

TRACK 1: ENERGY POLICY

ReliabilityFirst Fall Reliability & Security Summit

September 16, 2026



RELIABILITY FIRST

The sole purpose of this presentation is to provide technical reliability-related information based on ReliabilityFirst's expertise. This communication is not intended to be and should not be interpreted as advocating for a specific position or outcome.

Preparing for Load Growth: Insights from the Large Load Working Group (LLWG)

Wayman Smith

Director, Transmission & Distribution
Planning, AEP

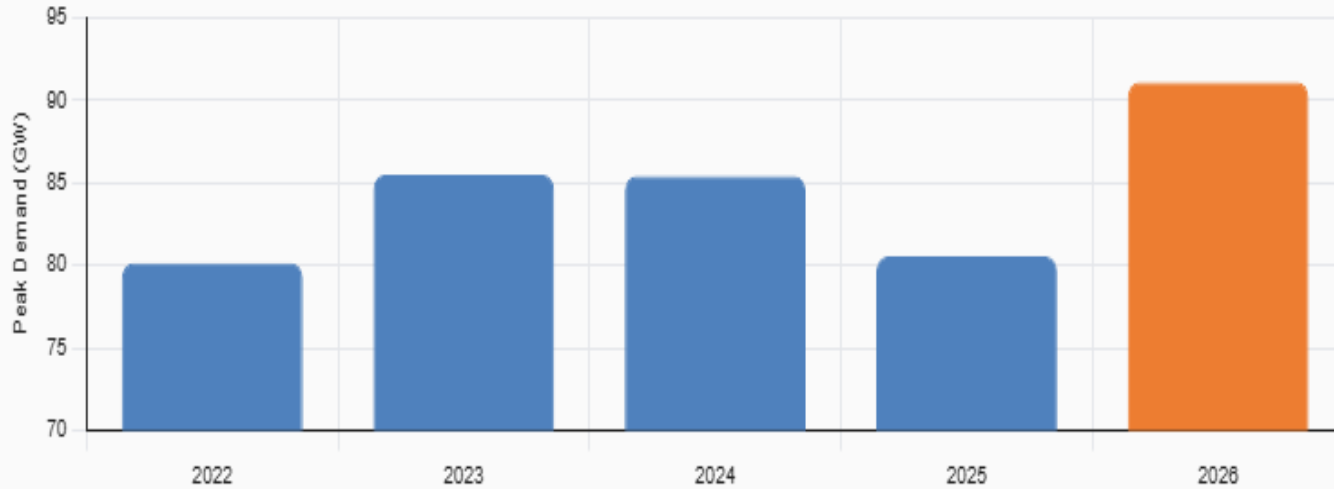


Preparing for load growth: Insights from the Large Load Working Group

The ERCOT Large Load Experience

ERCOT Demand & Resource Mix

ERCOT Peak Demand Trend (2022-2026)

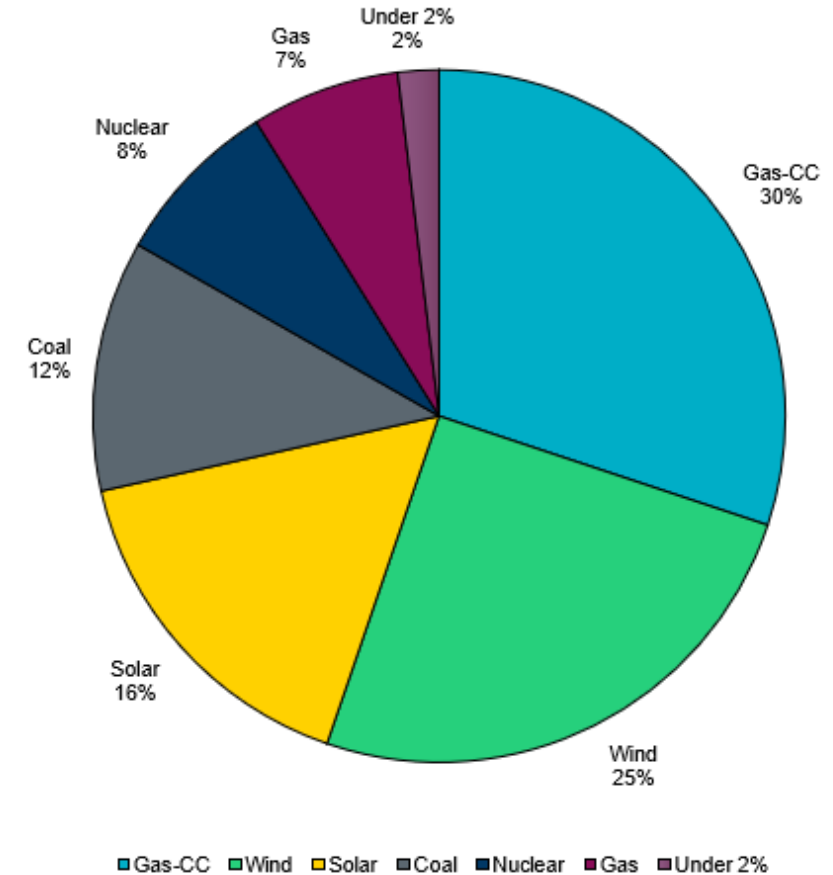


ERCOT as compared to Eastern Interconnect:

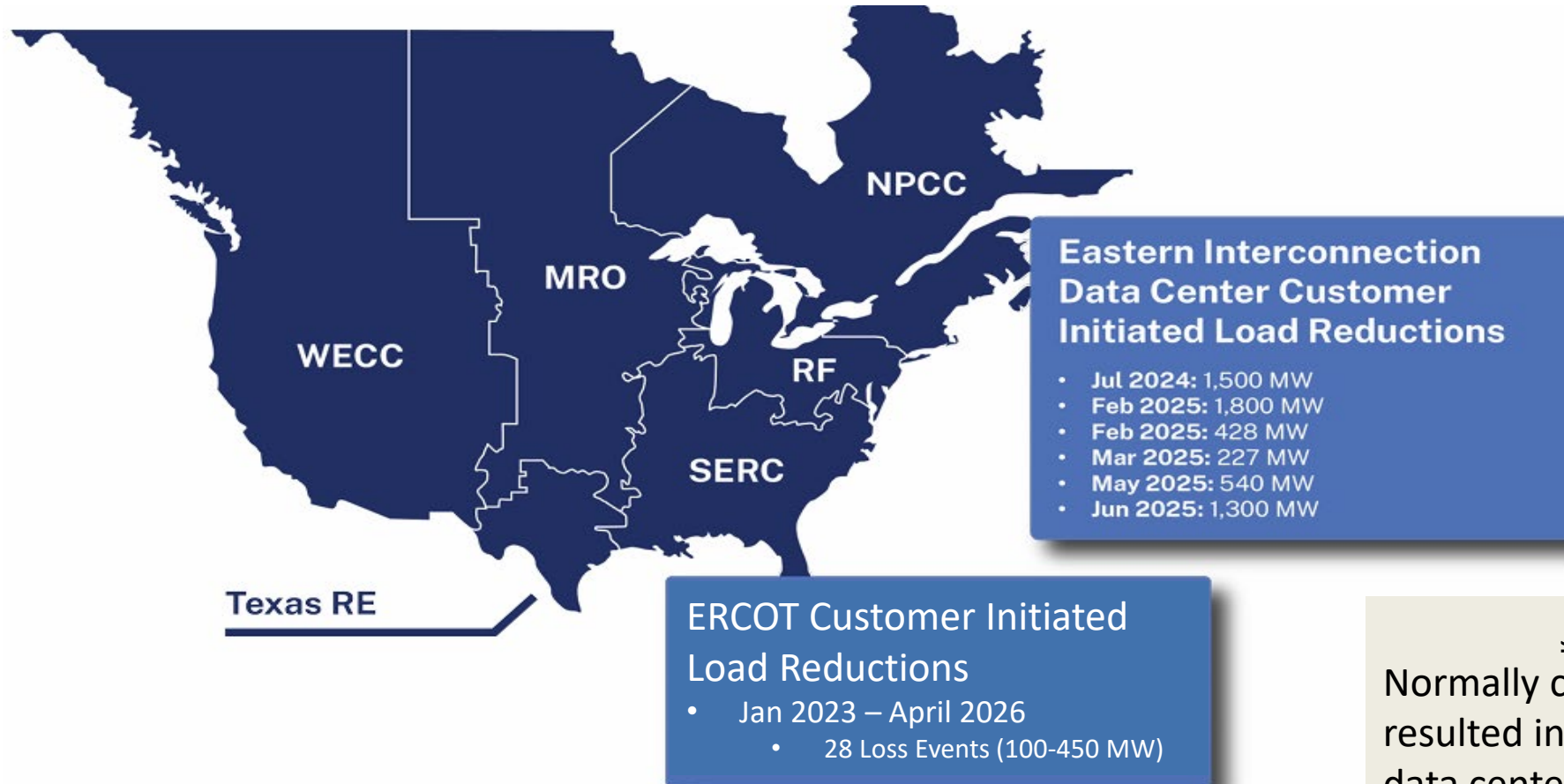
- Lower inertia per MW of load
- Rate of Change of Frequency (RoCoF) is much higher
- Lower system strength in many areas due to IBR concentration and fewer network connections

Greater sensitivity to Large Electronic Loads !

Energy by Fuel for 2026



Customer Initiated Load Reduction Events



July 22, 2026 Event
Normally cleared fault in Dominion resulted in approximately 3.8GW of data center load reduction



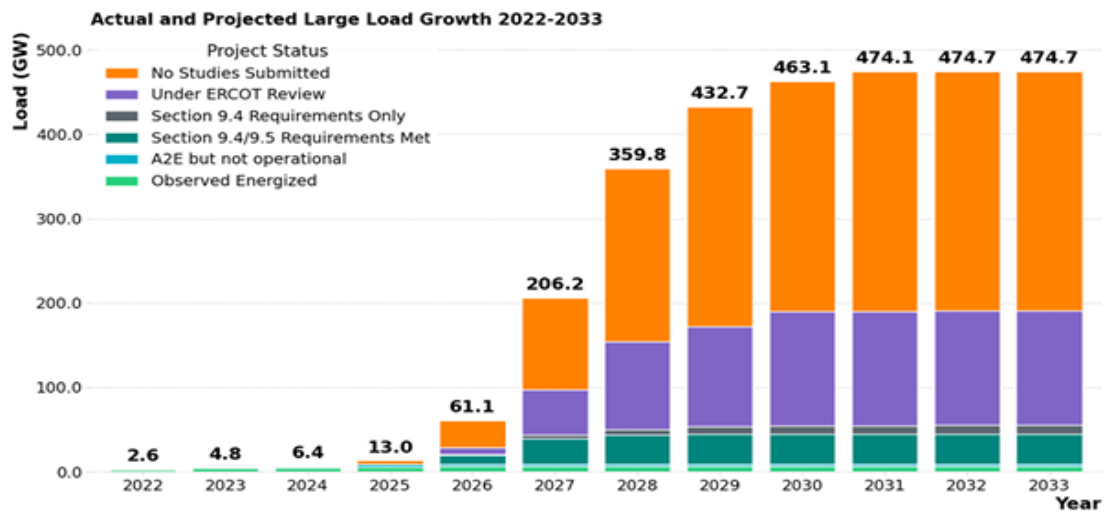
ERCOT Large Load Queue



PUBLIC

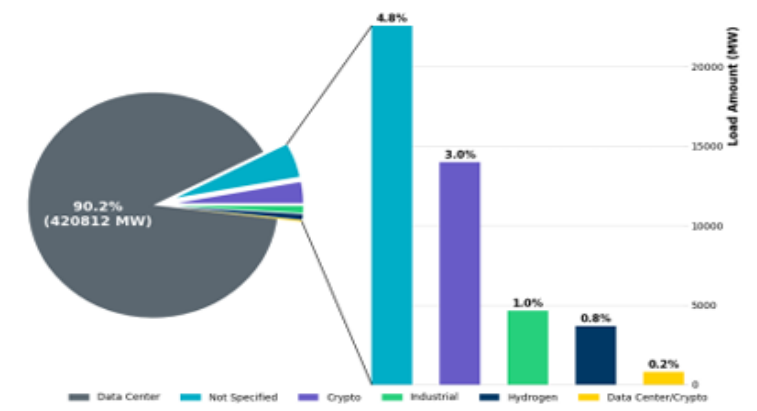
Large Load Interconnection Requests (as of June 2026)

Actual and Projected Large Loads Growth 2022-2033



Project Status	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033
No Studies Submitted	0.0	0.0	0.0	4.1	32.8	109.0	205.8	261.0	273.5	284.0	284.3	284.3
Under ERCOT Review	0.0	0.0	0.0	0.0	7.5	53.5	103.6	118.5	135.1	135.5	135.5	135.5
Section 9.4 Requirements Only	0.0	0.0	0.0	0.0	1.5	4.7	6.3	8.5	9.9	9.9	9.9	9.9
Section 9.4/9.5 Requirements Met	0.0	0.0	0.0	0.0	10.2	29.9	35.0	35.7	35.7	35.7	36.0	36.0
A2E but not operational	0.0	0.3	1.4	3.0	3.2	3.2	3.2	3.2	3.2	3.2	3.2	3.2
Observed Energized	2.6	4.5	5.0	5.8	5.9	5.9	5.9	5.9	5.9	5.9	5.9	5.9
Total (GW)	2.6	4.8	6.4	13.0	61.1	206.2	359.8	432.7	463.1	474.1	474.7	474.7

Large Loads by Project Type



Key Takeaway: ERCOT is tracking approximately 474 GW of Large Loads seeking interconnection, of which ~90% are data centers.

28 CILR Events with 4-6 GW of Large Loads

ERCOT Large Load Study Process

“Interim” Large Load Process

- Each large load request was studied separately
- Studies were primarily conducted by the host TSP
- ERCOT reviewed study results and determined whether additional analysis was needed
- New requests entering the same area often required existing studies to be **restudied**
- Transmission impacts were generally evaluated from a local or regional perspective rather than across the entire ERCOT system

Batch Study Model

- System-Wide Evaluation
- Rather than evaluating projects individually, ERCOT studies groups of requests together using common assumptions and planning cases
- Batch Zero serves as the transition mechanism from the legacy PGRR115 queue to the new process
 - Base Load
 - Studied Load
 - Excluded Load
 - Based on readiness, agreements, and study status

Volume and scale of large load requests require holistic approach

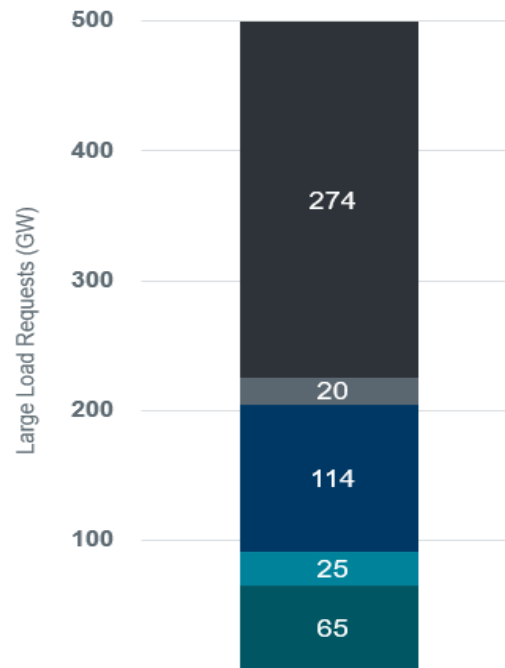
How Many Loads in Batch 0?



PUBLIC

Preliminary Overview of Batch Zero Eligibility

NOTE: The following data is preliminary and only reflects eligibility for inclusion in Batch Zero. ERCOT will review all application materials and make final determinations of which loads are included in the study on or before August 7. ERCOT will communicate the results by September 2.



- Not Included In Batch Zero – No Qualifying Study (315 Projects):** These loads did not have an existing study that qualified them for inclusion in Batch Zero.
- Not Included In Batch Zero – No Dynamic Model (47):** These loads had one or more studies that made them eligible for inclusion but were removed when no dynamic model was submitted to ERCOT by July 10.
- Eligible for Inclusion as Allocated Load (127):** These loads have existing studies that make them eligible for inclusion as allocated load and submitted the required dynamic model data to ERCOT by July 10.
- Eligible for Inclusion, Base or Allocated Load to be Determined (49):** These loads have existing studies that make them eligible for inclusion in Batch Zero and submitted the required dynamic model data to ERCOT by July 10. ERCOT will review the studies according to Planning Guide 9.2.1.4(4) by August 7 to determine if the load will be treated as base load or allocated load.
- Eligible for Inclusion as Base Load (150):** These loads have existing studies that make them eligible for inclusion as base load and submitted the required dynamic model data to ERCOT by July 10.

Key Takeaways

- Approximately 205 GW of Large Load is eligible for inclusion in Batch Zero based on existing studies
- ERCOT will make final determinations of which loads are included in the study on or before August 7 and communicate the results by September 2

Data as of July 28, 2026

ERCOT Batch Zero Composition

Preliminary Batch Zero Eligibility Results

Category	GW	Projects
Eligible as Base Load	65 GW	150
Eligible, Base vs. Allocated Load TBD	25 GW	49
Eligible as Allocated Load	114 GW	127
Total Eligible	204 GW	326
Not Included, No Dynamic Model	20 GW	47
Not Included, No Qualifying Study	274 GW	315
Total Submitted	498 GW	688

Batch Zero Status

- Original schedule targeted August for final Batch Zero qualification and April, 2027 for the Batch Zero Interconnection Study results.

August 3, 2026 Governor Abbott directive:

- Governor Abbott instructed the PUCT and ERCOT to conduct a "comprehensive verification and audit" of data centers advancing through ERCOT's large-load interconnection process before those projects could continue moving forward.
- Immediate Impact on Batch Zero
 - Upon receiving the directive, ERCOT:
 - Paused the Batch Zero study process.
 - Delayed the August 7 classification notices.
 - Suspended approvals to energize new large data centers and crypto facilities of 75 MW or greater.
 - Requested Good Cause Exceptions from the PUCT to modify the Batch Zero schedule.

BZ Eligibility and Community Impact Reviews

1. Batch Zero Eligibility Verification

ERCOT would confirm that every large load included in Batch Zero actually satisfied the applicable PGRR145 eligibility criteria. This included:

- Reviewing eligibility attestations.
- Requesting supporting documentation from TSPs and DSPs.
- Performing site-readiness verification for certain projects.
- Providing an opportunity to cure deficiencies.
- Disqualifying projects that failed verification or did not respond.

2. Community Impact Review

ERCOT would collect additional information from data center and crypto projects of 25 MW and larger regarding:

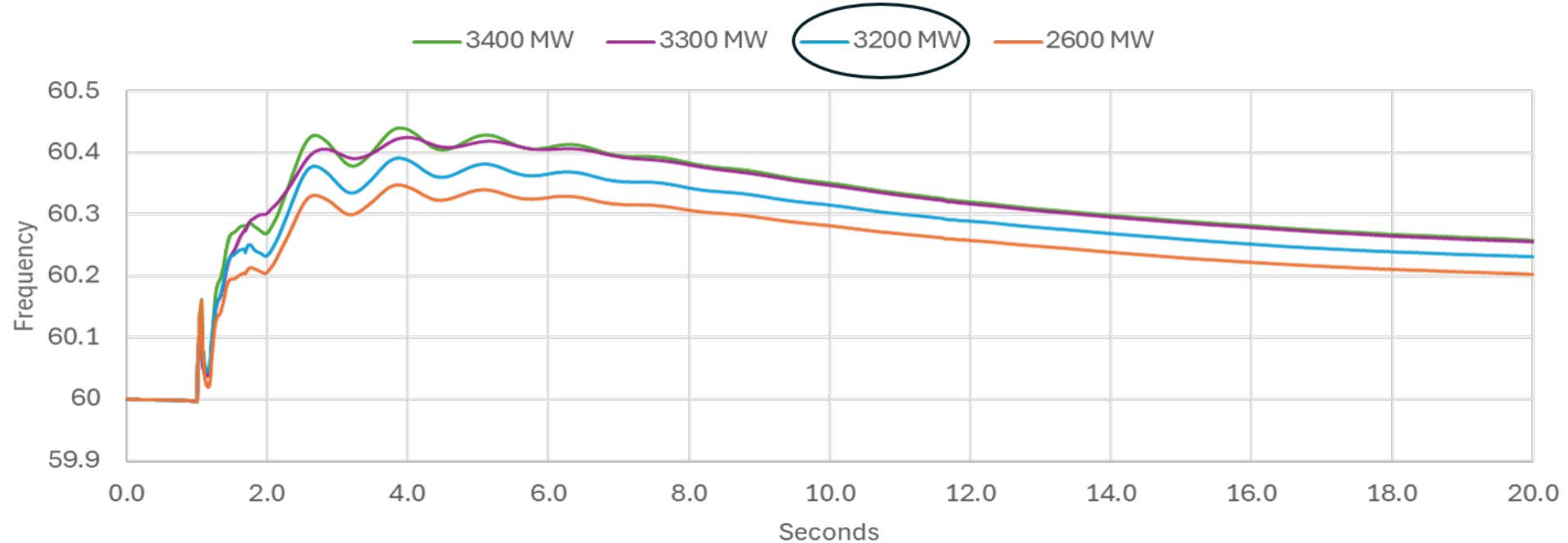
- Grid impacts
- Water usage
- Public financial assistance
- Ownership
- Community impacts
- On-site generation arrangements

Major Reliability Concerns with Large Computational Loads

- Customer Initiated Load Reductions (CILR)
 - Voltage Ride-Through
 - Frequency Ride-Through
- Post-Fault Active Power Recovery (PFAPR)

ERCOT Frequency Limit Study

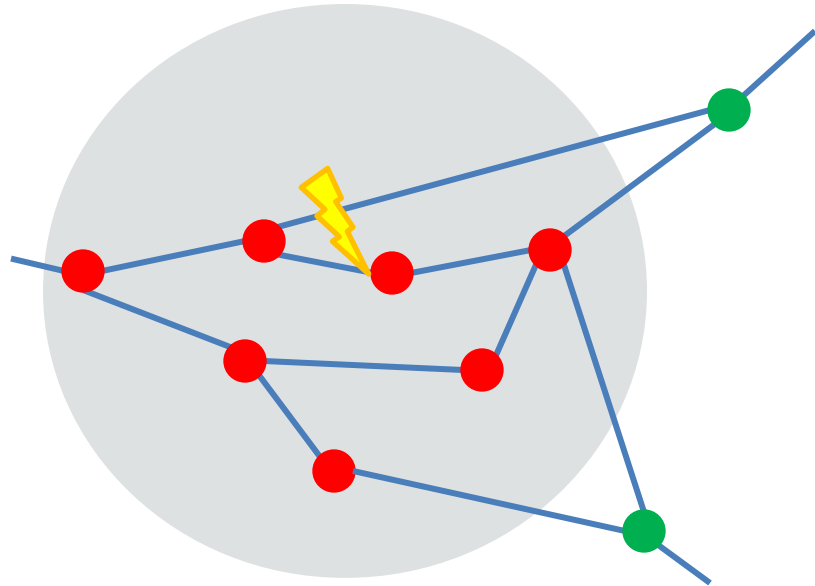
Bus Frequency for different load loss levels from original study case



MW Load Loss	Frequency Max
~3,400	60.43
~3,300	60.43
~3,200	60.38
~2,600	60.21

System frequency above 60.4Hz raises concern that generators may not ride-through which could lead to an uncontrolled cascading event

What is Voltage Ride-Through?



Location of the fault



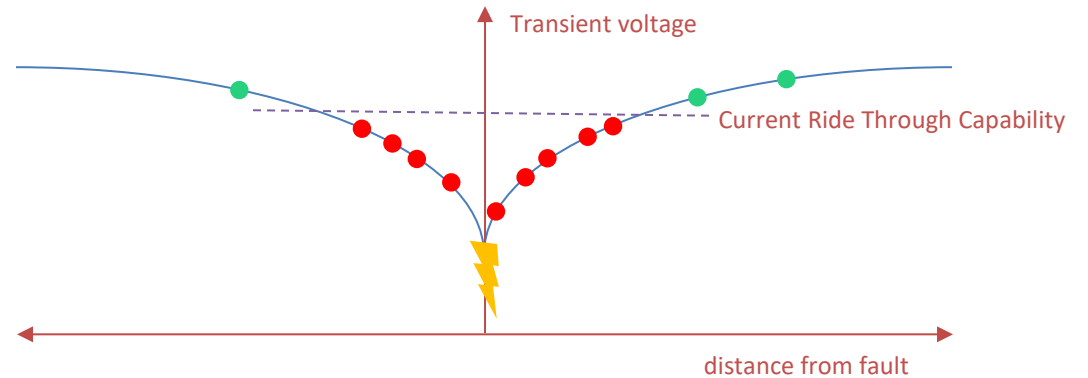
Area affected by voltage dip resulting from the fault



Equipment located outside the area of voltage dip

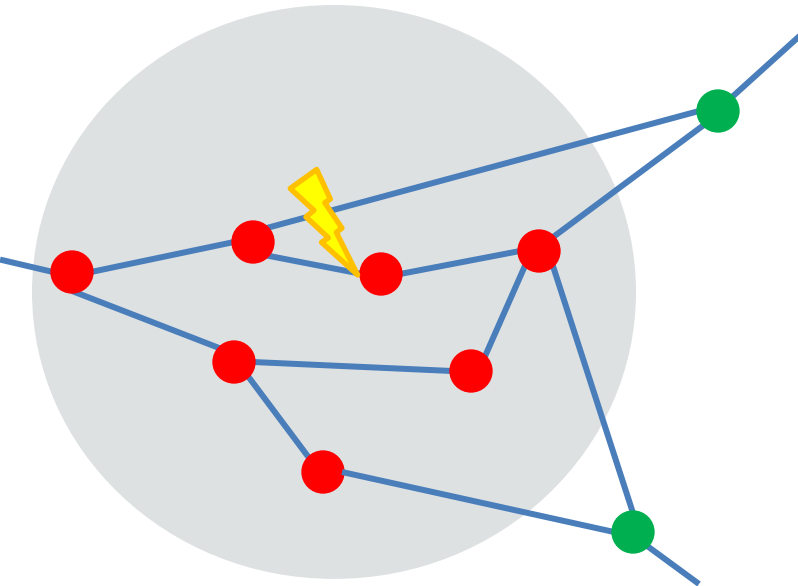


Equipment located inside the area of voltage dip (may trip if unable to ride-through)

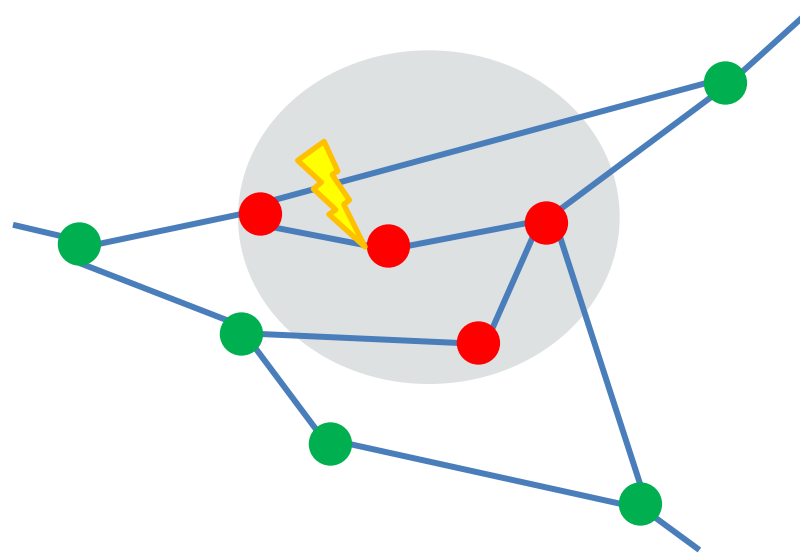


Grid-Side Mitigations Can Help...

Weaker Grid



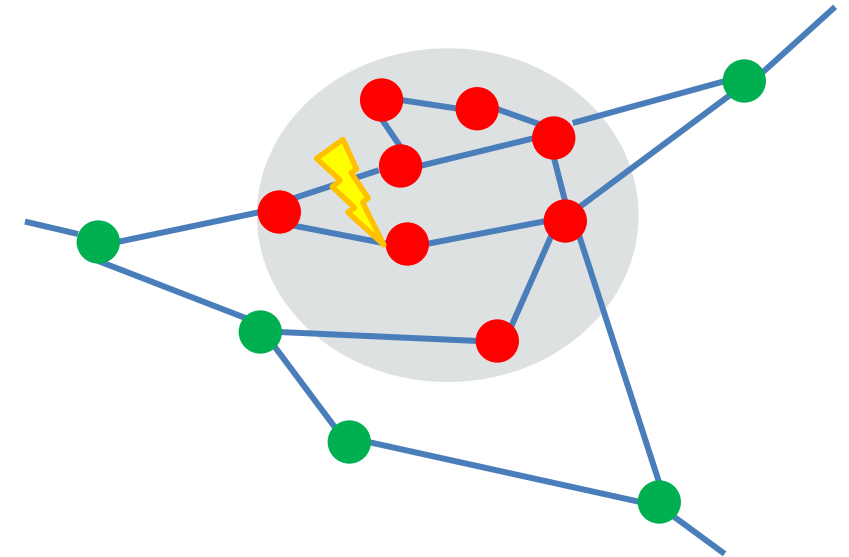
Stronger Grid



Strengthening the grid reduces the area affected by voltage dip during a fault

- New network connections, Statcom, E-Statcom, etc

Stronger Grid with Dense Concentration of Voltage-Sensitive Equipment



The area affected by the voltage dip is the same size, but there is more equipment concentrated in that area



Location of the fault



Area affected by voltage dip resulting from the fault



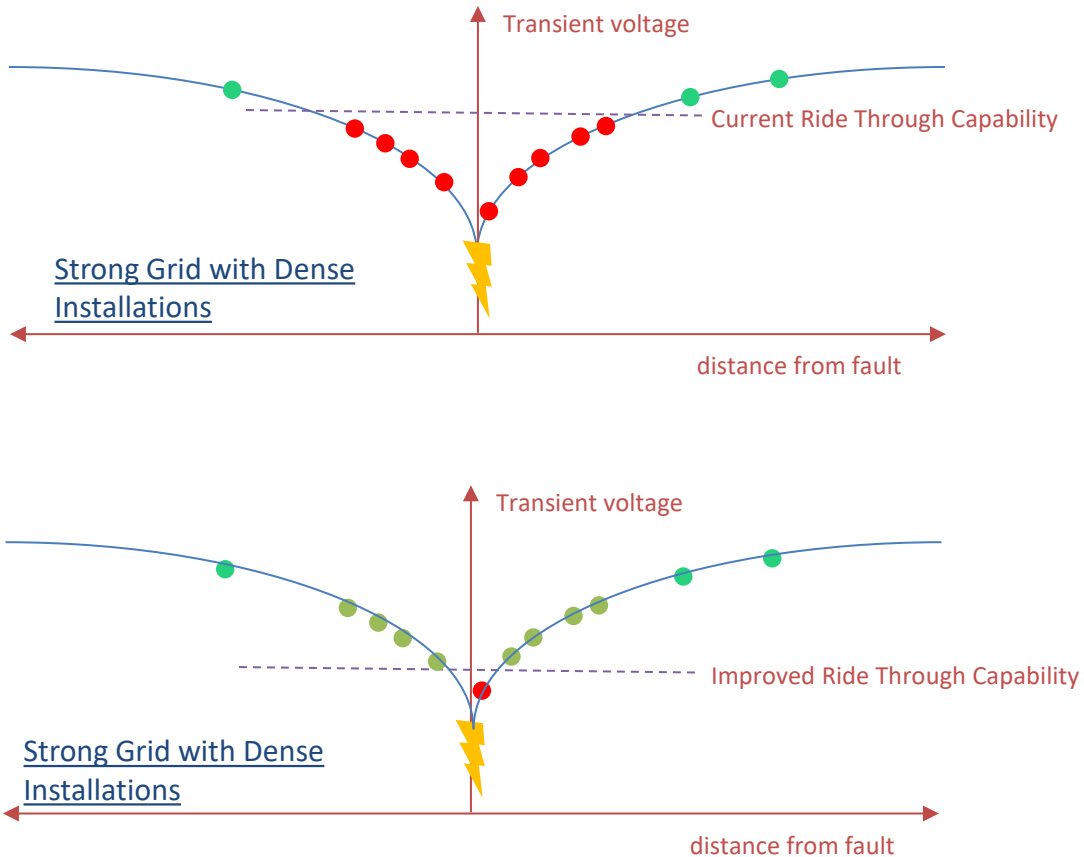
Equipment located outside the area of voltage dip



Equipment located inside the area of voltage dip (may trip if unable to ride-through)

BUT there may still be a problem

More Help is Needed



- If the amount of LELs affected by the voltage dip is too high, it may cause instability or cascading if it does not ride through
- Improvement of ride-through capability at each facility will reduce aggregate risk

Key Takeaway: Improved Ride-Through Capability is needed.

What is ERCOT Doing?

- ERCOT proposed NOGRR 282 and NPRR 1308
 - establish performance requirements for Large Electronic Loads (LELs), defined generally as large loads (>75 MW) where at least 50% of demand is computational load such as data centers and crypto-mining facilities
 - The requirements include:
 - Voltage ride-through (VRT)
 - Frequency ride-through (FRT)
 - Demonstration of compliance
 - Potential corrective actions for non-compliance
- Became effective August, 2026

NERC Activity on Computational Loads

What is NERC Doing?

- NERC established Large Load Task Force (LLTF), now Large Load Working Group (LLWG) in October 2024
 - Foundational Documents
 - Characteristics and risks white paper (July 2025)
 - Assessment of gaps in existing practices, requirements and reliability standards (March 2026)
 - SAR Roadmap
- Revisions to Rules of Procedure (ROP)
 - Registration for Computational Loads
 - Rules of Procedure (ROP) revisions out for comment (09-18-2026):
 - Create a new defined term: Computational Load Site (CLS)
 - Create new NERC registration categories:
 - » Computational Load Owner (CLO)
 - » Computational Load Operator (CLOP)
 - Establish registration criteria identifying which large computational loads become NERC registered entities.
 - Draft threshold is greater than or equal to 50MW connected to BPS at 100kV or above
- Initiated Project 2026-02 Computational Loads

Project 2026-02 Computational Loads

- Develops New Reliability Standards
 - CLO-001-1 Computational Load Interconnection, Studies, & Modeling Data
 - CLO-002-1 – Computational Load Operational Data and Communications
 - CLO-003-1 – Computational Load Protection Coordination & Disturbance Monitoring
- Modifies Existing Standards
 - FAC-001 (Interconnection Requirements)
 - FAC-002 (Interconnection Studies)
- Draw Heavily from Existing Standards

CLO-001-1

Computational Load Interconnection, Studies & Modeling Data (11 Requirements)

Purpose

- Establish reliability requirements for interconnection, study, commissioning, and modeling of large Computational Load Sites connected to the Bulk Power System.
- Ensure computational loads are accurately represented in planning assessments from project inception through operation.

Key Requirements

- Interconnection coordination and commissioning processes.
- Planning and reliability studies for new and modified computational loads.
- Identification and evaluation of qualified changes to existing sites.
- Provision, verification, and maintenance of model data.

Reliability Benefits

- Improves visibility into computational load characteristics before energization.
- Reduces planning uncertainty through standardized study and modeling requirements.
- Improves accuracy of reliability assessments and planning cases.
- Provides a consistent framework for evaluating large electronic load impacts across North America.

CLO-001 establishes the planning and modeling foundation necessary to reliably integrate large computational loads into the Bulk Power System.

CLO-002-1

Computational Load Operational Data & Communications (15 Requirements)

Purpose

- Ensure Reliability Coordinators, Balancing Authorities, and Transmission Operators have the operational data and communication capabilities needed to reliably manage large computational loads.

Key Requirements

- Provision of operational data needed for real-time reliability assessments.
- Establishment of interpersonal communications between computational load operators and grid operators.
- Communication protocols for receiving and responding to Operating Instructions.
- Procedures supporting prompt reliability actions during abnormal system conditions.

Reliability Benefits

- Improves operator situational awareness of large computational loads.
- Enables timely coordination between load operators and grid operators.
- Supports effective response to reliability events and operating instructions.
- Enhances operational visibility during load ramping, curtailments, and reconnection events.

CLO-002 provides the operational visibility and communication pathways needed to manage large computational loads in real time

CLO-003-1

Computational Load Protection Coordination & Disturbance Monitoring (10 Requirements)

Purpose

- Establish protection coordination and disturbance monitoring requirements for Computational Load Sites.

Key Requirements

- Coordinate protection systems between computational loads and the interconnected grid.
- Install and maintain disturbance monitoring equipment.
- Capture high-resolution event data for post-event analysis.

Reliability Benefits

- Reduces the risk of unnecessary or widespread load trips caused by protection miscoordination.
- Improves understanding of computational load behavior during disturbances.
- Provides high-resolution event data to support root-cause analysis and corrective actions.
- Supports model validation and continuous reliability improvements.

CLO-003 creates the monitoring and protection framework needed to understand, analyze, and mitigate reliability impacts from large computational load disturbances.

Proposed Implementation Plan

CLO-001			
	Applicability	Requirements	Implementation
Interconnection Process & Requirements	TO, DP, GO	R1, R2, R3	Reg Approval → Next Quarter → +6 Months
Qualified Change & Modeling Data Specifications	TP, PC	R7, R8	Reg Approval → Next Quarter → +3 Months
Study Coordination	TP, PC, TO, DP, GO, CLO	R4, R5, R6	Reg Approval → Next Quarter → +9 Months
Provision of Modeling Data & Data Verification	CLO	R9, R10, R11	Reg Approval → Next Quarter → +9 Months

CLO-002			
	Applicability	Requirements	Implementation
Operational Data Specifications	RC, BA, TOP	R1, R2, R3, R4, R5, R6	Reg Approval → Next Quarter → +6 Months
Provision of Operational Data	CLO, CLOP	R7	Reg Approval → Next Quarter → +12 Months
Adherence to Operating Instructions*	CLOP	R8, R9	Reg Approval → Next Quarter → +12 Months
Interpersonal Communications*	TOP, BA, CLOP	R10, R11, R12, R13	Reg Approval → Next Quarter → +12 Months
Oral Communication Protocol & Training*	CLOP	R14, R15	Reg Approval → Next Quarter → +12 Months

*Deadline extension possible under certain circumstances for R8-R15

CLO-003			
	Applicability	Requirements	Implementation
Protection Coordination	CLO	R9, R10	Reg Approval → Next Quarter → +9 Months
SER, FR, and DDR Monitoring Equipment**	CLO, TO, GO, DP	R1* – R8	Reg Approval → Next Quarter (Effective Date) Sites In-Service Prior to Effective Date +36 Months Sites In-Service After Effective Date +15 Months

*SER data in R1 is only applicable to CLO

** Deadline extension possible under certain circumstances for R1-R8

NERC LLWG SAR Roadmap



Figure 1: SAR/SIR Development Roadmap³

³ The timeline shown reflects SAR development (the proposal for a standard project), not the standard project development process (the process that develops and formalizes regulations).

NERC LLWG Near-Term Actions

- DRAFT White Paper: Large Load Disturbance Performance: Impact Analysis and Ride-Through Recommendations
- Draft SAR: Disturbance Performance Requirements for Computational Loads (comment period)
 - Establish explicit disturbance ride-through expectations
 - Address Customer-Initiated Load Reduction (CILR) events
 - Define performance expectations during voltage and frequency disturbances
- White Paper in Progress: Simulation and Study Considerations for Large Loads
 - Describe when positive sequence phasor domain dynamic studies are necessary and when EMT modeling and studies are required
 - Identify the types of studies (e.g. SSO, control interactions, torsional studies, etc.) applicable to each study method
- Added to LLWG Work Plan
 - SAR: Studying Computational Load Loss in Planning and Near-Term Reliability Studies
 - SAR: Computational Load Event Reporting, Model Validation, and Quality Assessment



SESSION BREAK

Energy Assurance: Strengthening Preparedness Across the Electricity Sector

Tim Fryfogle

Principal Engineer - Resources, Engineering,
& System Performance, ReliabilityFirst



AGENDA

ELECTRIC GRID OVERVIEW

RESOURCE ADEQUACY

ENERGY ASSESSMENTS

SOLUTIONS FOR CONSIDERATION

THE ELECTRIC GRID

From Power Generation to End Users

1. GENERATION

Electricity is produced at power plants.

2. TRANSMISSION

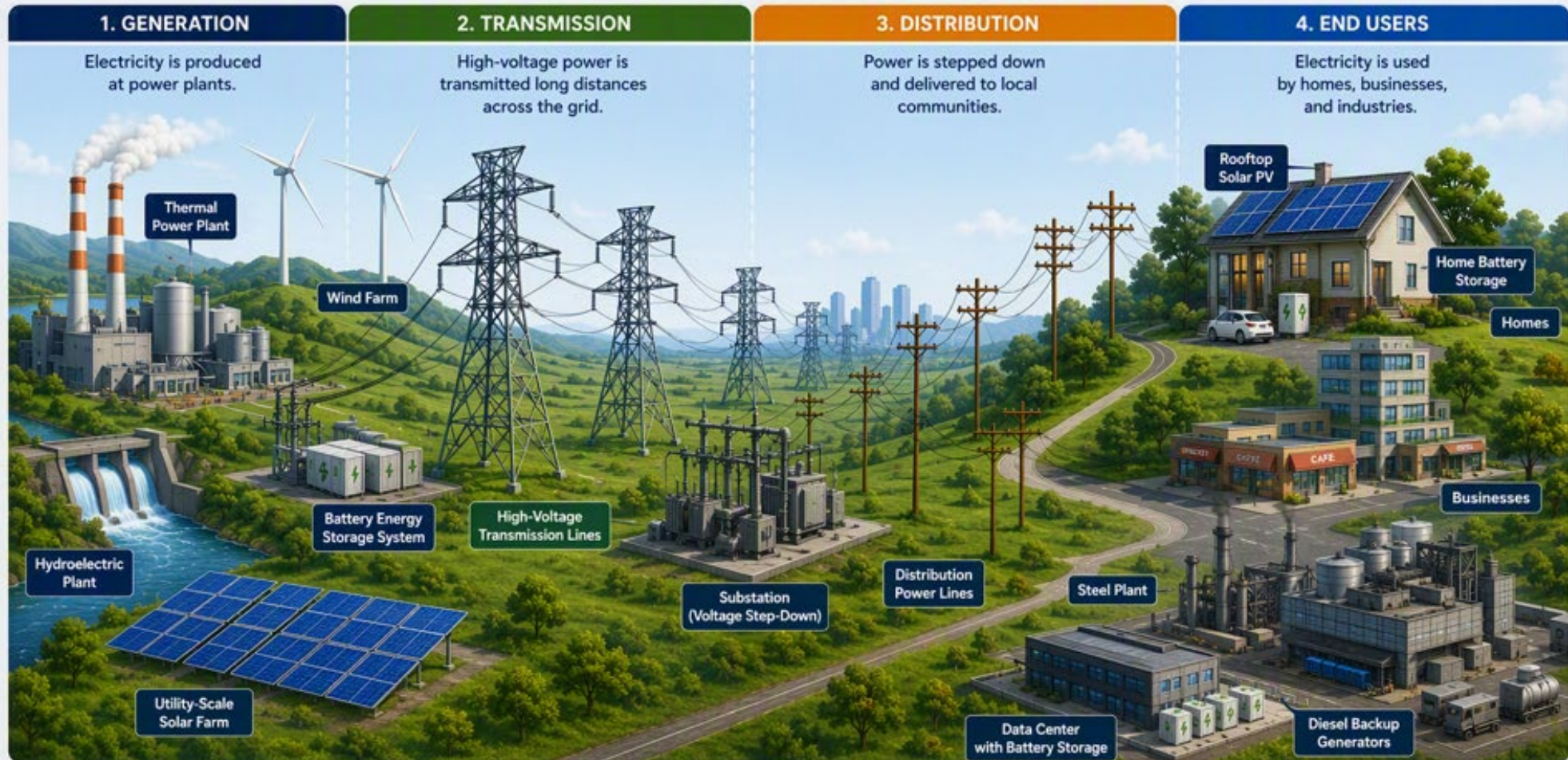
High-voltage power is transmitted long distances across the grid.

3. DISTRIBUTION

Power is stepped down and delivered to local communities.

4. END USERS

Electricity is used by homes, businesses, and industries.



Reliable

Delivering power when it's needed.



Resilient

Withstanding storms, faults, and disruptions.



Efficient

Operating the grid safely and economically.



Sustainable

Integrating clean energy for the future.

SERVING GROWING DEMAND



Proper modeling and planning are critical to enabling regional economic growth

Computational load impacts

Data centers, manufacturing, and electrification can concentrate demand in locations where the grid was not originally designed for that scale.

Why it matters

Reliability risk can constrain economic development if infrastructure cannot keep pace with demand growth.

MAKING GENERATION DELIVERABLE

The question is not just "how much supply?" – but also, "can it **serve** load?"



Generation location matters

New resources may be far from the customers or load centers they are intended to serve.



Constraints matter

A bottleneck can limit deliverability even when enough generation exists in the region. It can also restrict dispatch of lower cost resources.



Timing matters

Generation additions and transmission reinforcements may not move on the same schedule.

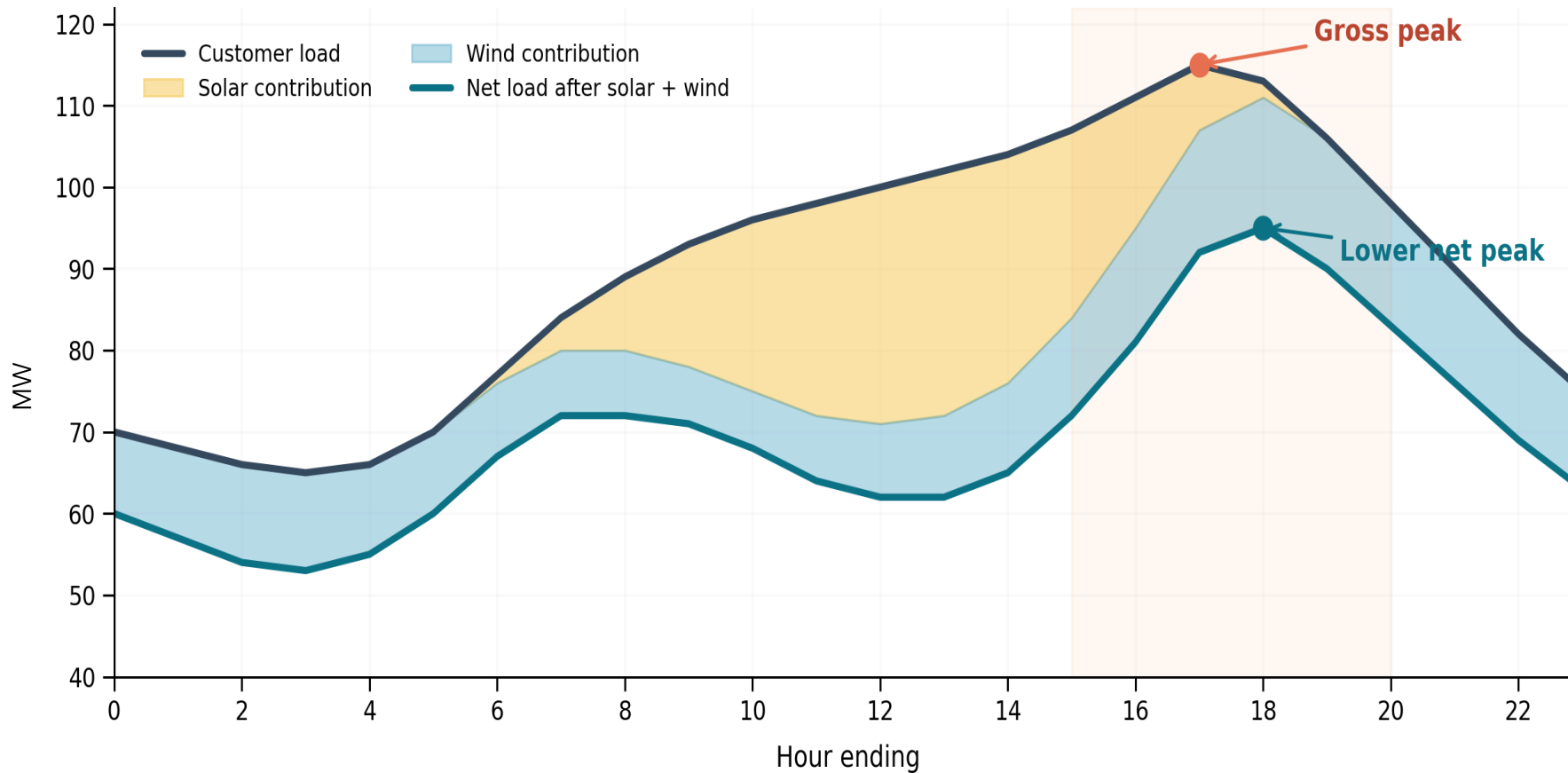
Deliverability impacts operational limitation, cost to connect, interconnection timing, and local reliability.



TYPICAL PEAK LOAD DAY: SOLAR AND WIND BENEFITS

Variable generation reduces net load, but the timing of output determines the contribution during the peak-risk window

Illustrative Typical Summer Peak Day



KEY BENEFITS

- Solar lowers daytime load**
Strong midday production reduces the load served by other resources.
- Wind broadens coverage**
Output can contribute across daytime and evening hours.
- Combined output lowers net peak**
Solar and wind together reduce the height of the remaining net-load peak.
- Timing still matters**
Solar output declines toward evening, so wind and other flexible resources remain important.

Illustrative normalized profiles, not actual system data

NERC'S SUBJECT MATTER EXPERTS

Governance, technical review and wide-area modeling combine to produce actionable bulk power system reliability insight.



NERC

North American Electric Reliability Corporation

Sets and enforces reliability standards and assesses reliability of the North American bulk power system.

RAS

Reliability Assessment Subcommittee

ASSESSMENT OVERSIGHT

Reviews and reports on bulk power system adequacy and security, including NERC seasonal and 10-year forward assessments and data collections.

PAWG

Probabilistic Assessment Working Group

PROBABILISTIC METHODS

Advances probabilistic Monte-Carlo resource adequacy analysis and supports core and special probabilistic studies.

WAEA

Wide Area Energy Assessment

WIDE-AREA APPLICATION

Combines interconnection models, common scenarios and transfer interactions to reveal interconnection-wide energy risk.

IN PRACTICE

NERC provides the mandate; RAS guides the assessment review; PAWG deepens the probabilistic analysis; WAEA applies them across a wider geographic footprint.

RELIABILITY ASSESSMENTS

NERC PUBLICATION CADENCE

JAN

Long-Term Reliability Assessment

2026 LTRA: January 2027

10-YEAR OUTLOOK

Annual view of bulk power system adequacy, security, and reliability over a 10-year horizon.

MAY

Summer Reliability Assessment

2026 SRA: May 2026

JUNE–SEPTEMBER

Electricity supply adequacy for the upcoming summer peak demand period.

NOV

Winter Reliability Assessment

2026–2027 WRA: November 2026

DECEMBER–FEBRUARY

Electricity supply adequacy for the upcoming winter peak demand period.

Special Reliability Assessments: published as conditions warrant or when requested, rather than on a fixed annual date.

RF REGIONAL RESOURCES

SUMMER

SEASONAL READINESS

Summer Newsletter Article

Near-term summer resource adequacy outlook using PJM and MISO data to assess expected and stressed demand conditions.

WINTER

SEASONAL READINESS

Winter Newsletter Article

Cold-weather view of resource availability and outage risk, focused on the ability to serve forecast winter demand.

10-YEAR

LONG-TERM OUTLOOK

Resource Adequacy Report

Forward-looking assessment of demand growth, resource changes, infrastructure timing, and potential reliability shortfalls.

RRA

REGIONAL PRIORITIES

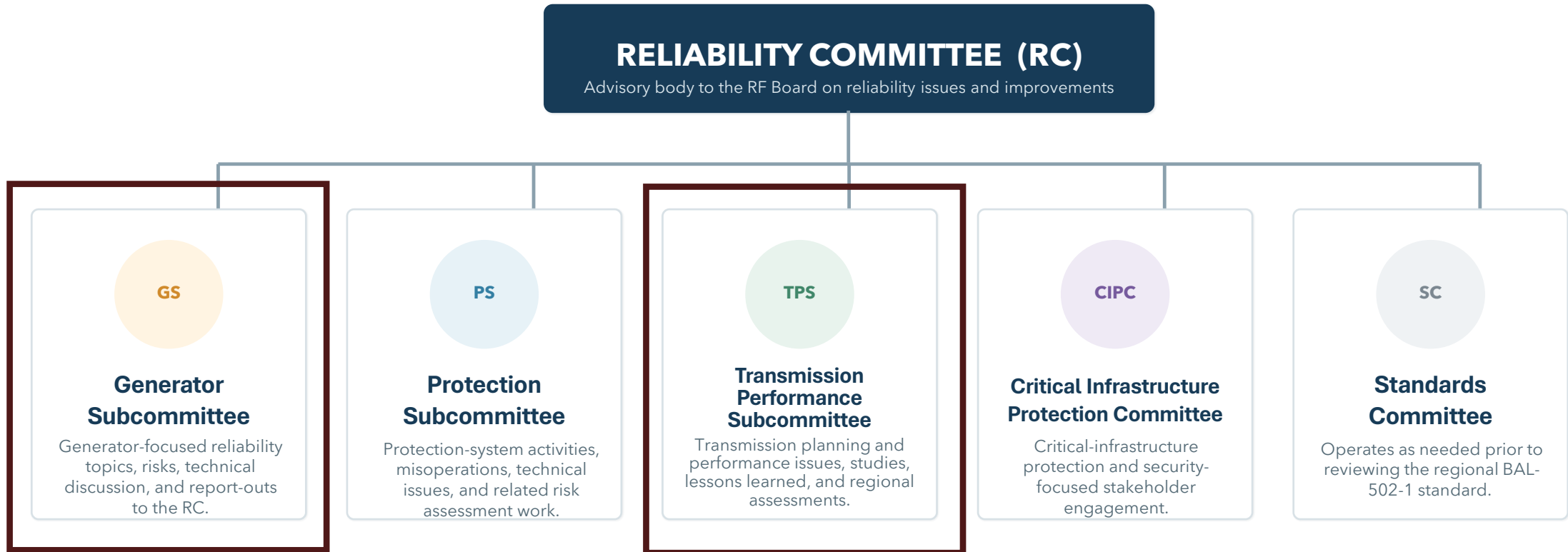
Regional Risk Assessment

Regional perspective on significant reliability risks, informed by stakeholder input, performance data, and trend analysis.

ONE STORY, THREE HORIZONS • Seasonal readiness • Long-term resource sufficiency • Regional risk priorities

RF COMMITTEES AND SUBCOMMITTEES

Stakeholder advisory and technical groups connect regional reliability priorities with focused subject-matter work.



STRUCTURE IN PRACTICE

Subcommittees develop technical insight and work products, then report activities and reliability concerns to the Reliability Committee.

ENERGY ASSURANCE STANDARDS

Three complementary views of reliability: near-term energy, long-term energy, and regional capacity adequacy

NEAR-TERM ENERGY

BAL-007-1

ACCOUNTABLE ENTITY

**Balancing
Authority**

TIME HORIZON

Near Term

- Conduct and document Near-Term Energy Reliability Assessments
- Account for demand, resource limits and fuel, transfers, and known transmission constraints
- Develop and implement Operating Plans when forecast energy emergencies are identified

Question answered: Can the system supply enough energy in the near term?

LONG-TERM ENERGY

Project 2024-02 (ERA-001-1)

Long-Term ERA Standard (draft)

ACCOUNTABLE ENTITY

**Planning
Coordinator**

TIME HORIZON

Beyond year one

- Perform hourly energy reliability assessments across long-term planning periods
- Model demand, variable resources, storage, fuel availability, outages, transfers, and transmission limits
- Define unacceptable risk criteria and mitigate identified energy risks

Question answered: Will the future resource mix deliver enough energy across time?

REGIONAL CAPACITY

BAL-502-RF-03

RF regional standard

ACCOUNTABLE ENTITY

**Planning
Coordinator**

TIME HORIZON

**Long-term
planning**

- Perform and document an annual resource adequacy analysis
- Establish a planning reserve margin using the one-day-in-ten-years LOLE principle
- Document projected load and resource capability for areas and constrained sub-areas

Question answered: Is sufficient dependable capacity planned for the RF region?

Together: BAL-502 establishes the regional capacity baseline; BAL-007-1 and Project 2024-02 add chronological energy-risk assessment across near-term and long-term horizons.

Resource Adequacy

Is there enough resource capacity to meet peak demand while experiencing resource unavailability?



NAMEPLATE, CAPACITY, & ENERGY

Installed generation tells only part of the reliability story. Resource adequacy focuses on resource capacity during the peak hour.



Generator nameplate

Designed megawatt output of the unit



Installed capacity

Megawatt output that can be produced at a defined moment



Available energy

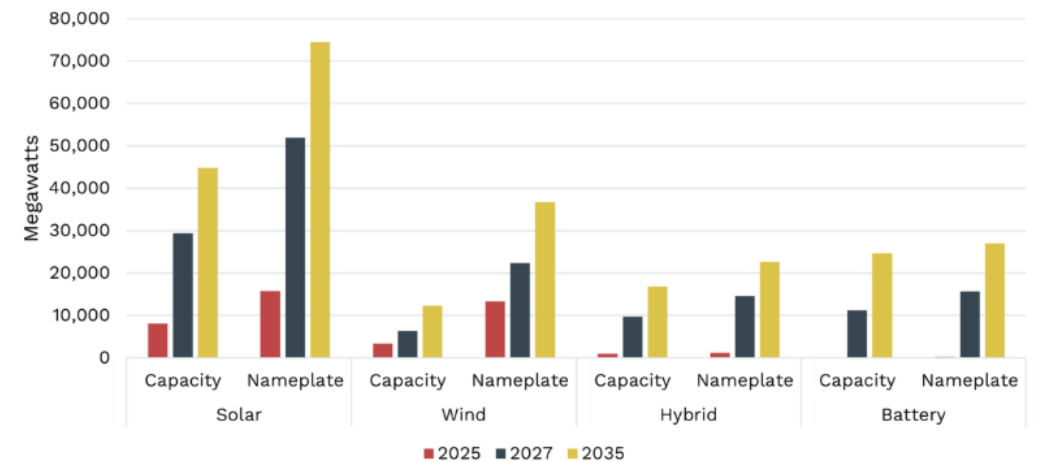
Megawatts produced over a defined set of time.



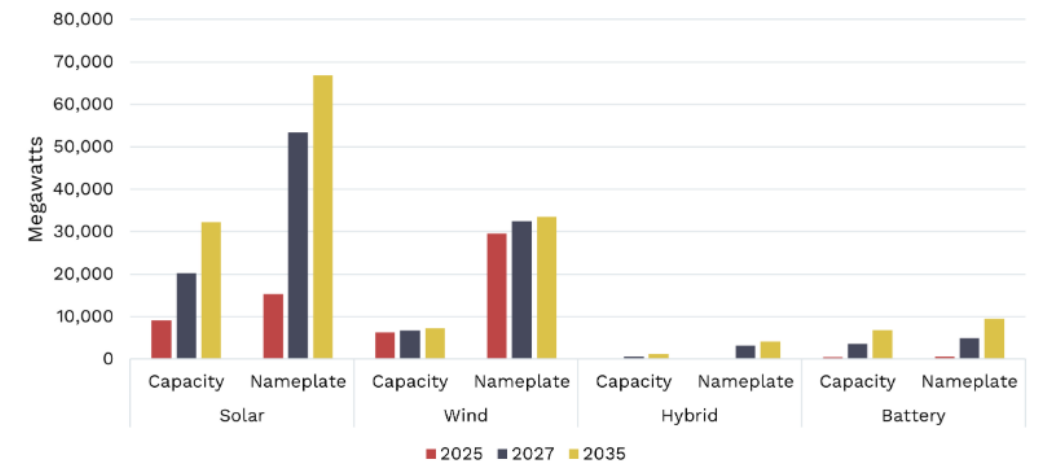
Why does it matter?

A system may appear adequate by nameplate or capacity values but still face risk if fuel, weather, outages, or transfers limit energy availability

PJM Existing, Planned, and Potential Renewable Summer Capacity vs. Nameplate



MISO Existing, Planned, and Potential Renewable Capacity vs. Nameplate



Source: ReliabilityFirst 2026 Resource Adequacy Report
<https://feature.rfirst.org/resource-adequacy-report-2026/index.html>

BALANCING RESOURCES & DEMAND

Key question: Do we have enough resources to keep the lights on in the future?



Applicable Risks

- 1) Resource retirements outpace resource additions**
- 2) Demand outpaces resource additions**

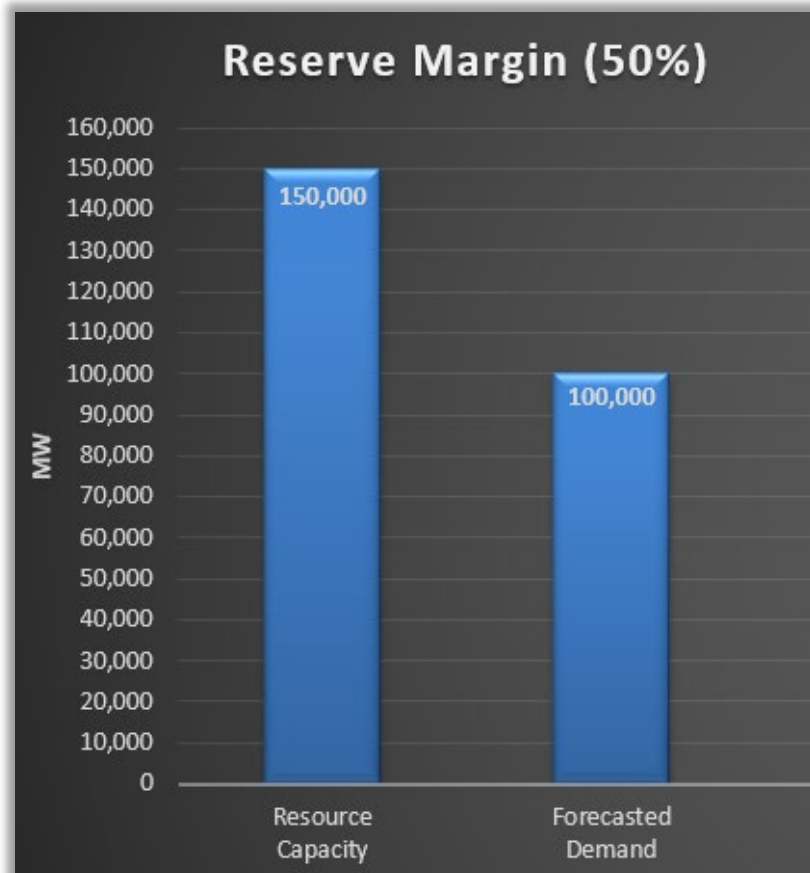
Are policy, market, permitting, and interconnection paths aligned so replacement resources arrive before shortages occur?

RESOURCE MARGINS

Reserve Margin

- Amount of resource capacity that exceeds demand

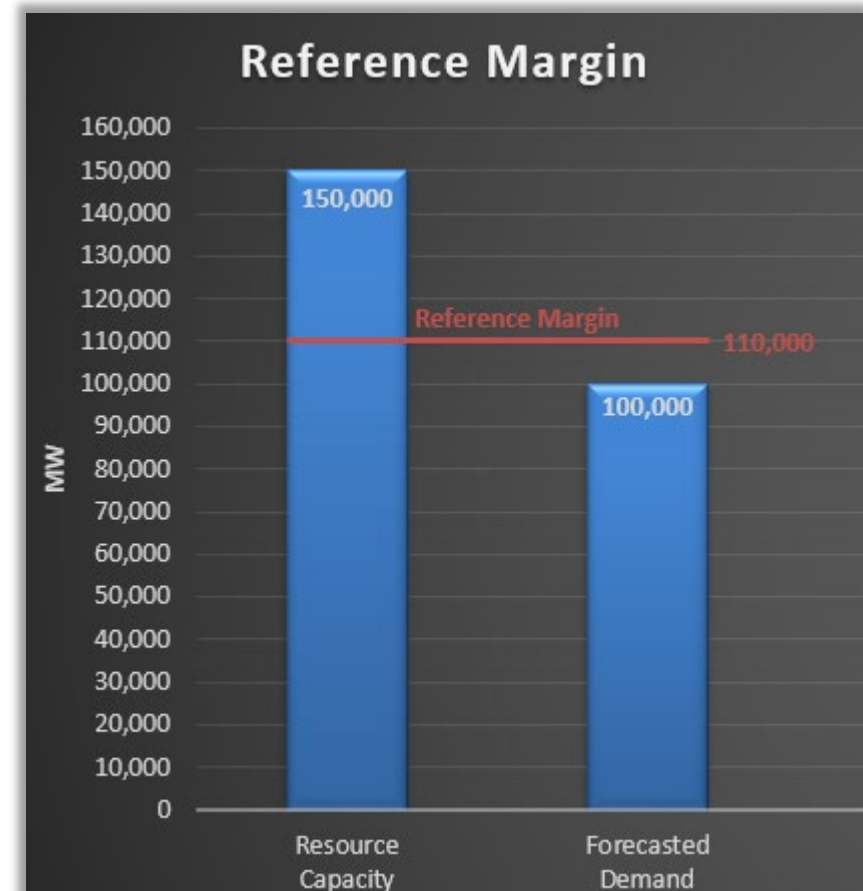
How much of a buffer does my area have?



Reference Margin

- Represents acceptable level of risk for resource planning

Is my buffer sufficient?



RESOURCE ADEQUACY - TAKEAWAYS

Results are constantly in flux: Pace of change in resource additions and retirements plus demand forecasts

- Resources are represented based on output profile impacted by outages, weather, and fuel availability
- Important to plan for resources to be greater than demand **AND** the reserve margin
- Reduce uncertainty with accurate forecasting
 - Can generation be built in time?
 - Will load develop as forecasted?
- Reliable portfolio considers how resources perform together during high-risk periods
- Measures like Demand Response can be used to balance resource shortfalls



Energy Assessments

Is there enough energy to supply demand through sustained events?



WHY IS IT IMPORTANT?

A system may have adequate reserve margins but still face risks if fuel, weather, outages, or transfers limit sustained energy availability.

Energy shortfall risk is shifting away from peak conditions

Extreme weather can impact renewable output, thermal plant performance, and increase risk of transmission outages

Operational complexity increases with flexible demand, fuel storage coordination, and optimizing battery dispatch

Wide-area events can impact ability to deliver energy between regions



DATA UTILIZED

Model

- “Pipe and bubble” – Not as complex as planning or operational models

Demand Inputs

- Forecasted hourly load profiles
- Demand Response assumptions

Transmission Inputs

- Transfer capabilities between areas
- Import/export assumptions

Weather Inputs

- Historical weather and temperatures

Resource Inputs

- Conventional resource capacity and operating characteristics
 - Forced outage rates and maintenance schedules
- Renewable nameplate values
- Renewable resource profiles (i.e., hydro, solar, and wind)
- Energy Storage nameplate, duration, and dispatch assumptions

Operational Inputs

- Reserve requirements
- Ramp rate and minimum run times
- Seasonal and extreme operating assumptions

PROBABILISTIC RISK METRICS



Loss of Load Expectation LOLE

How often?

Expected number of days in a year when supply could fall short at least once. It is a frequency metric. Common shorthand: 0.1 days/year, often described as "1 day in 10 years."



Loss of Load Hours LOLH

How long?

Expected number of hours in a year when demand could exceed available supply. It gives a more detailed view than counting days, because it looks hour by hour.



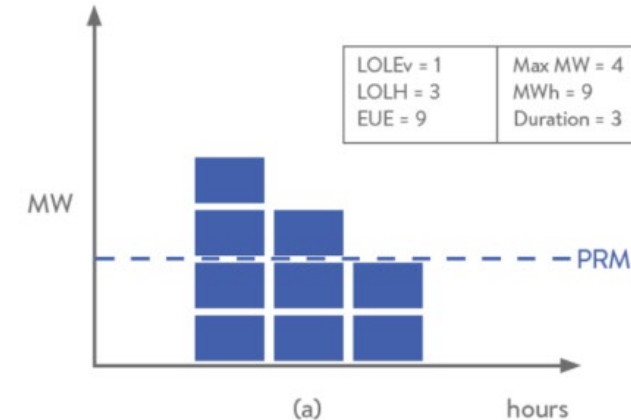
Expected Unserved Energy EUE

How big is the impact?

Expected amount of energy customers would not receive during shortage events, usually shown in MWh or GWh. It captures severity, not just occurrence.

No Perfect Metric

- No single metric tells the whole story.
- LOLE shows frequency, LOLH shows duration, and EUE shows severity.
- Together, they give a clearer picture of reliability risk and the types of solutions that may be needed.



OUTPUT FROM ENERGY ANALYSIS

Think of the EUE heat map as a weather radar for energy risk. Reds and yellows indicate periods where the model expects a higher amount of unserved energy. It helps us identify when energy shortages are most likely to occur, how severe they may be, and where additional resources or operational actions may be needed.

RESULTS FOR YEAR: 2029																								
EUE Heat Map																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
1	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
3	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	1%	1%	0%	0%	0%	0%	0%
5	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	2%	2%	1%	0%	0%	0%	0%	0%
6	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	2%	3%	2%	1%	0%	0%	0%	0%	0%
7	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	3%	6%	9%	12%	10%	7%	3%	1%	0%	0%	0%
8	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	2%	4%	4%	4%	2%	1%	0%	0%	0%	0%	0%
9	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	2%	2%	1%	0%	0%	0%	0%	0%
10	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	1%	1%	0%	0%	0%	0%	0%	0%
11	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
12	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%

RESULTS FOR YEAR: 2029																								
EUE Heat Map																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
1	0%	0%	0%	1%	2%	3%	5%	5%	3%	1%	1%	0%	0%	0%	0%	0%	0%	1%	2%	3%	3%	3%	2%	1%
2	0%	0%	0%	0%	0%	0%	1%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
3	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	1%	1%	1%	1%	0%	0%	0%	0%
5	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
6	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	1%	1%	0%	0%	0%	0%
7	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	2%	3%	4%	3%	1%	0%	0%	0%
8	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	1%	2%	2%	1%	0%	0%	0%	0%
9	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	1%	1%	0%	0%	0%	0%	0%
10	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
11	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
12	0%	0%	0%	0%	1%	2%	2%	3%	2%	1%	1%	0%	0%	0%	0%	0%	0%	1%	1%	1%	1%	1%	1%	1%

Solutions for Consideration

What can be implemented to alleviate identified resource and energy shortfalls?



SOLUTIONS FOR CONSIDERATION

Fast-Track Resources in PJM and MISO

Both initiatives accelerate interconnection review for resources intended to address near-term reliability needs.

PJM

RRI

RELIABILITY RESOURCE INITIATIVE

- One-time expedited path for shovel-ready resources that can contribute to reliability.
- Projects are evaluated for reliability contribution and commercial-operation-date viability.
- Selected projects enter PJM's Transition Cycle #2 study process.

MISO

ERAS

EXPEDITED RESOURCE ADDITION STUDY

- Temporary, targeted process for resources identified as needed for resource adequacy.
- Designed to speed interconnection studies for qualifying generation additions.
- Revised after initial FERC concerns to provide a more limited and targeted process.

ENERGY ANALYSIS TAKEAWAY

Fast-track resources may improve future adequacy, but current studies may not yet reflect final project selection, interconnection results, required transmission upgrades, or commercial operation dates.

SOLUTIONS FOR CONSIDERATION

- Accept the identified risks during extreme events (assuming other reliability thresholds are met)
 - Construct local generation
 - Increase Demand Response
 - Increase transfer capability to neighbors with surplus resources
 - Transmission infrastructure upgrades
- Dynamic line ratings (DLR)
 - Power flow control devices

Grid-enhancing Technologies (GETs)

Resource Reference Library

Four trusted starting points for regional assessments, industry methods, and practitioner guidance

RF

ReliabilityFirst

Regional assessments and reports for the RF footprint

START HERE

[RF Resource Center](#)

[2026 Resource Adequacy Report](#)

BEST FOR

Regional

Seasonal

Resource adequacy

NERC

NERC

North American reliability assessments and risk outlooks

START HERE

[NERC Assessments](#)

[2025 Long-Term Reliability Assessment](#)

BEST FOR

LTRA

Seasonal

Risk trends

ESIG

Energy Systems Integration Group

Modern resource adequacy methods and grid-integration guidance

START HERE

[Reports & Briefs](#)

[Redefining Resource Adequacy](#)

BEST FOR

Chronology

Multi-metric

Weather years

EPRI

Electric Power Research Institute

Research, concepts, tools, and practitioner resources

START HERE

[Resource Adequacy Hub](#)

[Assessment Resource Center](#)

BEST FOR

Frameworks

Tools

Research

Click any underlined link

QUESTIONS & ANSWERS

Tim Fryfogle

tim.fryfogle@rfirst.org





SESSION BREAK

Flexible Load as a Reliability Resource: Opportunities and Challenges

Dr. Aidan Tuohy

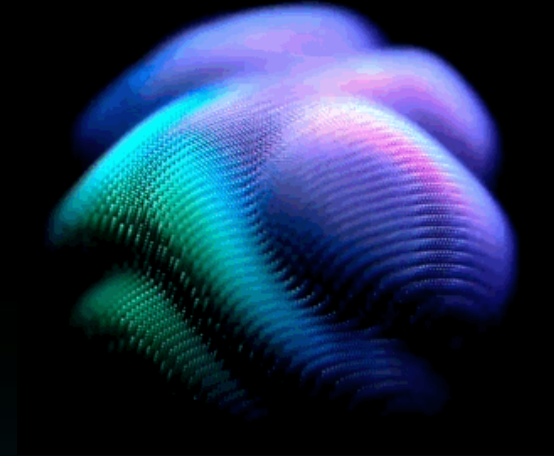
Director, Electric Power Research Institute
(EPRI)





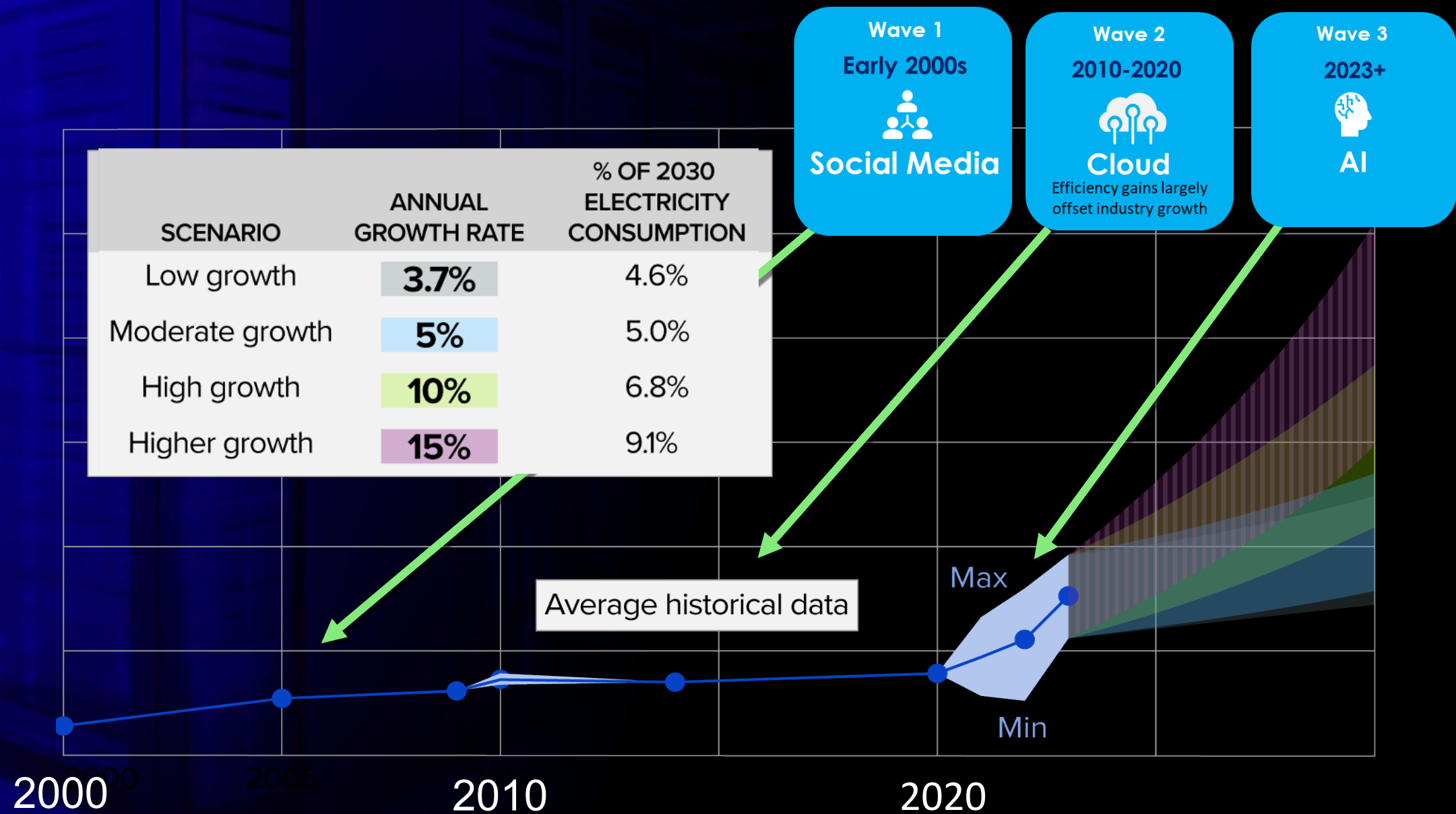
Flexible Load as a Reliability Resource

Opportunities and Challenges



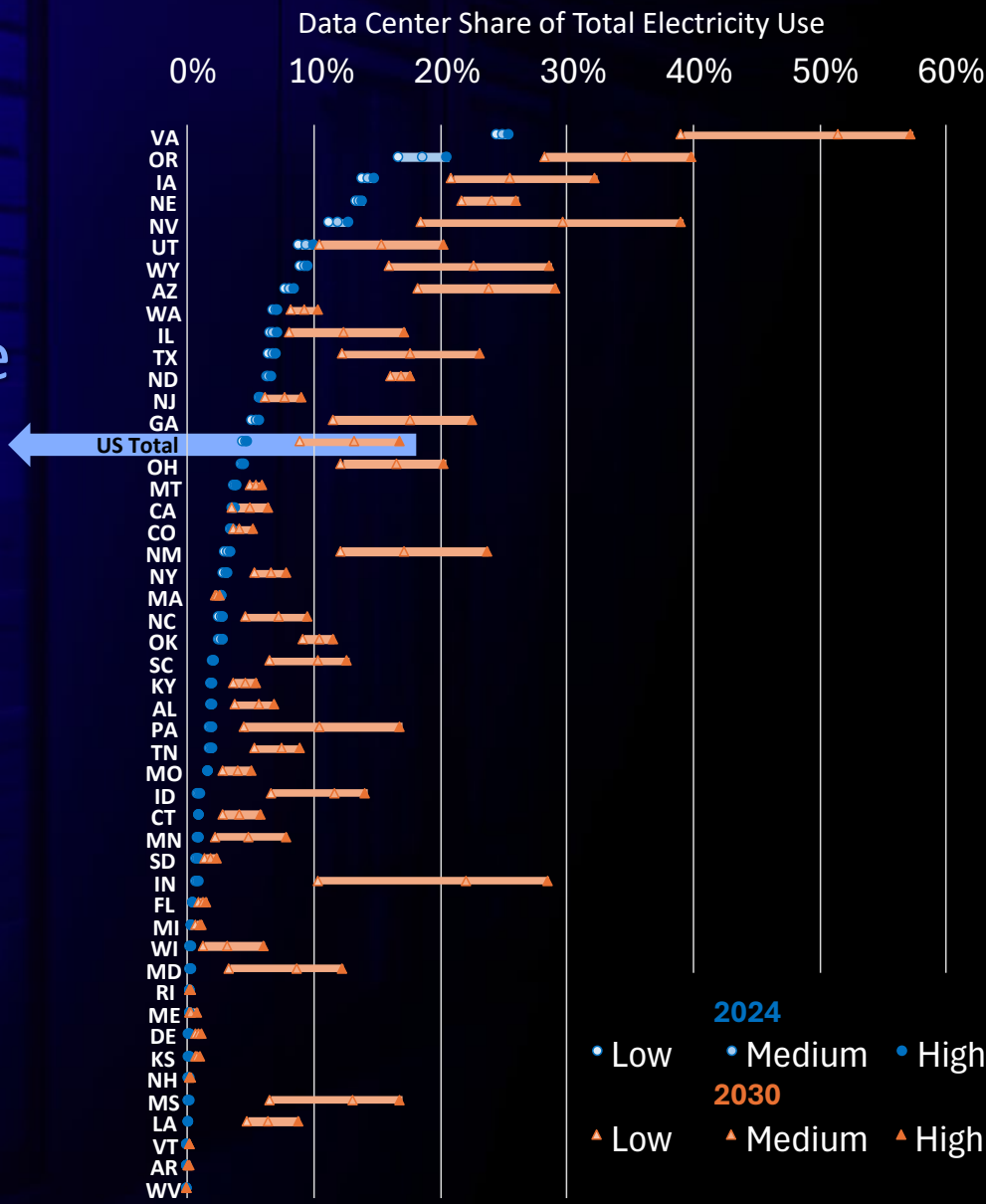
Aidan Tuohy, Director R&D, EPRI
Reliability First Fall Reliability and Security Summit
Sept 14-16, 2026
Columbus, OH

AI is Driving a Third Wave of Data Center Growth



New Insights from EPRI on U.S. Datacenter Growth

U.S. estimated share
4-5% in 2024
9-17% in 2030



Source: EPRI Powering Intelligence 2026



What Can We Do to Meet This Demand Growth?



EXTEND THE LIFE OF TODAY'S ASSETS.

INCREASE THE UTILIZATION OF TODAY'S ASSETS.



MAKE ROOM TO BUILD NEW ASSETS.



Optimize Data Center Operational Flexibility to Help Strengthen the Grid



- ARIZONA, U.S.
- NORTH CAROLINA, U.S.
- PARIS, FRANCE
- VIRGINIA, U.S.
- ILLINOIS, U.S.
- TEXAS, U.S.
- LONDON, U.K.

DCFlex Workstreams



The DCFlex participant panel actively collaborates with regulators, academia, and industry stakeholders – both to share leading practices and insights, and to incorporate diverse perspectives that strengthen the initiative’s direction and impact.



Learn More:
dcflex.epri.com

DCFlex Collaboration



Developers



Hyperscalers



IPP's



ISO/RTO



Technology Providers



Advisory & Finance



Engineering & Construction



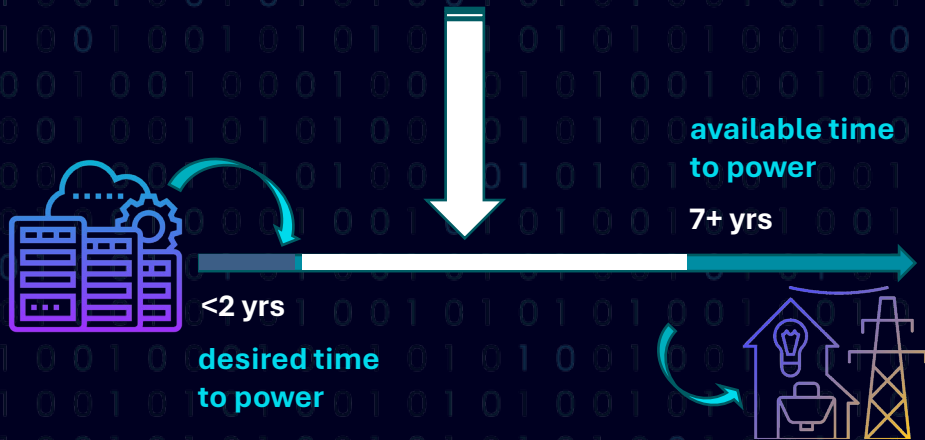
Utilities



Powering AI

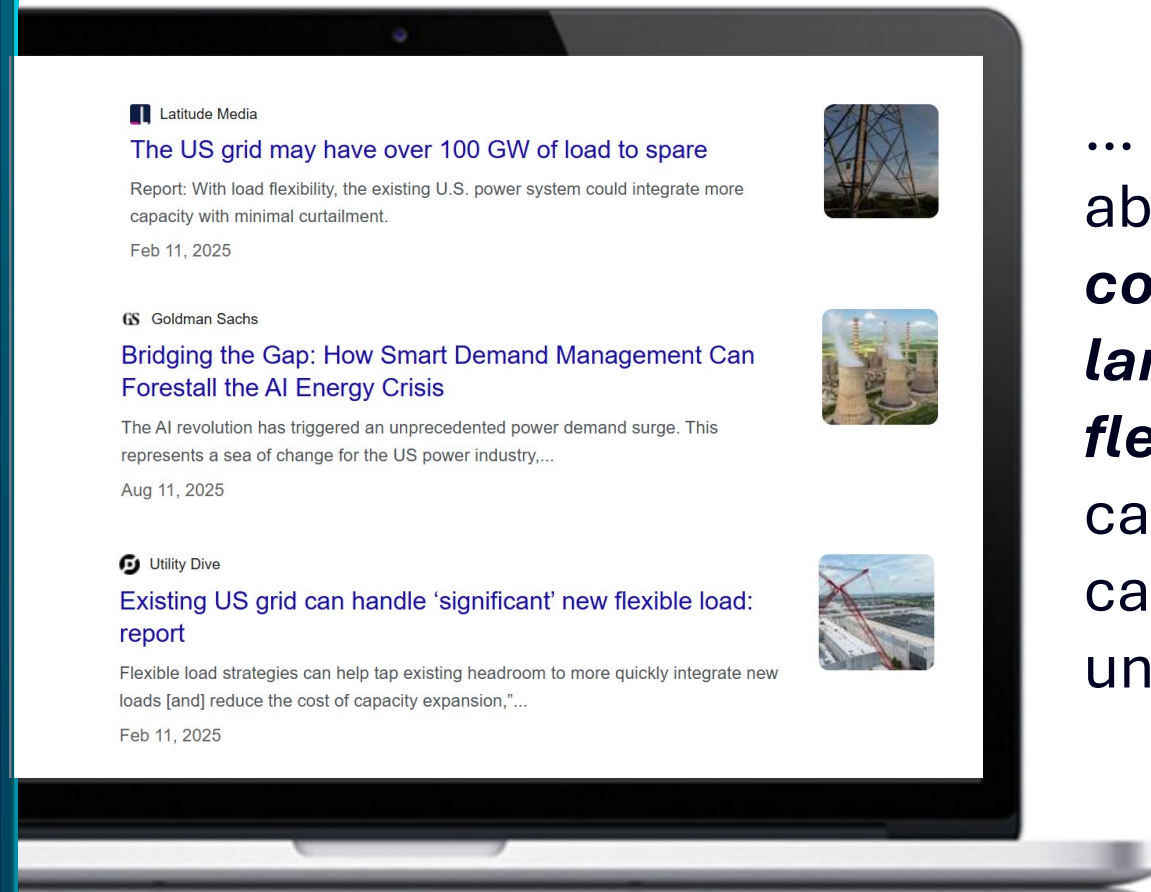
CHALLENGE

gap between data centers
need & capacity availability



SOLUTION

Grid-integrated Flexible Load



... but in the
absence of a
**common
language on
flexibility** grid
capacity
cannot be
unlocked

INCREASING FLEXIBILITY →

CLASS A	CLASS B	CLASS C	CLASS E
Critical Peaking  Hours to day-ahead  ≤ 5 Hours  ≤ 1% ≤ 90 h	Peaking  Hours to day-ahead  ≤ 5 Hours  2 - 10% 100 – 800 h	Prolonged  Day Ahead  ≥ 5 h-days  ≤ 10% ≤ 800 h	Fully Grid Responsive  ≥ 5 min  Unbounded  Unbounded
		CLASS D	
		Fast  ≥ 5 min  ≤ 5 Hours  2 – 10% 100 – 800 h	
respond to <i>rare</i> scarcity events 5 hours or less	respond to <i>frequent</i> scarcity events 5 hours or less	A + B + respond to <i>prolonged</i> events, up to 24+hrs	A + B + provide fast response with short notice
			Fully grid responsive

World's largest cross-sector collaborative on flexibility unveils
Common Flexibility Classification
 to unlock grid capacity without compromising reliability and affordability

	Notification Window
	Activation Period
	Annual Utilization

Flex MOSAIC™ in Context

What is a requirement to connect to the network vs. an optional attribute that can support speed to power?



Can increase speed to power in most cases when supported

Resource adequacy

Balancing needs

Congestion management

Intertrip RAS / SPS

OPTIONAL

Does not increase speed to power in most cases, also not a basic requirement for grid connection

INTERCONNECTION REQUIREMENT / GRID CODE

Basic capability requirement for grid connection

Fault ride-through

Power quality

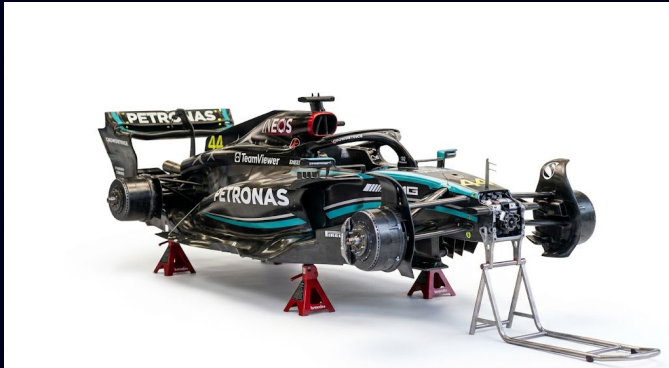
Voltage control

Reactive power control

Frequency response

Frequency regulation

Certain technologies can **unlock flexibility and interconnection requirements simultaneously**



The Formula 1



Tires needed to drive on track

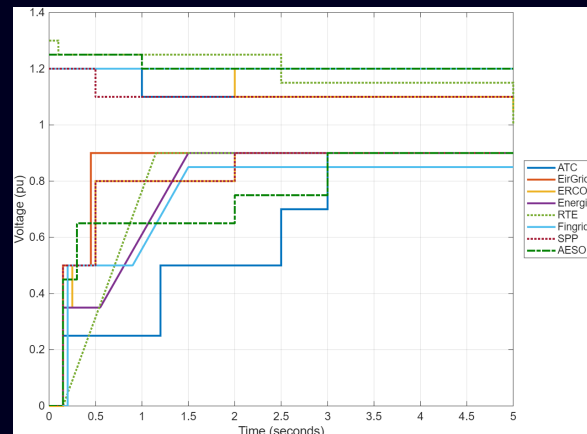


Better performance on different track

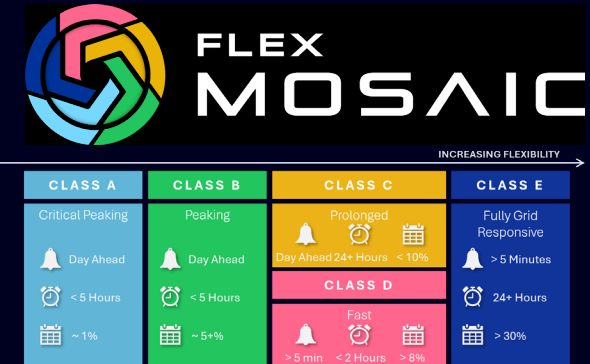
The Data Center



Grid codes needed for interconnection



Higher capacity on constrained grid



Flex MOSAIC™ - Common Program Names

	Notification Window
	Activation Period
	Annual Utilization

CLASS A	CLASS B	CLASS C	CLASS E
Critical Peaking  4 h - Day Ahead  ≤ 5 Hours  ~ 1% COMMON NAMES - Emergency Demand Response, Reliability Demand Response - Some Capacity Market Obligations - Resource Adequacy	Peaking  Day Ahead  ≤ 5 Hours  2-10% COMMON NAMES - Reliability Demand Response, Economic Demand Response - Capacity Market Obligations - Interruptible Rates - Congestion Management	Prolonged  Day Ahead  ≥ 5 h-days  <10% COMMON NAMES - Transmission Outages - Multi-day look-ahead	Fully Grid Responsive  > 5 Minutes  Unbounded  Unbounded COMMON NAMES - Day-ahead or Intra-day Procurement with Real-time Deployment of wholesale market products and services - Hourly Pricing Retail Programs
		CLASS D	
		Fast  ≥ 5 min  ≤ 5 Hours  2-10% COMMON NAMES Real-time procurement of wholesale market products or services	

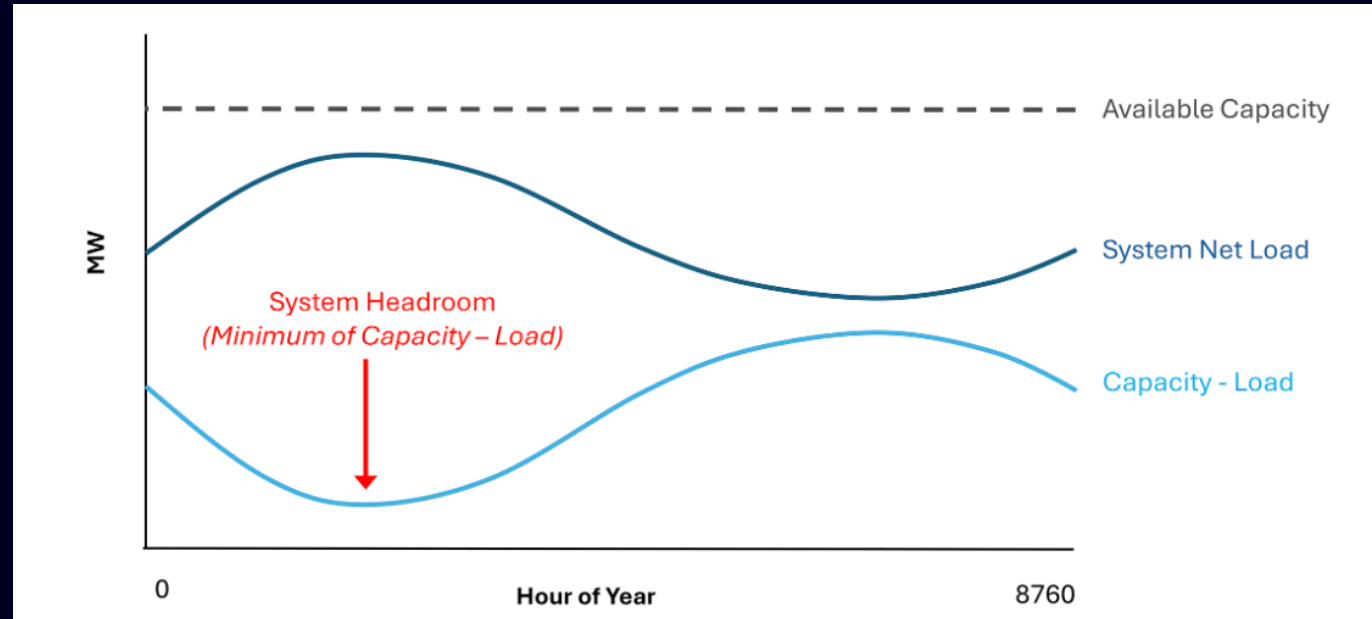
Assessing System Headroom for Integrating Data Center Load

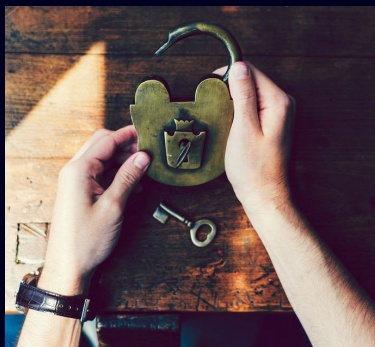
EPRI Lead: Nidhi Santen

WHAT IS HEADROOM?

The additional load (MW) a power system can integrate across all time periods before violating reliability requirements.

Total system headroom depends on time, location, operating conditions, reliability requirements, and flexibility characteristics of the new load. It's the minimum of *available* capacity less net load over a given window of time.





WHY WE CARE

Speed to power without compromising reliability

Data centers are requesting power faster than new transmission, generation, or substation infrastructure can be built. It is important to understand where existing systems can safely accommodate load and where flexibility can unlock additional capacity.



HOW HEADROOM ASSESSMENTS MAY ENABLE SPEED TO POWER

Signals, planning guidance, and the “handshake”

Utilities and system operators can translate the outputs of a headroom study into pre-interconnection application signals for data center and large load developers: where headroom exists, what flexibility is most valuable, and how flexible operations may afford additional MW connection. Developers can use this information in their investment, design, and locational decisions. **Interconnection applications become aligned with grid needs.**



HEADROOM FRAMEWORK 101

A practical playbook to estimate system headroom

- The Headroom Framework includes step-by-step guidance to calculate system headroom.
- It provides a standard, repeatable process for utilities and system operators to identify baseline headroom and how much additional headroom may be unlocked by flexible DC operations.
- It is compatible with existing planning models and adaptable to a system's planning journey, data availability, and market & reliability criteria.
- It can be used to support internal planning processes and external engagement with developers.
- Standardization enables 3 Cs:
 - consistency and a common language between utilities/ISOs and developers
 - confidence in assessment outputs, and
 - collaborative industry learning in a fast-paced environment.

WHAT IT ASSESSES

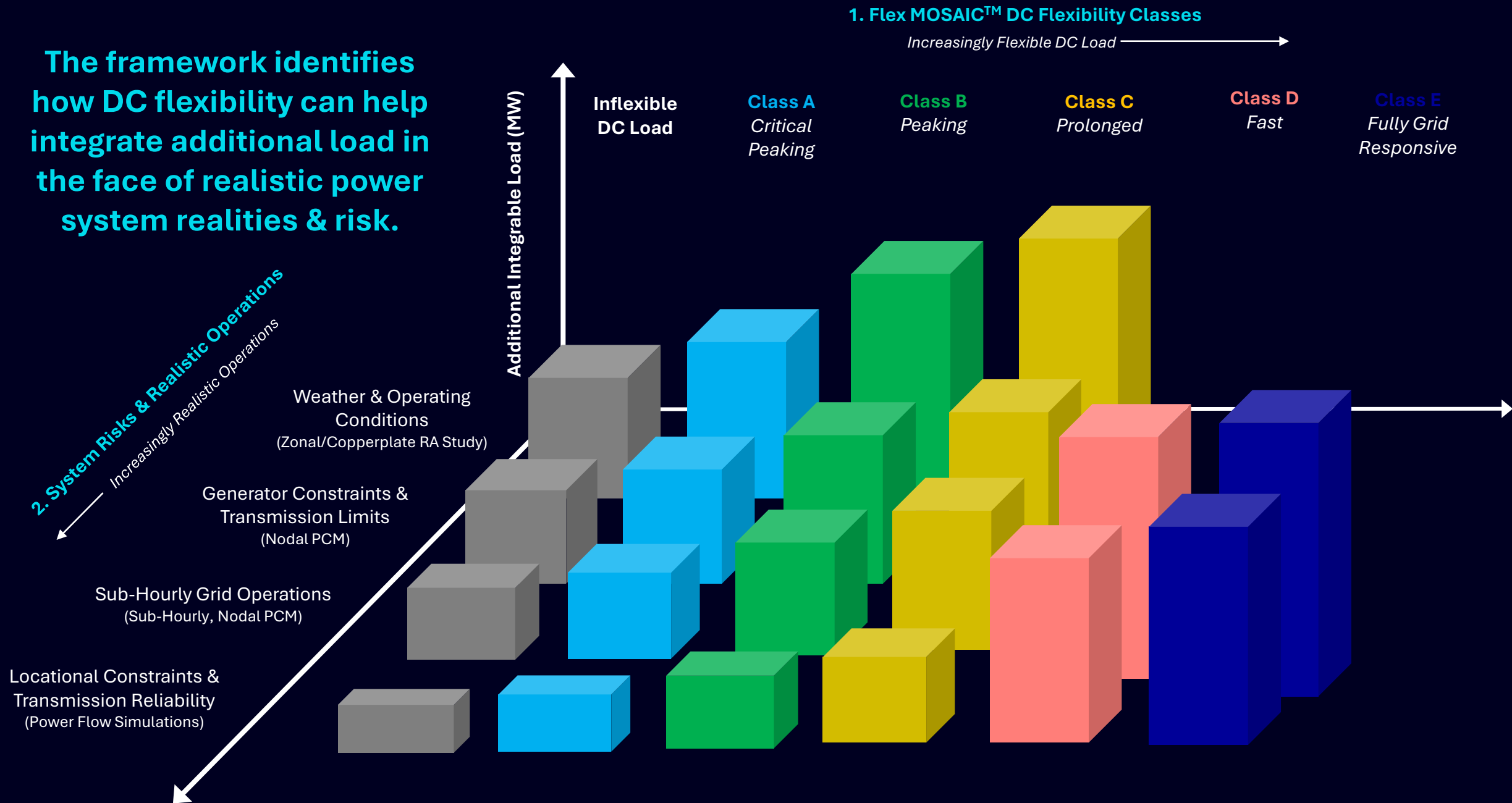
More than peak-load capacity

The framework assesses headroom along two key dimensions:

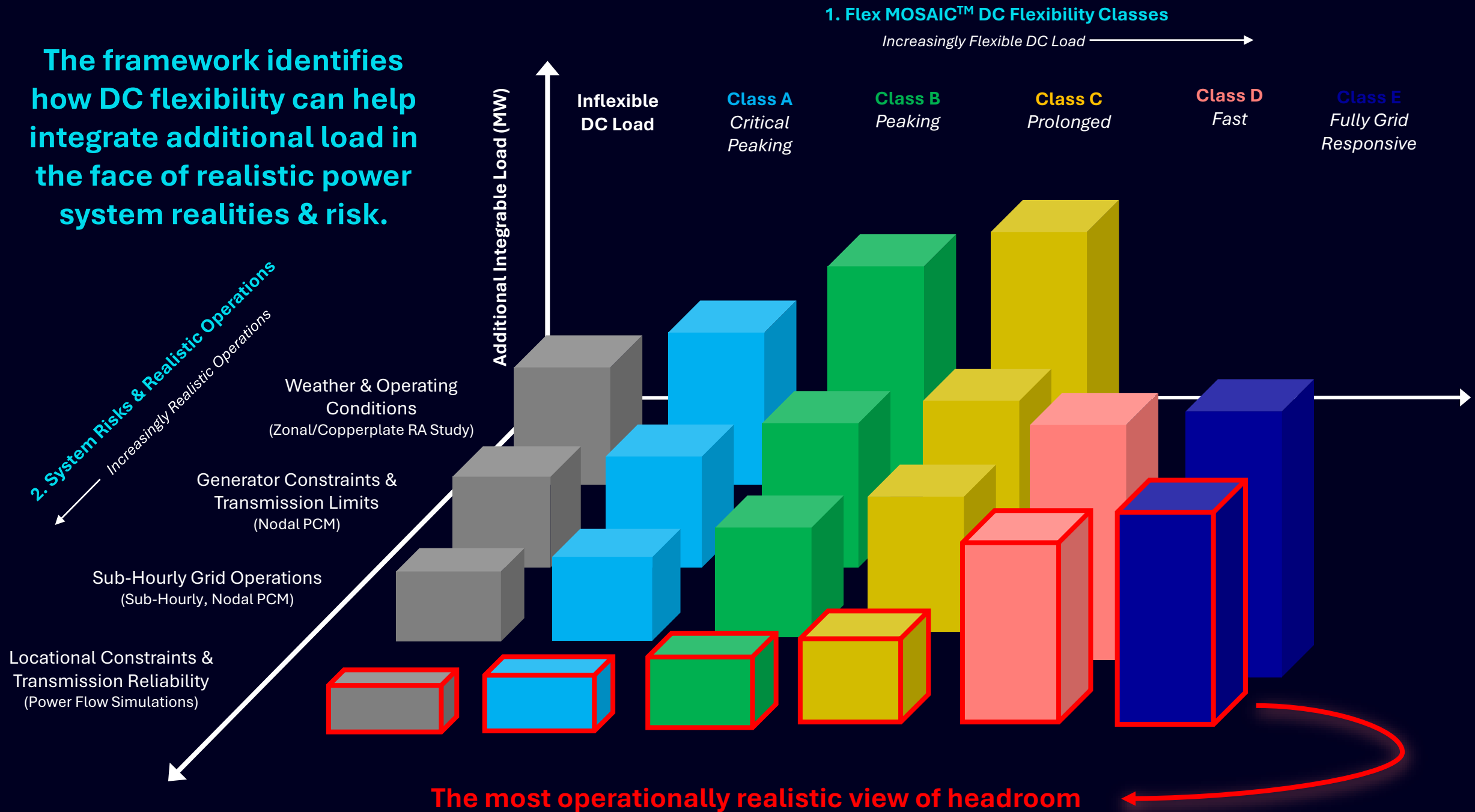
1. **Realistic power system characteristics** across relevant periods: system adequacy, generator constraints, transmission limits, fast-response operations, locational risk, and transmission reliability; and
2. **Flexibility potential of the additional load:** the full range of Flex MOSAIC™ data center classes A-E, offering critical peaking to fully responsive grid support.



The framework identifies how DC flexibility can help integrate additional load in the face of realistic power system realities & risk.



The framework identifies how DC flexibility can help integrate additional load in the face of realistic power system realities & risk.



EXPECTED OUTPUTS FROM A HR ANALYSIS



Primary—System Headroom Ladder & the Value of DC Flexibility

- Maximum *firm* load (MW) by location (e.g., zone, node) the system can integrate
- Maximum *non-firm* integrable load by location and by level of flexibility (i.e., flexibility ladder).
- Insight into the potential value of different types of flexible data centers in the power system



Secondary—Power System Operations, Flexibility Needs, & Sensitivity

- Simulation results showing operational characteristics of each type of flexible DC
- Number of flexibility events (i.e., curtailment) by location
- Depth (MW) and duration of flexibility events by event and location
- Deep understanding about the driver of flexibility needs (e.g., congestion, reliability thresholds)

MANY OPEN HEADROOM QUESTIONS

- How should a headroom analysis adapt for **vertically integrated utilities versus those operating within organized markets?**
- What analytical phases should be in a **headroom analysis vs. an interconnection study** after application? What may or may not be strategic for a utility to disclose pre-application?
- Should a “pre-application” signal include information about available **firm capacity, non-firm capacity, or both?**
- How **often** does a headroom assessment have to be updated for it to be useful to a utility/ISO and/or to a data center/large load developer?
- Are there **computational advances** (e.g., AI orchestration, machine learning) that can support conducting these studies faster
- Is “Headroom” the **preferred term** for these assessments? Another preferred phrase?

Interconnection of Data Centers TOP and DCFlex Highlights

Lead: Parag Mitra

Key Topics being Addressed

01

Modeling Guidance and Model Development

02

Voltage Ride Through Determination and Testing

03

Load Oscillation Impacts, Monitoring, and Mitigation

04

Interconnection Studies for Flexible Loads

Key Topics being Addressed

01

Modeling Guidance and Model Development

02

Voltage Ride Through Determination and Testing

03

Load Oscillation Impacts, Monitoring, and Mitigation

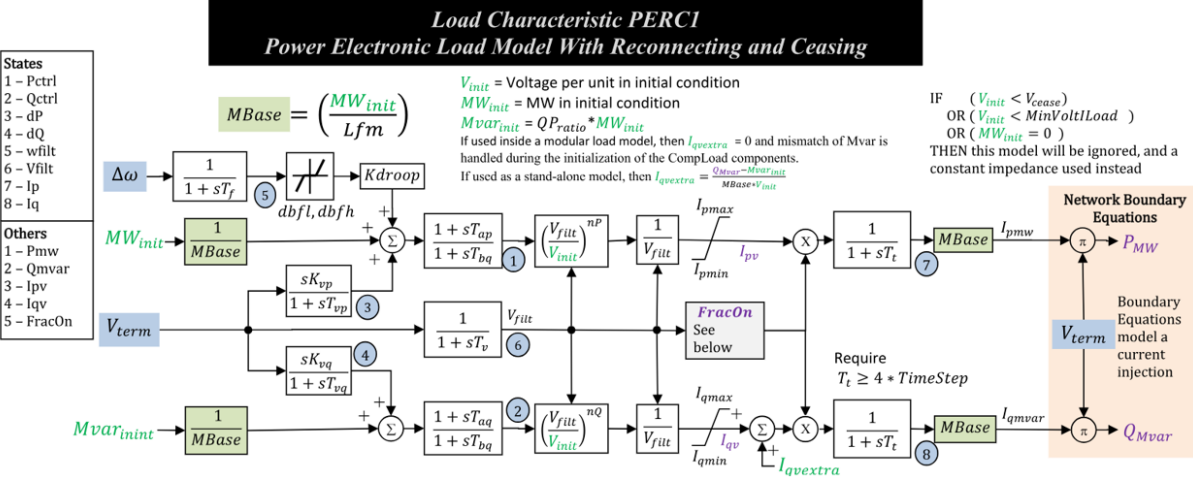
04

Interconnection Studies for Flexible Loads

Model Development – Phasor and EMT

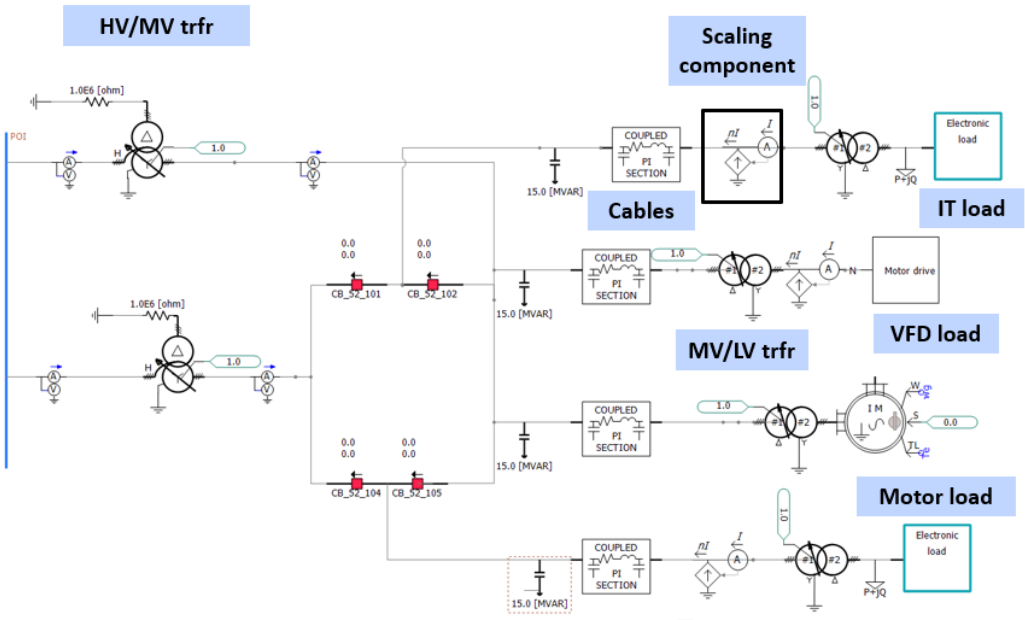
Phasor Domain Model

Load Characteristic PERC1



Phasor domain models are effective for studying load disconnection and reconnection impacts on the bulk power system.

EMT Model

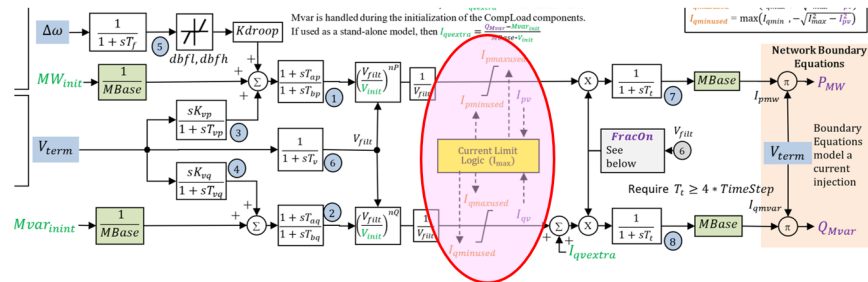


Allows us to identify emerging reliability risks related to data centers and parameterize and refine our phasor models

Improvements to PERC1 (PERC2 model)

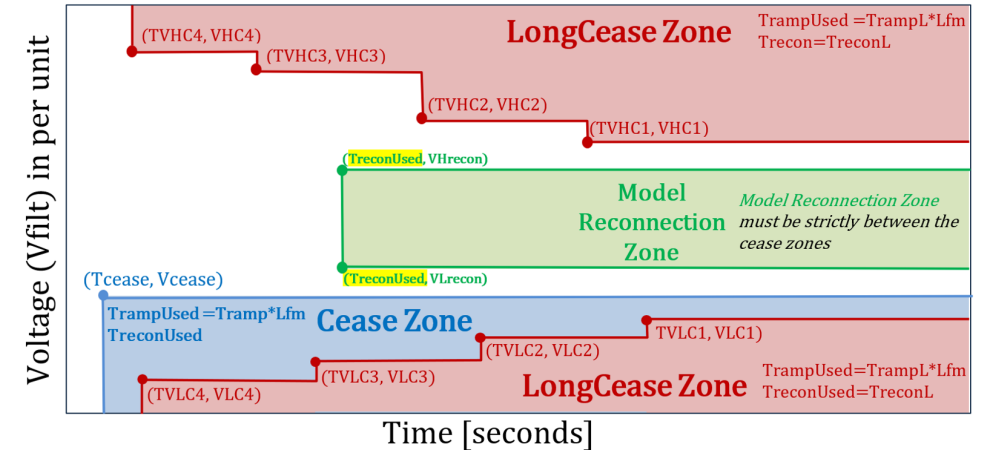
PERC2 Additions Adding High/Low Frequency Tripping, I_{max}

- Total Current Limit: I_{max}
 - For modeling a UPS, the MvarInit is typically 0.0 and no Mvar response is modeled, so this isn't needed for those.
 - Added for completeness.



PERC2 Changes Cease and Long Cease Zones

- “Blue Zone” and “Red Zone”



❑ PERC1 model got officially released in 2025. Powerworld, PSLF and PSS®E (36+) has it. **PSS®E 34/35 users, contact to get a DLL. Same model (coded by Kannan S and Benchmarked) in a DLL format is available.**

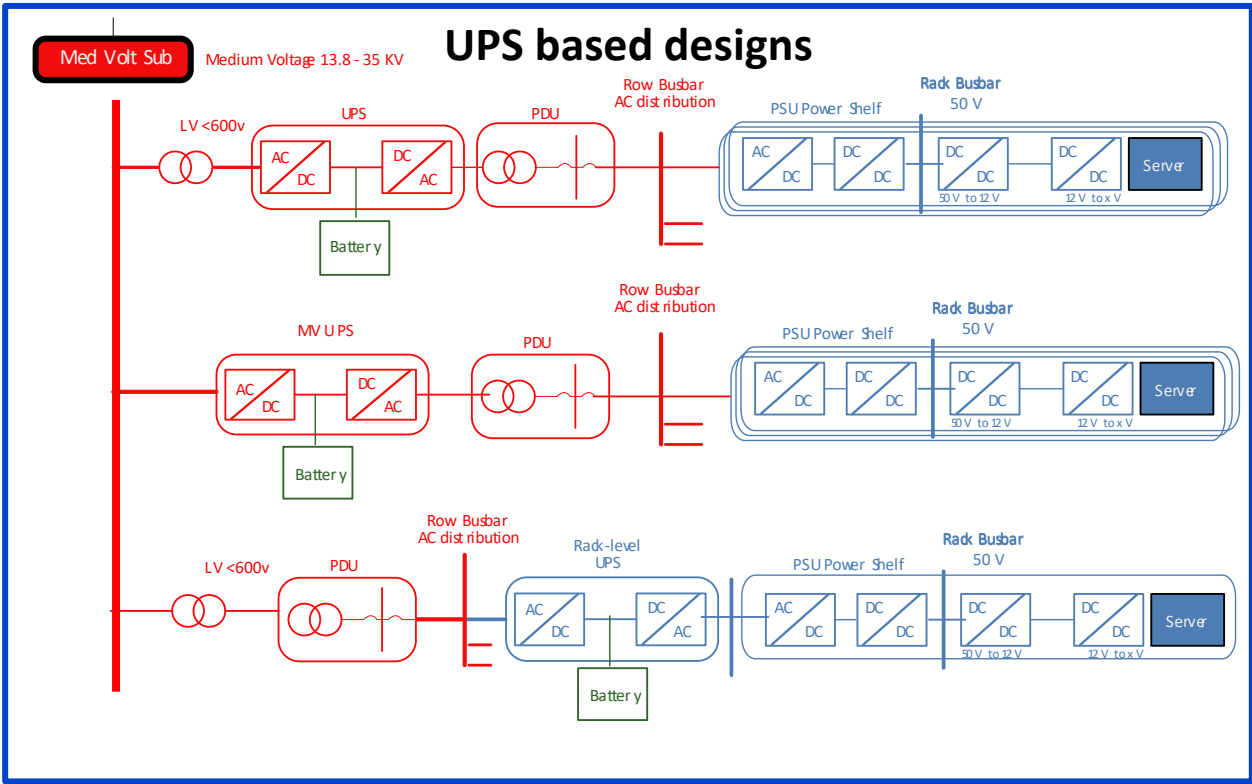
❑ Some improvements needed to the model structure to include:

- More flexibility to model ride-through curves
- Momentary cessation implementation

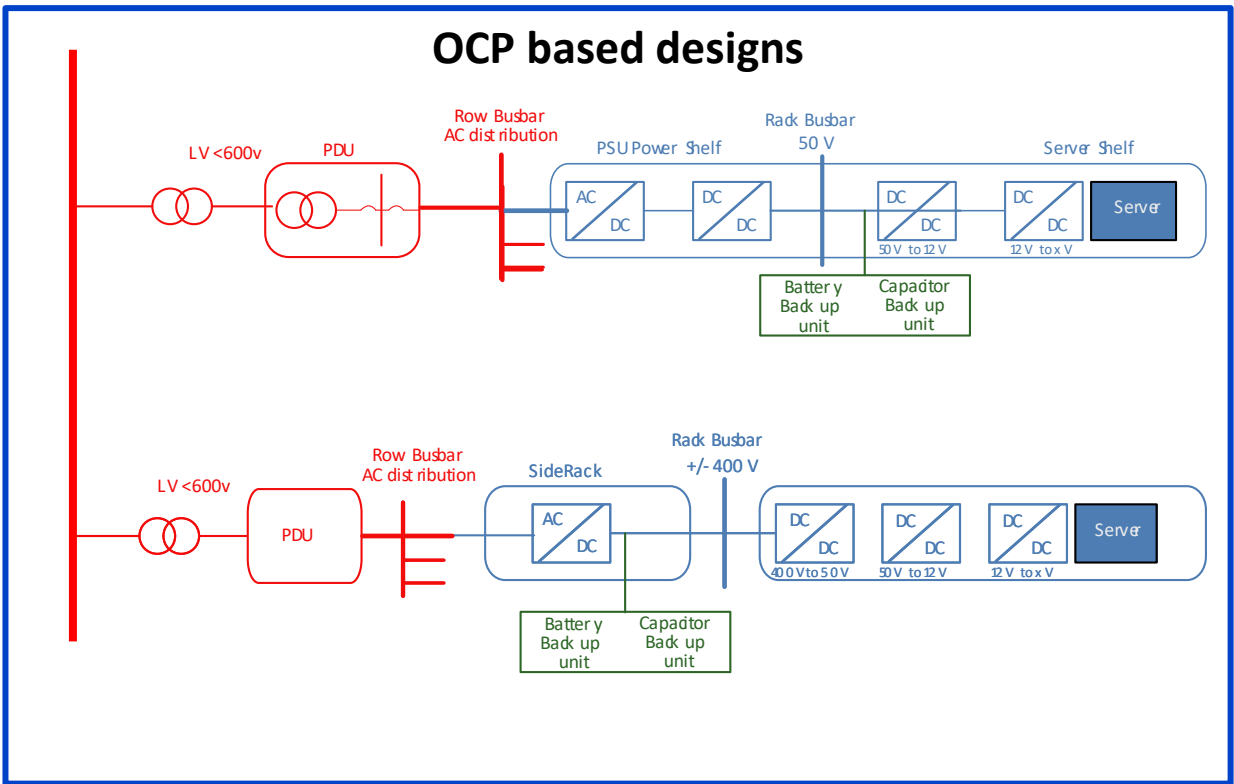
❑ Application guide in the works in conjunction with NERC to provide examples on model creation

Modeling Novel Data Center Architectures

UPS based designs

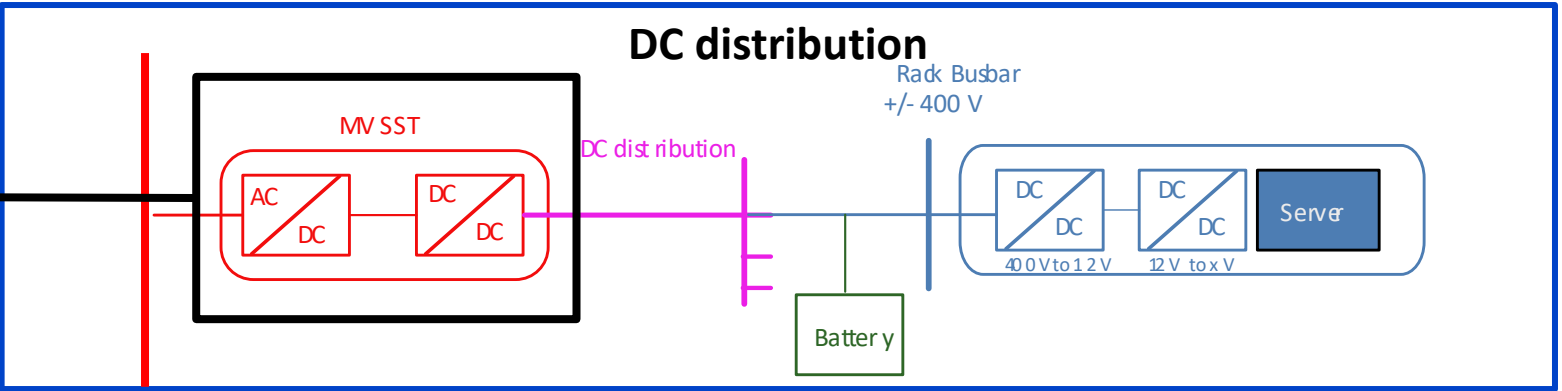


OCP based designs



**Model of 3 phase Solid-State Transformers
(In development)**

DC distribution



Key Topics being Addressed

01

Modeling Guidance and Model Development

02

Voltage Ride Through Determination and Testing

03

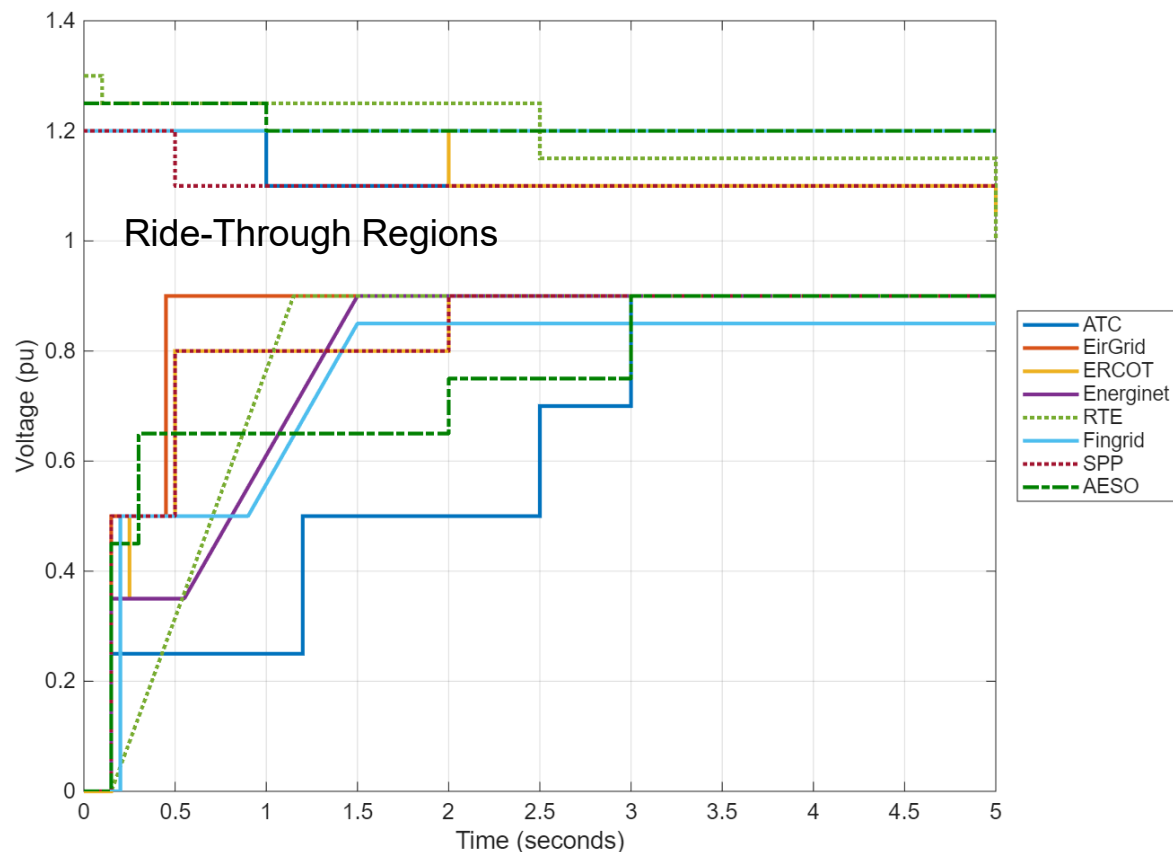
Load Oscillation Impacts, Monitoring, and Mitigation

04

Interconnection Studies for Flexible Loads

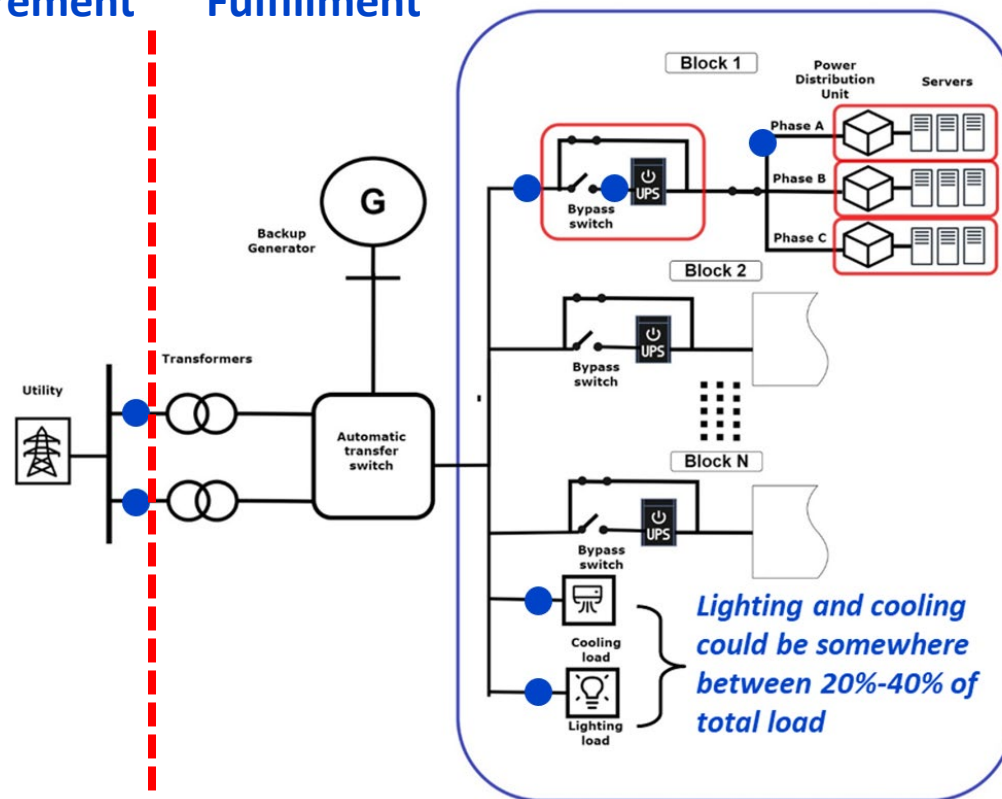
Challenges with Ride-Through

Current Ride-Through Requirements Landscape



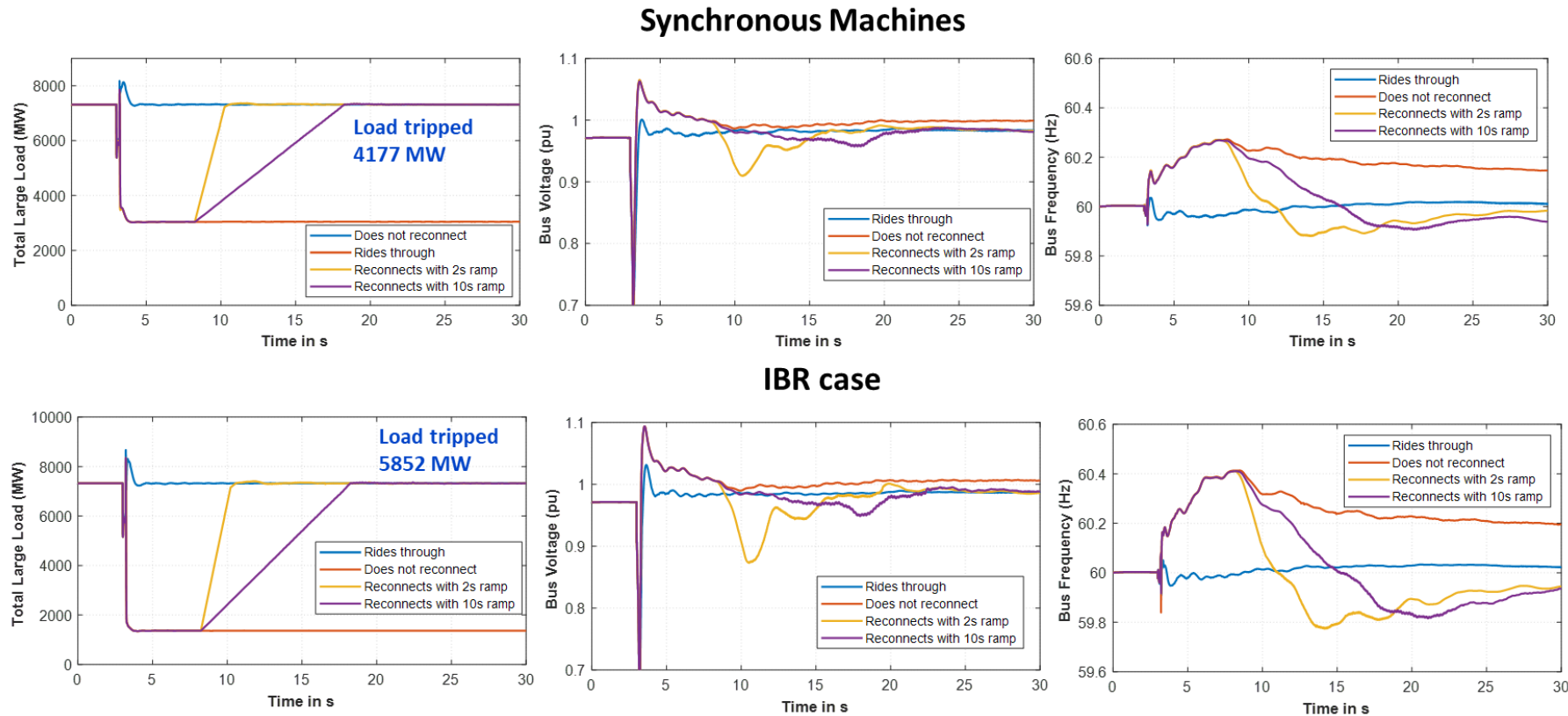
- Overall industry desire to have a uniform RT standard
- NERC LLWG WP suggests using ERCOT NOGRR282 as the starting point

Requirement ← → Fulfillment



- RT standards will be applicable at the POI but met by performance of devices behind a distribution network
- Need a method for compliance demonstration

Defining VRT/FRT Curves for Interconnection



- Testing if existing VRT characteristics work for a utility's system
 - Low load conditions and High load conditions need to be studied separately
 - Identifying if certain load pockets require a deviation from uniform characteristics

Equipment Testing and Model Validation

- ❑ Ride-through requirements are one of the key reliability needs being discussed in the industry today
- ❑ Independent testing and conformity assessment are two industry needs
- ❑ ***What are we planning to do in this space?***
 - **Devices of Interest** – Data Center Grid Interfacing Equipment
 - **Testing Outcome– Independent Performance Verification, Conformity Assessment with Grid Code, Model Verification and Validation**
- ❑ ***What is our desired outcome?***
 - **Development of a testing protocol** that can be used to demonstrate conformity as well as aid model verification and validation
 - **Develop a complete process that maps** equipment testing to facility level conformity assessment with clear documentation that can be used for submission during interconnection
 - **Provide insights** to stakeholders via independent testing and demonstration

Key Topics being Addressed

01

Modeling Guidance and Model Development

02

Voltage Ride Through Determination and Testing

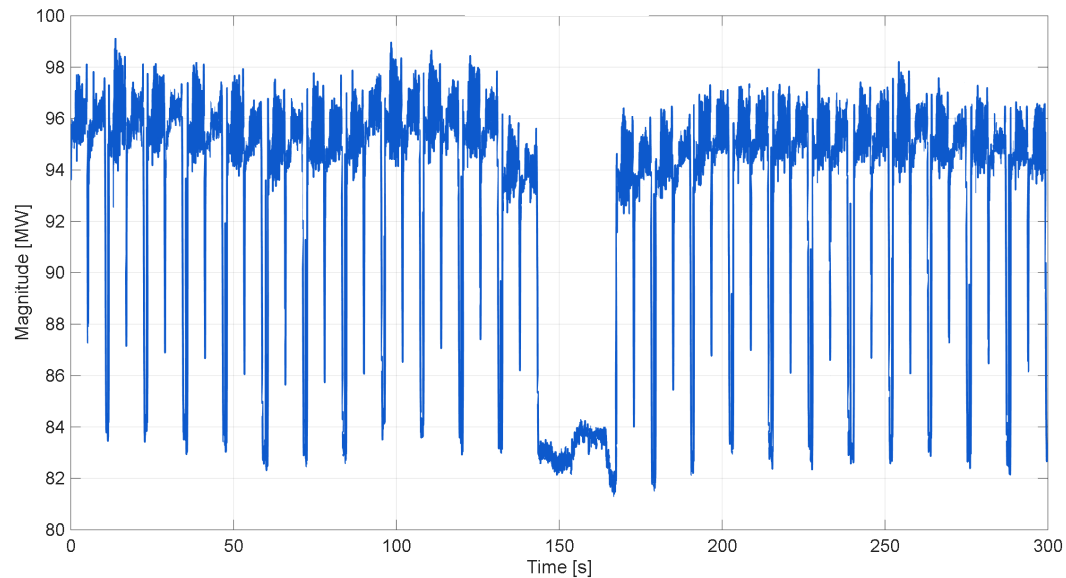
03

Load Oscillation Impacts, Monitoring, and Mitigation

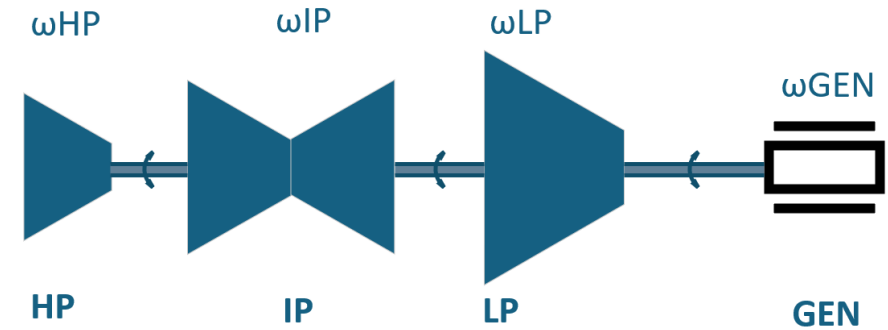
04

Interconnection Studies for Flexible Loads

Why AI loads are a concern for generators?



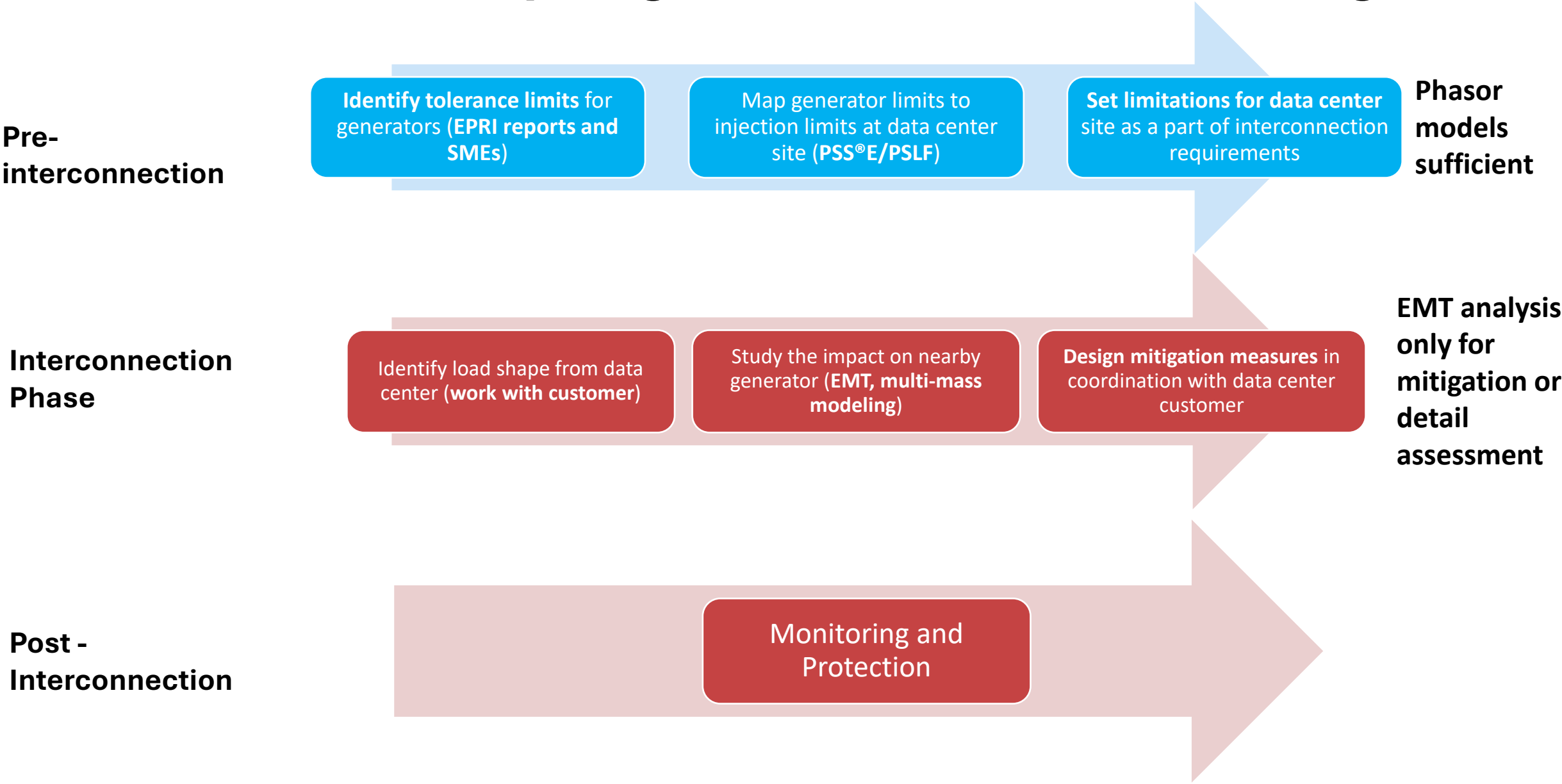
Data Center Load with AI Training



Steam turbine Multi-Mass Model

- Training LLMs require solving large linear equations periodically. These periodic operations causes load spikes followed by lulls.
- Load pulsations can range between 0.1 Hz – 55 Hz with the prevalent ranges between 5 – 55 Hz
- Any pulsating load will cause pulsating torque to appear on a nearby generators shaft and associated assembly
- ***Beyond a certain limit, this can damage the equipment***

How does the utility engineer address this challenge?



Understanding Machine Limits

- What is tolerable for a synchronous machine?

Non-Resonant Frequencies	Resonant Frequencies
Peak – Peak < 10% of Machine MVA	Avoid Entirely

*Above 10% is problematic based on assessment with available data. Actual tolerance limit could be much lower than 10%. **Talk to your GO and OEM.***

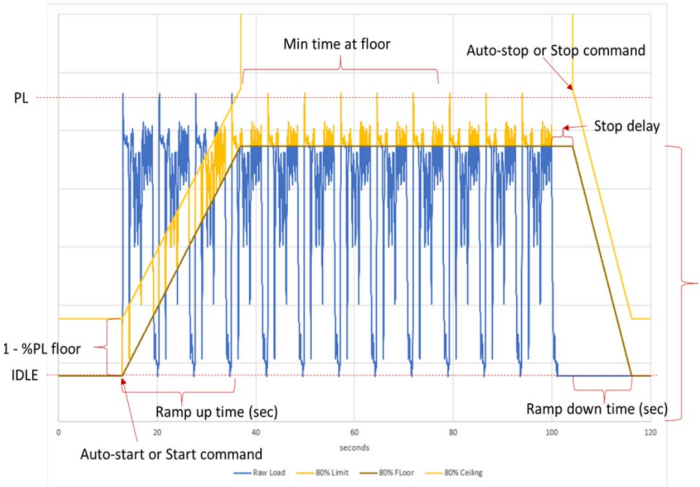
- How do we do these assessments?

Defining Limits	Detailed Assessments
PSS®E/PSLF/PW/DSATools can be used to define injection limits	Multi-mass model – work with your OEM Data Center – Current/Power injection model with load shape knowledge sufficient

Mitigation Methods

ESTATCOM	BESS GFM	BESS GFL	Double Conversion UPS
Good at mitigating high frequency oscillations but may fall short at preventing lower frequency oscillations	May not be the most suitable option when sited closer to a generating plant and high SCR.	Better performance than GFM but control delays (Pref change) can reduce effectiveness at high frequencies	Good performance for high frequency oscillations but may fall short on lower frequency oscillations unless storage sized appropriately

Upcoming Rack Level Solutions



Mitigation requires low latency and controlled injections. RATHER THAN GFM/GFL, LOOK FOR PERFORMANCE

Evaluation in progress

1. Understanding the advantages and disadvantages of different control methods (OEM agnostic)
2. Understanding how siting of mitigation can affect sizing
3. Understanding if certain mitigation methods can provide multiple benefits

Key Topics being Addressed

01

Modeling Guidance and Model Development

02

Voltage Ride Through Determination and Testing

03

Load Oscillation Impacts, Monitoring, and Mitigation

04

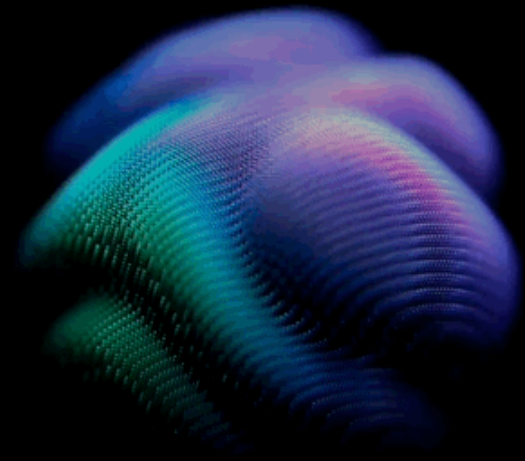
Interconnection Studies for Flexible Loads

Interconnection Assessments for Flexible Loads

- Many utilities as a practice treat load as fully firm for interconnection studies.
 - Some entities (e.g., ERCOT) has presented methods to treat provisional controllable load resources differently in interconnection studies.
- Flexibility offered by load may not be fully considered during interconnection, especially when transmission overloads or voltage concerns exist.
- Ensuring that flexibility treatment during planning can be translated to real-time operations is important
 - If planning studies are significantly different from real-time operational reality, this can present a challenge for operators
- Interconnection studies would need to evolve including assessments of multiple scenarios and possibly multi-snapshot assessments to ensure value of flexibility can be leveraged without compromising reliability.

Work in progress with a few use-cases. Findings can be insightful for others looking to evaluate flexible loads

EPRI
TOGETHER...
SHAPING THE FUTURE
OF ENERGY®



Thank You for Attending

RF State Outreach Contacts:

Michelle Cross: michelle.cross@rfirst.org

Brian Thiry: brian.thiry@rfirst.org

Please complete the Survey in Linktree

