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| PGRR Number | [128](https://www.ercot.com/mktrules/issues/PGRR128) | PGRR Title | Regional Transmission Plan Review of Grid Enhancing Technologies |
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| **Date**  | August 19, 2025 |
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| **Submitter’s Information** |
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| Market Segment | Investor-Owned Utility |

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| Comments |

Planning Guide Revision Request (PGRR) 128, Regional Transmission Plan Review of Grid Enhancing Technologies, would require ERCOT to evaluate grid enhancing technologies (“GETs”) for potential use as transmission project solutions for the ERCOT Regional Transmission Plan.

Oncor opposes the creation of a blanket framework, either for the Regional Transmission Plan and/or for the Regional Planning Group (RPG) process, that would require ERCOT (and/or Transmission Service Providers (TSPs)) to evaluate the entire universe of GETs for appropriate use in every transmission project. This framework implies that ERCOT and/or TSPs will be required to justify why each type of GET was not appropriate for the particular transmission project at hand, which is unreasonably burdensome and will introduce additional time delays into the already lengthy Regional Transmission Plan and RPG processes. Additionally:

* The universe of GETs is not well understood, since no formal definition for GETs exists, although technologies such as high-performance conductors are specifically referenced by PGRR128.
* The ERCOT planning reviews performed for the Regional Transmission Plan and RPG processes have always been technology and supplier neutral. PGRR128 would confer a competitive advantage to the manufacturers of certain types of equipment and technologies in these processes. A change to planning processes that would result in ERCOT selecting specific technologies and vendors is inappropriate.
* Certain GETs are focused on optimizing the capacity of the system, which may work for systems with slow growth and adequate margin, but do not work well, and are not cost effective, for areas with large growth and a need for larger gains in system capacity and flexibility.
* A GET can be proposed by any commenter during the RPG public comment process for a TSP’s consideration in the specific transmission project proposal. GETs technology vendors possess the specific knowledge of their particular technology type to recognize when its use might be appropriate to consider for a particular RPG project.
* To the extent that technologies such as dynamic line ratings are considered GETs, these operational tools are used for congestion management and optimization of the transmission system in Real-Time. These evaluations typically occur and are implemented in the operations horizon once assets are already in service, versus during the planning process as suggested by PGRR128.
* Oncor routinely evaluates technologies such as advanced conductors as candidates for transmission projects and has used these technologies in particular applications on its transmission system. Utilities like Oncor have the internal expertise necessary to evaluate these technologies since they have extensive Engineering, Standards and Procurement teams which are critical resources to these evaluations. The framework of PGRR128 is problematic because Independent System Operators (ISOs) do not possess these types of resources in their organizations and are not well equipped to perform an evaluation of specific transmission project technologies as proposed in this PGRR.

For the reasons stated above, and because a concept similar to PGRR128 was considered during the 2025 Legislative Session through House Bill 5200 that did not advance through the legislative process, Oncor recommends PGRR128 be withdrawn from further consideration.

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| **Revised Cover Page Language** |

None

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| Revised Proposed Guide Language |

None