

Category	MISO	SPP	NYISO	ISO-NE	PJM
Regional Flexibility	Strongly favors regional tailoring	Strong push for regional deference	Emphasizes independent-entity variation	Wants flexibility due to PTF / Non-PTF split	Supports regional stakeholder design; warns against one-size-fits-all
Existing Load Processes	Existing internal frameworks	HILL, HILLGA, CHILLS, PALS	SIS + TO facility study	RNS + Cluster GI	EDC/TO-run today; PJM uses necessary studies
Treatment of Hybrids (Load + Gen)	Wants full study, no netting	Full load + full gen studied, LLRIS only	Supports hybrid path w/ RA checks	Injection/withdrawal rights OK; still need full stability/EMT	Points to hybrid cases in EL25-49; flags RA + operations risks
Threshold for "Large Load"	Opposes national MW threshold	10 MW ($\leq 69kV$), 50 MW ($> 69kV$)	10 MW (115kV+), 80 MW ($< 115kV$)	Supports threshold; wants clarity on staged adds	Questions 20 MW; risk of over-capturing
Cost Responsibility	Prefers regional design	Uses Z2 credits + RSC oversight	Align w/ NYISO tariff + state law	Supports 100 percent w/ simple crediting	Already charges cost-causers; warns details matter
Expedited & Curtailable Studies	Concerned about speed hurting reliability	90-day HILL; 60-day unrealistic	Flexible deadlines; 60-day too short	Only for fully curtailable load; 60-day unrealistic	60-day not feasible; risks GI backlog
Reliability & RA Impacts	Anchors to NERC LLTF	Cites stability, EMT, IEEE 2800	Warns of shrinking RA margins	Highlights NPCC/NERC rules	Calls for NERC registration of large loads; RA central
Jurisdiction & State Interface	Emphasizes state retail boundaries	State limits on TO build; need deference	Jurisdiction unclear; Tri-State precedent	Wants clarity on FERC role vs transmission service	Major risk area; seven-factor test hard to apply
Implementation & Transition	Warns of disruptions if misaligned	Sequential rollouts planned	Must align w/ Order 2023 cluster	Needs explicit transition plan	Would need 12+ months to implement; big open questions