

LEGAL UPDATES

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LINDA L. WALSH

WASHINGTON:

202.378.2308

LINDA.WALSH@

HUSCHBLACKWELL.COM

EMILY STAROBIN

WASHINGTON:

202.378.5784

EMILY.STAROBIN@

HUSCHBLACKWELL.COM

FERC Issues Show Cause Orders to All Six RTOs/ISOs on Large Load Interconnection

On June 18, 2026, the Federal Energy Regulatory Commission (FERC or the Commission) took long-awaited action on the Advance Notice of Proposed Rulemaking (ANOPR) proceeding for large loads. The Commission issued unique show cause orders to each of the six Regional Transmission Organizations (RTOs)/Independent System Organizations (ISOs) under its jurisdiction: PJM (EL26-67), SPP (EL26-68), NYISO (EL26-69), MISO (EL26-70), CAISO (EL26-71), and ISO-NE (EL26-72).

The show cause orders are a direct response to Department of Energy's October 2025 ANOPR, in which Secretary Wright directed FERC to develop reforms ensuring timely, orderly, and non-discriminatory interconnection of large loads to the interstate transmission system, and to FERC's own April 2026 Order Regarding Intent to Act in which the Commission concluded that additional action was warranted to support further progress on that directive.

60 Day Filing Deadline. Each grid operator has **60 days from June 18, 2026**, to either (1) demonstrate ("show cause") that their current tariffs are just and reasonable even without large load-specific provisions, or (2) file tariff revisions addressing the issues identified by FERC.

Five Reform Areas. The show cause orders are tailored to each RTO/ISO, but they generally identify five categories of reform for the grid operators to address:

1. **Efficient transmission service application and study processes**—including consideration of alternative transmission technologies to accelerate interconnection timelines.

2. **Cost transparency**—ensuring that new large loads do not shift costs unfairly onto existing transmission customers.
3. **Co-location agreements and behind-the-meter generation**—providing clear rules for large loads that operate alongside or behind their own generation assets.
4. **New transmission services for flexible large loads**—recognizing that large loads with flexible operational profiles can provide value to the grid and may warrant distinct service offerings.
5. **Studying generating facilities serving electrically proximate and co-located large loads**—developing processes to assess the generation resources dedicated to or closely associated with large load customers.

30 Day Reporting Deadline. Within **30 days from June 18, 2026**, each grid operator and its transmission owners must submit a detailed informational report describing how the grid operator intends to ensure that adequate generation will be available to serve existing and new large loads.

Action Items

All Interested Parties:

Motions to Intervene. All interested parties should file a motion to intervene in the respective docket by **July 9, 2026**. This intervention date is the same for all six show cause orders.

Comments and Protests. Following the RTO's/ISO's show cause responses, which are due on August 17, 2026 (assuming no extensions are requested), all interested parties will have 30 days (by **September 16, 2026**) to file comments or protests addressing whether the tariffs are just and reasonable and/or what changes should be made as replacement rates.

RTOs/ISOs:

Informational Reports. Each RTO/ISO must submit a separate informational report on how it plans to ensure adequate generation to serve existing and new large loads by **July 20, 2026**.

Abeyance Requests. By **August 3, 2026**, each RTO/ISO must file any request for abeyance (up to 90 days, non-extendable), with description of anticipated Federal Power Act (FPA) Section 205 filing and expected filing date.

Show Cause Responses. Each RTO/ISO must file a show cause response by **August 17, 2026** as to why the tariff remains just and reasonable or propose tariff revisions to remedy identified deficiencies. May instead file under FPA Section 205.

What does this mean for you

If you're a large load customer, generator, transmission owner, or other stakeholder in any of the six RTO/ISO regions, these show cause orders could significantly impact how you interconnect to the grid, how costs are allocated, and what service options are available for flexible or co-located loads. You should file a motion to intervene by July 9, 2026 to preserve your ability to participate in the proceeding and influence the tariff changes that may result. The reforms FERC is seeking—covering study processes, cost transparency, co-location rules, and new service offerings—will shape the regulatory landscape for large load interconnections for years to come.

Additional Information

FERC Publications about the Show Cause Orders:

FERC Fact Sheet on the Show Cause Orders

FERC News Release on the Show Cause Orders

FERC Presentation | Items E-7 through E-12: RTO/ISO Show Cause Orders

Show Cause Order and Notice of Institution of Section 206 Proceeding and Effective Refund Date for Each RTO/ISO:

PJM (EL26-67): Show Cause Order, Section 206 Notice

SPP (EL26-68): Show Cause Order, Section 206 Notice

NYISO (EL26-69): Show Cause Order, Section 206 Notice

MISO (EL26-70): Show Cause Order, Section 206 Notice

CAISO (EL26-71): Show Cause Order, Section 206 Notice

ISO-NE (EL26-72): Show Cause Order, Section 206 Notice

Contact Us

For further details or additional information, contact Linda L. Walsh, Emily Starobin, or another member of the Husch Blackwell Energy & Natural Resources team.