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| PGRR Number | [127](https://www.ercot.com/mktrules/issues/PGRR127) | PGRR Title | Addition of Proposed Generation to the Planning Models |
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| **Date Posted** | | October 28, 2025 | |
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| **Submitter’s Information** | | | |
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| Market Segment | | Independent Generator & Independent Power Marketer (IPM) | |

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| Comments |

Texas Competitive Power Advocates (TCPA) respectfully submits these comments on Planning Guide Revision Request (PGRR) 127 to express its general support for Oncor’s comments filed on October 15, 2025.

TCPA agrees with the goal of improving the process to incorporate additional generation into the planning base cases to better capture the most realistic outlook of future Generation Resources. TCPA also endorses Oncor’s suggested changes to the Resource Integration and Ongoing Operations (RIOO) system.

Specifically, TCPA agrees with Oncor’s suggested changes to paragraph (5) of Section 6.9, Addition of Proposed Generation to the Planning Models, that would, “Clarify that projects with “Planned” status should be prioritized, as they represent the most current and active generation proposals.”

Finally, TCPA strongly supports Oncor’s suggestions regarding the method of generation dispatch utilized for the study cases and Oncor’s statement that, “Any extraordinary dispatch measures utilized in a study should always be clearly documented in study reports for stakeholder awareness. It should be an ongoing focus to ensure that where planning assumptions in a study (such as wind dispatch scenarios) are unlikely to reflect the likelihood of real time operational conditions, this is expressly articulated.”

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| **Revised Cover Page Language** |

None

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| Revised Proposed Guide Language |

None