STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

Proceeding on Motion of the Commission to Address Interconnection Reforms for Large Loads

Case 26-E-0045

COMMENTS OF THE NEW YORK STATE RELIABILITY COUNCIL ON INTERCONNECTION REFORMS FOR LARGE LOADS

Date May 13, 2026

New York State Reliability Council, L.L.C.

STATE OF NEW YORK PUBLIC
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The New York State Reliability Council, L.L.C. ("NYSRC") respectfully submits these comments in Case 26-E-0045 in response to the New York State Public Service Commission's ("Commission") *Order Instituting Proceeding and Soliciting Comments* issued on February 12, 2026.[1] The Commission is seeking comments on how best to assess and modernize the interconnection of large loads to the electric grid, while also ensuring an equitable cost allocation structure for interconnecting loads.

Relevant to the NYSRC, these comments are focused on the general topic of reliability, technical system matters impacting reliability, and ensuring that electric system reliability is maintained with the addition of incremental large loads onto the bulk power system. The NYSRC respectfully requests that the Commission consider these comments directed generally at the reliability aspects of questions 2, 3, 6, and 7 posed in the Appendix to the Commission's Order.

I. Introduction

The NYSRC was approved by the Federal Energy Regulatory Commission ("FERC") in 1998 as part of the comprehensive restructuring of the wholesale electricity market in New York

[1] Case 26-E-0045, Proceeding on Motion of the Commission to Address Interconnection Reforms for Large Loads, Order Instituting Proceeding and Soliciting Comments (issued Feb. 12, 2026) ("Order").

State.[2] Under the restructuring, the New York Power Pool ("NYPP") was replaced by the New York System Independent System Operator, Inc. ("NYISO") as the entity with the primary responsibility for the reliable operation of the State's bulk power system. The NYISO also assumed responsibility for administration of the newly established competitive wholesale electricity markets.

The NYSRC was established to promote and preserve the reliability of the New York State power system by developing, maintaining and, from time to time, updating the reliability rules ("Reliability Rules")[3] that govern the NYISO's operation of the State's bulk electric system. The NYSRC develops Reliability Rules in accordance with standards, criteria and regulations of the North American Reliability Corporation ("NERC"), Northeast Power Coordinating Council ("NPCC"), FERC, the Commission, and the Nuclear Regulatory Commission.[4] The NYISO/NYSRC Agreement provides that the NYISO and all entities engaged in transactions on the New York State power system must comply with the Reliability Rules adopted by the NYSRC.[5] Compliance with NYSRC Reliability Rules, which are incorporated into the NYISO's procedures, are made binding on market participants through the NYISO's tariff.[6] The NYISO/NYSRC Agreement also assigns to the NYSRC the responsibility to monitor the NYISO's compliance with the Reliability Rules and requires the NYISO to provide the NYSRC the data necessary for it to effectively perform its compliance monitoring responsibility.[7]

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2 *Central Hudson Gas & Electric Corp.*, et al., 83 FERC ¶ 61,352 (1998).

3 The NYSRC Reliability Rules are available on the NYSRC website, https://www.nysrc.org/, under Documents/Reliability Rules Compliance Monitoring.

4 NYISO/NYSRC Agreement, Section 4.1.

5 NYISO/NYSRC Agreement, Section 2.1, 3.1.

6 NYISO Market Services Tariff, Sections 5.1, 5.6.

7 NYISO/NYSRC Agreement, Section 3.6.

At its inception, the NYSRC adopted the pre-existing NYPP reliability rules. These planning and operating rules had been developed by the NYPP and the Commission based on decades of experience in the operation of the New York bulk power system. Revisions to the Reliability Rules are developed by the NYSRC in an open process with direct participation by the NYISO and Department of Public Service Staff ("DPS Staff"). If the NYSRC and the NYISO should disagree with respect to a new or modified Reliability Rule and cannot resolve their differences, the matter is referred to the Commission for resolution, unless the dispute affects not only reliability but also matters subject to FERC's authority that must be resolved directly by FERC.[8]

In addition to consistency with NERC and NPCC reliability criteria, the NYSRC Reliability Rules include criteria that are more specific or more stringent than NERC and NPCC criteria that are necessary to meet the special requirements of the New York Control Area ("NYCA"). These special requirements include the specific electric system characteristics and demographics of New York State, the complexities related to the maintenance of reliable transmission in New York State given the configuration of the State's bulk power system, and the severe consequences that result from power interruptions in New York State and, in particular, New York City and Long Island.

According to its Order the Commission initiated this proceeding to "to review the planning and interconnection processes, cost-allocation mechanisms, and tariff structures relating to the integration of large loads within the State's transmission and distribution (T&D) systems."[9] Further, the Commission's stated goal of this initiative is "to support new demand for electric

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[8] NYISO/NYSRC Agreement, Article 5.

[9] Order at 8.

power and to advance State economic development objectives without adversely impacting other ratepayers *or the reliability of the electric system*, and to do so in a way that is consistent with the Climate Leadership and Community Protection Act."[10]

While there is myriad of objectives to be discussed in this proceeding, the NYSRC's engagement rests exclusively with ensuring the continued reliability of the bulk power system – which is tightly integrated with the Eastern interconnection via transmission ties with PJM, ISO-NE, IESO and Hydro Quebec – which is consistent with the NYSRC's mission statement. As noted above, the NYSRC maintains and enhances its rules[11] on a periodic basis to assure that the power system (resources and delivery system) in the NYCA can stay ahead of the reliability and resilience related challenges imposed on it. The current trend of adding large loads to the NYCA system is the most recent challenge faced by industry participants.[12]

The NYSRC has created a Large Load Working Group ("LLWG"), to monitor the many state and federal entities analyzing large load reliability risks, such as FERC, NERC, NPCC, NYISO, and as here, the Commission. From tracking these processes, the LLWG is tasked with identifying potential risks to bulk power reliability and the expected increase in the number and magnitude of power delivery requirements through the interconnections of large loads. The NYISO already catalogs and analyzes these requests in its interconnection processes. As of today, there are a large number of projects in the NYISO interconnection queue. While not all of these

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[10] *Id.* at 8-9 (emphasis added).

[11] *See* NYSRC Reliability Rules, *NYSRC Reliability Rules & Compliance Monitoring Manual – NYSRC*, available at nysrc.com.

[12] The NYSRC undertook a similar effort related to the challenges posed by inverter-based resources. In 2024, the NYSRC approved a reliability rule that established minimum interconnection standards for large inverter-based resources in the NYCA. *See* Reliability Rule B.5 (PRR 151).

projects will be built; based on the size of these projects it is critical that we manage the reliability aspects from day one to ensure system reliability while realizing the economic development potential this sector could provide. The NYSRC will consider and may propose solutions from time to time (not limited to NYSRC rules changes) to mitigate any bulk power reliability risk concerns that are specific to the NYCA.

Accordingly, as DPS Staff conducts its diligence over the coming year in preparation for its forthcoming whitepaper addressing the interconnection of large loads and related issues, the NYSRC respectfully requests that due weight is given to the recommendations in these comments and that procedures are incorporated to protect the reliability of the system. The recommendations set forth in these comments by the NYSRC are not meant to be exhaustive, and the NYSRC reserves the right to supplement its findings as more is known following the work of the LLWG and other large load efforts.

II. COMMENTS

The NYSRC submits that it is vital that New York bulk power system reliability must be maintained with the addition of large loads. Reserve margins in the State have been decreasing to alarming levels over the past several years, as evidenced by the NYISO's outcomes from its Reliability Planning Processes.[13] This attenuation of margins has been driven by future demand growth resulting from large loads and electrification coupled with a changing supply mix with an increase in generation retirements. Recently, the NYISO released its annual Summer Reliability Assessment which found that under baseline summer conditions, the reserve margin is only

[13] *See* NYISO, *Short-Term Assessment of Reliability: 2026 Quarter 1* (Apr. 1, 2026); NYISO, 2025-2035 *Comprehensive Reliability Plan* (Nov. 21, 2025).

417 MW, which is the lowest it has been in recent history.[14]

The NYISO first found an actionable reliability need in New York City driven by load growth in its 2024 Reliability Needs Assessment ("RNA") for summer 2033.[15] The 2024 RNA found that when "accounting for forecasted economic growth and policy-driven increases in demand, the New York City (Zone J) will be deficient starting in summer 2033 by as much as 17 MW for 1 hour and increasing to 97 MW for 3 hours in summer 2034 on the peak day during expected weather conditions."[16]

During this same period, the NYISO saw significant amounts of large loads entering the interconnection queue; motivated by the State's economic development plans to lead in artificial intelligence ("AI") and Data Centers and the desire for New York to be a semiconductor hub. Resource adequacy issues resulting from large loads fall directly within the NYISO's and NYSRC's purview, however, the interconnection reforms proposed by the NYISO with respect to large load integration do not include considerations of resource adequacy, leaving this critical aspect of reliability to the NYISO's Reliability Planning processes.[17] The NYISO is currently evaluating multiple projects in the 2026 stakeholder process relating to large loads, which may include forecasting and reliability planning reforms.

The expected social and economic benefits of large load additions must be carefully

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[14] NYISO, Operating Committee Presentation: Summer 2026 Capacity Assessment (May 14, 2026), at pg. 3, 5, available at: https://www.nyiso.com/documents/20142/57796669/S2026%20Capacity%20Assessment%20for%20OC.pdf/0b4612fb-fb14-671f-98b1-89ec25d2732b.

[15] NYISO, 2024 Reliability Needs Assessment (RNA) (Nov. 19, 2024).

[16] *Id.* at 6.

[17] NYISO TPAS/ESPWH Meeting, *Load Interconnection Process: Challenges and Considerations* (Feb. 3, 2026), slide 16, available at: https://www.nyiso.com/documents/20142/56802634/04_Load_interconnection_reform_2-3-26_TPAS_final.pdf/063ff31f-a5ad-0494-707d-3275f007d23a.

balanced with potential system reliability and resilience concerns. Reliability impacts and risks can be accounted for, and adjusted over time, as the operational characteristics of each type of large load are understood. However, large load developer plans are driving towards implementation in time periods shorter than current generation or transmission expansion/interconnection efforts can accommodate.

Since the beginning of 2025, NERC has issued a series of incident reviews,[18] as well as a whitepaper titled "Assessment of Gaps in Existing Practices, Requirements, and Reliability Standards for Emerging Large Loads."[19] These findings by NERC highlight important impacts of large loads on bulk power system reliability, and provide industry with a list of recommendations for how to mitigate such impacts. Three highlighted reliability impacts that must be addressed locally include (1) system disturbance ride through, (2) mandatory automatic underfrequency load shedding requirements, and (3) rapid cyclic power demand variations of certain types of large loads.

Several regional reliability entities and utilities have developed large load interconnection standards to address the system security and operability issues that these loads can cause. Such standards are at advanced stages of development in the Electric Reliability Council of Texas[20],

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[18] NERC, *Industry Alert: Large Load Interconnection, Study, Commissioning, and Operations* (Sept. 9, 2026), available at:

https://www.nerc.com/globalassets/programs/bpsa/alerts/2025/nerc-alert-level-2--large-loads.pdf.

[19] NERC, *Assessment of Gaps in Existing Practices, Requirements, and Reliability Standards for Emerging Large Loads* (Mar. 2026) (hereinafter, "NERC Gaps Assessment"), available at: https://www.nerc.com/globalassets/our-work/guidelines/reliability/white-paper---assessment-of-gaps.pdf.

[20] *See* Electric Reliability Council of Texas, *Large Electronic Load Ride-Through Requirements,* available at: https://www.ercot.com/mktrules/issues/NOGRR282#summary; *see also*, Electric

Alberta Electric System Operator,[21] and the Midwest Independent System Operator.[22] Large load interconnection requirements have already been implemented by PSEG Long Island and were developed after extensive consultation with other utilities all over the country, examining their experiences with providing service to large loads.[23] These interconnection requirements address a range of large load issues including limitations on load variation, voltage and frequency ride-through requirements, destabilizing load characteristics, and power quality impacts.

A. System Disturbance Ride Through

With respect to system disturbance ride through, NERC has not yet set forth clearly defined voltage and frequency disturbance ride-through performance requirements for large loads that apply uniformly across North America, which leads to highly variable responses. While conventional loads are generally expected to remain connected through "reasonable" frequency and voltage disturbances, the formal definition of what constitutes reasonable and enforceable performance criteria is presently being established on a regional basis, if at all. Furthermore, many large load facilities have controls that remove their loads from the transmission system and transfer to their own backup sources in response to detection of a transmission system disturbance. The lack of uniform large load performance requirements can result in voltage, frequency, and angular

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Reliability Council of Texas, *Large Computational Load Ride-Through Requirements*, available at: https://www.ercot.com/mktrules/issues/NPRR1308.

[21] AESO, *Connection Requirements for Transmission-Connected Data Centres,* available at: https://aesoengage.aeso.ca/connection-requirements-for-transmission-connected-data-centres.

[22] MISO, *Large Load Interconnection Reliability Requirements LLWG-2026-3*, available at: https://www.misoenergy.org/engage/MISO-Dashboard/large-load-interconnection-reliability-requirements/.

[23] PSEG Long Island, *Performance Requirements for Large Loads Connected to The LIPA System* (Feb. 18, 2026) available at: https://www.psegliny.com/aboutpseglongisland/-/media/BB34AE143811453B8F5923C8E7C234BC.ashx.

instability of the bulk power system.

B. Automatic Underfrequency Load Shedding ("UFLS")

With respect to Automatic UFLS, it is imperative that large load impacts on Automatic UFLS programs be included before energization. Neither the NERC mandatory standard PRC-006-5 nor the NPCC mandatory regional standard PRC-006-NPCC-2 require this. Depending on their magnitude and point of interconnection to the NYCA, large loads should be required to participate in these programs, if it is found to be necessary after analysis by the connecting transmission owner and the NYISO. Such an analysis should occur early in the interconnection process, but it is not currently a timely consideration.

Automatic UFLS programs are essential because they prevent a cascading collapse of the NYCA by rapidly disconnecting selected loads when system frequency drops below predetermined levels, helping arrest frequency decline and avoid more widespread blackouts. The mandatory UFLS programs serve as a last-line of defense when system disturbances, such as generation-loss events, occur faster than operators using their manual load shedding capability can respond. Under mandatory NERC standards PRC-006-5 and PRC-006NPCC-2, it is a requirement that a certain amount of the load being served be included in the connecting transmission owner's Automatic UFLS program.[24]

The magnitude of large loads is such that there may be situations where the connecting transmission owner cannot place enough additional existing load under automatic underfrequency load shedding program control to comply with the requirements of the standards. The NYSRC

[24] *See* NERC PRC-006-5, PRC-006-NPCC-2 standards for the core requirements under NERC and the NPCC Region.

has provided comments on the need for Automatic UFLS in several FERC proceedings to date,[25] in addition to providing input to the NERC Board of Trustees during the development of NERC's Large Load Action Plan.[26] Further, the NYSRC Reliability Rules Subcommittee has issued a report with recommendations regarding Automatic UFLS which are in the process of being implemented through a reliability rule.[27]

The forthcoming DPS Staff whitepaper should undertake a thorough examination of this issue and make recommendations to the Commission regarding where the Automatic UFLS program-controlled loads should be obtained. Given the topology of the system and historic low reserve margins, the NYSRC believes there will be situations where there is no other choice but for large load project developers or their tenants (that control the operation of the load) to place the new load or a portion of it under the control of the mandatory Automatic UFLS programs. A thorough examination of this matter needs to be conducted in this proceeding.

C. Rapid Cyclic Power Demand Variations

Certain types of large load facilities, particularly data centers performing AI algorithm computations, are known to have large cyclic variations in the electric power demand. These loads can have multiple variations over much of the full range of demand within one second, with these

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[25] Docket No. AD24-11-000, *Large Loads Co-Located at Generating Facilities*, Post-Technical Conference Comments of the New York State Reliability Council (Dec. 9, 2024); Docket No. RM26-4-000, *Interconnection of Large Loads to the Interstate Transmission System*, Comments of the New York State Reliability Council in Response to Advanced Notice of Proposed Rulemaking (Nov. 21, 2025) available at: https://www.nysrc.org/wp-content/uploads/2025/11/NYSRC-ANOPR-Comments-RM26-4-000.pdf.

[26] NYSRC, Comments in Response to NERC Request for Policy Input on Large Load Reliability Risk Issues (Jan. 29, 2025).

[27] NYSRC, *Review of Under Frequency Load Shed Programs in Consideration of Rapidly Changing Resource Mix and Integration of Large Loads* (Jul. 30, 2025) available at: https://www.nysrc.org/wp-content/uploads/2026/03/5.5.1-Draft-UFLS-White-Paper-Version-July-30-Clean-Attachment-5.5.1.log_.pdf.

cycles persisting over a long period of time.[28] Such variations can stimulate oscillations in the transmission system that can lead to various forms of instability.[29] However, even more concerning, is the potential for these variations to cause stress on power plant turbine-generator mechanical systems that can cause catastrophic failure of critical power plants.[30] It is the NYSRC's understanding from speaking with industry experts that the expected repair time for such failures extends beyond one year, therefore, reliability risks are compounded by the loss of the damaged unit's generating capacity which aggravates the resource adequacy issues surrounding large additions.

The operational behavior of large computational loads represents such a significant risk to reliability that on May 4, 2026 NERC released its Level 3 Alert regarding large loads. The Level 3 Alert is the most serious of NERC alerts, requires essential actions to be undertaken with mandatory reporting by registered entities of active steps taken to mitigate risks from large load operational behavior.[31] The Alert outlines seven actions registered entities must implement to address immediate risks posed by computational loads interfacing with the bulk power system. The Level 3 Alert was issued as NERC observed that customer-initiated large load reductions

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[28] NERC, *Aggregated Report on NERC Level 2 Industry Recommendation: Large Load Interconnection, Study, Commissioning, and Operations*, available at: https://www.nerc.com/globalassets/programs/bpsa/alerts/2025/aggregated-report-level-2-large-load-interconnection-study-commissioning-and-operations.pdf.

[29] NERC, *Large Loads Task Force Whitepaper: Characteristics and Risks of Emerging Large Loads*, available at: https://www.nerc.com/globalassets/who-we-are/standing-committees/rstc/whitepaper-characteristics-and-risks-of-emerging-large-loads.pdf.

[30] EPRI, *Technical Report: Torsional Interaction Between Electrical Network Phenomena and Turbine-Generator Shafts* (Dec. 6, 2006), available at: https://restservice.epri.com/publicdownload/000000000001013460/0/Product.

[31] *NERC Level 3 Alert Regarding Computational Load Reliability Risks*, available at: https://www.nerc.com/globalassets/programs/bpsa/alerts/level-3-computational-load-alert.pdf.

triggered significant oscillations occurring in seconds, leaving little or no room for operator real-time responses, threatening bulk power system reliability. The NYSRC submits that DPS Staff should take this alert into account as it develops its report to the Commission.

D. Additional Reliability Concerns

The NYSRC also has several additional reliability concerns that it submits to DPS Staff for consideration and review. The first is sudden changes in the active power demand of large loads. Large loads have potential to cause up to one gigawatt-scale changes in bulk power system real power flows within a few electrical cycles (50 milliseconds in a 60 Hertz system).[32] This can create either over- or under-voltage conditions and demand/supply issues. This concern is discussed in detail in NERC's Gaps Assessment.[33]

Another action that the Commission should consider in this proceeding is requiring performance verification and monitoring of large loads using high-speed, high-resolution monitoring devices. This could include requiring high-speed disturbance data capture devices to monitor and assess the operational performance of large loads (*e.g.*, Phasor Measurement Units) and high-resolution data monitoring and fault capture (*e.g.*, advanced Digital Fault Recorders) to record and analyze disturbances. Use of performance verification and monitoring devices could help by providing a range of the behaviors of the large loads for analysis as to their impact on the bulk power system. In some cases, protective systems may be needed to enforce load variation limits by removing loads that do not conform to requirements.

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[32] *See* NERC, *Incident Review: Voltage Sensitive Crypto Load Reductions* (Jan. 9, 2026) available at: https://www.nerc.com/globalassets/our-work/reports/event-reports/incident_review_considering_voltage-sensitive_crypto_load_reductions.pdf; *see also* NERC, *Incident Review: Considering Simultaneous Voltage-Sensitive Load Reductions* (Jan. 8, 2025) available at: https://www.nerc.com/globalassets/our-work/reports/event-reports/incident_review_large_load_loss.pdf.

[33] *See* NERC Gaps Assessment, pg. 27.

Based on large load related disturbance events reported via NERC to date, it is clear that new large load operating behavior will require greater understanding and study. Data collection and analysis are essential to developing that understanding. The forthcoming DPS Staff whitepaper should consider a requirement that large load operating behavior data be obtained, anonymized, reported, and consolidated for use by the industry to provide high resolution information about how large loads are operating within NYCA. The NERC's Whitepaper titled "Characteristics and Risks of Emerging Large Loads" is informative on the identified risks presented by large load additions and provides a starting point for DPS Staff to consider as it develops its recommendations.[34] In furtherance of the work it is undertaking, the NYSRC LLWG has compiled a list of reliability risks for large load that the NYSRC submits for DPS Staff to review and incorporate into its whitepaper analysis.[35]

On May 1, 2026, NERC released a document titled "Risk Mitigation for Emerging Large Loads-Reliability Guideline."[36] The document is a preliminary guide while NERC works through its standards development process to address the risks posed by the connection and operation of Large Loads. NERC states:

> [t]his preliminary reliability guideline provides actionable BPS reliability-enhancing guidance for existing NERC registered entities as well as large load entities and their original equipment manufacturers (OEM). Reliable integration of emerging large loads is not only essential for protecting the BPS but also to accommodate additional large loads faster. When interconnection and operational processes are structured to ensure reliability from the outset,

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[34] NERC, *Large Loads Task Force White Paper: Characteristics and Risks of Emerging Large Loads* (Jul. 2025) available at: https://www.nerc.com/globalassets/who-we-are/standing-committees/rstc/whitepaper-characteristics-and-risks-of-emerging-large-loads.pdf.

[35] NYSRC LLWG, Reliability Risks for Large Loads (Mar. 20, 2026).

[36] NERC LLWG, *Guideline: Risk Mitigation for Emerging Large Loads* (May 2026) available at: https://www.nerc.com/globalassets/our-work/guidelines/reliability/RG_Risk-Mitigation-For-Emerging-Large-Loads.pdf.

emerging large loads can connect faster and in greater magnitude.

Currently the guideline serves as a bridge to mandatory standards and is voluntary and non-binding. NERC recommends – and the NYSRC agrees – that applicable functional entities implement the crucial risk mitigating actions and processes offered in this guideline. NERC is currently updating its registry criteria and its Reliability Standards to account for the changes needed to reliably connect large loads, which will take time. The NERC guideline provides key information as the many regulatory processes in North America move forward to address the reliability risks posed by the connection of city-sized loads with very new operating behaviors. Implementing the guideline recommendations will enhance system resilience, reduce outage risks, and if integrated into the interconnection review and design process, they will result in a more efficient interconnection process. This guideline also identifies potential future revisions to NERC's mandatory Reliability Standards. The NYSRC strongly recommends that DPS Staff take note of this document and integrate its recommendations into the forthcoming DPS Staff whitepaper. The NYSRC is prepared to assist DPS Staff with any specific NYCA questions it may have after its review of this guideline as it develops its report to the Commission.

III. CONCLUSION

The reliable and resilient interconnection of large loads is an emerging challenge for the industry, as evidenced by the numerous activities noted above and across a broad spectrum of venues. It is important to stay ahead of this curve and provide guidance to large load developers, interconnecting utilities, and the NYISO regarding technical expectations and requirements needed to preserve system reliability. There are several activities underway within FERC, NERC, NPCC, NYISO and the NYSRC which will influence this effort and should be addressed in DPS Staff's whitepaper.

The NYSRC appreciates the opportunity to provide comments in this proceeding to focus on technical matters pertaining to reliability. It is vital that all state and federal entities involved in the integration of large loads on the NYCA portion of the bulk power system in the Eastern Interconnection coordinate their efforts to ensure reliable operation of the bulk power system and to avoid duplicative, overlapping, and potentially conflicting efforts.

The NYSRC is available to serve as a partner with DPS Staff and to provide its expertise on potential large load reliability and resilience impacts as this proceeding continues to progress.

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Respectfully Submitted,

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