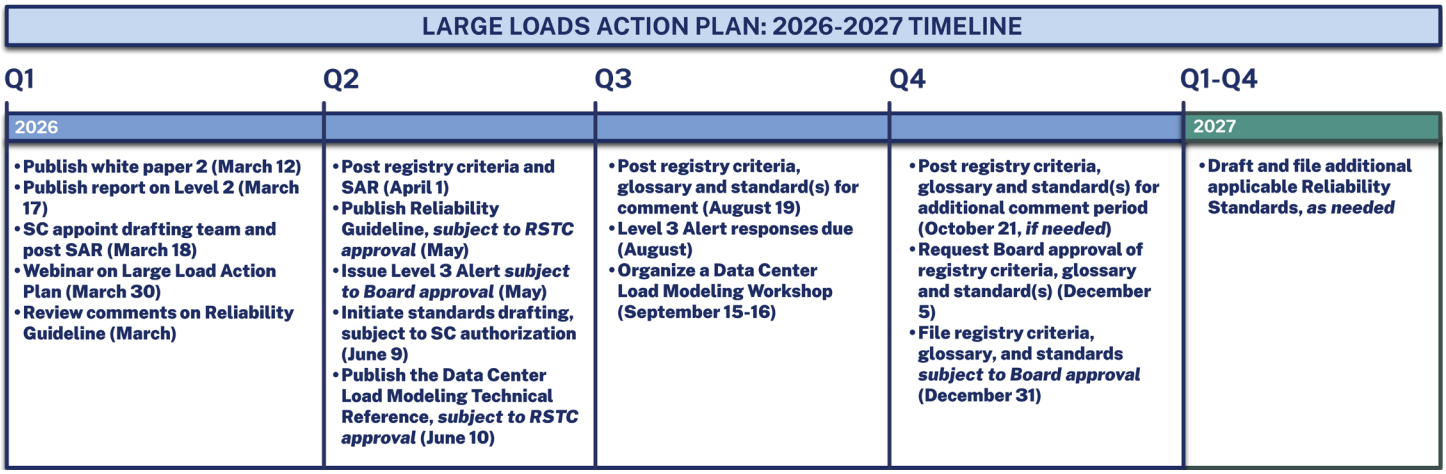
LLAP
Large Loads Action Plan

Large Loads Action Plan Q1 2026 Update

Addressing an Emerging Reliability Issue
April 2026

Strategies for Reducing Risks Associated with Large Loads



Advancing a Three-Pronged, Concurrent Approach

- **Technical Justification.** An Essential Action Level 3 alert will be issued to recommend near-term mitigation actions that current registered entities can take to address critical reliability risks, expected May 2026. Additionally, the LLWG plans to publish its Reliability Guideline for large load interconnections during the same period, subject to RSTC approval.

- **Registration Criteria for Computational Loads.** NERC will define which entities, based on specific physical and electrical criteria, would be required to register with NERC and comply with its Reliability Standards.

- **Reliability Standards.** NERC will revise and adopt new Reliability Standards to define computational loads and establish measurable requirements for newly registered entities, with an initial Reliability Standard completed, expected by the end of 2026.

Upcoming Engagement Opportunities

Standards Development
The Standards Committee launched Project 2026-02 on March 16, 2026, to develop Reliability Standards addressing computational loads. The committee appointed a drafting team and accepted the Standard Authorization Request (SAR) for posting. The SAR was posted for 30-day formal comment period on April 1, with comments due by April 30.

Additionally, subject matter experts with relevant experience can volunteer through April 30, 2026, for the Computational Load Short-Term Advisory Group. The Advisory Group will support the initial standard project by contributing at least three hours per week to support the drafting team. In addition, observers interested in this project may join public drafting team meetings and actively participate in the process. Additional information is on the Reliability Standards Under Development page.

Registration
NERC proposes to establish a new registered entity, subject to Reliability Standards, to address large computational loads. Accordingly, NERC plans to revise its Rules of Procedure, Appendix 5B Statement of Compliance

Registry Criteria to account for Computational Load Entities. The draft was posted for a 45-day comment on April 1, 2026 on the Proposed Changes to Rules of Procedure web page.

Large Loads Working Group
The Large Loads Working Group (LLWG) focuses on understanding the reliability impacts associated with emerging large loads. This includes identifying gaps in existing processes and recommending enhancements to planning and operations. The group will meet in 2026 on April 2, July 2, and October 1. To join the LLWG, please contact Evan Mickelson.

Load Modeling Working Group
The Load Modeling Working Group (LMWG) actively engages stakeholders through technical presentations and discussions focused on modeling large loads. Additionally, the group is developing a technical reference document to inform industry on how to model these emerging loads for dynamic studies. That draft will be shared with the RSTC for comment on April 30, 2026. To join the working group, contact Hasala Dharmawardena.

Actions Taken by NERC to Address Large Loads on the Grid

Key Reports and Findings
NERC's LLWG has several ongoing projects including a published white paper on *Characteristics and Risks of Emerging Large Loads*, which finds that peak demand is just one of several factors that can impact BPS reliability, and further action is needed to address these risks.

A second white paper examined *Gaps in Existing Practices, Requirements, and Reliability Standards for Emerging Loads* and found that the existing NERC Reliability Standards, as well as industry processes and requirements, are inadequate for the reliable integration of emerging large loads onto the BPS. The white paper recommendations include updates to registration criteria, Reliability Standards, processes, and requirements.

FERC Advance Notice of Proposed Rulemaking
NERC submitted comments to the Federal Energy Regulatory Commission's Advance Notice of Proposed Rulemaking (ANOPR) addressing the reliable interconnection of large loads. NERC previously filed comments in FERC's co-location proceeding in Docket No. AD24-11. In the ANOPR comments, NERC cites its support for addressing the rapid growth of these large loads and appreciation for recognition of NERC's role and its request that future actions reference NERC's full authority under Section 215 of the Federal Power Act to include users, owners, and operators of the BPS. Additionally, the comments underscore that NERC is actively collaborating with stakeholders to assess risks and mitigation options and to provide details on potential future efforts.

In March, NERC submitted a supplemental letter to FERC detailing an accelerated action plan, including revising our registry criteria and Reliability Standards by the end of 2026. A Level 3 alert will also be issued this May to begin essential risk mitigation actions.

Industry Alert
NERC issued a Level 2 Industry Recommendation Alert on September 9 that urged industry participants to take specific actions to mitigate risks to BPS reliability that may arise from the integration of large loads. Specifically, the alert focused on evaluating dynamic modeling and simulation practices related to large loads and their interconnection requirements. NERC is assessing the study processes, commissioning procedures, and dynamic modeling for large loads to identify additional actions needed to address any observed deficiencies. NERC posted its report summarizing the key findings from

the Level 2 Recommendation to Industry: Large Load Interconnection, Study, Commissioning, and Operations with specific actions to mitigate risks to the BPS.

Technical Conference
NERC hosted a technical conference on February 24–25, 2026, to discuss power system risks and associated mitigation pathways for emerging large loads. The conference focused on data centers and the characteristics of computational loads. This conference also discussed planning and operations, interconnection processes, facility performance requirements, and other topics related to the integration of large computational loads.

Reliability Guideline
The draft *Reliability Guideline: Risk Mitigation for Emerging Large Loads* was posted on November 3, 2025, for a 45-day industry comment period. NERC received more than 800 comments that will help shape the recommendations for risk mitigation. The focus will be on improving modeling practices, analyses, coordination, data collection efforts, real-time monitoring, and event analysis. NERC is appreciative of the level of stakeholder engagement. The final Reliability Guideline is expected to be published in the second quarter of 2026, pending RSTC approval.

Industry Webinar
On March 30, 2026, NERC hosted an informational webinar discussing next steps in the large loads process. NERC has been analyzing the reliability risks associated with integrating large computational loads onto the bulk power system. To mitigate these risks, NERC is implementing a three-pronged approach in its Large Loads Action Plan: registration criteria, Reliability Standards, and technical justification.

Background: Addressing Large Loads on the Grid

An increasing number of large commercial and industrial loads are rapidly connecting to the bulk power system (BPS). Computational loads, such as data centers (including cryptocurrency and artificial intelligence), present unique challenges in forecasting and planning for increased demand. To begin understanding large loads and identifying effective pathways for their integration, NERC established the Large Loads Task Force in August 2024, now the Large Loads Working Group (LLWG), and developed a work plan; the Member Representatives Committee provided written input and hosted a technical panel session at the February 2025 Board meeting; and NERC's Board issued a resolution in February 2025 directing NERC staff to develop an action plan, which will provide additional structure to NERC's efforts related to large loads integration. Through extensive analysis, report development, and engagement conducted to date, NERC has determined that it must act now to mitigate the risks associated with large computational loads.

Milestones

- **Level 3 Alert:** NERC will issue a Level 3 alert in May 2026.
- **SAR Comment Period:** Project 2026-02, focused on developing Reliability Standards to Address Computational Load - Phase I, April 1 through April 30, 2026.
- **Volunteer Opportunity:** The Computational Load Short-Term Advisory Group is open to additional volunteers through April 30 for subject matter experts with relevant expertise who want to support the initial standard project by contributing at least three hours per week to support the drafting team.
- **Draft Registry Criteria Comment Period:** NERC proposes to establish a new registered entity, subject to Reliability Standards, to address large computational loads. Accordingly, NERC plans to revise its Rules of Procedure, Appendix 5B Statement of Compliance Registry Criteria to account for Computational Load Entities. The draft was posted for a 45-day comment on April 1, 2026 on the Proposed Changes to Rules of Procedure web page.

Large Loads Resources