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

Re: Proposed Changes to NERC Rules of Procedure, Computational Load Owner, Computational Load Operator, Computational Load Site

On behalf of the member companies of the Industrial Energy Consumers of America (IECA), we submit the following input. We are grateful for the opportunity to provide comments.

IECA 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 membership represents a diverse set of industries including chemicals, plastics, steel, iron ore, aluminum, national defense industries, paper, food processing, fertilizer, insulation, glass, industrial gases, pharmaceutical, consumer goods, building products, automotive, independent oil refining, and cement.

We remain very concerned that manufacturing companies will be captured by the proposed NERC definitions.¹ Doing so could be costly to energy price sensitive non-computational load industries that compete globally, thereby possibly impacting competitiveness, investments and jobs.

IECA recommends a fail safe approach to excluding manufacturing industries from computational loads as you address important regulatory issues. We recommend

¹ Proposed Changes to Rules of Procedure, NERC, <https://www.nerc.com/who-we-are/rules-of-procedure/proposed-changes-to-rules-of-procedure>

that NERC use the North American Industry Classification System (NAICS), which is the U.S. Census Bureau's standard for classifying business establishments.²

The NAICS code for "computational loads" falls under NAICS 541513 "Data Processing, Hosting, and Related Services," with related codes in 541511 "Computer Systems Design Services" and 517210 "Data Processing, Hosting, and Related Services."

There is no manufacturing sectors included in those NAICS codes. Therefore, specifically stating that the new NERC definitions would only apply to those NAICS codes would not subject our industries to the new NERC rules.

Finally, we would like to reinforce the differences between data centers and manufacturers. Unlike data centers, manufacturing demand and how we operate do not increase costs to other ratepayers nor do our operations impact the reliability of the grid.

- Our electricity demand is barely increasing. According to the U.S. Energy Information Administration (EIA), in the last ten years U.S. manufacturing electricity demand increased by only 0.067 percent, while gross output increased by 32.2 percent.³ A tremendous success story. Because we face extreme competition, we are price sensitive and drive down the use of electricity and that is not going to change in the future.
- Manufacturing reduces electricity costs to other ratepayers. When there is high peak demand periods many implement demand response to reduce consumption. This results in lower prices to other ratepayers.
- We invest capital to generate power via combined heat and power, waste heat to power, wind, solar, and batteries. By doing so, it avoids the need for the utility to build generation capacity, thereby reducing costs to other ratepayers.
- Finally, many manufacturing facilities operate day and night, 365 days per year. Many facilities with CHP generation provide valuable balancing benefits to the grid by producing less power at night and buying power from the grid when demand from the residential and commercial sectors is low. This predictable behavior supports grid balancing and frequency stability through continuous operation that differs fundamentally from data center loads. Our electric generating units are also called upon to provide power or curtail load in times of

² North American Industry Classification System, <https://www.census.gov/naics/>

³ Manufacturing Electricity Demand is Flat, <https://www.ieca-us.org/wp-content/uploads/Electricity-slide.pdf>

grid system stress or shortages, thereby supporting grid reliability. There is not a single example nationwide that a manufacturing facility has caused a grid reliability problem.

The manufacturing sector are the supply chain for the entire U.S. economy including to data centers and our national defense industries. Thank you for your support.

Sincerely,

Paul N. Cicio

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President & CEO

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, defense industries, fertilizer, insulation, glass, industrial gases, pharmaceutical, consumer goods, building products, automotive, independent oil refining, and cement.