Grid Strategies

Large Generator Interconnection Update

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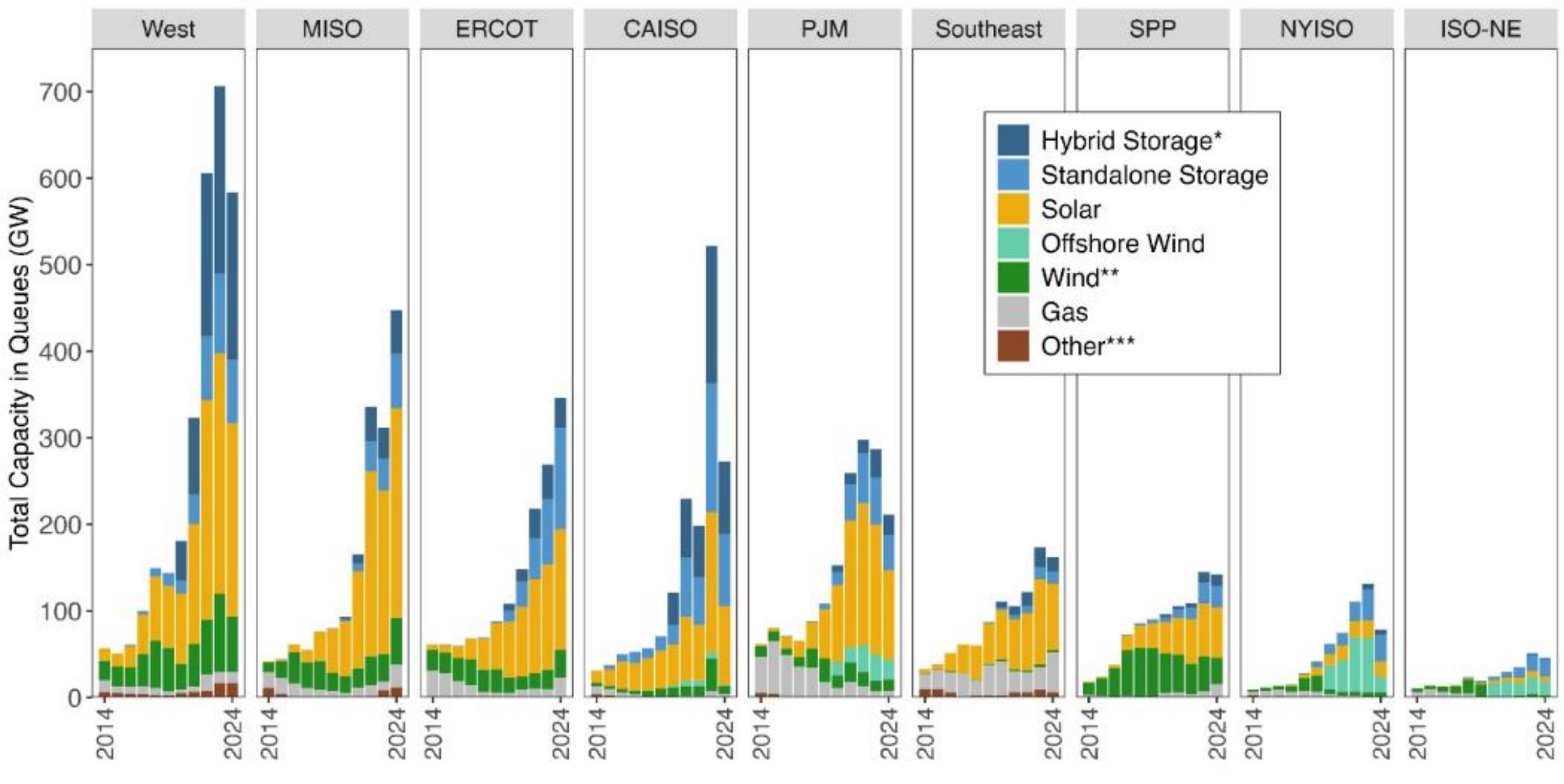
September 2025

Generator Interconnection Requests Ballooned

Limited transmission capacity slows interconnection



U.S. Interconnection Queue Data Through 2024: Complete Interconnection Request Dataset and Summarized Data Workbook | Energy Markets & Policy

Interconnection Scorecard as of February 2024

	CAISO	ERCOT	ISO-NE	MISO	NYISO	PJM	SPP
Interconnection Process Results	B-	A	C	C	D	D	C-
Pre-queue Information	C+	C	D	C+	C	C	C-
Interconnection Study Process Design	B	A-	C-	D+	B-	F	D
Study Assumptions, Criteria, Replicability	A	A+	C+	D	C+	F	C
Usefulness of Interconnection Alternatives	B+	B	D	B-	D	D	B
Using Regional Transmission Planning	A-	D	D	B	C+	D+	C+
Overall grade	B	B	D+	C-	C-	D-	C-

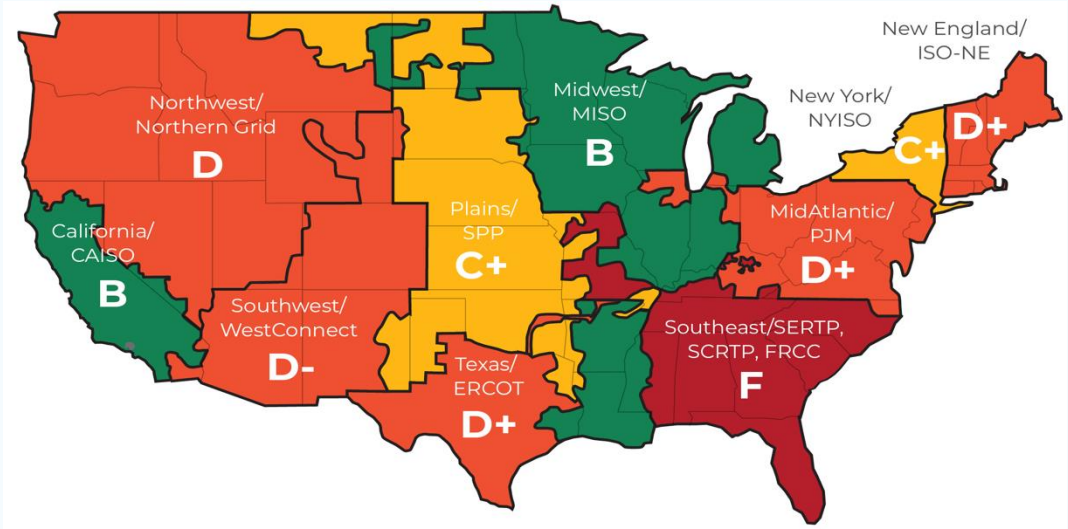
Poor Transmission Planning Slows Interconnection

Regional Transmission Planning Scorecard

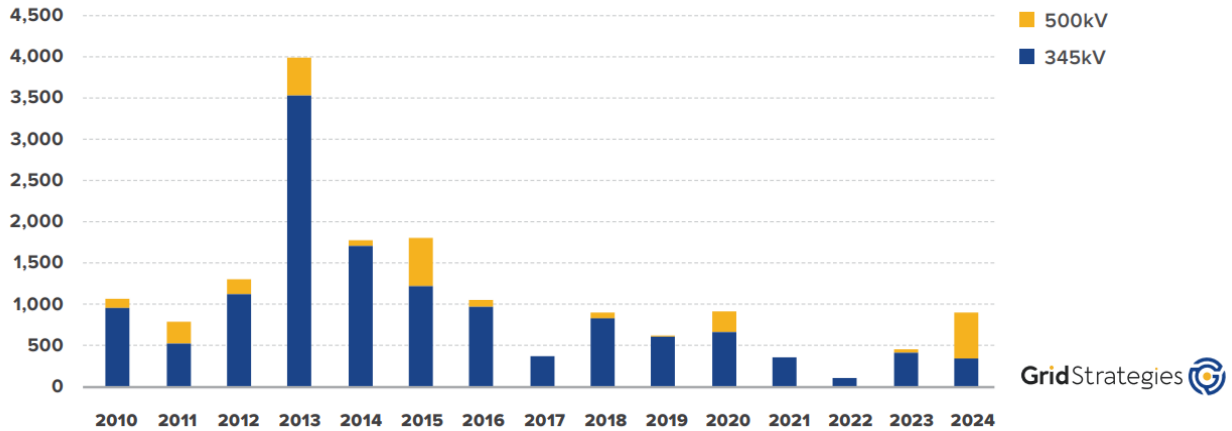
- CAISO and MISO leading others
- Interconnection customers: Other Regions' planning are currently ineffective at identifying and resolving needs for upgrading available headroom

Key areas for improvement in most regions

- Constraints or major network upgrades identified in interconnection studies are not transferred to transmission planning
- Upgrades planned by transmission providers may not be reflected in interconnection study models until construction schedules are finalized



UPDATED FIGURE 1 | Miles of new 345 kV+ transmission lines built over the last 15 years (updated using July 2025 data)[31]



GridStrategies

Vision for a more efficient interconnection process

Pre-Interconnection

Proactive planning to ensure transmission grid can accommodate known amount of new generation at a known cost

Existing and planned available headroom identified based on recent planning and interconnection studies

Interconnection Application

High fee to enter based on cost to increase planned interconnection capacity, in exchange for cost and schedule certainty

Transparent, timely, and actionable upfront information guides applications

Interconnection Studies & Interconnection Agreement

Most projects move through fast-track processes, do not encounter surprise costs or delays and fewer withdraw

Competition for available headroom resolved through "most ready" scoring

Study results are fast, predictable, and replicable due to limited scope (focused on necessary upgrades for level of service requested), expanded use of cost-effective non-wire solutions, and deployment of automation

Network Upgrade Construction

Transmission providers meet construction deadlines and budgets

Interconnection customers have visibility and recourse in the case of delays or cost increases outside their control

Commercial Operation

Generators efficiently come online as needed to deliver cost-effective, reliable power to consumers

Order 2023 compliance

- FERC issued all Order 2023 1st round compliance orders
  - ISO-NE's transitional cluster study is scheduled to begin Oct 10, 2025
- RTOs continue to implement further reforms to clear their queue backlogs
  - MISO queue cap and increased readiness requirements
  - CAISO's interconnection process enhancements (IPE) including a zonal approach, new scoring criteria, and an auction tiebreaker
  - PJM eliminated certain surplus interconnection service restrictions and working on Capacity Interconnection Rights (CIR) Transfer process
  - SPP Consolidated Planning Process proposal – integrated approach
- Further efficiencies - Onset of automation
  - MISO working with Pearl Street on DPP 22 Phase 1 study (completed)
  - PJM working with Google and Tapestry to streamline