to the Commission and stakeholders on the effectiveness of the HILL and HILLGA processes to meet rising demand and support the reliable integration of new, concentrated large loads and local

[92] Advanced Energy Comments at 8 (citing Transmittal at 32).

[93] *Id.*

[94] Eolian Comments at 12.

[95] *Id.*

interconnection of associated generating facilities.[96] In addition, SEIA contends that it is essential that SPP honor its pledge to dedicate sufficient resources to continue to meet its obligations regarding the standard interconnection process and pending DISIS requests.[97]

e. SPP MMU

46. SPP MMU states that the Commission should accept SPP's filing. SPP MMU explains that it was concerned during the overall development of SPP's proposal that HILLs, whether deemed conforming or non-conforming load, were not incentivized to submit accurate operational load forecasts. SPP MMU explains that an increase in large loads on the system will only increase the current operational needs for accurate load forecasts to be used in the Reliability Unit Commitment process and that SPP should pursue future Tariff changes to address the issue. SPP MMU contends that "requirements for HILLs should either immediately apply to all load meeting [SPP's proposed] criterion; or there should be a reasonable near-term line-of-sight to applying [SPP's proposed] requirements to existing HILLs."[98] SPP MMU states that it encourages SPP to re-evaluate the grandfathering of HILL requirements after implementation of its proposed HILL and HILLGA processes.[99]

f. SPP TO Group

47. As noted above, SPP TO Group supports SPP's proposal. SPP TO Group argues that interconnecting new large loads raises questions of federal and state jurisdiction. SPP TO Group asserts that SPP crafted its HILL proposal to avoid crossing into state regulation, as the proposal does not dictate terms and conditions for retail sales to end-use customers and, indeed, largely replicates SPP's existing load and generation interconnection procedures, except with stricter requirements.[100]

g. Enchanted Rock

48. Enchanted Rock states that it generally supports SPP's efforts to establish HILL and HILLGA Tariff provisions, which facilitate the expedited, flexible, and cost-effective interconnection of large loads. Enchanted Rock, however, requests that the Commission

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[96] SEIA Comments at 6.

[97] *Id.* at 6-7 (citing Transmittal at 35).

[98] SPP MMU Comments at 3.

[99] *Id.*

[100] SPP TO Group Comments at 20.

direct SPP to revise its capacity accreditation limits to instead be the associated HILL's requested load, multiplied by the greater of: "[(1)] 110% plus the Planning Reserve Margin outlined in the HILLGA Study Agreement; or [(2)] *150%, rather than the currently proposed 125% value*."[101] Enchanted Rock explains that it is standard industry practice for generation facilities to be oversized relative to their associated HILL demand value to build in redundancies for generator failures and that large load customers' targeted availability rates of 99.9% to 99.999% requires significant oversizing of on-site generation, while back-up-only, on-site configurations require approximately 25% excess on-site capacity to ensure reliable service.[102] Enchanted Rock argues that this higher capacity accreditation cap will ensure that many on-site power solutions are not unnecessarily restricted from being able to meet SPP's proposed HILL and HILLGA processes' broader goals, while also recognizing the extent to which many on-site power solutions must be oversized in order to meet large load customers' availability needs in the short term.[103]

2. Answers

a. SPP

49. SPP states that, apart from Enchanted Rock, all commenters support the Commission approving SPP's proposal as just and reasonable and not unduly discriminatory or preferential.[104] SPP contends that while Enchanted Rock's comments request specific modifications to SPP's proposal, Enchanted Rock does not argue that SPP's proposal is unjust or unreasonable.[105] SPP argues that under FPA section 205, it must only show that its proposal is just and reasonable, not that it is the best approach, better than preferred alternatives, or even better than the current Tariff. SPP argues that its proposal is just and reasonable and that the Commission should accept it.[106]

50. In response to Enchanted Rock's request to modify the capacity accreditation cap, SPP explains that it limited the size of HILLGA Requests in its proposal to ensure that

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[101] Enchanted Rock Comments at 6 (citing SPP, Proposed Tariff, attach. BB, § 3.1.3.2) (emphasis in original).

[102] *Id.* at 5.

[103] *Id.* at 6-7.

[104] SPP Answer at 3.

[105] *Id.* at 3-4.

[106] *Id.* at 4.

the generating facility being studied would only have injection rights, or LLRIS, necessary to support the HILL. SPP asserts that this limitation prevents generating facilities from impacting other pending interconnection requests.[107] SPP states that nothing in its Tariff prevents a HILLGA generating facility owner from having as much redundant generating capacity as it thinks is needed to support reliability.[108] SPP explains, however, that its proposal will limit the injection rights to the quantity that is necessary to support the HILL. SPP argues that its proposal allows sufficient generation to be built to serve the HILL in the near-term and allows sufficient generation to be studied to satisfy the capacity needs of the HILL after it takes firm transmission service.[109]

51. SPP further argues that SEIA's requested reporting requirement is not needed.[110] SPP contends that it and its stakeholders continuously monitor every service provided under the Tariff and that SPP will monitor the effectiveness of the HILL and HILLGA framework in addressing the exponential growth in large loads.[111]

52. In response to Eolian, SPP states that its Tariff processes remain unchanged other than those proposed in its filing.[112] SPP asserts that its proposal does not change the types of resources that are currently eligible to be studied in the processes outlined in Attachments AQ and AX of its Tariff. According to SPP, any generating facility that is eligible to serve load through SPP's transmission service processes today will continue to be eligible if the Commission approves SPP's proposal, which includes loads that qualify as HILLs. SPP asserts that its proposal does not contain any proposed Tariff language to the contrary and that there is no need for SPP to make any clarifications as requested by Eolian.[113]

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[107] *Id.* at 6.

[108] *Id.* at 6-7.

[109] *Id.* at 7.

[110] *Id.* (citing SEIA Comments at 6).

[111] *Id.* at 8.

[112] *Id.* at 9 (citing Eolian Comments at 2).

[113] *Id.*

b. SPP TO Group

53. In response to Enchanted Rock's comments, SPP TO Group argues that accepting Enchanted Rock's proposed condition would not be a "minor modification" to SPP's proposal, would subvert the fundamental understanding of SPP's proposal, and would impose an entirely new rate scheme contrary to *NRG*.[114] SPP TO Group states that the entire point of limiting HILLGA generators to LLRIS is to "grant[] limited interconnection rights solely to support the HILL, which limits both the impacts of the generation on SPP's [t]ransmission [s]ystem and potential [n]etwork [u]pgrade costs." SPP TO Group argues that SPP stakeholders supported and voted in favor of SPP's proposal because it was narrowly tailored to limit HILLGA generators to serving a designated HILL.[115]

3. Answers to Answers

a. Eolian

54. Eolian states that it requested clarification from SPP that its Tariff revisions would not restrict non-HILLGA generating facilities from specifically serving HILLs for the purposes of demonstrating adequate designated or planned resources pursuant to the relevant transmission study.[116] Eolian asserts that SPP's answer explained that SPP's proposal does not change the types of generating facilities that are currently eligible to be studied in the processes outlined in Attachments AQ and AX of its Tariff, that any generating facility that is eligible to serve load through SPP's transmission service processes today will continue to be eligible if the Commission approves SPP's proposal, and that SPP's proposal does not contain any proposed Tariff language to the contrary.[117] Eolian states that SPP's answer satisfies Eolian's prior request for clarification.[118]

b. Enchanted Rock

55. Enchanted Rock states that it recognizes SPP's clarification in its answer that the HILLGA process, if approved, would not interfere with a generator's installation of

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[114] SPP TO Group Answer at 5 (citing *NRG Power Mktg., LLC v. FERC*, 862 F.3d 108 (D.C. Cir. 2017) (*NRG*)).

[115] *Id.* at 6.

[116] Eolian Answer at 1 (citing Eolian Comments at 12).

[117] *Id.* (citing SPP Answer at 9).

[118] *Id.*

redundant on-site capacity and, accordingly, requests that the Commission accept SPP's proposal without condition.[119]

IV. Discussion

A. Procedural Matters

56. Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214 (2025), the notices of intervention and timely, unopposed motions to intervene serve to make the entities that filed them parties to this proceeding.

57. Pursuant to Rule 214(d) of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214(d) (2025), we grant Electricity Consumers Resource Council's and Nebraska Public Power District's late-filed motions to intervene given their interest in the proceeding, the early stage of the proceeding, and the absence of undue prejudice or delay.

58. Rule 213(a)(2) of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.213(a)(2) (2025), prohibits an answer to a protest or answer unless otherwise ordered by the decisional authority. We accept the answers filed by SPP TO Group, SPP, Eolian, and Enchanted Rock because they have provided information that assisted us in our decision-making process.

B. Substantive Matters

59. As discussed below, we find SPP's proposed Tariff revisions to establish the HILL and HILLGA processes to be just and reasonable and not unduly discriminatory or preferential and, therefore, accept them, effective January 15, 2026, as requested, subject to condition,[120] and direct SPP to submit a compliance filing within 30 days of the date of this order.

60. SPP has shown that unprecedented growth in large loads in the SPP region presents significant and unique operational and planning challenges. We find that SPP's proposed HILL and HILLGA processes are a just and reasonable and not unduly discriminatory or preferential approach to addressing these challenges, while maintaining the reliable operation of SPP's transmission system. We also find that SPP's proposed Tariff revisions implementing the HILLGA process accomplish the purposes of the Commission's final rules on generator interconnection, including Order Nos. 2003 and

[119] Enchanted Rock Answer at 2-3 (citing SPP Answer at 7).

[120] *See NRG*, 862 F.3d at 114-15 (discussing the Commission's authority to propose modifications to a utility's FPA section 205 rate proposal).

2023, by helping to ensure that interconnection customers seeking to serve HILLs in SPP are able to interconnect to the transmission system in a reliable, efficient, transparent, and timely manner.[121] Therefore, we find that SPP's proposed Tariff revisions implementing the HILLGA process meet the independent entity variation standard.

1. HILL Process

61. We find that SPP has demonstrated that its proposed HILL process—including the definition of HILLs, study requirements for HILLs, and ongoing reliability requirements for HILLs—is a just and reasonable and not unduly discriminatory or preferential approach for integrating Transmission Customers' new large loads into SPP's transmission system in a manner that enables SPP to maintain reliable operation of that system. We find that it is reasonable to subject HILLs, as SPP proposes to define them, to additional study requirements and the other proposed requirements set forth in Attachment BA given their unique operating characteristics. We also find that the voltage criterion in the proposed HILL definition recognizes that different-size loads may have different impacts on the transmission system depending on the voltage level at which they interconnect and reflects the prevalence of 69 kV transmission lines in the Eastern Interconnection portion of SPP's footprint.

62. Regarding SPP's proposed HDPS, EMT study, and HSLCS, we find that these proposed study requirements for HILLs, in conjunction with the existing study requirements in Attachments AQ and AX of SPP's Tariff, will help to ensure the reliable integration of Transmission Customers' HILLs into SPP's transmission system. We find that the proposed study requirements for HILLs will provide SPP with information about their impact on SPP's transmission system, including the transmission system's ability to withstand and control disturbances by the HILL at the point of interconnection. In addition, we find that the proposed study deposits reflect the estimated costs of the studies to be performed and will help discourage speculative HILL study requests. Further, refunding any excess portion of the deposit ensures Transmission Customers will pay only the actual study amount. We further find that allocating the study deposits and study costs to the Transmission Customer requesting a delivery point modification associated with a HILL is consistent with the Commission's cost causation principle.[122]

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[121] Order No. 2003, 104 FERC ¶ 61,103 at PP 26, 827; Order No. 2023, 184 FERC ¶ 61,054 at P 1.

[122] The cost causation principle requires costs to be allocated to those who cause the costs to be incurred and reap the resulting benefits. *See S.C. Pub. Serv. Auth. v. FERC*, 762 F.3d 41, 87 (D.C. Cir. 2014) (citing *Nat'l Ass'n of Regul. Util. Comm'nrs v. FERC*, 475 F.3d 1277, 1285 (D.C. Cir. 2007)).

63. We find that the proposed ongoing reliability requirements related to HILLs, including, among other things, non-conforming load forecasting, PMU, and ride-through requirements, are also just and reasonable and not unduly discriminatory or preferential. We find that the proposed requirements will allow SPP to maintain reliable operation of its transmission system by increasing SPP's visibility, providing necessary data, and imposing real-time operational safeguards for HILLs.

2. HILLGA Process

64. As noted above, the Commission applies an independent entity variation standard to evaluate RTO/ISO proposals for deviations from the Commission's *pro forma* LGIP and *pro forma* LGIA.[123] Under the independent entity variation standard, SPP must demonstrate that its proposed variations are just and reasonable and not unduly discriminatory or preferential and accomplish the purposes of the Commission's final rules on generator interconnection, including, as relevant here, Order Nos. 2003 and 2023.[124] We grant SPP an independent entity variation for its proposed HILLGA process because we find that the proposed process is just and reasonable and not unduly discriminatory or preferential and accomplishes the purposes of Order Nos. 2003 and 2023 to ensure that interconnection customers are able to interconnect to the transmission system in a reliable, efficient, transparent, and timely manner.[125] As discussed further below, we find that SPP's HILLGA process reasonably provides a flexible, expedited, and separate serial interconnection process that will facilitate the prompt interconnection of generating facilities that are limited to serving a HILL in the same local area.

65. We find that the more stringent eligibility requirements for the HILLGA process, compared to the requirements set forth in the Commission's *pro forma* LGIP, are just and reasonable and not unduly discriminatory or preferential because they will help deter speculative interconnection requests from entering the expedited interconnection process. Specifically, we find that the more stringent financial commitments, the obligation to satisfy a development milestone earlier in the process, and the requirement that

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[123] *See, e.g.*, Order No. 2003, 104 FERC ¶ 61,103 at P 827; Order No. 2023, 184 FERC ¶ 61,054 at P 1764 & n.3346.

[124] *See, e.g.*, *Sw. Power Pool, Inc.*, 183 FERC ¶ 61,215, at P 30 (2023) ("Under the independent entity variation standard, SPP must demonstrate that its proposed variations are just and reasonable and not unduly discriminatory or preferential, and accomplish the purposes of the Commission's rulemakings establishing the *pro forma* generator interconnection procedures and agreements.").

[125] *See, e.g.,* Order No. 2023, 184 FERC ¶ 61,054 at P 693 ("This approach achieves the Commission's goals of ensuring that interconnection customers are able to interconnect in a reliable, efficient, transparent, and timely manner.").

generating facilities enter commercial operation within five years of executing the HILLGA Study Agreement, among other requirements, will encourage the submission of more commercially ready and less speculative interconnection requests.

66. We further find that SPP's proposed HILLGA substation and transmission line segment requirements are just and reasonable and not unduly discriminatory or preferential because they help to preserve the local, limited nature of SPP's proposed LLRIS. These requirements help to ensure that a HILLGA interconnection will have limited impacts on SPP's transmission system by providing that the generator's POI must be in the same local area as the HILL that the HILLGA Customer will serve. Similarly, SPP proposes to cap the HILLGA Customer's generating facility's projected capacity accreditation value at the requested load amount of the associated HILL(s), multiplied by the higher of: (1) 110% plus the highest approved Planning Reserve Margin percentage effective at the time of the HILLGA Study Agreement and outlined in the SPP Planning Criteria; or (2) 125%.[126] We find that SPP's proposed cap on the projected capacity accreditation value helps to ensure that only the generation capacity necessary to serve the HILL is studied through the HILLGA process, while recognizing that the relevant load responsible entity must secure sufficient resources to cover the Planning Reserve Margin that it will be required to carry when the HILL receives long-term, firm transmission service.[127]

67. We also find that SPP's proposal is just and reasonable and not unduly discriminatory or preferential because we agree with SPP that the "HILLGA presents a reasonable approach to address [the] large load generation needs without disadvantaging

[126] Transmittal at 26.

[127] In its comments, Enchanted Rock initially requested that the Commission accept SPP's proposal but only on the condition that SPP change the second of the proposed values (i.e., the 125%) to 150%. Enchanted Rock Comments at 6. In its answer, however, Enchanted Rock states that SPP's answer clarifies that the HILLGA proposal would not interfere with an interconnection customer's installation of redundant on-site capacity to support reliability and, therefore, asks the Commission to accept SPP's HILLGA proposal without condition. Enchanted Rock Answer at 1-3. In any event, for the reasons discussed above, we find SPP's proposed cap just and reasonable, and under FPA section 205, SPP need not show that its proposal is the most just and reasonable among all possible alternatives so long as it demonstrates that the proposal is just and reasonable. *See, e.g.*, *Cities of Bethany v. FERC*, 727 F.2d 1131, 1136 (D.C. Cir. 1984) (describing the Commission's authority under section 205 of the FPA as "limited to an inquiry into whether the rates proposed by a utility are reasonable—and not to extend to determining whether a proposed rate schedule is more or less reasonable than alternative rate designs.").

requests in the DISIS queue."[128] For instance, SPP proposes to accept HILLGA Requests at any time and complete the entire HILLGA process within 150 days, which is a significantly faster timeline than the current DISIS process, which, as designed, takes 12 months to complete.[129] At the same time, HILLGA Requests will not be considered higher queued than pending interconnection requests in the standard DISIS queue and will not appear in the DISIS models until such models have been updated to include new ITP models. As a result, the proposed Tariff revisions are designed to not drive increased network upgrade costs or risk of restudies for pending DISIS interconnection requests. In addition, SPP states that the HILLGA process will not affect the timing of any pending DISIS interconnection requests because the HILLGA process will be predominantly completed by outside consultants paid for by the HILLGA Customer through the required study deposits.

68. Regarding LLRIS, we find that SPP's proposal is just and reasonable and not unduly discriminatory or preferential because it limits a HILLGA Customer to only serving a HILL or HILLs located in the same local area as the POI for its generating facility and, thus, mitigates the generating facility's impacts on SPP's transmission system. In addition, we find that it is a reasonable component of SPP's proposal to limit LLRIS to a term of five years. Because HILLGA Customers with LLRIS have interconnection service that is limited to a five-year term and limited to serving specific HILL or HILLs, we find it reasonable that these customers are only eligible to obtain non-firm point-to-point and short-term point-to-point service without being studied in the Aggregate Transmission Service Study process or obtaining different interconnection service.[130] We note that the expiration of LLRIS also ensures that any generating facilities that interconnect to the transmission system will eventually go through SPP's standard interconnection procedures, including all necessary studies, if they are to be interconnected for longer than five years.

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[128] Transmittal at 35.

[129] *Id.* at 36-37.

[130] Non-firm point-to-point transmission service includes the transmission of energy on an hourly, daily, weekly, or monthly basis, not to exceed one month's reservation. *See* SPP, Tariff, Pt. II, § 14.5 (Classification of Non-Firm Point-To-Point Transmission Service). Short-term firm point-to-point transmission service is firm point-to-point transmission service that provides firm deliveries of capacity and energy from the point(s) of receipt to the point(s) of delivery with a term of less than one year. *See also id.*, Pt. I, § 1.1S (Definitions); *id.*, Pt. II, § 13.7 (Classification of Firm Transmission Service); *id.*, attach. P (Transmission Service Timing Requirements).

69. Finally, we find that SPP's proposed HILLGA process accomplishes the purposes of Order Nos. 2003 and 2023 to ensure that interconnection customers are able to interconnect to the transmission system in a reliable, efficient, transparent, and timely manner. We find that SPP's HILLGA-related revisions, taken together, accomplish these purposes because they will help ensure that HILLGA Customers seeking to serve HILLs are able to interconnect to the transmission system in a timely manner and increase the speed of interconnection queue processing.[131] Therefore, we find that SPP's proposed Tariff revisions implementing the HILLGA process meet the independent entity variation standard.

3. Miscellaneous Issues

70. As noted above, SEIA asserts that the "Commission should encourage SPP to undertake ongoing monitoring and reporting commitments regarding its proposed HILLS/HILLGA processes."[132] We decline SEIA's request because SPP has demonstrated that the proposed HILL and HILLGA processes are just and reasonable for the reasons discussed above.[133] Moreover, we note that SPP asserts that it will monitor the effectiveness of the HILL and HILLGA processes just like it continuously monitors every service provided under its Tariff.[134]

71. However, we note that SPP's filing contains several ministerial errors throughout proposed Attachments BA and BB: (1) incorrect usage of the acronym "HSCS" instead of "HSLCS" in Attachment BA section 2.1.3.3; (2) redundant wording in the following sentence in Attachment BA section 2.1.3.4: "The Transmission Provider will perform a supplemental assessment, *in addition to the studies required pursuant to Attachment AQ and AX of the Tariff*, of the impact of a requested HILL delivery point configuration change on the Transmission System for the full requested term, *in addition to the studies required in Attachment AX and Attachment AX of the Tariff*";[135] (3) failure to specify "90-Calendar Day extension" in the following sentence in Attachment BA, section 2.1.3.4: "The Transmission Provider may grant a 90-day extension for completion of

[131] *See, e.g.,* Order No. 2023, 184 FERC ¶ 61,054 at PP 4, 693.

[132] SEIA Comments at 7.

[133] *See Cities of Bethany v. FERC*, 727 F.2d at 1136.

[134] SPP Answer at 8.

[135] SPP, Proposed Tariff, attach. BA, § 2 (0.0.0), § 2.1.3.4 (HILL Delivery Point Study) (emphasis added).

such negotiations";[136] (4) inconsistent usage of the term "Transmission Owner" in Attachment BA section 2.2.4 and the term "Host Transmission Owner" in the remainder of Attachment BA; (5) inclusion of the capitalized term "High Impact Large Load Generation Assessment Study Procedures" in the defined term "High Impact Large Load Generation Assessment Request" in Attachment BB section 1, which is not defined or used elsewhere in Attachment BB; and (6) incorrect usage of the acronym "HILGA" instead of "HILLGA" in Attachment BB sections 3.4.4.1 and 4.4. Therefore, we direct SPP to submit, within 30 days of the date of this order, a compliance filing that corrects the ministerial errors listed above.

The Commission orders:

(A) SPP's proposed Tariff revisions are hereby accepted, effective January 15, 2026, as requested, subject to condition, as discussed in the body of this order.

(B) SPP is hereby directed to submit a compliance filing, within 30 days of the date of this order, as discussed in the body of this order.

By the Commission. Commissioner Rosner is concurring with a separate statement attached.

(S E A L)

Debbie-Anne A. Reese,
Secretary.

[136] *Id.*

Appendix – Tariff Records

Southwest Power Pool, Inc.
Open Access Transmission Tariff, Sixth Revised Volume No. 1

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UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Southwest Power Pool, Inc. Docket No. ER26-247-000

(Issued January 14, 2026)

ROSNER, Commissioner, *concurring*:

1. Today's order accepts SPP's proposal to establish new study processes for new High Impact Large Loads (HILLs) and associated generation through the High Impact Large Load Generation Assessment (HILLGA). Together, these processes will enable SPP to efficiently identify new large loads, expedite the interconnection of new generation needed to serve them, and protect the reliability of the bulk power system. The proposal also encourages "bring-your-own-new-generation" solutions in SPP, which will enable rapid interconnection of new large loads without raising costs or threatening electric reliability for other customers. I concur to highlight SPP's pragmatic steps to support economic growth in its footprint and call on other transmission providers across the country to consider similar proposals through FPA section 205 filings.

2. The HILLs and HILLGA processes work together to pair shovel-ready generation with large loads and allow them to interconnect to the grid in less than half the time typically required for generators to clear SPP's generator interconnection queue. The secret sauce behind SPP's proposal is Load Limited Resource Interconnection Service (LLRIS), a new interconnection service that limits the amount of power a generator can put on the SPP grid to the forecasted hourly load of the nearby large load it serves. Because the generator's output is matched to the large load's demand, the impacts of adding load and generation to the transmission system effectively cancel each other out, which minimizes the need for time-consuming transmission upgrades. SPP's proposal is grounded in physics, takes a harder look at reliability impacts of large loads on the grid than current practice requires, and unlocks large load opportunities while protecting other customers from rising bills.

3. There are also clear parallels between SPP's approach in its HILLs and HILLGA processes and the new transmission services the Commission recently directed PJM to create for load co-located with generation.[1] While the mechanics of these approaches are distinct between the different regions, the practical outcome is similar: they both enable new generation needed to serve new large loads to connect to the grid faster and at lower

[1] *See* 193 FERC ¶ 61,217 at PP 200-03; 234.

cost. The common thread is a recognition that when generation is paired with load that is physically proximate, the impacts on the transmission system are lower than they are in the status quo, in which large loads and generation are planned separately.

4. I also note that SPP's proposal is another step towards realizing the goals of Secretary Wright's Large Load ANOPR proposal in three important ways: first, it pairs new large loads and new generation to connect them to the grid rapidly and reliably;[2] second, it minimizes costs borne by other customers;[3] and third, it does so through an FPA section 205 filing, rather than waiting on the Commission to require such action.[4]

5. Today's order is a productive step toward facilitating the energy needed to win the AI race, bring back American manufacturing, and deliver the reliable and affordable energy on which families and small businesses depend. I encourage other transmission providers to take note of the innovative approach SPP proposed in this filing, and to consider proposing similar solutions tailored to meet the needs within their own footprints.

For these reasons, I respectfully concur.

David Rosner
Commissioner

[2] *See* U.S. Department of Energy, Secretary of Energy, Direction that the Commission Initiate Rulemaking Procedures and Proposal Regarding the Interconnection of Large Loads Pursuant to the Secretary's Authority Under Section 403 of the Department of Energy Organization Act (Oct. 23, 2025) at P 20.

[3] *See Id.* at P 25.

[4] *See Id.* at P 32.

Document Content(s)