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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 4, 2025 |

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

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| Comments |

 ROS members –

Thank you for your interest in [PGRR 134](https://www.ercot.com/files/docs/2025/11/01/134PGRR-01-Interconnection-Studies-Reform-for-Dispatachable-Loads-110125.docx).  At this time, the sponsor is not asking ROS to take action this week on urgency.

We are eager to move forward with this in December, however.  This proposal is already getting [national attention](https://heatmap.news/energy/texas-data-center-connect-and-manage), it will be submitted as an example of load growth solutions in mid-November  comments to the White House OSTP, DOE, and FERC , and for all the right reasons, marries coming operational solutions via NPRR1188 to a planning paradigm can bring relief to regional load interconnection delays in ERCOT.

For decades, ERCOT and its stakeholders have worked to incentivize market-based demand response. Using CLRs as a planning tool will unlock gigawatts of new demand response, curb out-of-market solutions for load growth management, fundamentally improve the market outcomes while enabling substantial new economic development and keep Texas at the forefront of new electric demand.

We ask that ROS allow for discussion of the topic at this Thursday's meeting and that the procedural order allow for the discussion to occur - to hear from multiple parties who have supported and shaped PGRR134. The supporting parties themselves, shape what is easily one of the nationally widest and sectorally diverse groups  to ever coalesce around a critical markets and reliability-centric policy change in ERCOT.

Understanding the PLWG meeting is next week, we would support referral to PLWG and request that interested parties file proposed redlines *in advance of that meeting to the best of their abilities*, so we can come back for a vote in December at ROS to move this forward through the ERCOT stakeholder process.

Please see also:

Comments filed in relation to the PGRR:

<https://www.ercot.com/files/docs/2025/11/03/134PGRR-03-Agentic-Infrastructure-Comments-110325.docx>

<https://www.ercot.com/files/docs/2025/11/03/134PGRR-04-Schaper-Energy-Consulting-Comments-110325.docx>

Prior LLWG Comments: <https://www.ercot.com/files/docs/2025/09/19/PGRR-Explanatory-Comments_LLWG-Meeting_Sept.-19-2025.docx>

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| Revised Cover Page Language |

None

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| Revised Proposed Guide Language |

None