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| PGRR Number | [125](https://www.ercot.com/mktrules/issues/PGRR125) | PGRR Title | Update of LSIPA Compliance Attestation |

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| Date | April 29, 2025 |

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| Submitter’s Information |
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| Cell Number | N/A |
| Market Segment | Not applicable |

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| Comments |

CPV Basin Ranch LLC (CPV) strongly supports ERCOT’s request for urgent status for Planning Guide Revision Request (PGRR) 125. Expeditious approval of PGRR125 is critical for preventing delays in the interconnection of Texas Energy Fund (TEF) and other major generation projects, which have been deemed a reliability and economic development priority by the Texas Legislature.

PGRR125 corrects unintended inconsistencies between (1) the Planning Guide requirements for initiation and maintenance of a Generator Interconnection or Modification (“GIM”) and (2) the Lone Star Infrastructure Protection Act (LSIPA) and the requirements for market participant registration. The current Planning Guide requirements in this respect are needlessly and unintentionally preventing the interconnection of much-needed generation to the ERCOT Grid. Specifically, under Protocol Section 16.1.3, Market Participant Citizenship, Ownership, or Headquarters, an entity that only meets the prohibited LSIPA criteria through an Affiliate or a subsidiary may still register as an ERCOT Market Participant if the Entity attests that the subsidiary or Affiliate will not have direct or remote access to or control of certain critical ERCOT systems or any data from such ERCOT systems. This is consistent with the plain language of the LSIPA. The Planning Guide, however, does not provide an equivalent exception for an Interconnecting Entity (IE), project owners, or owners of real property to be utilized for the project that only meet the LSIPA criteria through an Affiliate or subsidiary.

As a result, an entity that is allowed to register as a Resource Entity may be unable to initiate or maintain a request for Generator Interconnection or Modification (GIM) as an IE. This is not intended or required by the LSIPA. This discrepancy must be addressed to ensure it does not needlessly prevent new generation from interconnecting with the ERCOT Grid. Moreover, it must be addressed quickly. If PGRR125 is deemed urgent, this would enable PGRR125 to receive Public Utility Commission of Texas (PUCT) approval as early as July 2025, rather than by November 2025. These four months are critical to the success or failure of TEF projects (given the current statutory deadline of December 31, 2025 for initial disbursements of in-ERCOT TEF loans). It is exceedingly difficult to imagine any project in the TEF process being able to meet these deadlines. This will also negatively impact other major generation projects that are needed to maintain the reliability of the ERCOT Grid, meet the significant forecasted growth in demand due to economic development, and prevent potential risks to system reliability.

At the April 7, 2025 ERCOT Board meeting, ERCOT CEO Pablo Vegas prefaced a forecasted load for the ERCOT region of 95 GW by 2026, increasing over time to 145 GW by 2031. ERCOT cannot afford to potentially lose the projects in the TEF process or delay the interconnection of any generation due to an inadvertent error in the Planning Guide LSIPA Attestation. Such unnecessary delays in interconnecting much-needed generation projects could imminently impair the reliability of the ERCOT Grid, curtail statewide economic development, and with respect to projects like CPV Basin Ranch, are at odds with state policy that supports the increased interconnection of generation to enhance grid reliability.

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| Revised Cover Page Language |

None

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| Revised Proposed Guide Language |

None