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Re: Comments of Renewable Northwest regarding the Facilitation of a Commission-led workshop series on large load interconnections and tariffs, Docket UE-260162.

I. INTRODUCTION

Renewable Northwest ("RNW") appreciates the opportunity to provide comments in response to the Washington Utilities and Transportation Commission's ("the Commission") April 7, 2026, Notice of Technical Workshop and Opportunity to Comment ("Notice") regarding the series of workshops on large load interconnections and tariffs, which will ultimately culminate in a policy statement to guide various large load issues. This is an important proceeding that is well-timed at a pivotal moment in the UTC's history. Unprecedented large load growth threatens the electricity sector's ability to meet state clean energy mandates and maintain core utility service elements of reliability and affordability. To ensure Washington keeps progress towards state mandates and remains resource adequate, the Commission may consider changes to the terms of service provided to large load customers and the procedures to interconnect them to the grid.

In RNW's view, large load integration can and should be conducted in a manner that provides net benefits to the utility's system, advances state clean energy mandates, and results in a more flexible and resilient grid. By creating policies that allow large loads to be met with flexible and clean energy, the UTC can guide the system towards achieving these goals. For example, by incentivizing co-locating flexible assets like energy storage technologies at large loads, a utility's system can operate more efficiently and balance supply and demand more readily during peak need. Since a recent evaluation found that large load flexibility can mitigate most or all winter

resource adequacy needs under various load growth scenarios,[1] the Commission should consider various options for maintaining adequate service with a flexible and modern approach.

II. COMMENTS

RNW looks forward to participating in this process and notes our positions may evolve after reviewing the responses and proposals of other parties. RNW reserves the right to alter the positions articulated herein or offer new proposals as this docket evolves. For now, these comments will respond to selected questions raised in the Notice and raise various issues for the Commission's consideration.

1. **How should the Commission and electric IOUs define "large loads?" Should it be based on a specific MW threshold, characteristics of the load itself, end use, current utility definitions, or a combination of those criteria?**

As the Notice notes, large loads have been defined differently in various policy and legislative contexts. Both HB 2515 and the POWER Act in Oregon set thresholds of 20 megawatts ("MW") combined with a requirement that the load be listed under 518210 of the North American Industry Classification System.[2] The definition in the Northwest Power Act–albeit from a different era–is an average MW standard.[3] The definition in the Federal Energy Regulatory Commission's ("FERC") Advance Notice of Proposed Rulemaking ("ANOPR") that asserts jurisdiction over the interconnection of large loads defines the term as greater than 20 MW.[4] The North American Electric Reliability Electric Cooperation ("NERC") has adopted a broader definition that does not set specific end use or MW thresholds, defining large loads as:

> [a]ny commercial or industrial individual load facility or aggregation of load facilities at a single site behind one or more point(s) of interconnection that can pose reliability risks to the [bulk power system] due to its demand, operational characteristics, or other factors. Examples include, but are not limited to, data centers, cryptocurrency mining facilities, hydrogen electrolyzers, manufacturing facilities, and arc furnaces.[5]

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[1] https://gridlab.org/portfolio-item/pnw_nearterm_winterra/ at slide 11.

[2] Notice at 3, fn 6 and HB 3546 (2025), Oregon Legislature *available at* https://olis.oregonlegislature.gov/liz/2025R1/Downloads/MeasureDocument/HB3546/Enrolled.

[3] Notice at 3, fn 6.

[4] https://www.kirkland.com/publications/kirkland-alert/2025/11/potential-game-changing-rulemaking-for-data-centers. RNW's understanding is that the large load must interconnect directly to the federally regulated interstate transmission system to be FERC regulated according to the ANOPR's guidance. This is to avoid "affecting the States' jurisdiction." *Id.*

[5] https://www.nerc.com/globalassets/who-we-are/standing-committees/rstc/whitepaper-characteristics-and-risks-of-emerging-large-loads.pdf at 1.

In RNW's view, where to set the definition's threshold is a question that should be determined once the scope of this docket comes into greater focus. For example, if this proceeding's policy statement were to simply express support for various alternative service options to be provided to all large load customers, the Commission can use a MW threshold, as is seen in various large load tariffs across the country.[6] Under a scenario like this, the Commission should strive to offer consistent service to all large loads, regardless of their use case.

If the Commission determines that the policy statement in this proceeding should include guidance regarding programs and terms of service to offer to large load customers of specific end uses, a more granular definition may be necessary. However, a purely capacity threshold definition–such as 20 MW–would be more durable and allow Commission-regulated utilities to adopt various programs to serve different types of load that may materialize in the future. In this scenario, the Commission can direct utilities to offer different definitions in the event future tariffs and programs are designed to be provided to a certain subset of customers and can provide guidance on doing so in the policy statement.

With the information available at this phase of the proceeding, RNW recommends that the Commission adopt a threshold of at least 20 MW to define large loads on utility systems. Large loads should not be based on customer type or end use but should be non-discriminatory and focused on the size of the load across customer types. This is an equitable, flexible, and durable approach.

2. **When large loads interconnect to a utility system, there are usually resulting costs to accomplish the interconnection. These costs can be direct, such as generation required to serve load or site-specific transmission upgrades, and indirect, such as increased demand for resources in the broader power market or other supply chain and resource adequacy constraints.**

    a. **What are particular costs (or benefits) related to large loads that the Commission and electric IOUs should quantify and track?**

RNW looks forward to reviewing the responses of other parties on this matter.

[6] https://www.utilitydive.com/news/large-load-tariffs-proliferate-as-states-take-more-active-role-in-data-cent/816184/. "A few years ago, utilities defined "large loads" using a threshold of five, 10 or 25 MW, Collier said, but more recently-approved tariffs are defining large loads at 50 MW and above."

b. Would tracking the costs related to large loads require different approaches than the Commission's and electric IOU's existing practices?

RNW looks forward to reviewing the responses of other parties on this matter.

3. What data do the Commission, electric IOUs, and interested persons require to assess the effects of large loads in an IOU service territory? Is that data publicly accessible or otherwise available through existing UTC processes? Are there third-party sources of data that could be used when assessing large loads in a utility setting?

To understand the effects of large loads, the Commission and affected parties should have access to reliable load forecasts that can be verified with a high degree of certainty. While load forecasts are contained and scrutinized in utility planning processes such as the Integrated Resource Plan ("IRP") and the Clean Energy Implementation Plan, they often do not contain sufficient granularity or certainty to determine exactly when large loads will materialize or how long they will remain. To that end, the Commission may wish to include in its policy statement language signaling requirements for large load growth to be both verifiable and durable. Due to the magnitude of many large loads forecasted in our region–and the scale of investment needed to serve them–the Commission must have this information to make reasoned recommendations that will support a clean, flexible, and affordable energy future for Washingtonians. Therefore, the level of the information the Commission may require is likely not yet available at the level of detail needed to make informed decisions.

a. In line with the DCWG recommendations, what data is needed to incentivize greater demand flexibility and energy efficiency that allows for interconnection of new large loads?

Washington's Data Center Working Group ("DCWG") recommended, in part, that the Governor's office:

> [d]irect agencies to identify, incentivize, and unlock the potential for load flexibility, particularly from large data centers. Incentives could include specific tax incentives or faster interconnections for large loads that are able to participate in demand response programs or those that help fund demand response and energy efficiency for low-income households and other customers.[7]

[7] Data Center Working Group Preliminary Report, Department of Revenue, Washington State at 22, *available at* https://dor.wa.gov/sites/default/files/2025-12/2025DataCntrWrkgrpPrelimReport.pdf.

To the degree the Commission is considering whether to incentivize load flexibility through programs like demand response, it should first gather information regarding the degree to which various large load end uses can engage in demand response. End use customers are best equipped to be able to provide this type of information about their operations. This information will allow the Commission to craft programs that can unlock grid flexibility while allowing the competitive marketplace to determine the right mix of flexible and inflexible loads, consistent with recent guidance for regulators.[8] By allowing the market to determine whether it is feasible to enroll in alternative forms of service that would provide a system benefit, the Commission can help ensure a reliable electric system while balancing other state interests.

In addition to the takeaways from the DCWG, the Commission can more efficiently interconnect large loads while minimizing peak capacity needs through incentivizing grid modernization. Underpinning this concept is the fact that many MWs of capacity lay latent on a utility's system at any given time. Therefore, much of the grid is under-utilized. By integrating large loads in a manner that allows the utility system to optimize and utilize existing infrastructure, efficiencies can be gained that may obviate the need for substantial thermal generation additions for our region. Achieving maximum grid optimization will require increased reporting from utilities to understand how their system is utilized and how alternative large load service offerings can be tailored to achieve maximum efficiency. Under the current paradigm where capital expenditures are the predominant form of incentive regulation, achieving grid optimization and efficiency may require re-examining how utilities are regulated. The Commission may wish to explore this issue in the context of this docket before suggesting concrete reforms in its ongoing performance-based regulation proceeding. Policies supporting this approach are being considered in various jurisdictions across the country.[9]

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[8] Leveraging Large Load Flexibility to Facilitate Access to Power While Protecting Customers: Considerations for State Regulators, Nicholas Institute for Energy, Environment & Sustainability, Duke University and Roselle LLP (2026) at 3 *available at* https://nicholasinstitute.duke.edu/sites/default/files/publications/leveraging-large-load-flexibility-facilitate-access-power-while-protecting-customers.pdf.

[9] *See, e.g.,* Virginia to utilities: Do more with the existing power grid, Canary Media (Mar. 3, 2026) *available at* https://www.canarymedia.com/articles/transmission/virginia-to-utilities-do-more-existing-power-grid.

4. **Industry expertise suggests that more uniform forecasting frameworks and modeling methodologies are needed to accurately forecast large loads and protect customers from risk.**

    a. **How should electric IOUs evaluate requests for interconnection from large load customers?**

As discussed, electric IOUs should evaluate requests for interconnection that can be identified with a high degree of certainty. IOUs should evaluate large load interconnection requests through a standardized process that includes a technical feasibility and system impact assessment, verification of customer readiness milestones (e.g., executed contracts, site control, financial creditworthiness) and a clear cost allocation framework. In addition, IOUs may consider whether the large loads are likely to remain on the utility's system for a period correlated to the scale of investment needed to serve them.

Beyond determining the magnitude and duration of large loads seeking interconnection, electric IOUs should generally follow principles dictated by the prevailing state or federal regulatory policy when interconnecting new large loads. The regulatory dynamic governing the interconnection of certain large loads is currently in flux. While state regulatory commissions have historically regulated load interconnection processes and retained the ability to craft load interconnection to align with state policy, that is subject to change. Once finalized, the FERC ANOPR aimed at large load interconnection would move to FERC jurisdiction all loads over 20 MW seeking to interconnect directly to the interstate transmission system, and such interconnection requests would be "rapidly accelerate[d]" under the new rule.[10]

Regardless, the Commission will maintain regulatory authority over certain loads seeking interconnection directly to the utility's distribution network or lower-voltage lines, as well as retail service terms, rate design, resource planning, and load forecasting. Therefore, in this proceeding the Commission may wish to give guidance regarding specific interconnection reforms and other policies within its regulatory purview that help ensure system reliability, affordability, and meeting state clean energy mandates.

    b. **How should electric IOUs forecast large load demand within their service territories, or otherwise consider large load demand in their forecasts and planning processes?**

[10] *Id*. at 4.

The load forecast is a critical foundation of integrated resource planning. A utility's load forecast is typically composed of several components: a base economic forecast derived from econometric modeling of historical relationships between economic activity and electricity consumption, adjusted for demand-side impacts such as energy efficiency programs, behind-the-meter solar generation, electric vehicles, and customer programs that reduce load. Large load additions, given their nascency and limited historical information, are generally handled as a separate adjustment to this econometric base.

It is important to acknowledge at the outset that all stakeholders, utilities, regulators, and commissions are still in the early stages of gaining experience with large loads as a planning input. The empirical data necessary to support a fully robust forecasting methodology does not yet exist. Furthermore, large load additions are both uncertain and consequential in ways that distinguish them from other forms of load growth. Much of the projected load growth across the country is concentrated among a small number of very large customers, meaning that the realization or cancellation of even a single project can have a material impact on system needs and resource portfolio optimality — in stark contrast to the more gradual changes that characterize traditional load growth. Meaningful guidance can nonetheless be drawn from jurisdictions that have confronted this challenge earlier and at greater scale, and increased transparency will accelerate the learning process for all parties.

With this context in mind, we offer the following recommendations for how IOUs should approach large load forecasting:

(a) Avoid double-counting. The econometric base load forecast may already capture some large load activity to the extent that recent electricity consumption data reflects early-stage large load operations. IOUs should carefully examine whether proposed exogenous large load adjustments overlap with demand already embedded in the base forecast and should clearly document their methodology for avoiding double-counting between the two.

(b) Apply a disciplined threshold for inclusion. Jurisdictions with the most experience in this area have generally concluded that only loads with executed Energy Service Agreements should be included in the base load forecast — and only a portion of even those, reflecting historical experience that not all executed agreements result in full load materialization on the projected schedule.[11] Loads at earlier stages (letters of authorization, preliminary interconnection inquiries, or non-binding expressions of interest) should not be included in the base forecast, but should still be tracked and inform scenario analysis. This threshold reflects the reality that the gap between announced and executed projects is large and that including speculative demand inflates resource needs and can trigger premature and inefficient resource commitments.

[11] *See, e.g.,* Dominion Energy, January 6, 2026, Letter to PJM Load Analysis Team, *available at* https://www.pjm.com/-/media/DotCom/planning/res-adeq/load-forecast/dominion-documentation.pdf.

(c) Increase transparency and reporting frequency. Given how rapidly large load conditions evolve, traditional IRP cycles are not sufficient to keep the Commission and stakeholders informed. IOUs should be required to file regular reports tracking the status of large load projects at a frequency commensurate with how quickly conditions change. The appropriate content and cadence of such reporting is addressed in more detail in response to Question 4.d below.

c. Are current electric IOU practices related to resource adequacy metrics sufficient for large loads? Why or why not?

Resource adequacy as a concept does not need to be redefined — the goal of maintaining sufficient resources to meet load reliably remains unchanged. What does need to shift is the analytical framework used to assess it. In most cases, resource adequacy planning relied on a deterministic approach in which a least-cost resource portfolio was identified to meet a single forecasted load outcome, with sensitivities applied at the margins. That framework is less informative in an environment where a significant share of projected demand is uncertain, together with other uncertain factors. In that environment, the relevant planning question is not which portfolio is least-cost under a central forecast, but which portfolio performs well across a range of plausible futures — and what the consequences are of committing to resources that may prove either insufficient or excessive depending on how large load demand evolves.

If load forecasts include non-binding or speculative large load demand, the resulting resource adequacy assessments will overstate the need for new resources — potentially triggering premature and costly resource commitments that ultimately prove unnecessary. Conversely, if large loads materialize faster than expected, under-forecasting creates its own reliability risks.

To address these limitations, IOUs should develop a range of scenarios rather than relying on a single point estimate — at minimum a base case reflecting only executed agreements (or a portion of those), and sensitivity cases reflecting partial and full materialization of pipeline demand. Critically, these scenarios should be analyzed not only in terms of their load implications but also in terms of the resource commitments the utilities are proposing, the lead times associated with those commitments, and the degree to which those resources can be ramped up or down if load materializes differently than projected. Understanding the asymmetric consequences of over- and under-procurement is essential to sound planning under uncertainty. A resource portfolio that performs well across multiple futures is meaningfully more resilient than one optimized for a single forecast outcome that may not materialize. To the extent that the Commission supports policies to modify large load demand through applicable tariffs and alternative terms of service, customer programs, or bring-your-own-capacity frameworks — whether involving supply-side resources, customer on-site generation, or off-site demand-side resources — these flexibilities should be explicitly reflected in the scenario analysis, as they materially affect the net resource obligation and the range of outcomes across which the portfolio must perform.

d. What steps should be taken by electric IOUs or the Commission to manage changing conditions for the arrival, departure, or overall demand of a large load?

Managing the dynamic conditions associated with large load development requires both improved monitoring and reporting mechanisms that will allow all stakeholders to understand the drivers and implications of large loads, as well as tools that allow large load customers to contribute to shaping the conversation. We recommend the following steps as a starting point to guide the discussion:

(a) Require quarterly reporting. Require quarterly reporting. IOUs should be required to file quarterly reports with the Commission tracking the status of large load projects. These reports should include at minimum:

1. Customer or project name;
2. Project address;
3. Announced project load (MW);
4. Projected load ramp including load (MW) and timing;
5. Changes in project status since the last report, including:
    - a. Updates to announced load;
    - b. Updates to load ramp;
    - c. Project stage (new project; existing project undergoing the transmission service request process; contract status — Engineering, Procurement, Construction or service agreement); and
6. Reason for project loss if known (selected alternative state; project cancelled; project delayed indefinitely).

This framework is modeled on the quarterly reporting Georgia Power provides to the Georgia Public Service Commission,[12] which has proven useful for tracking large load pipeline activity in a rapidly evolving market.

(b) Track incremental load and incremental resources together. IOUs should be required to track not only incremental large load additions but also the incremental resources being planned or procured to serve that load. This pairing ensures that the Commission can assess whether resource procurement is appropriately calibrated to actual demand.

More broadly, given the limited empirical data currently available on large load behavior, both IOUs and the Commission should approach this area with a commitment to ongoing learning and transparency, updating methodologies and reporting requirements as experience accumulates. The quarterly reporting mechanism recommended above serves not only as a management tool

[12] Attachment A in the Order Adopting Stipulation in Georgia Power's Amended 2023 Integrated Resource Plan Update. Docket No. 55378, *available at*: https://psc.ga.gov/search/facts-document/?documentId=218484.

but as a means of building the empirical record that will eventually support more robust forecasting and planning methodologies.

5. **What mechanisms, in WA or elsewhere, could be used to protect ratepayers from bearing additional cost burden from large load interconnections and operations?**

The Commission should encourage policies that allow large loads to co-locate flexible and clean energy resources–such as renewables and storage–onsite in a manner that can help shave peak needs and maintain system reliability. Policies like this will allow the utilities to more efficiently and flexibly operate their system, which may result in deferred investment and other system-wide efficiency savings.

A variety of alternative solutions and proposals exist that the Commission may consider signaling support for. RNW may provide additional recommendations for the Commission's consideration as this proceeding evolves and we more thoroughly understand various parties' positions.

III. CONCLUSION

Renewable Northwest thanks the Commission for considering these comments and creating a venue for affected parties to investigate this important matter.

Sincerely,

/s/ Mike Goetz
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