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May 15, 2026

North American Electric Reliability Corporation  
1401 H Street NW, Suite 410  
Washington, DC 20005  
[ROPcomments@nerc.net](mailto:ROPcomments@nerc.net)

***Re: Proposed Computational Load Entity Registry***

On behalf of the Industrial Energy Consumers of America (IECA), we urge you not to move forward with the proposed Computational Load Entity Registry. Manufacturing self-generation units (CHP/WHP) operate as stable, predictable resources that do not present the reliability risks this proposal is intended to address. There is no evidence to suggest that these units are a threat to the grid.

The proposed rule is intended to address reliability gaps associated with emerging computational loads but does not identify a demonstrated reliability gap for CHP/WHP resources. We are not data centers. We do not operate like data centers and we should not be treated like them under contemplated regulations.

The proposed criteria appropriately focus on large, high-density computational loads comprised of information technology equipment with distinctive and less predictable electrical behavior, which is not characteristic of CHP/WHP facilities driven by thermal and industrial processes. Unlike computational loads, which can fluctuate rapidly, CHP/WHP units are thermal-following and operate with stable, continuous output that supports grid stability. Industrial facilities typically fall within conventional load profiles and may only include de minimis levels of information technology equipment, consistent with NERC's distinction based on differing electrical behavior. The proposed changes unnecessarily increase our costs and economic and regulatory uncertainty.

One hundred percent of IECA's members are manufacturing companies from every industry. Many of these companies have been generating their own power and steam since the late 1970s, using CHP and/or heat to power systems.

According to EIA there are over 900 CHP units across the U.S. that have a rated capacity of about 60,000 MW. They have operated successfully day and night without any negative impacts to grid reliability. Some of them provide valuable balancing benefits to the grid by producing less at night and buying power from the grid when demand by other sectors are low. This predictable behavior supports grid balancing and supports frequency stability through continuous operation that differs fundamentally from the volatility of data center loads.

Importantly, some of these units have a history of being called upon to provide power in times of power shortages, thereby supporting grid reliability.

Existing NERC reliability standards and interconnection requirements, including FAC-001 and FAC-002, already provide appropriate oversight and study requirements for industrial facilities and their interaction with the Bulk Power System. No additional regulatory gap has been identified that would justify expanding registration to CHP/WHP under a new functional entity classification.

We are a resource and we look forward to working with you to help ensure any new registry is appropriately scoped to address emerging, high-variability computational loads while avoiding unintended inclusion of stable, conventional industrial generation.

Sincerely,

Paul N. Cicio  
*Paul N. Cicio*  
President & CEO

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*The Industrial Energy Consumers of America is a nonpartisan association of leading manufacturing companies with \$1.3 trillion in annual sales, over 12,000 facilities nationwide, and with more than 1.9 million employees. One hundred percent of IECA members are manufacturing companies whose competitiveness is largely determined by the cost and reliability of natural gas and electricity. IECA's sole mission is to reduce and avoid energy costs and increase energy reliability through advocacy in Congress and regulatory agencies, such as the Federal Energy Regulatory Commission (FERC). IECA membership represents a diverse set of industries including chemicals, plastics, steel, iron ore, aluminum, paper, food processing, fertilizer, insulation, glass, industrial gases, pharmaceutical, consumer goods, building products, automotive, independent oil refining, and cement.*