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| **PGRR Number** | [**128**](https://www.ercot.com/mktrules/issues/PGRR128) | **NPRR Title** | **Regional Transmission Plan Review of Grid Enhancing Technologies** |
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| **Date** | | October 23, 2025 | |
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| **Market Segment** | | Industrial | |

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| **Comments** |

Google LLC (“Google”) appreciates the opportunity to submit these comments in support of Planning Guide Revision Request (PGRR) 128, Regional Transmission Plan Review of Grid Enhancing Technologies (“GETs”).

Grid capacity is an increasingly critical challenge for Load interconnection in the ERCOT region. GETs offer significant potential to provide both short- and long-term flexibility while awaiting the completion of major transmission expansions, such as the Permian Plan.

Given the substantial temporal distance between new Load applications and the completion of transmission upgrades, Google has actively championed solutions to maximize existing grid capacity. This commitment is evidenced by our strong track record of supporting GETs and GETs-enabling policies, including our recent announcement of partnerships with developers to promote these technologies.[[1]](#footnote-1)

Google respectfully disagrees with the 8/19/25 Oncor comments and the 10/1/25 ERCOT comments. PGRR128 does not require transmission utilities to justify the exclusion of GETs from their Regional Transmission Plan projects; instead, it simply requests utilities establish transparent screening criteria for evaluating GETs. Establishing clear, objective screening criteria (including inputs like project size, congestion levels, and timeline) will allow utilities to quickly filter projects for GETs consideration and provide stakeholders with a transparent understanding of their applicability in transmission planning.

While Google agrees there is no single, exhaustive list of GETs, their purpose is quite clear: to maximize the use of the existing system. There are well established, commercially viable technologies that achieve this criteria that utilities should evaluate. PGRR128 calls out some technologies but it does not limit or restrict the opportunity to integrate new technologies. This strikes the balance between evaluating well established technologies and the potential inclusion of new technologies as they achieve greater commercial viability. As emerging technologies become more commercially viable, the protocols can be later amended to include such technologies.

Google does not believe PGRR128 creates preferential treatment for specific vendors. Rather, it encourages the creation of evaluation criteria for the technical application of non-traditional solutions to meet non-traditional circumstances (e.g., rapid load growth). Transmission Service Providers (TSPs) already have vendor neutral ways to evaluate technologies like substation equipment, transformers, conductors, and GETs themselves. Requiring the development of publicly available screening criteria for well-established technologies such as advanced conductors or advanced power flow control technology should not create any preferential treatment.

Oncor maintains that the GETs technologies requested under PGRR128 are insufficient to address rapid load growth; however, this position is not shared by its utility peers, including others operating within Texas.[[2]](#footnote-2) Google is working with utility partners across the United States to begin integrating GETs as part of a suite of solutions to integrate data centers quickly onto their systems. These partnership areas meet the very rapid load growth criteria that Oncor claims GETs technologies are inadequate to support. The key difference is that these utilities are evaluating GETs to secure short-term incremental capacity while their long-term capacity expansion plans are developed.

Google acknowledges that the integration of GETs technology may require ERCOT to enhance its existing technical evaluation capabilities and could disrupt North American Electric Reliability Corporation (NERC) and ERCOT defined processes. We believe this is a solvable challenge that can be addressed through collaborative effort. First, the purpose of the PGRR process is for ERCOT to define specific changes that may be needed to successfully implement stakeholder-driven objectives. Additionally, PGRR128 does not need to be implemented overnight. Google encourages greater discussion regarding the types of GETs technologies ERCOT is comfortable adopting as a starting point. This process could be structured similarly to ERCOT’s workshops on 765kV adoption, providing a series of technical forums to educate all stakeholders on the value and application of these emerging grid technologies. In fact, industrial consumers like Google would welcome these workshops as a way to facilitate a shared, collaborative understanding of emerging grid technologies.

In conclusion, Google urges the prompt adoption of PGRR128. It is the necessary mechanism to establish criteria for the timely, systematic, and consistent review of GETs, thereby spurring the incorporation of technologies that will unlock the near-term benefits of large load growth. The alternative — introducing GETs review only at the Regional Planning Group (RPG) — poses a significant risk of delay and inconsistent analysis by forcing intervenors to request restudies.

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| Revised Cover Page Language |

None

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| Revised Proposed Guide Language |

None

1. https://blog.google/feed/ctc-global-partnership-us-electrical-grid-capacity/ [↑](#footnote-ref-1)
2. https://ctcglobal.com/aep-reconductoring-case-study/ [↑](#footnote-ref-2)