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| PGRR Number | [133](https://www.ercot.com/mktrules/issues/PGRR133) | PGRR Title | Clarifying Legacy Generation Breaker Control for PGRR115 Implementation |

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| Date | November 24, 2025 |

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| Comments |

Texas Competitive Power Advocates (TCPA) respectfully submits these comments on Planning Guide Revision Request (PGRR) 133 to express its support for Vistra’s comments filed on November 6, 2025.

TCPA agrees that nuclear generators should be exempt from the new proposed Section 5.2.10(2) to avoid conflict with Nuclear Regulatory Commission (NRC) requirements and to prevent unnecessary security risks posed by the unplanned shutdown of these unique resources.

TCPA also agrees that the new proposed Section 5.2.10(2) should be revised to remove the remote operation of generation breakers by Qualified Scheduling Entities (QSEs). Instead, as Vistra proposed, QSEs should be permitted to direct the operation of generation breakers, but the actual remote control of the breakers should still occur from the generator control room.

To paraphrase Vistra’s comments, the breakers at “each Point of Interconnection (POI)” are not clearly demarcated for legacy generators. Additionally, it would be costly for legacy generators to implement such a configuration. The existing configuration at many legacy generators was the result of the compromise necessary to implement functional unbundling during the transition to a competitive wholesale market without requiring generators to build new, separate interconnection facilities. Taken together, the remote operation of generation breakers by TOs could negatively impact existing generation resources by making uprates potentially cost prohibitive. Thus, generation resources commissioned on or before December 31, 2025, should be remotely controllable (via the generator control room) at the direction of the applicable QSE in lieu of the TO.

TCPA appreciates ERCOT staff working with TCPA members, including Vistra, on coordinating language to address this issue and for agreeing to keep the language in Section 5 of the Planning Guide included in PGRR115, Related to NPRR1234, Interconnection Requirements for Large Loads and Modeling Standards for Loads 25 MW or Greater, grey-boxed until an agreement can be reached through the stakeholder process.

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| Revised Cover Page Language |

None

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| Revised Proposed Guide Language |

None