COST CONTROL & ALLOCATION REVIEW & EVALUATION TEAM MEETING
September 16-17, 2026
8:00 a.m. – 5:00 p.m. CT

Evergy | Kansas City, MO

SUMMARY OF MOTIONS AND ACTION ITEMS

Motions

1. **Minutes**

   Motion: The CARE Team approves the meeting minutes from August 24, 2026. Tyler Huebner (Google) motioned/Kevin Gunn (Evergy) seconded. *The motion passed unanimously.*

2. **Stranded Cost Principle**

   Original Motion: The CARE Team endorses the Large Load Stranded Cost Protection principle, as presented.

   > "New large loads through their transmission customer should be responsible for paying costs related to the planned new large load even if those large loads do not materialize, reduce demand or cease operations."

   Mike Wise (GSEC) motioned/Katheleen Jackson (PUCT) seconded. *The motion passed with 15 in favor, none opposed, and one abstention (Google).*

   First Amended Motion: The CARE Team endorses the Large Load Stranded Cost Protection principle, as amended.

   > "New large loads through their transmission customer should be responsible for paying costs directly related to serving the planned new large load even if those large loads do not materialize, reduce demand or cease operations."

   Tyler Huebner (Google) motioned and motion failed to receive a second.

   Second Amended Motion: The CARE Team endorses the Large Load Stranded Cost Protection principle, as presented and amended.

   > "~~New large loads through~~ The transmission customer serving new large loads should be responsible for paying costs related to the planned new large load even if those large loads do not materialize, reduce demand or cease operations."

Justin Grady (KCC) motioned/Chuck Hutchison (NPRB) seconded. *The motion failed with five in favor (NDPSC, KCC, Google, NPRB, APSC), eight opposed (SPP Board (Wright), AEP, OCC, Evergy, PUCT, SPP Board (Solomon), SDPUC), and three abstentions (MOPSC, LES, Basin).*

Third Amended Motion: The CARE Team endorses the Large Load Stranded Cost Protection principle, as amended.

> "New ~~large~~ computational loads greater than 50 MW ~~loads~~ through their transmission customer should be responsible for paying costs related to the planned new large load even if those large loads do not materialize, reduce demand or cease operations."

Justin Grady (KCC) motioned/Chuck Hutchison (NPRB) seconded. *The motion was withdrawn.*

3. **Cost Neutrality Principle**

Original Motion: The CARE Team endorses the Large Load Principles related to Large Load Cost Neutrality, as amended, inclusive of the cost neutrality definition.

> Large Load Cost Neutrality Principle:
> "New large loads, through their transmission customer, should be responsible for incremental costs associated with service including the costs of facilities to interconnect those customers and a share of regional transmission portfolios so that existing customers are held cost-neutral* as a consequence of serving the new load."
>
> *Cost Neutrality Definition:
> - Cost neutrality means non-large load customers will not incur rate increases as a result of transmission costs associated with new large loads (roughly as it is impossible to be exact).
> - Cost neutrality does not mean non-large load customers will avoid all rate increases.
> - Cost neutrality does not mean non-large load customers will avoid all transmission rate increases.
> - Cost neutrality in this context applies only to transmission authorized by SPP.

Mike Wise (GSEC) motioned/Randy Christmann (NDPSC) seconded. *The motion passed unanimously.*

First Amended Motion: The CARE Team endorses the Large Load Principles related to Large Load Cost Neutrality, as amended, inclusive of the cost neutrality definition.

> "New large loads, through their transmission customer, should be responsible for incremental costs associated with service including the costs of facilities to interconnect those customers and a share of regional transmission portfolios." ~~so that existing customers are held cost-neutral as a consequence of serving the new load~~.

Kate Daley (AEP) motioned/Tyler Huebner (Google) seconded. *The motion failed with three votes in favor (AEP, Evergy, Google), 13 opposed (MOPSC, SPP Board (Wright), OCC, NDPSC, LES, KCC, NPRB, PUCT, Basin, SPP Board (Solomon), APSC, SDPUC, GSEC), and no abstentions.*

Second Amended Motion: The CARE Team endorses the Large Load Principles related to Large Load Cost Neutrality, as amended, inclusive of the cost neutrality definition.

Large Load Cost Neutrality Principle:

New large loads, through their transmission customer, should be responsible for incremental costs directly associated with service including the costs of facilities to interconnect those customers and a share of regional transmission portfolios so that existing customers are held cost-neutral* as a consequence of serving the new load.

*Cost Neutrality Definition:

- *Cost neutrality means non-large load customers will not incur rate increases as a result of transmission costs associated with new large loads (roughly as it is impossible to be exact).*
- *Cost neutrality does not mean non-large load customers will avoid all rate increases.*
- *Cost neutrality does not mean non-large load customers will avoid all transmission rate increases.*
- *Cost neutrality in this context applies only to transmission authorized by SPP.*

Tyler Huebner (Google) motioned/Kate Daley (AEP) seconded. *The motion failed with one in favor (Google), 15 opposed, and no abstentions.*

4. CP + Energy

Original Motion: The CARE Team recommends adding an energy component of at least 50% to the cost allocation methodology for facilities above 345kV and associated supporting infrastructure. The CARE Team recommends the RSC consider application to other Base Plan funded facilities. Dennis Florom (LES) motioned/Justin Grady (KCC) seconded. *The motion passed with 12 in favor, 1 opposed (PUCT), and 3 abstentions (SPP Board (Wright), AEP, Google).*

First Amended Motion: The CARE Team recommends adding an energy component to the cost allocation methodology for facilities above 345kV and associated supporting infrastructure. The CARE Team recommends the RSC consider application to other Base Plan funded facilities. Tyler Huebner (Google) motioned/Kathleen Jackson (PUCT) seconded. *The motion failed with one vote in favor (Google), ten opposed (MOPSC, NDPSC, LES, KCC, Evergy, NPRB, Basin, SPP Board (Solomon), SDPUC, GSEC), and five abstentions (SPP Board (Wright), AEP, OCC, PUCT, APSC).*

Second Amended Motion: The CARE Team recommends adding an energy component of at least 50% to the cost allocation methodology for all Base Plan Funded facilities. Justin Tate (APSC) motioned/Kathleen Jackson (PUCT) seconded. *The motion failed with five votes in favor*

(OCC, LES, PUCT, APSC, GSEC), six opposed (MOPSC, NDPSC, KCC, Google, NPRB, SDPUC), and five abstentions (SPP Board (Wright), AEP, Evergy, Basin, SPP Board (Solomon).

5. Load Interconnection Cost Responsibility

Motion: The CARE Team recommends establishing a dual-limit "Safe Harbor" for Network Upgrade costs associated with new or modified load delivery points studied under Attachments AQ, AX, and BA. Tyler Huebner (Google) motioned/Jason Chaplin (OCC) seconded. *The motion passed with 14 in favor, none opposed, and two abstentions (AEP, Evergy).*

6. Load Materialization Risk Protection

Motion: The CARE Team recommends establishing a Load Materialization Risk Protection mechanism. Kevin Gunn (Evergy) motioned/Shawnee Claiborn-Pinto (PUCT) seconded. *The motion passed with 13 in favor, one opposed (AEP), two abstentions (LES, Basin).*

7. Cost Allocation for Large Load

Motion: The CARE Team recommends establishing a Cost Allocation for Large Load Contribution.

> *The CARE Team recommendation includes the Recommendation section of the White Paper as substance of its recommendation, with the rest of the White Paper to be used as background information by the designated working groups as they develop their recommendation.*

Justin Grady (KCC) motioned/Randy Christmann (NDPSC) seconded**.** *The motion passed with 13 in favor, two opposed (OCC, Google), one abstention (AEP)*

8. Focused Portfolio Implementation

Motion: The CARE Team approves the Focused Portfolio Implementation Plan, as presented, and directs Staff to route RR811 through the working groups as appropriate. Kathleen Jackson (PUCT) motioned/Jeremy Severson (Basin) seconded. *The motion passed unanimously.*

9. Generator Retirements

Motion: The CARE Team accepts the Cost Allocation Working Group recommendation to continue the existing Base Plan Funding methodology for transmission improvements identified through the Generator Retirement studies under Attachment AB of the SPP Tariff. Kevin Gunn (Evergy) motioned/Dennis Florom (LES) seconded. *The motion passed with 14 in favor, one opposed (NDPSC), and no abstentions*

10. Benefit Cost Threshold

Motion: The CARE Team approves a 1.25 Benefit-to-Cost threshold for use in the economic portfolio development milestone in the ITP/CPP, High Priority, Coordinated System Planning (CSP), and 20-Year Assessment.

If an economic project has a B/C ratio under 1.25, if based on engineering judgement, Staff believes it is a beneficial project for the portfolio and it will provide benefits worth considering in the consolidated portfolio, they have the discretion to move it forward for further consideration. Staff shall justify that decision in the final transmission project separately in the final report.

Mike Wise (GSEC) motioned/Dennis Florom (LES) seconded. *The motion passed with 15 in favor, one opposed (Google), and no abstentions.*

Action Items

1. Ratepayer Protection Pledge: Staff will provide an overview of recent federal legislation related to large loads.

2. Regional/Deliverability Area Overlap: Staff will quantify the overlap between the Regional/Deliverability Area approach and other CARE cost allocation components.

3. HILL Computational Load: Staff will provide additional information on the composition of HILL requests, including the portion attributable to computational loads compared with other types of large-load requests.

4. Financial Security: Staff will bring back additional financial security options for consideration.

5. Staff will clarify that the load forecast used for protection is the forecast provided by the Transmission Customer (TC) and will not be a higher or otherwise modified forecast developed for other business purposes or models, such as a regional resiliency need scenario.

6. SPP Staff to revise the lookback mechanism white paper language to address stakeholder feedback and present the revised language to CARE for approval.

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MINUTES

Agenda Item 1 – Call to Order

CARE Co-Chair Kayla Hahn (MOPSC) called the meeting to order at 8:03 a.m. CT and welcomed everyone. The following members were present or represented by proxy:

CARE Co-Chair Kayla Hahn, Missouri Public Service Commission (MOPSC)
Stacey Burbure, American Electric Power (AEP), *proxy Kate Daley*
Jason Chaplin, Oklahoma Corporation Commission (OCC)
Randel Christmann, North Dakota Public Service Commission (NDPSC)
Dennis Florom, Lincoln Electric System (LES)
Justin Grady, Kansas Corporation Commission (KCC)
Kevin Gunn, Evergy
Tyler Huebner, Google
Chuck Hutchison, Nebraska Power Review Board (NPRB)
Kathleen Jackson, Public Utility Commission of Texas (PUCT)
Jeremy Severson, Basin Electric Power (BEP)
Stuart Solomon, SPP Board of Directors (SPP Board)
Justin Tate, Arkansas Public Service Commission (APSC)
Jon Thurber, South Dakota Public Utilities Commission (SDPUC)
Michael Wise, Golden Spread Electric Cooperative (GSEC)
CARE Co-Chair Steve Wright, SPP Board of Directors (SPP Board)

Agenda Item 2 – Administrative Items

A. Approval of Minutes

An updated version of the August 24, 2026 meeting minutes were presented for approval.

MOTION: The CARE Team approves the meeting minutes from August 24, 2026. Tyler Huebner (Google) motioned/Kevin Gunn (Evergy) seconded. *The motion passed unanimously.*

B. Review of Action Items

Kim O'Guinn (SPP) reviewed open action items from previous meetings.

Agenda Item 3 – CARE Roadmap

Kim O'Guinn (SPP) reviewed the roadmap and highlighted the objectives for the upcoming meetings.

Agenda Item 4 – CARE Package

Casey Cathey (SPP) provided an overview of the CARE package, including proposed cost allocation and large-load recommendations. It was emphasized that the recommendations should be considered as an integrated package because the mechanisms may interact and affect the need or effectiveness of other components. The CARE Team discussed the need to clearly distinguish policy frameworks from implementation direction and emphasized evaluating potential unintended consequences and overlap among the mechanisms. Members also discussed the 12 CP plus Energy split, including whether to establish a 50/50 allocation or defer further analysis to the working groups. Staff outlined its current positions, including support for retaining highway byway cost allocation, an energy component, load interconnection cost responsibility, and load materialization protection. Members requested additional analysis of how the proposed mechanisms interact and whether costs could be more closely aligned with incremental load growth.

Agenda Item 5 – Load Interconnection Cost Responsibility – Show Cause Compliance

Charles Locke (SPP) presented a proposed delivery-point safe harbor to address FERC's Show Cause Order and cost-shifting concerns. Following the cost neutrality principle, the delivery-point safe harbor would allow delivery-point network upgrades to remain base-plan funded up to a specified limit, with costs above the limit directly assigned to the transmission customer and backed by financial security. Discussion focused on how to establish the safe-harbor limit, including per-MW and aggregate limits, which loads should be covered, and how the approach would interact with the broader CARE recommendations. Further analysis by the Cost Allocation Working Group (CAWG) and Staff is expected before a recommendation is developed for consideration by the Regional State Committee (RSC).

Agenda Item 6 – Cost Allocation for Large Load

Sarah Bockelmann (SPP) provided an update on large load activity and discussed whether a large-load contribution is warranted. Staff reported significant large load activity progressing through the study and service agreement processes and presented illustrative analyses regarding load materialization and potential impacts to existing customers. The CARE Team discussed two potential contribution methodologies: an interconnection cost benchmark using AQ/AX costs and a system-usage-based allocation. Participants generally viewed the usage-based approach as providing a more direct analytical basis, while noting that substantial policy and implementation details remain to be developed. The CARE Team also discussed how a contribution could interact with the safe harbor and load forecast protection mechanisms, including potential overlap and

residual ATRR impacts. Staff noted that additional work is needed to determine the contribution amount, applicability, timing, duration, revenue treatment, and implementation, and that these elements should be coordinated with the other CARE recommendations. Staff supported further consideration of a contribution but did not recommend that one is necessary at this time, noting that its necessity depends in part on how the other mechanisms are ultimately structured.

Agenda Item 7 – CARE One Pager Recommendations

1. Large Load Principles

The CARE Team discussed the large load cost neutrality and stranded cost protection principles, including concerns about the scope and definition of "large load," and the relationship to the ratepayer protection pledge. Participants debated whether the principles should apply broadly to all large loads or be more specifically focused on data centers or computational loads. Staff and participants also discussed the distinction between SPP allocating costs to transmission customers and state regulators determining how those costs are ultimately recovered from retail customers.

a. Stranded Cost Principle: The CARE Team adopted the large-load stranded cost protection principle as originally proposed, after amendments to clarify the language and limit the principle to data centers were withdrawn or failed.

Original Motion: The CARE Team endorses the Large Load Stranded Cost Protection principle, as presented.

> "New large loads through their transmission customer should be responsible for paying costs related to the planned new large load even if those large loads do not materialize, reduce demand or cease operations."

Mike Wise (GSEC) motioned/Katheleen Jackson (PUCT) seconded. *The motion passed with 15 in favor, none opposed, and one abstention (Google).*

First Amended Motion: The CARE Team endorses the Large Load Stranded Cost Protection principle, as amended.

> "New large loads through their transmission customer should be responsible for paying costs directly related to serving the planned new large load even if those large loads do not materialize, reduce demand or cease operations."

Tyler Huebner (Google) motioned and motion failed to receive a second.

Second Amended Motion: The CARE Team endorses the Large Load Stranded Cost Protection principle, as presented and amended.

"~~New large loads through~~ The transmission customer serving new large loads should be responsible for paying costs related to the planned new large load even if those large loads do not materialize, reduce demand or cease operations."

Justin Grady (KCC) motioned/Chuck Hutchison (NPRB) seconded. *The motion failed with five in favor (NDPSC, KCC, Google, NPRB, APSC), eight opposed (SPP Board (Wright), AEP, OCC, Evergy, PUCT, SPP Board (Solomon), SDPUC), and three abstentions (MOPSC, LES, Basin).*

Third Amended Motion: The CARE Team endorses the Large Load Stranded Cost Protection principle, as amended.

"New ~~large~~ computational loads greater than 50 MW ~~loads~~ through their transmission customer should be responsible for paying costs related to the planned new large load even if those large loads do not materialize, reduce demand or cease operations."

Justin Grady (KCC) motioned/Chuck Hutchison (NPRB) seconded. *The motion was withdrawn.*

b. Cost Neutrality Principle: The CARE Team then considered the large load cost neutrality principle and incorporated the cost neutrality definition into the principle. An amendment to remove the final sentence addressing cost neutrality failed, as did an amendment to specify that costs must be "directly" associated with serving the large load.

Original Motion: The CARE Team endorses the Large Load Principles related to Large Load Cost Neutrality, as amended, inclusive of the cost neutrality definition.

Large Load Cost Neutrality Principle:
"New large loads, through their transmission customer, should be responsible for incremental costs associated with service including the costs of facilities to interconnect those customers and a share of regional transmission portfolios so that existing customers are held cost-neutral* as a consequence of serving the new load."

*Cost Neutrality Definition:

- Cost neutrality means non-large load customers will not incur rate increases as a result of transmission costs associated with new large loads (roughly as it is impossible to be exact).
- Cost neutrality does not mean non-large load customers will avoid all rate increases.
- Cost neutrality does not mean non-large load customers will avoid all transmission rate increases.
- Cost neutrality in this context applies only to transmission authorized by SPP.

Mike Wise (GSEC) motioned/Randy Christmann (NDPSC) seconded. *The motion passed unanimously.*

First Amended Motion: The CARE Team endorses the Large Load Principles related to Large Load Cost Neutrality, as amended, inclusive of the cost neutrality definition.

> "New large loads, through their transmission customer, should be responsible for incremental costs associated with service including the costs of facilities to interconnect those customers and a share of regional transmission portfolios." ~~so that existing customers are held cost-neutral as a consequence of serving the new load~~.

Kate Daley (AEP) motioned/Tyler Huebner (Google) seconded. *The motion failed with three votes in favor (AEP, Evergy, Google), 13 opposed (MOPSC, SPP Board (Wright), OCC, NDPSC, LES, KCC, NPRB, PUCT, Basin, SPP Board (Solomon), APSC, SDPUC, GSEC), and no abstentions.*

Second Amended Motion: The CARE Team endorses the Large Load Principles related to Large Load Cost Neutrality, as amended, inclusive of the cost neutrality definition.

> Large Load Cost Neutrality Principle:
>
> New large loads, through their transmission customer, should be responsible for incremental costs directly associated with service including the costs of facilities to interconnect those customers and a share of regional transmission portfolios so that existing customers are held cost-neutral* as a consequence of serving the new load.
>
> *Cost Neutrality Definition:
>
> - *Cost neutrality means non-large load customers will not incur rate increases as a result of transmission costs associated with new large loads (roughly as it is impossible to be exact).*
> - *Cost neutrality does not mean non-large load customers will avoid all rate increases.*
> - *Cost neutrality does not mean non-large load customers will avoid all transmission rate increases.*
> - *Cost neutrality in this context applies only to transmission authorized by SPP.*

Tyler Huebner (Google) motioned/Kate Daley (AEP) seconded**.** *The motion failed with one in favor (Google), 15 opposed, and no abstentions.*

2. CP + Energy

On day one of the meeting, the CARE Team reviewed stakeholder feedback on the CP and Energy cost allocation white paper. Stakeholders generally expressed support for incorporating an energy component, with several recommending that the specific allocation between CP and energy be supported by additional analysis and developed through the stakeholder process. Discussion included a potential 50/50 starting point, with flexibility to adjust the allocation based on further analysis. Members also discussed whether the energy

component should apply only to facilities at or above 345kV, consistent with the CARE Team's established scope, or to all new Base Plan-funded facilities.

On day two, the CARE Team discussed the scope of the recommendation in relation to the CARE scope document and the EHV Overlay application document. Staff reviewed the EHV Overlay application document, which limits CARE application to transmission facilities above 345kV identified through the CPP/ITP process. Members discussed whether the recommendation should remain within the scope previously established by the CARE Team and noted that the RSC ultimately has authority to determine the applicability of any CARE recommendation. The discussion also addressed the lack of voltage-specific analysis below the EHV Overlay scope and the potential implications of expanding the recommendation to lower-voltage facilities.

The group considered two amendments: (1) to remove the recommended minimum percentage for the energy component, and (2) to broaden the application of the recommendation by removing the reference to facilities above 345 kV. Both amendments failed. The CARE Team then returned to the underlying motion to recommend adding an energy component of at least 50% to the cost allocation methodology for facilities above 345kV, with the RSC to consider application to other Base Plan-funded facilities.

Original Motion: The CARE Team recommends adding an energy component of at least 50% to the cost allocation methodology for facilities above 345kV and associated supporting infrastructure. The CARE Team recommends the RSC consider application to other Base Plan funded facilities. Dennis Florom (LES) motioned/Justin Grady (KCC) seconded. *The motion passed with 12 in favor, 1 opposed (PUCT), and 3 abstentions (SPP Board (Wright), AEP, Google).*

First Amended Motion: The CARE Team recommends adding an energy component to the cost allocation methodology for facilities above 345kV and associated supporting infrastructure. The CARE Team recommends the RSC consider application to other Base Plan funded facilities. Tyler Huebner (Google) motioned/Kathleen Jackson (PUCT) seconded. *The motion failed with one vote in favor (Google), ten opposed (MOPSC, NDPSC, LES, KCC, Evergy, NPRB, Basin, SPP Board (Solomon), SDPUC, GSEC), and five abstentions (SPP Board (Wright), AEP, OCC, PUCT, APSC).*

Second Amended Motion: The CARE Team recommends adding an energy component of at least 50% to the cost allocation methodology for all Base Plan Funded facilities. Justin Tate (APSC) motioned/Kathleen Jackson (PUCT) seconded. *The motion failed with five votes in favor (OCC, LES, PUCT, APSC, GSEC), six opposed (MOPSC, NDPSC, KCC, Google, NPRB, SDPUC), and five abstentions (SPP Board (Wright), AEP, Evergy, Basin, SPP Board (Solomon).*

3. Regional/Deliverability Area Split

The CARE Team discussed the Regional Deliverability Area Split white paper and stakeholder comments, including whether a Deliverability Area approach would better align costs with

benefits for large transmission facilities and future 765 kV development. Participants discussed potential cost shifts, uncertainty regarding future load and transmission development, and possible phased or hybrid approaches. The discussion also considered interactions with other CARE proposals, including energy allocation and load materialization protections. No final recommendation was reached, and additional analysis and discussion were identified as needed.

4. Lookback Mechanism

Brooke Keene (SPP) presented a proposed lookback mechanism using the existing RCAR process to evaluate whether costs remain commensurate with benefits after implementation of CARE cost allocation changes and construction of the EHV Overlay. Members discussed timing, scope, RCAR thresholds, review frequency, and potential cost shifts from phased construction. The CARE Team requested Staff revise the white paper to consider a forward-looking look-ahead/refresh mechanism, potentially in 2028–2029, to assess approved but not-yet-in-service facilities to inform future cost allocation decisions.

5. Load Interconnection Cost Responsibility

On day one, the CARE Team discussed the Load Interconnection Cost Responsibility white paper, focusing on delivery-point safe harbor, direct assignment, financial security, and cost recovery. Staff clarified that financial security would apply to directly assigned delivery-point upgrades, but not the Base Plan-funded portion. Members also discussed lump-sum contributions, self-funding, independent studies, and interactions with other mechanisms.

On day two, members continued discussion of the dual-limit safe harbor, financial security, payment options, and application to large-load interconnections. Members also discussed safe harbor limits and application to loads above 50 MW and non-HILL requests. Staff noted related FERC Show Cause compliance revisions would be developed for CAWG and RSC consideration.

> **Motion:** The CARE Team recommends establishing a dual-limit "Safe Harbor" for Network Upgrade costs associated with new or modified load delivery points studied under Attachments AQ, AX, and BA. Tyler Huebner (Google) motioned/Jason Chaplin (OCC) seconded. *The motion passed with 14 in favor, none opposed, and two abstentions (AEP, Evergy).*

6. Load Materialization Risk Protection

On day one, the CARE Team discussed the Load Materialization Risk Protection concept and reviewed stakeholder comments regarding forecast accuracy, allocation of financial risk, and implementation. Stakeholders raised concerns regarding underforecasting, transmission customer responsibility, forecast ownership and updates, and the need to align load forecasts used in load interconnection studies with ITP/CPP processes and timeframes. Discussion also addressed the appropriate protection percentage, use of a demand-based methodology, and whether the protection should apply to CARE facilities, all new Base Plan-funded facilities, or all transmission facilities. The CARE Team also discussed the need for flexibility when forecasts

change due to circumstances such as generation or transmission delays or unexpected load loss, while maintaining sufficient protection against stranded costs. Staff indicated that additional work is needed to determine an appropriate percentage, exceptions, forecast timing, and the duration of protection, including potential application beyond Year 10.

On day two, the group reviewed the Load Materialization Risk Protection white paper and summarized prior discussion regarding forecast selection, the protection period, applicability to Base Plan-funded facilities, and potential financial safeguards. Participants discussed guardrails related to forecasts, timing, scope, and implementation, including concerns about financial impacts, under-forecasting incentives, impacts on smaller transmission customers, and prospective versus retroactive application. The CARE Team generally supported establishing a load materialization risk protection mechanism, with specific design elements to be developed through the revision request process and further stakeholder input. The motion adopted the high-level recommendation without prescribing implementation details, and the white paper's supporting analysis will remain a resource for future development.

> **Motion*:*** The CARE Team recommends establishing a Load Materialization Risk Protection mechanism. Kevin Gunn (Evergy) motioned/Shawnee Claiborn-Pinto (PUCT) seconded. *The motion passed with 13 in favor, one opposed (AEP), two abstentions (LES, Basin).*

7. Cost Allocation for Large Load

The CARE Team discussed the proposed large load contribution framework and whether to adopt the recommendation without the detailed methodologies in the white paper. Participants noted potential overlap with the load interconnection safe harbor and agreed that any duplication of charges should be addressed through the revision request process. The CARE Team agreed to adopt the high-level recommendation, with the supporting white paper material retained as background to be included in the final CARE report for future workgroup consideration.

> **Motion*:*** The CARE Team recommends establishing a Cost Allocation for Large Load Contribution.
>
> > *The CARE Team recommendation includes the Recommendation section of the White Paper as substance of its recommendation, with the rest of the White Paper to be used as background information by the designated working groups as they develop the contribution.*
>
> Justin Grady (KCC) motioned/Randy Christmann (NDPSC) seconded**.** *The motion passed with 13 in favor, two opposed (OCC, Google), one abstention (AEP)*

Agenda Item 8 – Focused Portfolio Implementation

Tony Green (SPP) presented the implementation plan for the Focused Portfolio, including proposed tariff revisions, a new business practice, and criteria. Mr. Green noted that RR811 is underway, with stakeholder review planned for October–December and MOPC and Board

consideration targeted for early 2027. Members discussed the proposed project criteria and whether the supporting positions should be treated as a general budget expense rather than a billable service.

> **Motion**: The CARE Team approves the Focused Portfolio Implementation Plan, as presented, and directs Staff to route RR811 through the working groups as appropriate. Kathleen Jackson (PUCT) motioned/Jeremy Severson (Basin) seconded. *The motion passed unanimously.*

Agenda Item 9 – Generator Retirements Recommendation

In response to a CARE Team action item, John Krajewski (NPRB and CAWG Chair) reviewed the generator retirement cost allocation policy under Attachment AB and presented the recommendation from the CAWG to continue to use Base Plan funding for transmission improvements associated with generator retirements. The recommendation was based on the lack of transmission improvements identified through prior studies and the decline in planned retirements. Members discussed whether future retirements could result in additional transmission needs and noted the importance of considering longer-term planning sensitivities.

> **Motion:** The CARE Team accepts the Cost Allocation Working Group recommendation to continue the existing Base Plan Funding methodology for transmission improvements identified through the Generator Retirement studies under Attachment AB of the SPP Tariff. Kevin Gunn (Evergy) motioned/Dennis Florom (LES) seconded. *The motion passed with 14 in favor, one opposed (NDPSC), and no abstentions.*

Agenda Item 10 – CAWG/ESWG Benefit Cost Threshold Recommendation

John Krajewski (NPRB) reviewed the CARE Team's request for the CAWG and the Economic Studies Working Group (ESWG) to consider the current 1.0 benefit-to-cost (B/C) ratio requirement for individual economic projects and whether to increase the threshold to 1.25. Mr. Krajewski highlighted the review conducted by the CAWG and ESWG and their subsequent recommendations. Eduardo Garcia, ESWG Chair, provided additional context on the ESWG recommendation, noting that it would allow Staff to retain discretion to advance projects with a B/C ratio below 1.25 when engineering judgment identifies additional benefits, with justification included in the final report. Members discussed the conservatism of the current calculations and the value of explicitly recognizing Staff discretion. Following discussion, the ESWG recommendation was offered as the motion for consideration.

> **Motion**: The CARE Team approves a 1.25 Benefit-to-Cost threshold for use in the economic portfolio development milestone in the ITP/CPP, High Priority, Coordinated System Planning (CSP), and 20-Year Assessment.
>
> If an economic project has a B/C ratio under 1.25, if based on engineering judgement, Staff believes it is a beneficial project for the portfolio and it will provide benefits worth considering in the consolidated portfolio, they have the discretion to move it forward for

further consideration. Staff shall justify that decision in the final transmission project separately in the final report.

Mike Wise (GSEC) motioned/Dennis Florom (LES) seconded. *The motion passed with 15 in favor, one opposed (Google), and no abstentions.*

Agenda Item 11 – FERC Show Cause Compliance

Paul Suskie (SPP) provided a brief update on the revision requests under development for compliance with the FERC Show Cause Order.

Agenda Item 13 – Action Item Review

1. Ratepayer Protection Pledge: Staff will provide an overview of recent federal legislation related to large loads.

2. Regional/Deliverability Area Overlap: Staff will quantify the overlap between the Regional/Deliverability Area approach and other CARE cost allocation components.

3. HILL Computational Load: Staff will provide additional information on the composition of HILL requests, including the portion attributable to computational loads compared with other types of large-load requests.

4. Financial Security: Staff will bring back additional financial security options for consideration.

5. Staff will clarify that the load forecast used for protection is the forecast provided by the Transmission Customer (TC) and will not be a higher or otherwise modified forecast developed for other business purposes or models, such as a regional resiliency need scenario.

6. SPP Staff to revise the lookback mechanism white paper language to address stakeholder feedback and present the revised language to CARE for approval.

Agenda Item 14 – Next Steps

The Co-Chairs announced a previously unplanned meeting which will be held in Chicago on Wednesday, October 7, 2026.

Agenda Item 15 – Adjournment

Chair Hahn adjourned the meeting at 4:44 pm CT.

Month	Meeting Date	Location
October	Wednesday, Oct 7 (8:00-5:00 CT)	Chicago

October	Monday, Oct 19 (8:00-5:00 CT)	Denver
November	Sunday, Nov 15 (1:00-5:00 CT)	Little Rock
December	Tuesday, Dec 8 (8:00-12:00 CT)	Virtual