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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 3, 2025 |

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

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| Comments |

Schaper Energy Consulting LLC provides strategic and technical advisory services exclusively to large load developers operating within Texas and the ERCOT market. Our clients represent a significant share of the state’s new industrial and data center load growth, and their investment decisions depend upon transparent, accurate, and forward-looking assumptions within ERCOT’s long-term system planning processes.

At present, the ERCOT planning study framework does not adequately reflect the dispatchable characteristics of large loads, nor does it provide meaningful visibility into how Controllable Load Resources (CLRs) are represented in study assumptions. This gap has created uncertainty that materially affects investment decisions and constrains the ability of developers to commit capital to new projects within the ERCOT footprint.

Schaper Energy Consulting LLC strongly supports Planning Guide Revision Request (PGRR) 134, as proposed by Luminary Strategies, LLC and the other co-sponsors of this Revision Request. This proposal complements Nodal Protocol Revision Request (NPRR) 1188, Implement Nodal Dispatch and Energy Settlement for Controllable Load Resources, and ensures that ERCOT’s planning framework evolves in parallel with forthcoming operational reforms. The alignment between interconnection studies and dispatchable load operation is necessary to achieve seamless integration, accurate transmission planning, and efficient use of existing infrastructure.

Incorporating dispatchable load behavior into ERCOT’s planning assumptions is fully consistent with ERCOT’s Strategic Plan Objectives 1 and 2: to lead the industry in reliability and resilience, and to enhance the ERCOT region’s economic competitiveness

Allowing Interconnecting Large Load Entities (ILLEs) to elect CLR treatment in interconnection and planning studies will improve the accuracy of transmission constraint modeling, enable earlier energization where reliability permits, and shift delivery risk to the market participant best positioned to manage it.

Other organized markets have already begun integrating frameworks that recognize flexible and dispatchable loads as a vital component of system reliability. ERCOT should not delay implementation of this important update. Continued exclusion of load dispatchability from planning assumptions will lead to distorted study outcomes, inefficient allocation of transmission investment, and diminished competitiveness relative to peer markets.

Accordingly, Schaper Energy Consulting LLC urges ERCOT to place **PGRR134** on the agenda for discussion and approval at the **upcoming ROS meeting on Thursday, November 6, 2025**. Prompt action is warranted. Any delay in advancing this revision will materially impair ERCOT’s ability to remain competitive with other markets that are already integrating dispatchable load into their planning and operational frameworks.

Timely adoption of PGRR134 will enhance transparency, improve planning accuracy, and provide greater certainty for load developers and transmission service providers. It will also align ERCOT’s planning practices with the operational framework established under NPRR1188 and with the intent of Senate Bill 6, supporting continued economic growth and reliability for the State of Texas.

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| Revised Cover Page Language |

None

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| Revised Proposed Guide Language |

None