

ATTACHMENT A

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

PJM Interconnection, L.L.C., et al.	Docket No. EL26-67-000
New York Independent System Operator, Inc., et al.	Docket No. EL26-69-000
Midcontinent Independent System Operator, Inc., et al.	Docket No. EL26-70-000
California Independent System Operator Corporation, et al.	Docket No. EL26-71-000
ISO New England Inc., et al.	Docket No. EL26-72-000

**AFFIDAVIT OF
ANDREW LEVITT**

**ON BEHALF OF
EOLIAN, L.P.**

July 20, 2026

I. QUALIFICATIONS

My name is Andrew Levitt. I am a Senior Consultant at The Brattle Group (Brattle).

I am an expert on wholesale market design and reliability implications of changes in the power system. I have consulted for Independent System Operators and Regional Transmission Organizations (ISO/RTOs) such as the Midcontinent Independent System Operator (MISO), the New York Independent System Operator (NYISO), the Alberta Electric System Operator (AESO), and the Independent Electricity System Operator (IESO) of Ontario, and helped other clients navigate ISO/RTO changes nationwide. Prior to joining Brattle in 2022, I was on staff at PJM for seven years (most recently as Lead Market Designer), where I developed reforms to reliably integrate new resource types. I hold an MMP from the University of Delaware and a BSc in physics from the University of Toronto.

I have worked extensively on the benefits of co-located loads and generation and how such arrangements can be facilitated to reduce costs, achieve faster connection of new loads and generation, and ensure reliability. This includes co-authored affidavits and reports in prior filings before the Federal Energy Regulatory Commission (FERC or Commission) on co-location, including an affidavit on behalf of Eolian filed in FERC Docket No. RM26-4-000 on *Interconnection of Large Loads to the Interstate Transmission System* and a report on behalf of Bloom Energy filed in Docket EL25-49-000 on *Accelerating the Integration of New Co-located Generation and Loads*.¹

II. ASSIGNMENT

I was asked by Eolian, L.P. to assess the five recent Commission Orders on co-located and electrically proximate generation and load pairings, issued June 18, 2026 in the above-captioned dockets. In particular, I was asked to assess how Load-Limited Generator Interconnection Service (LLGIS) can facilitate the efficiency, speed, and reliability benefits of new generation

¹ [Affidavit of Andrew Levitt, Aniruddh Mohan, Ryan Quint, and Sirisha Tanneeru](#) on Behalf of Eolian Energy, Inc., before the Federal Energy Regulatory Commission in the matter of Interconnection of Large Loads to the Interstate Transmission System, Docket No. RM26-4-000, November 21, 2025; A. Levitt, J. Pfeifenger, and A. Mohan, [Accelerating the Integration of New Co-located Generation and Loads](#), prepared for Bloom Energy as part of Docket No. EL25-49-000, April 23, 2025.

co-located with new load (“co-location arrangements”), consistent with the Commission’s objectives.

III. BACKGROUND

In a set of six orders issued June 18, 2026, the Commission initiated separate show-cause proceedings for each wholesale market region, requiring each ISO/RTO and its transmission owners to submit tariff revisions to address (or demonstrate how current tariff provisions already address): 1) the application process, study procedures, and ongoing operational requirements associated with transmission service on behalf of large loads; 2) transparency associated with the costs of Network Upgrades necessary to provide transmission service to large loads; 3) new firm and non-firm transmission services for large loads co-located with generation, and for flexible large loads. Five of the regions (all but SPP) addressed an additional tariff reform need: 4) new resource interconnection service for generation serving electrically proximate large load or co-located load. My focus is this last item.

IV. PERMANENT LOAD-LIMITED GENERATOR INTERCONNECTION SERVICE

IV.A. Lack of a Permanent Load-Limited Generator Interconnection Service Option Would Work Against the Purpose of Non-Firm Transmission Service

In these show-cause orders, the Commission identifies the opportunity to achieve speed-to-power by offering a new type of accelerated interconnection for a new generator that is dedicated to providing power to a large load, and is co-located with or electrically proximate to it. This Load-Limited Generator Interconnection Service (LLGIS) is premised on the generator’s commitment to limiting its output to match the consumption of the load it is supporting. The Commission finds that “[w]here a generating facility’s output is matched to the demand of the electrically proximate large load or large co-located load or if the generating facility’s output is limited to ensure no new injection, the impacts to the transmission system of interconnecting the generating facility to serve that electrically proximate large load or large co-located load may be limited,

1 thereby potentially reducing the need for Network Upgrades, which can accelerate the generator
2 interconnection process.”² I concur with the finding that this service achieves expedited
3 connection of new supply and new large loads. It also improves the cost-effectiveness of the
4 interconnection process by avoiding unneeded network upgrades associated with the
5 interconnection process for the new load-limited generation. This is true because a) no
6 deliverability is needed for injections from the generator to the broader grid, and b) the large load
7 is presumably included in the model used for studying the new generation, thus limiting net
8 flows on the broader grid.

9 However, these benefits of LLGIS would be limited if it were structured only as an interim
10 service. While FERC has not categorically ruled out that this service is available both on an
11 interim and permanent basis (and indeed embraces a permanent approach in the case of co-
12 located supporting generation taking LLGIS), FERC may expect that service to be mostly
13 interim in the case of electrically proximate generation taking LLGIS.³ The issues with interim-
14 only LLGIS would be two-fold.

15 First, if a developer taking LLGIS is obligated to obtain network resource interconnection
16 service (NRIS) or energy resource interconnection service (ERIS) later, it will be obligated to
17 pay the interconnection costs associated with that NRIS or ERIS. However, this obligation
18 introduces a sequencing problem because of the accelerated timeline made possible by the
19 simplified LLGIS process, such as the 90-day timeline for SPP’s High Impact Large Load
20 Generation Assessment (HILLGA) process. Specifically, the potentially high cost of the
21 obligatory NRIS or ERIS network upgrades is unlikely to be known at the time that LLGIS is

² *PJM Interconnection L.L.C., et al.*, 195 FERC ¶ 61,211 (2026) at P 95 (internal citations omitted) (PJM Show-Cause Order).

³ PJM Show-Cause Order at P 97 (“To the extent that the interconnection customer’s generating facility is serving an electrically proximate large load, we believe that the generator interconnection service should be of an interim nature until the interconnection customer obtains Energy Resource Interconnection Service (ERIS) or Network Resource Interconnection Service (NRIS). To the extent that the interconnection customer’s generating facility is serving a large co-located load, it may be reasonable for the generator interconnection service to be permanent because there will be no injections onto the transmission system and therefore it does not present operational or planning risks for reliability”); *Midcontinent Independent System Operator, Inc.*, 195 FERC ¶ 61,212 at P 115 (2026); *California Independent System Operator Corp.*, 195 FERC ¶ 61,214 at P 115 (2026); *New York Independent System Operator, Inc.*, 195 FERC ¶ 61,216 at P 123 (2026); *ISO New England Inc.*, 195 FERC ¶ 61,215 at P 113 (2026).

1 granted and the developer must commit to building its generator. This is a substantial cost
2 uncertainty that would likely materially reduce the commercial viability of LLAGIS.

3 Second, the network upgrades associated with mandatory NRIS or ERIS would be unnecessary
4 and inefficient if the lower-cost LLAGIS arrangement can reliably accommodate the load-limited
5 generation and its associated load on a permanent basis, and if permanent non-firm service is
6 acceptable to the customer. Indeed, if the load is taking permanent non-firm transmission service
7 (such as Non-Firm Contract Demand Service) as enabled by the LLAGIS generation, the
8 requirement for NRIS or ERIS is inconsistent with the large load's permanent reliance on the
9 load-limited generation. Therefore, offering LLAGIS only as an interim service works against the
10 purpose of non-firm transmission services for loads that rely on load-limited generation, and
11 results in construction of unnecessary transmission facilities, which is inefficient and
12 unnecessarily costly.

13 To avoid these inefficiencies, the LLAGIS that an ISO/RTO proposes must include both interim
14 and permanent options.

15 IV.B. Requiring an Option for Permanent Load-Limited Generator 16 Interconnection Service Improves Efficiency and Speed-to- 17 Power without Impacting Grid Reliability

18 Ensuring that regions provide a permanent LLAGIS option will improve the efficiency and
19 attractiveness of non-firm transmission service for co-located loads. Doing so will remove a
20 substantial and unnecessary risk for investment in new supply, yielding the benefits the
21 Commission cited in supporting its determination in the show-cause orders.⁴ In fact, a scenario in
22 which the Commission requires full deliverability (NRIS) or injection (ERIS) rights for load-
23 limited generators runs counter to the Commission's own holding by not reflecting the

⁴ PJM Show-Cause Order at P 96 ("As commenters in the ANOPR proceeding have recognized, the status quo may result in inefficient and unnecessary development of infrastructure, which leads to unnecessarily higher Network Upgrade costs that may result in unjust and unreasonable rates. The Commission has already determined in the PJM Co-Location Order that without the new transmission services that reflect the operational dynamics of co-location arrangements, there could be unnecessary, costly, and inefficient Network Upgrades, increasing Network Upgrade costs")(internal citations omitted).

1 “operational dynamics” of the paired arrangements, leading to “unnecessary, costly, and
2 inefficient Network Upgrades.” Mandating that LLGIS service be temporary would require the
3 generator to ultimately pay for the construction of network upgrades for permanent service, even
4 though the Commission has identified such upgrades as “inefficient.”⁵

5 When describing the potential for permanent LLGIS, the Commission distinguishes between
6 generators supporting co-located large loads versus those supporting electrically proximate
7 loads. In the case of co-located loads, the Commission finds that these arrangements do not
8 “present operational or planning risks for reliability,” as there “will be no injections onto the
9 transmission system.”⁶ The Commission describes several arrangements that would fit under this
10 framework while using a series of special protection schemes to limit injections on the broader
11 grid and thereby maintain reliability.⁷

12 The co-location requirement for permanent LLGIS would disqualify many configurations that
13 present the same simplified reliability profile as co-located arrangements, but offer better
14 commercial viability because they avoid any commercial complexity associated with a shared
15 point of interconnection. FERC could substantially improve the commercial viability of LLGIS
16 (expanding its benefits) without materially changing its reliability features by taking a slightly
17 less restrictive approach to the locational eligibility for permanent service. To avoid
18 unnecessarily narrowing eligibility for permanent LLGIS, it should include generators at
19 interconnection locations that are “electrically equivalent” to the load’s point of interconnection,
20 rather than limiting it only to generators that are located behind the same point of interconnection

⁵ PJM Show-Cause Order at P 96 (“As commenters in the ANOPR proceeding have recognized, the status quo may result in inefficient and unnecessary development of infrastructure, which leads to unnecessarily higher Network Upgrade costs that may result in unjust and unreasonable rates. The Commission has already determined in the PJM Co-Location Order that without the new transmission services that reflect the operational dynamics of co-location arrangements, there could be unnecessary, costly, and inefficient Network Upgrades, increasing Network Upgrade costs”)(internal citations omitted).

⁶ PJM Show-Cause Order at P 97.

⁷ PJM Show-Cause Order at P 98.

1 as the load.⁸ Electrically equivalent interconnection points are defined to be functionally
2 identical for reliability purposes, as demonstrated by use of this concept in several ISO/RTOs
3 today. Even a narrow electrical-equivalence test—such as same substation and same voltage
4 level—would materially improve commercial workability by allowing the generation and load
5 sites to be developed separately, without requiring shared property or a common physical POI.

6 For example, PJM applies the electrical equivalence concept in its generation replacement
7 process, requiring an interconnection at either the same electrical bus or an “electrically
8 equivalent bus” as the deactivating generating facility.⁹ Similarly, MISO’s process allows a
9 replacement generator to utilize a different point of interconnection when it meets test criteria
10 demonstrating that the new connection point is electrically equivalent to the original location.¹⁰
11 As FERC recognized in its order approving the MISO process, these test criteria “limit potential
12 impacts to flow in the transmission system,” “will not cause new constraints in the contingency
13 analysis,” will “minimize impacts to flow and therefore other projects in the interconnection
14 queue,” all “without subjecting other projects to an unreasonable risk of causing network
15 upgrades.”¹¹ SPP similarly defines electrical equivalence as “a relationship between Points of
16 Interconnection (POI) that are (1) at the same substation and nominal voltage level, (2) on the
17 same branch or on a collection of in series two-terminal branches and associated buses and
18 facilities, or (3) on the same radial branch and associated facilities.”¹²

⁸ The Commission could broaden permanent LLAGIS further to include electrically proximate arrangements. These would not create further reliability issues as compared to temporary LLAGIS. Given the inherent front-of-the-meter structure of (non-co-located) proximate generation and load pairings, the grid operator would retain the ability to manage the system in operations, including by curtailing individual load and/or generation as needed to preserve reliability where intervening transmission facilities are impaired. In that respect, permanence does not remove the operational tools that grid operators already use to address transmission constraints or other system conditions on an interim basis. That said, electrically proximate arrangements may present some additional considerations relative to co-located arrangements, because they rely on facilities between the load and generation rather than being located entirely behind a single point of interconnection.

⁹ See [PJM Tariff Part VIII, Subpart J](#) § 437(A)(4).

¹⁰ FERC states that MISO considers a point of interconnection electrically equivalent to that of an existing generating facility when it will: “(1) interconnect at the same voltage level as the Existing Generating Facility unless that voltage level is not available by the commercial operation date; (2) not cause new constraints, as demonstrated by a contingency analysis performed in accordance with the Generator Interconnection Business Practices Manual 015 (BPM); and (3) not change the power distribution factor (DFAX) by more than 5% on any branch unless it is a zero impedance element or a line of the shortest path without queued interconnection requests from the existing point of interconnection to the new point of interconnection.” *Midcontinent Independent System Operator, Inc.*, [191 FERC ¶ 61,154](#) (2025); MISO Tariff Attachment X, Section 3.7.1(i)(a).

¹¹ *Midcontinent Independent System Operator, Inc.*, [191 FERC ¶ 61,154](#) (2025).

¹² SPP, [Generator Interconnection \(DSIS\) Manual](#), Version 4.4 (March 31, 2026) at 7.

1 Generators seeking replacement treatment and those requesting permanent LLGIS are similarly
2 situated with respect to the electrical-equivalence test. In generator replacement, the test asks
3 whether moving the point of injection from Point A to Point B materially changes transmission
4 impacts. For permanent LLGIS, it asks the same question about locating new generation at Point
5 A (behind the load's point of interconnection) or at Point B. In each case, the central planning
6 question is whether the alternate generation connection point produces material grid impacts:
7 new constraints, materially different power flows, or harm to queued projects. Therefore, if the
8 test fails in either case, the generator must go through the standard interconnection queue
9 process. With permanent LLGIS, electricity may flow across a short segment of public
10 transmission between the generator and load, but that fact alone does not establish the kinds of
11 regional impacts addressed by the full interconnection queue.¹³ Rather, as with generator
12 replacement, the test of interest is whether the arrangement creates material grid impacts.
13 MISO's and SPP's generator replacement tests for electrical equivalence reflect that impact-
14 based approach, and it can be applied with equal effectiveness to similarly-situated load-limited
15 generators connecting close to their paired loads.

16 Expanding permanent LLGIS eligibility to generators with paired loads at electrically equivalent
17 interconnection points will not, by definition, create incremental adverse reliability impacts. As
18 in the case of the mandated temporary service,¹⁴ the tariff should set out the principles guiding
19 the need for operational net load reductions, including restatement of the authority grid operators
20 have to take actions necessary to maintain reliability when operational circumstances dictate. As
21 compared to co-located arrangements, electrically equivalent generation/load pairings may

¹³ A separate point of interconnection for the resource taking LLGIS may require review of intervening-facility outages, protection coordination, stability, short-circuit impacts, and the response to a load trip. Those are localized issues suitable for targeted LLGIS studies and operating requirements—not grounds for studying the generator as though it had unrestricted ERIS or NRIS injection rights. Where the substation is newly built for the load and generator, the transmission owner can design the topology, breakers, relays, telemetry, and controls to limit contingency impacts. Eligibility for permanent LLGIS could require that, following relevant contingencies, the pair remain coupled, isolate together, or automatically reduce generation or load. Indeed, similar controls may also be required for a generator that is co-located behind the load's point of interconnection to prevent unintended injection following a load trip.

¹⁴ PJM Show-Cause Order at P 97 (“we remain concerned that the Tariff may be unjust and unreasonable without any uniquely tailored interconnection study process and/or generator interconnection service to recognize the reduced transmission system impacts that may result from the interconnection of a generating facility where the interconnection customer has committed, in an interconnection agreement, to limit the generating facility's output to match the hourly forecast of an electrically proximate large load or large co-located load.”)

1 improve reliability outcomes compared to the behind-the-meter frameworks that the Commission
2 has already required to be permanent, as a result of the improved metering, telemetry,
3 scheduling, and control required of the various front-of-the-meter components of the paired
4 LLGIS facilities.

5 Accordingly, I recommend that the Commission require the broader locational eligibility for
6 permanent LLGIS (to accommodate a larger set of commercially feasible arrangements to
7 support faster connection of new load-limited supply) to include loads and generation at
8 electrically equivalent locations as an available option.

9 IV.C. Reliable and Resource-Neutral Load-Limited Generator 10 Interconnection Service Must Include Studies of Storage 11 Charging

12 To ensure LLGIS maintains resource and technology neutrality, the service must be accessible to
13 storage resources. Consistent with NRIS and ERIS today, the LLGIS application process will
14 therefore need to include study provisions associated with reliable energy withdrawals for
15 charging of a potential storage resource (analogous to the ESR-LA process for storage in SPP,
16 which is included in the HILLGA process¹⁵). This study would need to be included in the LLGIS
17 interconnection process even if the storage resource does not reserve transmission service (i.e.,
18 because it is charging pursuant to the provision of a grid service).

19 These charging studies—which reflect the dispatch capability of storage—are already conducted
20 as part of the ISO/RTO generator interconnection processes for storage requesting NRIS and
21 ERIS. It is important that they be extended to storage requesting LLGIS.
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¹⁵ See e.g., SPP, [Generator Interconnection \(DSIS\) Manual](#), Version 4.4 (March 31, 2026) at § 5.

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Affidavit of Andrew Levitt

I, Andrew Levitt, do hereby swear that I have authored this Affidavit, and that the statements contained therein are true and accurate to the best of my knowledge and belief.

A handwritten signature in black ink, appearing to read 'Andrew Levitt', with a long horizontal stroke extending to the right.

Andrew Levitt

Date: July 20, 2026