

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

**Interconnection of Large Loads to the  
Interstate Transmission System**

**Docket No. RM26-4-000**

**Reply Comments of Paige Lambermont of the Competitive Enterprise Institute**

I appreciate this opportunity to provide feedback on the Secretary of Energy's advance notice of proposed rulemaking. Specifically, I am providing reply comments that support the comments of the Cato Institute's Travis Fisher.<sup>1</sup>

I am a Research Fellow in the Center for Energy and Environment at the Competitive Enterprise Institute (CEI). CEI is a policy and research organization dedicated to advancing the principles of free markets and limited government.

I support Mr. Fisher's request in his comment to enable Consumer Regulated Electricity (CRE). In doing so, this would allow a parallel path to power access for large electricity loads that is timely, orderly, and non-discriminatory. As a result, this would help to support the goal of the rulemaking, by providing an alternative option to customers, including those large load customers considered in this rulemaking.

CRE presents an alternative option for those whose electricity needs cannot be readily met by the Bulk Power System or who feel they can better meet their own power needs. CRE primarily requires state level policy change to allow companies to work with power suppliers independent of the existing power grid. This is done by amending the enabling legislation of state utility regulators (generally a public service commission or public utilities commission) to define CRE and exempt it from the regulation.<sup>2</sup>

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<sup>1</sup> Travis Fisher, Cato Institute, Comments on Proposed ANOPR: Interconnection of Large Loads to the Interstate Transmission System, Docket No. RM26-4-000, (November 21, 2025) [https://elibrary.ferc.gov/eLibrary/filelist?accession\\_number=20251124-5131&optimized=false&sid=1d906938-95f3-4e29-a1c4-2835d052f554](https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20251124-5131&optimized=false&sid=1d906938-95f3-4e29-a1c4-2835d052f554).

<sup>2</sup> Glen Lyons, "Consumer Regulated Electricity: The Path to Faster, Reliable Power Solutions?," Data Center Knowledge, July 2, 2024, <https://www.datacenterknowledge.com/energy-power-supply/consumer-regulated-electricity-the-path-to-faster-reliable-power-solutions->.

Although state policy change is what is needed to allow these arrangements to occur, regulatory clarity from DOE and FERC would make clear that CRE utilities are separate from the Bulk Power System and should be treated as such. Mr. Fisher's comment is correct to ask for this clarification.

Respectfully submitted,

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