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| NPRR Number | [1274](https://www.ercot.com/mktrules/issues/NPRR1274) | NPRR Title | RPG Estimated Capital Cost Thresholds of Proposed Transmission Projects |
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| **Date Posted** | | August 20, 2025 | |
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| Submitter’s Information | | | |
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| Market Segment | | Investor-Owned Utility | |

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| Comments |

Oncor submits these comments to NPRR1274, RPG Estimated Capital Cost Thresholds of Proposed Transmission Projects, in response to the 6/12/25 Texas Energy Buyers Alliance (TEBA) comments.

TEBA’s comments to NPRR1274 would specifically permit ERCOT to use its judgement to recommend Grid Enhancing Technologies (“GETs”) in the Regional Planning Group (RPG) process. Oncor opposes this concept for the following reasons:

* The universe of GETs is not well understood, since no formal definition for GETs exists, although technologies such as advanced conductors are specifically referenced in TEBA’s comments to NPRR1274.
* The ERCOT planning reviews performed for the RPG project evaluation process have always been technology and supplier neutral, and TEBA’s comments would confer a competitive advantage to the manufacturers of certain types of equipment and technologies in this process. A change to planning processes that would result in ERCOT recommending 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 Transmission Service Provider’s (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. Requiring an Independent System Operator (ISO) to evaluate GETs is problematic because 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 TEBA’s NPRR1274 comments.

In these comments Oncor proposes to remove the proposed revision that would permit ERCOT to recommend GETs as part of the RPG process.

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| **Revised Cover Page Language** |

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| Revision Description | This Nodal Protocol Revision Request (NPRR) updates the estimated capital cost for the tier classification rules used for the Regional Planning Group (RPG) process. |
| Justification of Reason for Revision and Market Impacts | The estimated capital cost thresholds used by ERCOT to categorize transmission projects were last changed in June of 2018 and have since become outdated with the rise of transmission project costs over the years. ERCOT has observed a correlation between an increase in overall project costs and the number of transmission projects the ERCOT planning department must review.  ERCOT believes adjusting the thresholds to account for inflation will help ensure ERCOT is reviewing the most appropriate and impactful transmission projects.  To account for inflation, after considering evaluation costs by Oncor and the concurrence of other ERCOT utilities, this NPRR proposes to double the review thresholds in the RPG process. |

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| Revised Proposed Protocol Language |

3.11.4.3 Categorization of Proposed Transmission Projects

(1) ERCOT classifies all proposed transmission projects into one of four categories (or Tiers). Each Tier is defined so that projects with a similar cost and impact on reliability and the ERCOT market are grouped into the same Tier. For Tier classification, the total estimated cost of the project shall be used which includes costs borne by another party.

(a) A project shall be classified as Tier 1 if the estimated capital cost is greater than or equal to $200,000,000, unless the project is considered to be a neutral project pursuant to paragraph (f) below.

(b) A project shall be classified as Tier 2 if the estimated capital cost is less than $200,000,000 and a Certificate of Convenience and Necessity (CCN) is required, unless the project is considered to be a neutral project pursuant to paragraph (f) below.

(c) A project shall be classified as Tier 3 if any of the following are true:

(i) The estimated capital cost is less than $200,000,000 and greater than or equal to $50,000,000 and a CCN is not required, unless the project is considered to be a neutral project pursuant to paragraph (f) below; or

(ii) The estimated capital cost is less than $50,000,000, a CCN is not required, and the project includes 345 kV circuit reconductor of more than one mile, additional 345/138 kV autotransformer capacity, or a new 345 kV substation, unless the project is considered to be a neutral project pursuant to paragraph (f) below.

(d) A project with an estimated capital cost greater than or equal to $50,000,000 that is proposed for the purpose of replacing aged infrastructure or storm hardening shall be processed as a Tier 3 project and shall be reclassified as a Tier 4, neutral project upon ERCOT’s determination that any concerns, questions or objections raised during the comment process have been resolved satisfactorily.

(e) A project shall be classified as Tier 4 if it does not meet the requirements to be classified as Tier 1, 2, or 3 or if it is considered a neutral project pursuant to paragraph (f) below.

(f) A project shall be considered a neutral project if it consists entirely of:

(i) The addition of or upgrades to radial transmission circuits;

(ii) The addition of equipment that does not affect the transfer capability of a circuit;

(iii) Repair and replacement-in-kind projects;

(iv) Transmission Facilities needed to connect a new Generation Resource, Energy Storage Resource (ESR), or Settlement Only Generator (SOG) to a new or existing substation on the existing ERCOT Transmission Grid, including the substation;

(v) The addition of static reactive devices;

(vi) A project to serve a new Load, unless such project would create a new transmission circuit connection between two stations (other than looping an existing circuit into the new Load-serving station);

(vii) Replacement of failed equipment, even if it results in a ratings and/or impedance change; or

(viii) Equipment upgrades resulting in only ratings changes.

(2) ERCOT may use its reasonable judgment to increase the level of review of a proposed project (e.g., from Tier 3 to Tier 2) from that which would be strictly indicated by these criteria, based on stakeholder comments, ERCOT analysis or the system impacts of the project.

(a) A project with an estimated capital cost greater than or equal to $100,000,000 that requires a CCN shall be reclassified and processed as a Tier 1 project upon request by a Market Participant during the comment period per Planning Guide Section 3.1.5, Regional Planning Group Comment Process.

(3) Any project that would be built by an Entity that is exempt (e.g., a Municipally Owned Utility (MOU)) from getting a CCN for transmission projects but would require a CCN if it were to be built by a regulated Entity will be treated as if the project would require a CCN for the purpose of defining the Tier of the project.

(4) If during the course of ERCOT’s independent review of a project, the project scope changes, ERCOT may reclassify the project into the appropriate Tier.