NERC

Consideration of Comments

Rules of Procedure (ROP) Revisions to Appendices 2, 5A, and 5B (Computational Load Entities)

August 19, 2026

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Introduction

NERC thanks all commenters who submitted comments on the proposed changes to the Rules of Procedure. NERC posted the proposed changes for public comment from April 1, 2026 through May 15, 2026. NERC received 32 sets of comments from 44 commenters, as shown in the table on the following pages.

NERC has posted submitted comments on the Rules of Procedure page.

List of Commenters

	Entity
1	Equinix
2	Persistence Analytics Group LLC (Persistence)
3	AIONTRACKS, Inc.
4	Southwest Power Pool (SPP)
5	Entergy
6	Large Public Power Council (LPPC)
7	Arkansas Electric Cooperative Corporation (AECC)
8	American Chemistry Council (ACC)
9	PacifiCorp
10	Alphataraxia
11	Southern Company (Southern)*
12	Independent Electricity System Operator (IESO)
13	American Electric Power (AEP)
14	Solar Energy Industries Association (SEIA)
15	Crusoe Technologies (Crusoe)**+
16	Industrial Energy Consumers of America (IECA)
17	Eversource*
18	Sacramento Municipal Utility District and Balancing Authority of Northern California (SMUD/BANC)*
19	Corscale Data Centers (Corscale)**
20	Dominion Energy (Dominion)*
21	Google**
22	Electricity Consumers Resource Council
23	Edison Electric Institute, American Public Power Association, Large Public Power Council, National Rural Electric Cooperative Association, Transmission Access Policy Study Group, and National Association of Regulatory Utility Commissioners (Trades)
24	New York Power Authority (NYPA)*
25	FirstEnergy*
26	Bonneville Power Administration (BPA)
27	Digital Power Network (DPN)

28	CenterPoint Energy Houston Electric, LLC (Centerpoint)*
29	DC Energy Management, LP (DC Energy Mgmt.)
30	Salt River Project* (SRP)
31	PJM Interconnection (PJM)
32	Oracle**
33	Ameren*
34	Consumers Energy
35	Arizona Public Service (AZPS)*+
36	Independent System Operator/Regional Transmission Organization Council Standards Review Committee (IRC SRC)
37	Invenergy
38	Data Center Coalition (DCC)
39	Arevon
40	Microsoft
41	ATC*+
42	Electricity Customer Alliance, Electricity Consumers Resource Council, and Industrial Energy Consumers of America (End-User Groups)
43	Midcontinent Independent System Operator (MISO)
44	City of Santa Clara (dba Silicon Valley Power(SVP))*+

*supports Trade Associations

**supports DCC

+means support and additional comments

Summary of Proposed Revisions Posted for Comment

The following section summarizes the proposed revisions to the NERC Rules of Procedure posted for comment from April 1-May 15, 2026 regarding registry criteria for computational loads. In response to comments, NERC is posting further revisions to the proposed criteria as described in the response to comments and is providing this summary on the original proposed language commenters reviewed for convenience.

NERC Rules of Procedure Appendix 2 – Definitions Used in the Rules of Procedure

Appendix 2 to the NERC Rules of Procedure includes defined terms used throughout the Rules of Procedure. The proposed revisions add the following two terms and definitions:

- "Computational Load means Load comprised of electric power demand from information technology equipment, such as servers, storage, and networking hardware."
- "Computational Load Entity means the end-user or the entity that hosts end-users that receives electric power for Computational Load."

NERC Rules of Procedure Appendix 5A – Organization Registration and Certification Manual

Appendix 5A contains the process used by NERC and the Regional Entities to register certain functional entity types to which mandatory and enforceable Reliability Standards apply. The proposed revisions to Appendix 5A added "Computational Load Entity (CLE)" as a type of entity that is required to register on the NERC Compliance Registry. In addition, proposed revisions to Appendix 5A include minor administrative corrections.

NERC Rules of Procedure Appendix 5B – Statement of Compliance Registry Criteria

Appendix 5B contains the specific criteria NERC and the Regional Entities use to identify which organizations may be candidates for registration for functional entity types. In accordance with the Federal Power Act, NERC must identify the owners, operators, and users of the Bulk Power System (BPS) who have a material impact on the BPS. To that end, the proposed revisions in Appendix 5B added threshold criteria to identify those organizations that should be registered as Computational Load Entities, summarized below:

1. A Computational Load Entity must be the end-user or the entity that hosts end-users that receives electric power for Computational Load; and

2. A Computational Load Entity that 1) contributes to an aggregate connected Load capability greater than or equal to 20 MW; 2) at a single point of interconnection to the Bulk Power System at a voltage greater than or equal to 60 kV; and 3) hosts 1 MW or greater of Computational Load.

Candidates must meet all the criteria in the proposed revisions in Appendix 5B in order to be registered as a Computational Load Entity.

Comments

The following section provides a summary of issues raised in stakeholder comments along with NERC's response.

Definitions

Entity	Summary of Stakeholder Comments	Response
AEP ATC AZPS DCC Crusoe Corscale Google Oracle Trades Southern Eversource SMUD/BANC Dominion NYPA FirstEnergy Centerpoint SRP Ameren AZPS ATC SVP PJM	Several commenters recommended NERC use a definition of Computational Load Facility to clarify what sort of "site" owners or operators are subject to registration. Commenters note this definition would assist in the standards development project addressing computational loads. Some commenters provided a proposed definition for consideration: "Computational Load Facility means a collection of electrical equipment located at one or more buildings, structures, or installations that is designed to receive power, has an aggregate connected maximum peak demand of Computational Load greater than or equal to 75 MW, and is served through electric facilities at a voltage level greater than or equal to 100 kV from one or more points of connection." Others suggested borrowing concepts FERC uses in implementing PURPA through use of the "one-mile" rule to better define sites.	NERC agrees that defining the composition of a site provides clarity to the registry criteria for the owner and operator entities that must register. Accordingly, NERC is proposing a definition of "Computational Load Site." The proposed definition does not include the word "Facility" as proposed by some commenters because NERC determined that using such a term could lead to confusion. For example, a "Computational Load Facility" would include the term "Facility", which is associated with Bulk Electric System (BES) Elements, a narrowly defined subset of the BPS. In addition, NERC determined that the Computational Load Site definition does not need the numerical thresholds for MW and kV because those will be in the registry criteria only, whereas the Computational Load Site definition can also be used by the standard drafting team in the proposed Reliability Standards. This ensures alignment across ROP terms and NERC Glossary terms while maintaining registry thresholds in the ROP only. See the revised ROP Appendix 2 posted for comment for the proposed "Computational Load Site" definition.

Entity	Summary of Stakeholder Comments	Response
AECC AEP Arevon ATC AZPS DCC Crusoe Corscale Google Oracle ELCON IRC SRC Microsoft MISO SEIA Trades Southern Eversource SMUD/BANC Dominion NYPA FirstEnergy Centerpoint SRP Ameren SVP	Some commenters suggested that Computational Load definition needs clarification on its scope as it may include unintended entities or information technology infrastructure. Some commenters suggest it to mean "Load comprised *primarily* of electric power demand from *power electronic-based* information technology equipment." Other commenters noted that some terms used in the definition created ambiguity, such as "storage" instead of "data storage" or the use of "such as." Other commenters suggested creating a "volatile loads" definition instead of Computational Load. Others suggested "Computational Load" means "Load that uses electric power for equipment needed for operation of computers or computer programs. Examples of such equipment include, but are not limited to, processors, memory, data storage devices, and networking equipment." Others note that "electronic load" may be a better description.	NERC determined that with the use of the newly proposed Computational Load Site definition, the definition of Computational Load is no longer needed for registry criteria purposes. Where appropriate, NERC considered applying the proposals from the comments on the Computational Load definition to other components of the revised proposed criteria. For instance, the use of "primarily" as suggested by some commenters in the Computational Load definition is now used in the proposed definition of Computational Load Site.

Entity	Summary of Stakeholder Comments	Response
AEP AIONTRACKS Arevon ATC AZPS SVP DCC Crusoe Corscale Google Oracle ELCON Entergy IRC SRC Microsoft PacifiCorp SEIA Trades Southern Eversource SMUD/BANC Dominion NYPA FirstEnergy Centerpoint SRP Ameren	Some commenters proposed that Computational Load Entity should be Computational Load Owner and Computational Load Operator. Other commenters suggested further clarity or guidance on which end-users, particularly in a multitenant situation, would be registered as the Computational Load Entity. Others suggested to clarify that Computational Load Entities are "operators of the facility" that uses power for Computational Load. Others suggested clarifying that the Load "aggregates" at a point of interconnection "or substation."	NERC agrees that two functions provide more clarity on the types of entities subject to registration. Accordingly, NERC changed the proposed functional entity from "Computational Load Entity" to "Computational Load Owner" (CLO) and "Computational Load Operator" (CLOP). Additionally, NERC removed references to "end-user or entity that hosts end-users" from the functional registrations as the two separate functions address differing organizational arrangements more clearly.

Entity	Summary of Stakeholder Comments	Response
BPA Trades Southern Eversource SMUD/BANC Dominion NYPA FirstEnergy Centerpoint SRP Ameren AZPS ATC SVP	Several commenters stated not to revise the BES definition at this time. One commenter suggested that NERC consider revisions to the definition of BES to address computational loads, in particular by adding to Inclusion I6, to address entities that may have BES-qualifying equipment.	NERC determined that the proposed registry criteria, without revising or expanding the BES, address the identified risk to the BPS. Based on comments received, NERC will continue that approach and not revise the BES definition at this time.

Thresholds

Entity	Summary of Stakeholder Comments	Response
AECC AEP Arevon ATC AZPS BPA SPP Equinix Crusoe DCC Crusoe Corscale Google Oracle ELCON Invenergy IRC SRC Microsoft Consumers Energy SEIA ACC Trades Southern Eversource SMUD/BANC Dominion NYPA FirstEnergy Centerpoint SRP Ameren SVP	Stakeholders opposed the 1 MW “de minimus” Computational Load threshold as too low, confusing, or capturing unintended entities, such as industrial or commercial large loads that did not pose similar risks as entities with greater computational load. Some entities suggested using “50 % or greater” of Computational Load. Some suggested alternative amounts of Computational Load instead of 1 MW, ranging from 3 MW to 20 MW.	NERC revised the Section III registry criteria thresholds to remove the 1 MW “de minimus” Computational Load. Instead, NERC is proposing to define “Computational Load Site” as “primarily” containing certain IT infrastructure. This approach achieves the same objective by ensuring those with a small amount of computational load that do not pose the same impact are not included in the registry criteria through a focus on indicating the site “primarily” contains IT infrastructure.

Entity	Summary of Stakeholder Comments	Response
AEP Arevon AZPS Crusoe DCC Crusoe Corscale Google Oracle Invenergy IRC SRC Microsoft PJM Eversource Consumers Energy ACC Trades Southern Eversource SMUD/BANC Dominion NYPA FirstEnergy Centerpoint SRP Ameren	Some commenters suggested the 20 MW threshold was too low and may capture sites that could be considered only local distribution or commercial or industrial loads that are not historically impactful to the BPS. Comments recommended increases ranging between 50 to 100 MW. Some commenters alternatively suggested that if the lower threshold is maintained, NERC should consider a tiered threshold approach to registration that mimics the GO/GOP Category 1 and 2 structure. Others suggested that the thresholds align with RTO/ISO tariff definitions of large loads.	Based on comments and ongoing analysis during and after the April 1-May 15, 2026 posting, NERC was able to refine its understanding of the aggregate risks associated with data center sites and clusters connected throughout the BPS. Further analysis was expanded to sites planned to be operational by the end of 2027.From the ongoing and expanded analysis, NERC determined that the threshold could be raised to 50 MW while still addressing the risks. In addition, NERC reviewed Regional Transmission Organizations (RTO) and Independent System Operator (ISO) definitions of large loads and considered whether those would be appropriate for continent-wide reliability purposes. NERC found that a 50 MW is generally in alignment with some RTO/ISO large load definitions.
AIONTRACKS ATC SVP	Some commenters supported the proposed 20 MW threshold.	Based on comments and ongoing analysis during and after the April 1-May 15, 2026 posting, NERC was able to refine its understanding of the aggregate risks associated with data center sites and clusters connected throughout the BPS. As a result, NERC determined that the threshold could be raised to 50 MW.

Entity	Summary of Stakeholder Comments	Response
AZPS SVP	Some commenters supported the proposed 60 kV threshold.	Based on comments and ongoing analysis during and after the April 1-May 15, 2026 posting, NERC was able to refine its understanding of the aggregate risks associated with data center sites and clusters connected throughout the BPS. As a result, NERC determined that the threshold could be raised to 100 kV.
AEP Arevon Crusoe DCC Crusoe Corscale Google Oracle ELCON Trades Southern Eversource SMUD/BANC Dominion NYPA FirstEnergy Centerpoint SRP Ameren ATC	Some commenters suggested the 60 kV threshold was too low and may capture sites that could be considered only local distribution or commercial or industrial loads that are not historically impactful to the BPS. Some commenters alternatively suggested that if the lower threshold is maintained, NERC should consider a tiered threshold approach to registration that mimics the GO/GOP Category 1 and 2 structure.	Based on comments and ongoing analysis during and after the April 1-May 15, 2026 posting, NERC was able to refine its understanding of the aggregate risks associated with data center sites and clusters connected throughout the BPS. As a result, NERC determined that the threshold could be raised to 100 kV.
Consumers Energy	Remove the kV threshold for clarity.	NERC determined that including voltage in the registry criteria ensures registration of entities with the most impactful connection to the BPS. As each candidate goes through the registration process, Regional Entity staff will assist candidates in assessing the appropriate voltage threshold or connection configuration.

Criteria Clarifications

Entity	Summary of Stakeholder Comments	Response
Arevon AZPS BPA SPP IESO Microsoft MISO Trades Southern Eversource SMUD/BANC Dominion NYPA FirstEnergy Centerpoint SRP Ameren ATC SVP	Commenters remarked that “single point of interconnection” needs further clarification as it does not address facilities with multiple points of interconnection, shared substations, or co-located generation. Some commenters suggested revisions such as “Connects to the Bulk Power System (BPS) operated at a voltage greater than or equal to 60 kV on the high side and behind one or more common Points of Interconnection (POIs) or Service Delivery Points” instead of the “single point of interconnection” language. Others noted the need for clarification on whether the point of interconnection is the immediate customer connection point or the upstream transmission connection point.	NERC revised the proposed criteria to state the Computational Load Site could be connected from “one or more points of connection” to address the possible configurations that meet the registry criteria.

Entity	Summary of Stakeholder Comments	Response
Trades Southern Eversource SMUD/BANC Dominion NYPA FirstEnergy Centerpoint SRP Ameren AZPS ATC SVP	Clarify that entities must meet all criteria, including criteria in "Section III" to be registered.	NERC clarifies that in order to be registered as a Computational Load Owner or Operator, a candidate for registration must meet all criteria applicable to those functions in order to be placed on the NERC Compliance Registry. However, NERC declines to further revise the proposed registry criteria in response because Section III of the proposed ROP already states that "Entities identified in Section II above as being subject to Registration as a Distribution Provider, Computational Load Operator, or Computational Load Owner should be included in the Compliance Registry for these functions only if they meet any of the criteria listed below." Accordingly, the ROP already dictates that CLO or CLOP will not be placed on the NCR without meeting the criteria in Section III. NERC also notes this is how it has been applying Section III to Distribution Providers over the past several years, and historically for Generator Owners, Generator Operators, Transmission Owners, Transmission Operators, and other functions prior to implementation of the BES Definition.

Entity	Summary of Stakeholder Comments	Response
IECA Arevon Trades Southern Eversource SMUD/BANC Dominion NYPA FirstEnergy Centerpoint SRP Ameren AZPS ATC SVP	Some commenters requested clarification that industrial or commercial large load are not included in the proposed criteria, citing the lack of a demonstrated reliability gap for these types of entities. Others suggested that the criteria is too narrow by excluding non-IT load and is inconsistent with the LLWG findings.	NERC revised the proposed criteria to clarify that large industrial or commercial loads historically have not posed a material impact to the BPS, such as manufacturing facilities or large hospitals, are not included. Clarity is accomplished through the removal of the term "Computational Load" and the required 1 MW "de minimus" amount and the addition of the Computational Load Site term, which includes the word "primarily" to indicate the use of the IT infrastructure at the site. Therefore, entities that have computational load but are not "primarily" performing computational activities do not meet the proposed registry criteria. While NERC recognizes the LLWG efforts reviewed other large loads in addition to computational loads, NERC determined that the risk is appropriately addressed at the moment by focusing on computational loads due to their aggregate and operational impacts on the BPS.
AIONTRACKS Persistence	During registration, NERC should capture a "class descriptor" of the type of computational load (e.g., training dominant, inference-dominant, etc.) to better apply Reliability Standards requirements.	NERC recognizes computational loads differ, and while this information may be captured during the registration process, it likely would be more appropriately captured by the Regional Entities during their risk-based compliance monitoring and enforcement processes.

Entity	Summary of Stakeholder Comments	Response
AZPS BPA	The proposed registry criteria should clarify that it applies to all those computational loads that meet the thresholds, including those that are served through small distribution entities. In addition, the proposed registry criteria should clarify that the voltage refers to the high-side and not necessarily the interconnecting utility's stepdown low-side voltage.	NERC clarified that the proposed registry criteria applies across various configurations of users of the BPS through addition of the following language: "supplied through electrical equipment" connected to the BPS at 100 kV or above. This is intended to reference the BPS connection of the electrical equipment serving the Computational Load Site, irrespective of the site's service or interconnection agreement voltage. NERC plans to post an ERO Registration Reference document that will provide better clarity on various configurations relative to high- and low-side voltage and may be factors in determining registration.
AZPS IESO MISO Trades Southern Eversource SMUD/BANC Dominion NYPA FirstEnergy Centerpoint SRP Ameren ATC SVP	The proposed registry criteria uses an unclear term of "capability" which can be interpreted as maximum load. Some commenters recommend using "maximum peak demand." Other comments noted the need to clarify whether it is gross load, net load, maximum connected load capability, or another metric. Others questions how to calculate "aggregate connected Load capability."	NERC revised the proposed registry criteria to use the term "connected Load", which refers to all the electrical equipment in a Computational Load Site, for better clarity on how to determine the MW.

Other

Entity	Summary of Stakeholder Comments	Response
End-user Groups Arevon DCC Crusoe Corscale Google Oracle IESO Microsoft Consumers Energy	Commenters requested additional technical justification or legal basis supporting the proposed registry criteria. To that end, some commenters requested additional information on why NERC is including certain end-users in the proposed registry criteria or why the criteria does not cover all load instead of just computational load.	Consistent with the Federal Power Act section 215, the NERC registry criteria identify the set of owners, operators, and users who have a material impact on the BPS and must therefore comply with applicable Reliability Standards. As NERC noted in its technical reasoning document in the first posting of the proposed registry criteria, the technical justification for proposing to register computational loads is based on their aggregate impact to the reliability of the BPS. The assessment of this aggregate impact resulted from the work performed by the Reliability and Security Technical Committee Large Loads Working Group and verified through the Aggregated Report on NERC Level 2 Alert and industry confirmation. Further analysis identified entities that should be registered to address the identified risk based upon their MW capability and voltage connection to the BPS.. Upon review of the comments received on the initial proposed criteria and further analysis, NERC determined to revise the criteria to the higher 50 MW/100 kV thresholds and revised the technical reasoning document to provide justification for the new proposed thresholds.
Trades Southern Eversource SMUD/BANC Dominion NYPA FirstEnergy Centerpoint SRP Ameren AZPS ATC SVP	Some commenters suggested that NERC and the Regional Entities be responsible for the identification of entities that can meet the new function instead of requesting the information from existing registered entities.	While NERC endeavors to ensure its processes are not overly burdensome on entities, there may be instances where existing registered entities are best positioned to provide the necessary information to ensure identification of appropriate entities to support reliability.

End-users Group Microsoft ELCON	Commenters questioned why existing registered entities cannot address the risk posed to the BPS instead of a new functional registration.	Existing Reliability Standards provide important precedents and framework for maintaining the reliability of the BPS, but they were not developed specifically for this type of large load with its unique characteristics and aggregate impact. The NERC Large Loads Working Group identified gaps in existing Reliability Standards in "Assessment of Gaps in Existing Practices, Requirements, and Reliability Standards for Emerging Large Loads" and recommended development of new and/or updated Reliability Standards to address the unmitigated risks to the BPS. This need was also underscored in NERC's Aggregated Report on NERC Level 2 Industry Recommendation: Large Load Interconnection, Study, Commissioning, and Operations. Further analysis identified entities that should be registered to address the identified risk based upon their MW capability and voltage connection to the BPS. When determining the need for new Reliability Standards, the LLWG also assessed whether existing registered entities could take on the new requirements. Through this assessment, the LLWG determined that while a Transmission Owner could include requirements such as disturbance ride-through or modeling into interconnection requirements via NERC Reliability Standard FAC-001.A Transmission Owner does not always have the ability to assess performance-based financial penalties to better ensure appropriate performance when connected to the BPS. Furthermore, the LLWG asserted that if computational loads do not have NERC standards directly applicable to them, the existing registered entities will then be responsible for the performance of that computational load. The LLWG noted that while this may have been appropriate for historical loads of significant size, emerging large loads are comparable to the size of significantly large generators and have unique operational characteristics, both of which create challenges for having an existing entity be responsible for their performance. Accordingly, the LLWG determined that requirements applicable to a new functional entity would

Entity	Summary of Stakeholder Comments	Response
		provide clear enforcement mechanisms to help ensure the risk to the BPS is addressed by those able to control performance. This assessment was further supported by NERC's Aggregated Report on NERC Level 2 Industry Recommendation: Large Load Interconnection, Study, Commissioning, and Operations. Further analysis identified entities that should be registered to address the identified risk based upon their MW capability and voltage connection to the BPS.
DCC Crusoe Corscale Google Oracle ELCON	Some commenters requested that NERC wait until it receives the responses to the Level 3 Alert. Others requested that the recommendations from the Level 3 Alert become standards for existing registered entities.	As noted in the Large Load Action Plan, NERC has intended for the Level 3 Alert and NERC standards and registry criteria development to occur simultaneously in order to most expeditiously address the risks posed by computational loads. In addition, FERC issued an order directing NERC to complete registry criteria revisions and standards development for computational loads by the end of 2026, NERC must continue its efforts simultaneously to meet its regulatory deadlines.

Entity	Summary of Stakeholder Comments	Response
DCC Crusoe Corscale Google Oracle DPN ELCON	Some commenters requested more information on NERC's jurisdiction or statutory authority to register large or computational loads.	Under section 215, the Federal Power Act provides the Commission, via the ERO, authority to regulate "users, owners, and operators of the Bulk Power System (BPS)." This statutory authority to regulate includes: (1) developing and enforcing mandatory Reliability Standards that provide for reliable operation of the BPS, subject to approval by FERC; and (2) assessing BPS reliability and adequacy. Consistent with federal jurisdiction over interstate commerce and other sections of the Federal Power Act, Congressional authority under section 215 pertains only to the BPS and "users, owners, and operators" of the BPS. As such, under section 215, NERC cannot: (1) develop and enforce Reliability Standards for reliable operation of facilities used in the local distribution of electric energy, or (2) order the construction of additional generation or transmission capacity or set and enforce compliance with standards for adequacy or safety of electric facilities or services. FERC's regulations echo Federal Power Act section 215 by requiring that "each user, owner and operator of the [BPS] within the United States…shall register with the [ERO] and the Regional Entity for each region within which it uses, owns, or operates [BPS] facilities, in such manner as prescribed by the Rules of the [ERO] and each applicable Regional Entity. While NERC's reliability authority extends to all users, owners, and operators of the BPS, NERC's registry criteria and Reliability Standards identify the appropriate users, owners, and operators based on an exercise of reasonable judgment as to their potential material impact to the BPS. NERC applies risk-based engineering judgment, often in coordination with its stakeholder technical groups, to assess the impact of a particular user, owner, or operator on the BPS and whether any action(s) taken by that user, owner, or operator could mitigate risks posed by that impact.

Entity	Summary of Stakeholder Comments	Response
AZPS DCC Crusoe Corscale Google Oracle Microsoft Trades Southern Eversource SMUD/BANC Dominion NYPA FirstEnergy Centerpoint SRP Ameren ATC SVP	Some commenters suggested NERC develop an exception process similar to the BES Exceptions process that allows entities without a material impact to be exempt from registering despite meeting the criteria. Other commenters requested that existing entities be allowed an exception from any future rules.	NERC already has an established process to handle circumstances where an entity does not believe it meets the registry criteria or does not believe its Computational Load Site has a material impact on BPS reliability. Under Rules of Procedure Appendix 5A, entities may request a review of their registration determinations under the NERC-led Registration Review Panel. Through that process, NERC and Regional Entities review an entity's materiality to the BPS and may either deregister an entity that meets registry criteria or register an entity that does not meet registry criteria. As for exceptions for existing entities, NERC notes that the Project 2026-02 standards drafting team considers appropriate implementation time of Reliability Standards. The drafting team will consider whether existing facilities are allowed different implementation timeframes, or exceptions based on reliability risk.

Entity	Summary of Stakeholder Comments	Response
Alphatraxia Arevon Crusoe Trades Southern Eversource SMUD/BANC Dominion NYPA FirstEnergy Centerpoint SRP Ameren AZPS ATC SVP IESO	NERC should provide more guidance on how the registry criteria applies to entities in differing configurations, such as those with co-located configurations among others. In addition, some commenters noted that NERC should provide guidance on a reasonable timeline and clear communication on that workflow for implementation and registration of those entities.	As was done with the Category 1 and 2 GO/GOP criteria once approved, NERC and the Regional Entities plan to develop an ERO Registration Reference document that provides additional detail on how the registry criteria is applied. This will occur once the registry criteria is more finalized, but in the interim, NERC registration staff collaborated with the Project 2026-02 drafting team to develop a Frequently Asked Questions (FAQ) document that provides some information on applicability of the registry criteria and Reliability Standards. While actual registration determinations are made after assessment of an individual entity's configuration compared to the criteria, the FAQ document provides some insight into the general application of the registry criteria. In response to communication and timelines, NERC and the Regional Entities will coordinate registration efforts based on the anticipated effective date of the newly proposed Reliability Standards that will be applicable to the new functional entities. As such, once those Reliability Standards are filed and then approved at FERC, NERC will base its registration activities timeline around the Reliability Standards' effective dates and ensure timely communication and outreach to new entities occurs to support a smooth registration process and effective dates of registration.
IRC SRC PJM	NERC should revise the Distribution Provider MW threshold to match the computational load MW threshold.	At present, NERC is not revising the Distribution Provider criteria.

End-users Group Arevon DPN ACC	NERC should work with governmental authorities and policymakers on the appropriate approach or process to addressing the risk posed to the BPS by computational loads. Others suggest a more robust regulatory and economic impact assessment.	NERC recognizes the importance of collaboration with federal and state governmental authorities, policymakers, and stakeholders on this matter. To that end, NERC engagement with governmental authorities on key issues is a continuous high priority. This includes several key engagements with critical state and provincial policymakers on large computational load entities. NERC has presented on its efforts to address reliability risk from large computational loads to associations representing the state legislator community, state energy officials, state regulators, and other key policymaker organizations. NERC has engaged several times with the National Association of Regulatory Utility Commissioners, also known as NARUC, and its relevant committees to discuss major efforts related to the Large Loads Working Group (LLWG), including briefings on various LLWG white papers and proposed updates to NERC's registration criteria. NERC and NARUC co-hosted two feedback sessions between NERC staff and six state commissions that are 'first-movers' addressing reforms to large load rate structure and interconnection requirements. In similar ways, the Regional Entities are actively engaging with government officials in their respective states. Continued dialogue between NERC, its state government representatives on NERC committees, and the organizations representing state policymaker interests is essential to address risks stemming from integrating large computational load entities onto the bulk power system. As for FERC input, NERC notes that on July 16, FERC issued an order directing NERC, under its section 215(d)(5) authority of the Federal Power Act, to "develop and submit new or modified Reliability Standards addressing the reliability risks associated with the integration of computational loads into the Bulk-Power System." The Commission also directed NERC to "develop revisions to its Rules of Procedure, including registry criteria for computational load entities." Accordingly, FERC, through this

Entity	Summary of Stakeholder Comments	Response
		order, indicates its agreement that the risks to the BPS should be addressed through registration of computational load and subsequent application of Reliability Standards.
IESO	Any revisions to the Rules of Procedure registry criteria should maintain existing compliance structures for non-U.S. entities.	NERC affirms its intent to maintain existing compliance structures for non-U.S. entities.
Alphatraxia Arevon DC Energy Mgmt DPN	Some commenters suggest NERC registration should require transparency on historical consumption data. Conversely, other commenters note the commercially sensitive nature of such data.	While NERC endeavors to provide as much transparency as possible in its regulatory activities, NERC also recognizes the sensitive nature of certain Confidential Information submitted as part of the registration process or other regulatory processes. Accordingly, NERC and the Regional Entities protect such information under its Rules of Procedure Section 1500. Due to the sensitive commercial nature of consumption data, NERC does not plan to collect it on computational loads, and if collected, would treat it as Confidential Information and only collect such information to aid in registration determinations based on the registry criteria.
Arevon	NERC should develop a clear de-registration process specific to computational loads due to their dynamic nature.	At this time, NERC determined the current Appendix 5A deregistration process is appropriate for any new functional registrations. Therefore, NERC will not create separate de-registration processes in the proposed ROP revisions. NERC or the Regional Entities can develop additional guidance around de-registration should issues arise in the future for the new entities specific to computational load.
SVP DPN	Some commenters submitted comments on the Standards Authorization Request, proposed Reliability Standards, or other standards development matters.	NERC notes that those comments should be submitted through the comment periods conducted by the Project 2026-02 Computational Loads drafting team, whose web page provides information on ways to engage or comment on the development of the proposed standards.