

**REGULATORY UPDATE FOR March 18, 2026
(March 11, 2026 – March 17, 2026)**

I. STATE REGULATORY AGENCIES

CALIFORNIA PUBLIC UTILITIES COMMISSION (CPUC OR COMMISSION)¹

Proposed Decisions and Resolutions

None to report.

Voting Meeting

The CPUC will hold a voting meeting in Sacramento, California, on Thursday, March 19, 2026, at 11:00 a.m. PT. The energy-related items on the [agenda](#) are below:

Item 2. Resolution (Res) G-3617. This Resolution addresses Southwest Gas Corporation Advice Letter (AL) 1338-G, filed on July 29, 2025, which requests Commission approval of one biomethane procurement contract pursuant to the Renewable Gas Standard, as established in Decision (D.) 22-02-025.

Item 5. Application (A.) 24-05-008 (Application of Pacific Gas and Electric Company (PG&E) to Submit Its 2024 Risk Assessment and Mitigation Phase (RAMP) Report). This decision closes PG&E's 2024 RAMP proceeding, the initial phase of PG&E's 2027 Test Year General Rate Case (GRC), A.25-05-009, filed on May 15, 2025. PG&E's RAMP Report, filed with its application in this proceeding, contains PG&E's detailed assessment of its top safety risks, risk mitigation programs and projects and the associated expenditures to address those risks for the 2027 to 2030 GRC period. According to the Proposed Decision (PD), PG&E's RAMP Report employs a new cost-benefit approach that permits a more logically sound "apples-to-apples" comparison of mitigation options than the now-superseded risk-spend efficiency approach used in previous RAMP applications.

Item 6. A.25-06-012 (In the Matter of the Application of Southern California Gas Company (SoCalGas) Regarding Year 31 (2024– 2025) of Its Gas Cost Incentive Mechanism). This decision approves SoCalGas's request for a shareholder reward of \$8,374,056 for Year 31 (2024–2025) of the company's Gas Cost Incentive Mechanism performance. The Public Advocates Office at the Commission verified that SoCalGas's recorded procurement annual actual costs were \$42,142,370 below the benchmark, which results in a reward of \$8,374,056 to SoCalGas's shareholders and a ratepayer savings benefit of \$33,768,315 in lower gas costs.

¹ Per CPUC Rules of Practice and Procedure Rule 14.3, comments on proposed decisions are due 20 days after issuance of the proposed decision, and reply comments are due five days thereafter. Comments on draft resolutions are due 20 days after the draft resolution appears in the CPUC's daily calendar, per Rule 14.5.

Item 8. A.25-02-001 (In the Matter of the Application of Shell California Pipeline Company LLC (Shell California) for Authority to Withdraw Its Pipeline from Public Utility Service). This decision approves Shell California's Application to withdraw the Carson, California to the Los Angeles International Airport and the Carson to Van Nuys, California petroleum pipelines from common carrier service and terminate its status as a public utility upon fulfilling specific conditions.

Item 9. Rulemaking (R.) 25-07-013 (Order Instituting Rulemaking to Improve the California Climate Credit). This decision orders the large electric investor-owned utilities (IOUs) to pause the distribution of the 2026 electric residential Climate Credit so that a forthcoming decision can direct when these credits should be distributed this year. The residential electric Climate Credit is provided on customer bills in April and October, which are relatively low-billed months. The current phase of this proceeding is considering moving the 2026 residential electric Climate Credit to high-billed summer months to maximize its affordability impact. A PD addressing that matter is anticipated in March 2026.

Item 12. Res E-5411. This Resolution addresses San Diego Gas & Electric Company's (SDG&E) request for review of CPUC staff's denial of SDG&E AL 4475-E, through which SDG&E sought to open a memorandum account to track actual incremental administrative and/or procurement costs during a mass involuntary return of customers to Provider of Last Resort service. While the Commission declines to review CPUC staff's denial of SDG&E's request to immediately open a memorandum account, the Resolution clarifies that the AL to be submitted in the event of an involuntary return shall be classified as Tier 1.

Item 13. Res E-5452. This Resolution approves, with modifications, the request from Southern California Edison Company (SCE) to establish a new vehicle-grid integration (VGI) program within its existing Low Carbon Fuel Standard (LCFS) Implementation Plan. On April 29, 2025, SCE filed AL 5536-E, requesting to (1) include a new VGI program in SCE's existing LCFS Implementation Plan, and (2) exempt the requirements of Public Utilities Code Section 851 as it applies to the LCFS holdback credit sales. The VGI proposal consists of two major components. First, the proposal presents the Orchestrated Charging and Advanced Resiliency for Distribution (ORCHARD), which would integrate a software layer into SCE's Distributed Energy Resource Management System that would optimize customer electric vehicle (EV) charging times. ORCHARD would offer each participant an annually declining incentive, starting at \$50 for the customer's first year of enrollment and fully withholding the incentives by the customer's fifth year of enrollment. Second, the proposal would offer rebates to some participants to cover the costs associated with installing bidirectional charging equipment.

Item 15. Res E-5440. This Resolution adopts, with modifications, the proposals of PG&E, SCE, and SDG&E (the IOUS) to establish Integration Capacity Analysis (ICA) remediation plans and baseline reporting pursuant to D.24-10-030. ALs PG&E 7686-E, SCE 5614-E, and SDG&E 4710-E contain separate proposals from each IOU on remediation plans and baseline reporting for their respective ICAs. Further, the Resolution establishes requirements for tracking and reporting issues with ICA that have been identified by the IOUs, parties, and prior orders of the Commission. The progress of the ICA remediation plans and all

additional reporting are ordered to be included in the Biannual ICA Reports and Quarterly ICA Workshops also established under D.24-10-03. **Held to April 9, 2026.**

Item 17. A.25-06-007 (Application of SCE to issue, sell, and deliver one or more series of Debt Securities and guarantee the obligations of others in respect of the issuance of Debt Securities, the total aggregate principal amount of such indebtedness and guarantees not to exceed \$10,125,000,000 and to execute and deliver one or more indentures; to sell, lease, assign, mortgage, or otherwise dispose of or encumber utility property; to issue, sell and deliver in one or more series, an aggregate amount not to exceed \$1,405,000,000 par or stated value of Preferred Equity, and guarantee the obligations of others in respect of the issuance of that Preferred Equity). This decision grants SCE authority pursuant to California Public Utilities Code §§ 816, 817, 818, 821, 823, 830, and 851 to, among other things, issue debt securities secured by utility property and accounts receivable not to exceed \$9,850,000,000 and preferred equity not exceeding \$1,155,000,000; use debt enhancements, caps, collars, swaps, and hedges to lower cost of debt securities; guarantee obligations of regulated affiliates and governmental entities; renew and/or refund commercial paper and other floating or variable rate debt securities; and arrange credit agreements or other credit facilities for the purpose of issuing debt.

Item 19. A.24-09-010 (Application of Liberty Utilities (CalPeco Electric) LLC (Liberty) for Authority to Among Other Things, Increase Its Authorized Revenues for Electric Service, Establish Marginal Costs, Allocate Revenues, and Design Rates, as of January 1, 2025). This decision adopts and modifies an uncontested multi-party Settlement Agreement regarding revenue requirements issues and addresses Liberty's Test Year 2025 GRC to increase its authorized revenues, allocate revenues and design rates. This decision authorizes Liberty's revenue requirement of \$231,938,000, representing an 11.4% increase over the currently authorized revenue requirement of \$208,147,000.

Item 20. A.24-06-001 (Application of SDG&E for Approval of: (i) Contract Administration, Least-Cost Dispatch and Power Procurement Activities in 2023, (ii) Costs Related to Those Activities Recorded to the ERRA, Portfolio Allocation Balancing Account, Power Charge Indifference Adjustment Undercollection Balancing Account, Transition Cost Balancing Account, Local Generating Balancing Account, and Modified Cost Allocation Mechanism Balancing Account in 2023, and (iii) Costs Recorded in Related Regulatory Accounts in 2023). This decision grants, with the modifications, the application of SDG&E for approval of its ERRA Compliance for Record Period 2023. SDG&E, in discussion with the intervenors to this application, agreed to update its valuation of its Resource Adequacy portfolio, to correct its accounting of its Renewables Portfolio Standard compliance position, and to allocate the revenue from certain battery energy storage systems to a broader set of customers. This decision adopts those proposed changes. This decision finds that SDG&E's prudently managed activities resulted in a recording of the net undercollection of \$214.580 million (though this number excludes the amounts in two accounts whose balances are confidential). Finally, this decision authorizes SDG&E to recover the stranded costs from its Green Tariff Shared Renewables programs from all ratepayers via the Public Purpose Programs charge. **Held to April 9, 2026.**

Item 21. R.20-05-012 (Order Instituting Rulemaking Regarding Policies, Procedures and Rules for the Self-Generation Incentive Program and Related Issues). This decision denies the Petition for Modification of D.21-06-005 filed by ENGIE North America, Inc. The petition requested that wastewater treatment plants be exempted from a Self-Generation Incentive Program requirement that on-site renewable biogas used in internal combustion engine projects contain at least 96% methane.

Item 22. A.09-09-022 (In the Matter of the Application of SCE for a Certificate of Public Convenience and Necessity for the Alberhill System Project). This decision grants SCE's request for a certificate of public convenience and necessity to construct the proposed Alberhill System Project subject to the Mitigation Monitoring, Compliance and Reporting Plan.

Item 24. Res E-5443. This Resolution approves PG&E's relocation agreement with Meritage Homes to accommodate the Machado Ranch Project, which requests approval under Electric Rule 15.I.3 of an Actual Cost Contract (ACC) and Assignment and Consent of the ACC from Signature Homes, Inc. to Meritage Homes for the Machado Ranch development project in the City of Manteca, San Joaquin County, California.

Item 25. A.25-01-003 (In the Matter of the Application of Crimson California Pipeline L.P. for Authority to Withdraw a Segment of Its Seal Beach Pipeline from Public Utility Service). This decision approves Crimson California Pipeline L.P. to withdraw the southern segment of the Seal Beach Pipeline from public utility service, pursuant to California Public Utilities Code section 851.

Item 52. A.24-04-017 (Application of LS Power Grid California, LLC (LS Power) for a Certificate of Public Convenience and Necessity Authorizing Construction of the Power Santa Clara Valley Project). This decision grants LS Power's request for a certificate of public convenience and necessity authorizing the construction of the Power Santa Clara Valley Project, configured as Alternative Combination 1 and subject to the mitigation measures identified in the Mitigation Monitoring, Compliance, and Reporting Program. This decision also certifies that the Final Environmental Impact Report for this project meets the requirements of the California Environmental Quality Act (CEQA), and that the benefits of the Power Santa Clara Valley Project outweigh and override the significant and unavoidable impacts for the reasons stated in Appendix A of the PD. Finally, this decision establishes a maximum cost cap of \$1,592,760,000 and grants LS Power exemptions from certain Commission affiliate transaction rules and reporting requirements.

Item 53. A.24-05-014 (Application of LS Power for a Certificate of Public Convenience and Necessity Authorizing Construction of the Power the South Bay Project). This decision grants LS Power's request for a certificate of public convenience and necessity authorizing the construction of the Power the South Bay Project, as proposed and subject to the mitigation measures identified in the Mitigation Monitoring, Compliance, and Reporting Program. This decision also certifies that the Environmental Impact Report prepared for this project meets the requirements of CEQA and adopts the CEQA Findings and Statement of Overriding Considerations contained in Attachment A of the PD. Further, this decision finds that the ability of the proposed project to improve system reliability and address system overload in the San

Jose, California area outweighs its significant and unavoidable impacts on air quality. Finally, this decision grants LS Power exemptions from certain Commission affiliate transaction rules and reporting requirements.

Item 54. Res E-5447. This Resolution approves PG&E AL 7653-E. PG&E requests Commission approval of a non-standard Engineering, Procurement and Construction (EPC) Agreement with STACK Infrastructure, Inc. (STACK) under the exceptional case provisions of Electric Rules 15 and 16. The EPC Agreement is part of the contractual framework supporting the energization of STACK's new 90 megawatt (MW) data center load in San Jose, California and governs STACK's construction of the Ringwood Switching Station and the subsequent transfer of that facility to PG&E. The scope of AL 7653-E is limited to approval of the EPC Agreement for the customer-built Ringwood Switching Station. AL 7653-E does not cover cost estimates, cost allocation and responsibility, or refunds to STACK. Those issues were addressed in PG&E's prior AL 7569-E and were approved with modification in Res E-5420, adopted by the Commission on October 30, 2025. The Commission already approved the underlying energization project in Res E-5420 and adopted a modified refund framework to protect ratepayers.

Item 55. Res E-5433. This Resolution approves, with modifications, PG&E AL 7667-E, which requests Commission approval of an agreement to support the energization of a new 49 MW data center and computing lab load in Sunnyvale, California, as requested by Sunnyvale Technology Partners LLC c/o Menlo Equities (Menlo Equities). According to the Resolution, this agreement facilitates the construction of new transmission facilities to serve Menlo Equities' load. The Commission approves the AL with modifications, finding the agreement necessary and largely appropriate to energize this new load.

Court of Appeal Upholds Net Energy Metering (NEM) Successor Tariff

On March 9, 2026, the California Court of Appeal upheld the CPUC's Net Billing Tariff, adopted in 2022 as a successor NEM 2.0 tariff, finding that the CPUC acted within its authority. More information on this decision may be found in our blogpost [here](#).

Upcoming Workshops and Events

VGI Forum. The Commission will host a VGI Forum on March 25, 2026 from 9:30 a.m. to 5:00 p.m. PT in collaboration with several IOUs. The purpose of the forum is to discuss three strategic focus areas for VGI, as identified in D.22-11-040: (1) rates and demand flexibility programs; (2) technology enablement; and (3) planning. The VGI Forum will feature presentations from stakeholders on the three strategic focus areas as well as discussion to inform on ongoing VGI policy development. The event will be held both in-person at the CPUC's San Francisco headquarters, and remotely via WebEx. Registration details are available [here](#).

CALIFORNIA ENERGY COMMISSION (CEC)

2026 Integrated Energy Policy Report (IEPR) Update

The CEC is [seeking comments](#) on the Draft Scoping Order for the 2026 IEPR Update. According to the [Notice](#), the 2026 IEPR Update will include an updated 15-year electricity demand forecast, an assessment of the challenges and opportunities for geothermal development in California, and a discussion of progress toward energy equity and environmental justice. Written comments on the Draft Scoping Order are due to the Docket Unit under Docket No. 26-IEPR-01 by 5:00 p.m. PT on March 25, 2026. The [Notice](#) also includes a proposed 2026 IEPR Update schedule, which will be available on the 2026 IEPR Update [page](#) and subject to regular updates. The initial proposed schedule is as follows:

Task/Event	Date
• Final <i>2026 IEPR Update Scoping Order</i> released	April 2026
• Adopt order instituting informational proceeding	May 2026
• Public workshops on specific topics	May-December 2026
• Release draft <i>2026 IEPR Update</i>	October 2026
• Release proposed <i>2026 IEPR Update</i>	January 2027
• Adopt 2026 IEPR Forecast	January 2027
• Adopt <i>2026 IEPR Update</i>	February 2027

Extended Comment Deadline for the Joint Agency Workshop on Senate Bill (SB) 100

On February 19, 2026, the CEC, CPUC, and California Air Resources Board (CARB) hosted a joint two-part workshop to present and discuss the draft electricity resource modeling results and implementation challenges for the SB 100 Joint Agency Report. Pursuant to the March 4, 2026 notice of extension of the public comment period, the comment deadline on SB 100 Draft Results Workshop is March 20, 2026, by 5:00 p.m. PT.

Staff Workshop on Fusion Research and Development Innovation Initiative

The CEC will host a remote-access staff workshop on April 2, 2026 from 9:00 a.m.-11:30am PT to discuss implementation of its new Fusion Research and Development Innovation Initiative, created pursuant to SB 80 (Caballero, 2025). The purpose of the initiative is to accelerate the development and growth of fusion energy by advancing fusion science and technology. The staff workshop will facilitate a discussion on fusion energy research needs and barriers, and identify opportunities that could be supported by grant funding under the Fusion Research and Development Innovation Initiative. Documents for the workshop, including an

agenda and access details, will be available [here](#). Written comments may be submitted to the docket 26-ERDD-01 by April 16, 2026.

Staff Workshop on Offshore Wind Port Development Program

The CEC hosted a remote workshop on March 17, 2026 at 10:00 a.m. PT to present an overview of the Proposition 4 Offshore Wind Port Development Program, including a summary of related statutes, the processes the CEC will follow, and preliminary considerations for developing a future grant solicitation. Access details along with a workshop agenda are available [here](#). Written comments are due to the Docket Unit by 5:00 p.m. PT on May 22, 2026.

Workshops on EV Charger Reliability Reporting and on Interoperability Standards

Workshop on Roaming and Interoperability. The CEC will host a remote workshop on March 25, 2026 from 10:00 a.m. - 12:30 p.m. PT to present and discuss concepts related to standardizing communications for Plug & Charge and the EV charging experience. The goal is to gather industry inputs as the CEC considers options for establishing minimum standards that enhance the reliability and driver experience across California's public EV charging infrastructure. Presentations and a workshop agenda and access details are available on the docket, [here](#). Written comments can be submitted to the CEC by 5:00 p.m. PT on April 15, 2026.

Workshop on the Regulations for Improved EV Charger Recordkeeping and Reporting, Reliability, and Data Sharing. On Thursday, March 26, 2026 from 10:00 a.m. – 12:00 p.m. PT, the CEC will host a staff workshop to explain the recently adopted Regulations for Improved EV Charger Recordkeeping and Reporting, Reliability, and Data Sharing (EV Charger Data and Reliability Standards), which will take effect on April 1, 2026. A detailed workshop agenda and attendance details are available [here](#).

CEC Issues Whitepaper on Benefits of Bidirectional Charging

On March 5, 2026, the CEC issued a [whitepaper](#) titled “A Roadmap to Unlocking the Benefits of Bidirectional Charging.” The document signals the CEC’s commitment to realizing the benefits of bidirectional EV charging in California and discusses CEC activities and projects that demonstrate substantial potential and progress, while also identifying key barriers to adoption. Modeling cited in the whitepaper shows that vehicle-to-home bidirectional charging could reduce peak residential demand by up to 5 gigawatts in 2030, with drivers achieving potential savings of up to \$321 each summer season. The report cites standardization and limited compensation mechanisms as key barriers to realizing the full benefits of bidirectional charging, but notes that the CEC is committed to working with all stakeholders and continuing to

collaborate with CARB and the CPUC to support a policy framework for enabling and scaling bidirectional charging opportunities in California.

Public comments on the whitepaper can be submitted to the Docket 22-EVI-06, available [here](#).

CEC Business Meetings

The next CEC Business Meeting is scheduled for April 8, 2026. The agenda and supporting materials will be posted [here](#) at least 10 days prior to the meeting.

MINNESOTA PUBLIC UTILITIES COMMISSION (MPUC)

At its March 19, 2026, weekly agenda meeting, the MPUC will consider (1) adoption of the Administrative Law Judge Report and issuance of a site permit for the 200 MW Crane and 200 MW Sandhill Energy Storage Projects slotted for Olmstead County, Minnesota (IP7149/ESS-24-406; IP7149/ESS-24-407); (2) granting a route permit for Great River Energy and Lake Region Electric Cooperative's Otto Tap 115 kilovolts Transmission Line Project, including any additional conditions or requirements (Docket No. ET2/TL-25-269); and (3) approval of Xcel Energy's Renewable Development Fund (RDF) Rider Factor for 2026 and its 2025 RDF annual report (Docket No. E002/M-25-370).

PACIFIC NORTHWEST (OPUC, WUTC, BPA)

Oregon Public Utility Commission (OPUC)

On March 17, 2026, the OPUC held a public meeting to consider: (1) adoption of the permanent new administrative rules as set forth in Attachment 1 to amend OAR Chapter 860, Division 022, related to the implementation 2025 House Bill (HB) 3179 requirements that seek to address rising energy bills and improve affordability (Docket No. AR 678); and (2) adoption of the permanent new administrative rules and amendments that propose to amend OAR Chapter 860, Divisions 1, 27, 89, and 90, related to utility system planning and the review process for integrated resource plans, clean energy plans, and requests for proposals (Docket No. AR 669).

Washington Utilities and Transportation Commission (WUTC)

The Washington legislature continues to consider a pair of bills, SB 6171 and HB 2515, that would require Emerging Large Energy Use Facilities (ELEUFs) to purchase their energy and pay for needed infrastructure through new tariffs or contracts developed by the state's utilities. Under the bills, starting in 2031, ELEUFs commencing operation after July 1, 2026, must certify to the state that 80% of the energy used to serve their load in the prior year came from renewable or non-emitting resources, and that they purchased the electricity and renewable energy certificates to substantiate that certification in a "single transaction." The laws require ELEUFs to serve their load using 100% renewable or non-emitting resources beginning in

2035. There has been no movement on SB 6171 in the Senate. However, on March 12, 2026, HB 2515 was returned to the House Rules Committee for a third reading.

Bonneville Power Administration (BPA)

On March 11, 2026, BPA hosted a workshop to develop and review Provider of Choice Resource Support Service contract provisions for application of non-federal resources. On March 12, 2026, BPA hosted a discussion covering Day-Ahead Market issues, including a review of the Readiness Schedule, the Commercial Model Framework, BPA's exit from the Energy Imbalance Market, changes to its Automatic Generation Control System, and updates related to the Reliability Coordinator transition. The presentation materials and more information are available on BPA's Day-Ahead Market webpage [here](#).

II. FEDERAL ENERGY REGULATORY COMMISSION (FERC)

March 2026 Commission Meeting

FERC noticed its March 2026 Commission Meeting, which will take place on March 19, 2025, at 10:00 a.m. ET. The meeting's agenda may be found [here](#).

Order Denying Petition to Prohibit “Junk and Jewel” Gas Bids

FERC issued an [order](#) denying a petition from gas association groups asking FERC to initiate a rulemaking to ban natural gas pipelines from aggregating open-season bids on non-contiguous segments of pipeline to determine the highest value bid for allocating capacity. FERC found that, although certain activities related to aggregating bids may be unjust and unreasonable, FERC would more appropriately hear those issues in individual, case-specific complaints or rate case proceedings.

III. U.S. DEPARTMENT OF ENERGY (DOE)

Advanced Transmission Technologies for Power Grid Funding Opportunity

DOE [announced](#) a \$1.9 billion notice of funding opportunity under its program, Speed to Power through Accelerated Reconductoring and other Key Advanced Transmission Technology Upgrades (SPARK). DOE states that projects under SPARK must demonstrate measurable improvements in electric grid capacity and system value, combining physical capacity gains, including solutions such as reconductoring or other infrastructure upgrades from advanced transmission technologies.

IV. INDEPENDENT SYSTEM OPERATORS (ISO) AND REGIONAL TRANSMISSION ORGANIZATIONS (RTO)

CALIFORNIA INDEPENDENT SYSTEM OPERATOR (CAISO)

Stakeholder Initiatives: Upcoming Meetings and Deadlines

Distributed Generation Deliverability Assessment Results Posted. The CAISO has posted the 2025-2026 Deliverability for Distributed Generation Study Results [Report](#). The eligible distributed generation facilities in grid areas, where the CAISO's distributed generation facilities seeking an initial or increase in deliverability status must apply for deliverability status assignment as described in the report.

2025-2026 Transmission Planning Process. The CAISO will make the draft transmission plan [available here](#) by the end of the day on March 31, 2026. Additionally, the CAISO will host a hybrid public stakeholder meeting for transmission planning process to discuss the draft. The stakeholder meeting will take place on April 7, 2026. Meeting registration details can be found [here](#).

SOUTHWEST POWER POOL (SPP)

Consolidated Planning Process (CPP) Framework Approved

FERC [approved](#) SPP's tariff revisions that establish a CPP framework to streamline SPP's regional transmission planning and generator interconnection processes. Previously, SPP has handled its generator interconnection requests and its annual Integrated Transmission Plan separately. SPP's tariff revisions, however, introduce a streamlined approach that will combine SPP's regional transmission planning and generator interconnection processes into a consolidated assessment of regional transmission needs. SPP will open its first CPP window in April 2026 and publish the first Generalized Rate for Interconnection Development-Contribution this fall.

ISO NEW ENGLAND (ISO-NE)

Show Cause Proceeding

FERC [initiated](#) a show cause proceeding on ISO-NE's lack of provisions in its tariff that would enable ISO-NE to correct improper or erroneous payments or charges to market participants in its markets. The order directs ISO-NE to either show why its tariff remains just and reasonable and not unduly discriminatory or preferential given its lack of a mechanism to allow ISO-NE to adjust errors or explain how it will revise its tariff.

ELECTRIC RELIABILITY COUNCIL OF TEXAS (ERCOT)**Proposed Large Load Rule**

The Texas Public Utility Commission has [proposed](#) a rule requiring large load customers—those seeking new or expanded interconnections of 75 MW or more—to execute an intermediate agreement before they can be included in an ERCOT interconnection study. Under this agreement, the customer must provide specified disclosures and post financial security equal to \$50,000 per MW.