UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

North American Electric Reliability Corporation	Docket No. RR27-1-000

MOTION TO INTERVENE AND COMMENTS OF THE AMERICAN PUBLIC POWER ASSOCIATION, LARGE PUBLIC POWER COUNCIL, AND TRANSMISSION ACCESS POLICY STUDY GROUP

The American Public Power Association (APPA), Large Public Power Council (LPPC), and Transmission Access Policy Study Group (TAPS) respectfully move to intervene in the above-captioned proceeding and submit these comments in support of the North American Electric Reliability Corporation (NERC) petition for approval of its rules of procedure regarding registration criteria for computational loads.[1]

We urge the Federal Energy Regulatory Commission (Commission) to approve NERC's proposed registration criteria and to make clear that such approval is not resolving broader questions about the scope of the bulk-power system and its users.

MOTION TO INTERVENE

APPA is the voice of not-for-profit, community-owned utilities that power 2,000 towns and cities nationwide. Public power utilities are in every state except Hawaii. They collectively serve over 55 million people in 49 states and five U.S. territories, and account for 15 percent of all sales of electric energy (kilowatt-hours) to end-use consumers. Public power utilities are load-serving entities, with the primary goal of

[1] NERC, Petition for Approval of Revisions to NERC Rules of Procedure Regarding Computational Load and Request for Expedited Action (Oct. 21, 2026), eLibrary No. 20261021-5204 ("Petition").

providing the communities they serve with safe, reliable electric service at the lowest reasonable cost, consistent with good environmental stewardship. This orientation aligns the interests of the utilities with the long-term interests of the residents and businesses in their communities.

LPPC is an association of 29 of the nation's largest municipal and state-owned utilities, representing the larger, asset-owning members of the public power community and approximately 90% of the transmission assets owned by public power. Located throughout the nation, many of LPPC's members are transmission-owning members of ISOs/RTOs, while others are considering membership in regions of the nation in which ISOs/RTOs and other organized markets are yet being developed.

TAPS is an association of transmission-dependent utilities (TDUs) in thirty-nine states promoting open and non-discriminatory transmission access. TAPS members have long recognized the importance of grid reliability. As TDUs, TAPS members are users of the Bulk Power System and are highly reliant on the reliability of facilities owned and operated by others for the transmission service required to meet TAPS members' loads. In addition, many TAPS members participate in the development of and are subject to compliance with NERC reliability standards.

The outcome of this proceeding will affect our members and the customers they serve. APPA, LPPC, and TAPS therefore each have an interest in the outcome of this proceeding, and our participation is in the public interest. APPA, LPPC, and TAPS respectfully move to intervene.

All correspondence, communications, pleadings, and other documents related to this proceeding should be addressed to the undersigned. We request that the Commission

waive Rule 203(b)(3), 18 C.F.R. § 385.203(b)(3), to allow each of the individuals listed below to be placed on the official service list in this proceeding to avoid delays in receipt of notices and responses to pleadings.

COMMENTS

A. REGISTERING LARGE COMPUTATIONAL LOADS WILL STRENGTHEN BULK-POWER SYSTEM RELIABILITY.

We support approval of NERC's proposed registration criteria for Computational Load Owner and Computational Load Operator.[2] Large computational loads can affect bulk-power system reliability through their size, electrical characteristics, and operating behavior.[3] Registering the entities that own and operate these loads is an essential step toward subjecting them to enforceable reliability standards that address those risks.

NERC's proposed criteria appropriately focus registration on computational loads that pose material reliability risks. The criteria apply to owners and operators of Computational Load Sites with a total connected load of at least 50 megawatts (MW), supplied through electrical equipment connected at a voltage level of at least 100 kilovolts (kV) from one or more points of connection.[4] These criteria provide a sound basis for identifying computational load owners and operators that directly use the bulk-power system and whose activities can materially impact bulk-power system reliability.

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[2] In these comments, undefined capitalized terms—such as Computational Load Owner—are used as they are defined in NERC's Petition.

[3] Petition at 16-17 (citing January 2025 and January 2026 reports analyzing incidents in the Eastern Interconnection and ERCOT in which computational loads demonstrated a potential for impacting bulk-power system reliability).

[4] Petition at 29.

Those entities are properly registered pursuant to Federal Power Act section 215's authority over "users…of the bulk-power system."[5]

B. THE COMMISSION SHOULD RESERVE BROADER QUESTIONS ABOUT THE SCOPE OF THE BULK-POWER SYSTEM AND ITS USERS.

The Commission can—and should—approve NERC's proposed criteria without resolving broader questions about the boundaries of the bulk-power system or which other entities may qualify as its users. The proposed definition of Computational Load Site refers to electrical equipment connected to the bulk-power system, while the registration criteria apply specific load and voltage thresholds to the site supplied through that equipment. The two operate together to identify the computational load owners and operators subject to registration in this proceeding.

That combined framework does not require the Commission to adopt a broader interpretation of the statutory term "bulk-power system" or to determine which entities outside the proposed criteria qualify as users of that system for registration purposes. Nor does registering a computational load owner or operator require treating every facility through which the site receives electricity as part of the bulk-power system.

Accordingly, the Commission should clarify that, when approving the registration of computational load owners and operators under these criteria, the Commission is making no broader determination about the scope of the bulk-power system and the identification of other users that may be subject to registration.[6]

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[5] 16 U.S.C. § 824o(b).

[6] *Cf.*, *N. American Elec. Reliability Corp.*, 187 FERC ¶ 61,196, P 44 (2024) ("as NERC confirmed that it was not seeking to modify the statutory definition or boundaries of the Bulk-Power System, we similarly clarify in response to TAPS that the Commission, in approving NERC's proposed revisions to its Rules of

CONCLUSION

For the reasons stated above, APPA, LPPC, and TAPS urge the Commission to approve NERC's petition and confirm that such approval does not resolve broader questions about the scope of the bulk-power system and its users that are not before the Commission in this proceeding.

Respectfully submitted,

American Public Power Association

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November 20, 2026

Procedure, is not determining the boundaries of the Bulk-Power System.").

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Arlington, VA this 20th day of November, 2026.

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