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| PGRR Number | [134](https://www.ercot.com/mktrules/issues/PGRR134) | PGRR Title | Interconnection Studies Reform for Dispatchable Loads |

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| Date | November 5, 2025 |

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| Submitter’s Information | |
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| Market Segment | Not applicable |

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| Comments |

Cypress Creek Renewables (Cypress) is a leading renewable energy developer and independent power producer. It develops, finances, owns, and operates utility-scale and distributed solar and energy storage projects across the United States with a mission to power a sustainable future, one project at a time. Since inception, Cypress Creek has commercialized 12GW of solar and storage projects. Today it owns more than 2.5GW of solar and storage and has an almost 16GW solar and storage pipeline.

Cypress Creek supports the Planning Guide Revision Request (PGRR) 134 proposed by Luminary Strategies and asks that Reliability and Operations Subcommittee (ROS)

allow this important discussion to take place at Thursday’s meeting. Given the unprecedented load growth occurring in ERCOT and around the country, Cypress believes this is an urgent matter and the proposal should retain its urgent status and be voted on no later than the December scheduled meeting, with referral directly to the Technical Advisory Committee (TAC).

In Cypress’ recent experience, the load interconnection processes today in ERCOT are marked by significant uncertainty related to cost and timelines associated with firm transmission requests that Cypress is evaluating and has submitted on behalf of large load customers. We are concerned in particular about ongoing reform efforts, including the consideration of cluster studies associated with firm transmission requests. These reforms may result in delays we see associated with Large Generator Interconnection Procedures nationwide. PGRR134 would allow Large Loads that register as CLRs to be studied as dispatchable / non-firm loads in the Large Load Interconnection Studies (LLIS) and ERCOT’s planning studies. This would enable faster interconnection while maintaining the reliability of the system.

It is Cypress’ recommendation that PGRR134 receive prompt consideration to ensure Texas remains a key destination for data centers and other large loads seeking to develop and require power.

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| Revised Cover Page Language |

None

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| Revised Proposed Guide Language |

None