

REGULATOR Q&A ON THE FLEXIBLE GRID CONNECTION IMPLEMENTATION GUIDE

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1. What is Flexible Grid Connection?

Flexible Grid Connection (FlexGC) is the process of modifying the performance or timing of loads or distributed energy resources (DERs) connecting to the grid to expedite connection timelines and avoid creating grid constraints. The guide describes two broad categories of FlexGC — static and dynamic. Static FlexGC is based on a predefined set of limits that the customer agrees to at the point of grid connection, while dynamic FlexGC more actively conveys these limits on a day-ahead or real-time basis, based on monitored grid conditions. Dynamic Flex GC can fine-tune limits but requires a method to communicate those limits to customers. This could be done through DERMS or other methods (such as in Australia, where limits are “published” to customers).

2. How can this guide inform regulatory action?

The purpose of the guide is to help utilities implement FlexGC and to clarify the regulatory decisions and oversight that flexible service connections may require. Regulators can use it to:

- ▶ **Initiate discussions around FlexGC opportunities** to improve grid connection speed and delay or avoid triggering distribution upgrades.
- ▶ **Evaluate the feasibility and specific**

benefits of different FlexGC methods in their jurisdiction.

- ▶ **Help create enabling rules, tariffs, incentives, and other regulatory structures or riders** defining FlexGC options, eligibility, reporting requirements, transparency, and cost recovery.

3. How does FlexGC differ from traditional connections?

Unlike traditional connections, FlexGC offers:

- ▶ **Time-varying capacity impacts** rather than one-size-fits-all firm capacity.
- ▶ **Compliance assurance** through formal offerings with enforceable limits and performance standards.
- ▶ **Shared accountability:** Customers agree to operational limits and utilities must provide data and communication pathways.

4. What economic and policy benefits can regulators enable?

- ▶ **Faster customer connections** by enabling new/increased loads to connect under temporary limits while grid upgrades are constructed.
- ▶ **Enhanced system utilization** by unlocking latent grid asset capacity.
- ▶ **Customer cost savings** by avoiding unnecessary system upgrades.

This fact sheet was developed from the report, “CHARGED Flexible Grid Connection: Implementation Guide,” which was developed as part of a CHARGED working group.

5. What risks should regulators anticipate?

- ▶ **Overly conservative utility compliance requirements** could limit participation and reduce potential benefits.
- ▶ **Customer adoption can lag** if reliability or service quality is not adequately protected.
- ▶ **Inconsistent utility approaches** could fragment adoption, confuse customers, and complicate oversight.
- ▶ Establishing a clear process and guidance for utilities to effectively implement FlexGC could **increase regulatory burden and workload**.

6. When and where should regulators encourage FlexGC adoption?

- ▶ Where **load growth hotspots** risk multi-year delays from utility capacity upgrade construction.
- ▶ In dockets examining **existing interconnection reform, DER/DR deployment/scaling, distribution system planning, or grid utilization**.
- ▶ When **policy targets (e.g., EV adoption, building electrification, decarbonization)** demand faster grid access.

7. How can regulators approach FlexGC in a formal docketed process?

- ▶ **Stage 1:** Identify dockets (open or needed) that can support grid connection reforms.
- ▶ **Stage 2:** Establish requirements and incentives for utilities to explore and scale the use of FlexGC in priority areas.
- ▶ **Stage 3:** Integrate FlexGC results into grid modernization and planning filings.
- ▶ **Stage 4:** Enable necessary cost recovery to scale FlexGC for more complex applications as is effective and useful.

8. Can FlexGC be considered outside of docketed proceedings?

Yes, existing utility connection processes may be able to support FlexGC without additional regulatory structures. Consider options such as

working groups to explore how existing utility processes can integrate FlexGC approaches.

9. How should costs and benefits be considered?

- ▶ **Utility-side enablement costs** (data, telemetry, monitoring) may be considered recoverable via rate cases or performance incentives. Customer-specific costs for on-site facilities may also be incorporated into existing connection cost regulatory structures including Contribution in Aid of Construction (CIAC).
- ▶ **Customer-side equipment or control costs** should be borne by the customer as part of their on-site facilities.
- ▶ **Performance-based regulation** can reward utilities for increasing connection speed or deferring upgrades.

10. How does FlexGC for loads differ from FlexGC for solar or other DERs?

Although this guide focuses on load, many of the same principles may apply to distributed solar or other DERs. However, the technical nuances may differ; for example, dynamic FlexGC may be more appropriate for solar than for load. The key question from a regulatory perspective is whether the utility has considered an approach that maximizes benefits to customers in the most cost-effective manner.

11. What open regulatory questions remain?

- ▶ How can regulators define “firmness” and enforce performance obligations?
- ▶ Should telemetry and data requirements be standardized at the state and/or national level?
- ▶ How can regulators incentivize customers to utilize FlexGC methods when they would not otherwise directly benefit from faster connection speeds or directly avoided costs but would instead benefit indirectly via lower system costs.
- ▶ How can FlexGC equitably provide benefits of deferred upgrades among ratepayers?