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| PGRR Number | [127](https://www.ercot.com/mktrules/issues/PGRR127#summary) | PGRR Title | Addition of Proposed Generation to the Planning Models |

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| Date | August 25, 2025 |

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

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| Comments |

ERCOT submits these comments to Planning Guide Revision Request (PGRR) 127 in response to the stakeholder feedback received at the Planning Working Group (PLWG) meeting on July 29, 2025, specifically the comments around increasing transparency and collaboration with stakeholders when additional generation are added to the Regional Transmission Plan base cases in accordance with the proposed paragraph (5) language of Section 6.9, Addition of Proposed Generation to the Planning Models.

ERCOT appreciates the feedback and is committed to increasing transparency and collaboration. The language proposed by PGRR127 is intended to provide sufficient but not overly prescriptive rules to add generation to the planning models when there is a generation deficit in the models. The desire to avoid being overly prescriptive is to ensure that the rules leave sufficient flexibility to account for future changes in the rapidly evolving ERCOT System. Proposed paragraph (8) of Section 3.1.4.1.1, Regional Transmission Plan Cases, in particular, is intended to ensure transparency and the opportunity for collaboration:

“ERCOT must provide reasonable advance notice to the RPG of additional generation proposed to be added to the base cases in accordance with paragraph (5) of Section 6.9, and an opportunity for stakeholder comment.”

To illustrate the envisioned process, ERCOT would like to further lay out how ERCOT plans to implement the above requirement to provide additional assurance to stakeholders:

1. ERCOT will bring a presentation to Regional Planning Group (RPG) with details on how additional generation are added to the Regional Transmission Plan cases for each applicable Regional Transmission Plan to give stakeholders an opportunity to provide feedback, which has been ERCOT’s practice since the 2024 Regional Transmission Plan when the issue of a generation deficit first surfaced due to the unprecedented load growth.

In 2024, ERCOT delivered the following presentations at the RPG April and May meetings to outline the details around the generation deficit observed, the proposed method to include additional generation in the 2024 Regional Transmission Plan cases, and to solicit stakeholder feedback:

<https://www.ercot.com/files/docs/2024/04/08/2024_RTP_Generation_Assumptions_Update_April_2024_RPG.pdf>

<https://www.ercot.com/files/docs/2024/05/14/2024_RTP_Update_May_2024_RPG.pdf>

In July of 2025, ERCOT again provided a presentation to RPG with the details of the additional generation added to the 2025 Regional Transmission Plan cases:

<https://www.ercot.com/files/docs/2025/07/29/2025_RTP_Assumptions_July_2025_RPG.pdf>

ERCOT will continue this practice to provide information needed to increase transparency and facilitate collaboration with stakeholders when adding generation to the planning models.

1. ERCOT also plans to document the additional generation added to the Regional Transmission Plan cases in the *RTP Scope and Process* document, which is typically posted on the individual RPG meeting page in which the document is first made available, and included in the final Regional Transmission Plan report, to provide further transparency and facilitate collaboration with stakeholders.

ERCOT believes that the implementation plan provided above addresses the stakeholder comments by providing transparency and opportunities for stakeholder collaboration without making the Planning Guide language overly prescriptive.

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| Revised Cover Page Language |

None

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| Revised Proposed Guide Language |

None