

Wyoming Cooperative Large Load Solutions

How Wyoming's Electric Cooperatives Can Serve Large-Scale Industrial Development

WREA Statewide Managers Group | Working Draft — May 7, 2026 | Revision 5

OVERVIEW

Wyoming's electric cooperatives serve the majority of the state's geographic area and are the primary providers of electric infrastructure for industrial development. As large-scale energy users—including data centers, mining operations, gas compression facilities, and advanced manufacturing—evaluate Wyoming for new projects, the cooperative system already has multiple pathways in place to deliver reliable, competitively priced electric service at scale. While an immense challenge to serve the unprecedented point loads being discussed, cooperatives have paths available. This document describes five service options available through Wyoming's generation and transmission (G&T) cooperatives and local distribution cooperatives. A side-by-side comparison matrix is included for quick reference. These pathways align with the Rate Payer Protection Pledge, taken by the big 7 data center developers, aimed at protecting existing rate payers and potentially lowering retail rates by working together. This is a living document and will be updated as programs evolve and tariff filings are acted on.

I. AVAILABLE SOLUTIONS

A. Basin Electric — Large Load Commercial Program

G&T: Basin Electric Power Cooperative. **Applies to loads:** ≥ 75 MW place-based loads, ≥ 25 MW technology loads (data centers, AI), and Emerging or Crypto loads above the All-Requirements Member allowance.

Basin Electric's large load program creates an extremely flexible format to serve large loads with a special-purpose entity to own and finance new generation on behalf of the customer. The customer pays for all infrastructure costs, and power is delivered through the local cooperative. Potential ownership structures include, but are not limited to: Basin-owned generation funded by customer contributions, shared ownership between Basin and third-party investors that can include the requesting load entity, or fully independent generation with a power purchase agreement. Project ownership structures are determined based on individual project needs and circumstances. In every case, the local cooperative remains the customer's electric provider. The process has three phases: initial screening, detailed study and term sheet development, and project implementation.

Costs: A non-refundable \$10,000 application fee and a \$40,000 commitment fee are required. Prefunding is required for all transmission and power supply studies (typically in the range of \$50,000 or more depending on system location and project scope). All additional project costs are borne by the industrial customer.

Status: Program established June 2025. The onboarding framework is defined and ready to accept applications. No projects have yet completed the full process.

B. Tri-State — Island (Non-Grid Connected)

G&T: Tri-State G&T. **Applies to:** loads and resources that do not intend to be served through distribution- or transmission-interconnected services ("island"), where the resource provider and load are not the same entity (i.e., not self-supply) (no formal minimum size).

Under the Island arrangement, load and generation is sited within a cooperative's service territory in a non-grid-connected configuration. Three agreements define the structure: 1) the generation developer sells unit contingent energy to Tri-State, 2) Tri-State sells unit contingent energy to the cooperative, and 3) the cooperative sells unit contingent energy to the end consumer (islanded load). This arrangement ensures the cooperative retains its exclusive service territory, and the cooperative does not violate its wholesale supply contract with Tri-State by applying specific demand charges under the defined structure. This structure also accommodates third-party generation developers, making the island a practical vehicle for projects where the generation owner is separate from the load customer.

The Island configuration starts without a grid connection, but as the project matures, it can transition to grid-connected services through the HILT processes described below.

Status: The Island framework is not subject to FERC approval if the load is located in a single state and physically isolated from the grid.

C. Tri-State — High Impact Load Tariff (HILT) and Bring Your Own Resource (BYOR)

G&T: Tri-State G&T. **Applies to loads:** greater than 45 MW (or expected to exceed 45 MW within four years).

The HILT is Tri-State's formal process for evaluating and integrating large loads onto the grid. A load qualifies if it exceeds 45 MW at the time of application or is expected to reach that level within four years. Tri-State will also aggregate nearby loads within defined criteria for this threshold.

The process has four steps that can work in parallel to some degree. First, the **HILT Cycle:** the cooperative submits a request, Tri-State performs a feasibility study, and the cooperative submits an evaluation fee, and executed customer contract. Second, **Generation Procurement:** power supply is secured either through Tri-State's competitive procurement process or the cooperative's BYOR proposal associated with the specific large loads, evaluated by an independent third

party. Third, **Transmission Service**: standard transmission study and interconnection, with the customer responsible for directly assigned costs. Fourth, **System Expansion**: the developer or Tri-State builds out generation, obtains permits, and completes financing.

Costs: Evaluation fees range from \$35,000 plus \$1,000 per MW for projects under 80 MW, to \$150,000 for 80–200 MW projects, to \$250,000 for projects over 200 MW. These fees are non-refundable. A security deposit of approximately \$1.87 million per MW is also required for the generation that Tri-State will acquire on the customer’s behalf prior to Tri-State contracting for generation procurement. As an alternative, the Bring Your Own Resource (BYOR) option allows the cooperative to develop a generation resource associated with the specific large load, significantly reducing or eliminating the security deposit requirement.

Status: Tri-State refiled the HILT with FERC on March 26, 2026, after an initial rejection in October 2025 (without prejudice). Tri-State anticipates a FERC order by the end of May 2026.

D. Customer Allocation Agreement

G&T: Any (this is an arrangement between the cooperative and another utility).

A customer allocation agreement allows a cooperative to allocate a specific large load to another utility that has the generation resources or infrastructure to serve it immediately. A cooperative may also serve the load in an IOU’s territory if all parties agree. The cooperating utility builds or operates generation within the cooperative’s service territory, and the cooperative receives an annual payment. This mechanism has deep roots in cooperative practice—cooperatives have routinely served into each other’s territory for stock wells, remote loads, and similar situations when it was the most practical solution for the member.

In the large-load context, speed to market is the primary value. A customer allocation agreement can get power flowing while the cooperative builds the infrastructure to serve the load directly.

Precedent: Small-scale allocation agreements already exist with most electric utilities within the state.

E. Deseret — Negotiated Contract

G&T: Deseret G&T. **Applies to loads**: greater than 5 MW.

Deseret handles large loads through individually negotiated contracts. All infrastructure costs are paid by the customer. Bridger Valley Electric is the only Wyoming cooperative served by Deseret. There are no active large-load projects in Wyoming through Deseret at this time.

F. Bonneville Power Administration (Reference)

Applicable to: Lower Valley Energy (the only Wyoming BPA customer).

BPA serves Lower Valley under a base contract with a 10 MW large load threshold.

II. REGULATORY CONSIDERATIONS

A. PSC 2 Billion kWh Threshold

Under current Wyoming law, cooperatives that exceed 2 billion kWh in annual sales become subject to Public Service Commission rate regulation. A single large load—for example, a 300 MW+ data center—could push a cooperative past this threshold by itself. The cooperative community supports statutory language that would exempt cooperatives from PSC regulation when the threshold is triggered solely by the addition of a single large customer.

B. Protecting Existing Members from Cost Shifts

Across all of the options described above, the large-load customer pays for the infrastructure needed to serve it. This is the foundational principle. Additional protections include rate riders for asset retirement (modeled on the coal bed methane precedent), security deposits, and minimum billing provisions. These safeguards exist because the cooperative industry has seen what happens without them—multiple G&Ts have faced severe financial consequences, including bankruptcy, when large industrial customers departed. The goal is straightforward: economic benefits flow to all members, and the risks stay with the customers creating them.

III. WHAT WYOMING COOPERATIVES BRING TO THE TABLE

- **Infrastructure already in place.** Cooperatives own and maintain the transmission and distribution lines across the majority of Wyoming’s land area, including the corridors where industrial development is happening.
- **Multiple pathways.** Five options serve different project sizes, timelines, and risk profiles. There is no one-size-fits-all, and that is by design.
- **Existing-member protection.** Every option includes safeguards against cost shifts. Infrastructure contributions, security deposits, and rate riders ensure that current members are not subsidizing new industrial load.
- **Speed to market.** Island generation and customer allocation agreements can deliver power quickly while longer-term grid infrastructure is built out.

Wyoming’s cooperatives have the infrastructure, the service options, and the commitment to serve the next generation of industrial load in this state.

DOCUMENT HISTORY

Rev. 1 — March 2026: Initial draft from WREA Managers Meeting (Casper, March 2, 2026).

Rev. 2&3 — April 15 & 21, 2026: Updated HILT filing status; integrated Tri-State process document; restructured for external audiences.

Rev. 4 — May 4, 2026: Incorporated Basin Electric redline feedback

Rev. 5 — May 7, 2026: Incorporated Tri-State G&T redline feedback.

SOLUTION COMPARISON MATRIX*All information reflects the most current data available as of May 7, 2026.*

Dimension	Basin Electric LLC	Tri-State Island	Tri-State HILT / BYOR	Customer Allocation	Deseret Negotiated
G&T	Basin Electric	Tri-State G&T	Tri-State G&T	Any (co-op + another utility)	Deseret G&T
Core Concept	Flexible ownership structures available while customer is responsible for generation and transmission costs	Customer seeks islanded load and generation, with potential transition path to grid; three agreements govern	Structured G&T evaluation for loads >45 MW; generation via ERP or BYOR; two-year cycle govern	Co-op allocates load to another utility; co-op receives annual payment; speed-to-market emphasis	Individually negotiated; CIAC model
Load Threshold	≥75 MW place-based; ≥25 MW technology (data centers, AI); emerging/crypto above ARM allowance	No formal minimum	>45 MW at request or forecasted within 4 yrs; nearby loads aggregated	No threshold; PSC may direct allocation	>5 MW marginal load
Entry Cost	\$10K + \$40K commitment fee; prefunding for transmission/power supply studies (~\$50K+)	Customer bears all generation cost; Tri-State demand charge specific to islanding applies	\$35K+\$1K/MW (<80); \$150K (80–200); \$250K (>200); ~\$1.87M/MW security	No co-op investment; 3rd party builds	Negotiated; all CIAC on customer
Co-op Value	Co-op charges based on infrastructure cost; arrangement specifics	Co-op charges based on arrangement specifics	Expected retail margin (under development by individual members)	Annual payment; no infrastructure cost; speed to market	Negotiated retail rate
Territory	Preserved	Preserved via agreements	Preserved	Preserved with conditions — time-limited, plan to serve directly	Preserved
Grid Connection	Yes	Islanded initially; potentially transition via HILT; partial islanding options	Customer funds directly assigned costs	3rd party builds; may transition to co-op service	Varies
Status (Apr 2026)	Established June 2025; no completed projects yet	Island agreements are available for cooperative members	Refiled FERC 3/26/2026; action ~5/26/2026	CP&L exploring 200 MW; small-scale precedent exists	No active WY projects
Key Consideration	Extremely flexible for various generation solutions and timely to fit member's needs	Speed to market; value grows as load transitions to grid	Grid-connected large loads and generation	Allows for other solutions in time to market while longer term cooperative grid connection is developed.	Limited WY footprint

