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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**  | October 15, 2025 |
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| **Submitter’s Information** |
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| Market Segment | Investor-Owned Utility (IOU) |

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| Comments |

American Electric Power (AEP) and CenterPoint Energy Houston Electric (CEHE) (“Joint Commenters”) appreciate the opportunity to provide comments to Planning Guide Revision Request (PGRR) 128, which proposes a requirement for ERCOT to evaluate grid enhancing technologies (“GETs”) and advanced conductors as potential transmission project solutions when developing the annual ERCOT Regional Transmission Plan (RTP).

The Joint Commenters oppose the creation of a mandatory evaluation framework targeted to a specific set of technologies and use cases as contemplated by PGRR128. ERCOT and the Transmission Service Providers (TSPs) (Joint Commenters included) routinely evaluate the transmission system to identify future needs and may propose alternative solutions to address those needs. Since GETs and advanced conductors are specialized assets and not applicable for every identified need or use case, the Joint Commenters feel strongly that it is unreasonably burdensome and inefficient to mandate the evaluation of GETs as part of the annual ERCOT RTP.

Consistent with Oncor’s August 19, 2025 comments, the TSPs (Joint Commenters included) already consider alternative technologies and solutions as a normal part of the planning process and have utilized these technologies in the past where appropriate. The Joint Commenters will continue to evaluate the merits of new technologies and consider their use where feasible, practical and cost-effective.

Furthermore, the Joint Comments believe that PGRR128 goes beyond the intended function of ERCOT’s RTP analysis by requiring ERCOT to consider a specific set of attributes associated with the various technologies including repairability, durability, and technical feasibility, among others. The Joint Commenters do not believe ERCOT is the appropriate entity to assess the performance of these technologies in that regard as they do not own or maintain the assets, and fully believe the evaluation is best suited to the TSPs.

It is widely accepted by Market Participants that the Regional Planning Group (RPG) process is open and transparent. To the extent a stakeholder believes an alternative technology or solution should be considered for resolution of an identified need, the Joint Commenters encourage the stakeholder to provide those comments as part of the existing RPG evaluation process.

In conclusion, for the reasons stated above, the Joint Commenters recommend PGRR128 be withdrawn from further consideration.

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| **Revised Cover Page Language** |

None

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| Revised Proposed Guide Language |

None