|  |  |  |  |
| --- | --- | --- | --- |
| PGRR Number | [141](https://www.ercot.com/mktrules/issues/PGRR141) | PGRR Title | Large Load Interconnection Study Reform for Substantiated Load |

|  |  |
| --- | --- |
| Date | February 2, 2026 |

|  |  |
| --- | --- |
| Submitter’s Information | |
| Name | Agee Springer |
| E-mail Address | [agee.springer@ercot.com](mailto:agee.springer@ercot.com) |
| Company | ERCOT |
| Phone Number | 512-248-4508 |
| Cell Number |  |
| Market Segment | Not applicable |

|  |
| --- |
| Comments |

ERCOT appreciates the opportunity to offer the following comments on Planning Guide Revision Request (PGRR) 141. As proposed, PGRR141 would allow Large Loads interconnecting to the ERCOT System to bypass the Large Load Interconnection Study (LLIS) process if a transmission project proposed for review by the Regional Planning Group (RPG) includes the Large Load. ERCOT is very concerned that PGRR141 will introduce a new source of uncertainty that will slow the study timeline and ultimately delay interconnection of Large Loads. PGRR141 may also stymie efforts reform the LLIS process from an individualized study approach to a batch study approach. Therefore, ERCOT opposes PGRR141 at this time.

By reintroducing an alternative path to interconnection via an RPG submission, PGRR141 would abandon the decision in PGRR115, Related to NPRR1234, Interconnection Requirements for Large Loads and Modeling Standards for Loads 25 MW or Greater, to unify the interconnection of Large Loads in a single process. Historically, Large Loads were studied through traditional planning processes. However, as the volume and characteristics of Large Loads changed, traditional planning processes proved unable to effectively and efficiently study Large Load interconnection requests. Stakeholders, with approval from the Public Utility Commission of Texas (PUCT), agreed that a single interconnection process applicable to all Large Loads would facilitate the interconnection of Large Loads while ensuring reliability.

The transition to the LLIS process has not been without challenges. The unanticipated increase in Large Load interconnection requests has made it difficult for Transmission and/or Distribution Service Providers (TDSPs) to complete studies and for ERCOT to review them. A persistent issue is that, as one Large Load completes its studies and meets other development milestones, neighboring Large Loads must restart their studies to now account for this Large Load. Rapid changes to study assumptions have slowed the study approval process making it difficult for Large Loads to interconnect. Returning to an interconnection framework that provides different paths to interconnection will compound that challenge slowing interconnection, not speeding it up or simplifying it.

ERCOT has initiated an extensive stakeholder process to address this issue through a system-wide batch study process. Contrary to Lancium and Google’s assertions, PGRR141 is likely to be inconsistent with a system-wide batch study process. A system-wide batch study relies on the existence of a single, comprehensive study based on a snapshot of the best data available that gives everyone in the study equal treatment. An alternative path to interconnection would make it impossible to get a good snapshot of the system since some Large Loads would be under RPG review at the time a batch starts and would ensure that the landscape will likely change during a batch study if a RPG submission is endorsed. The purpose of a batch study is to ensure that all Large Loads are studied together on a system-wide basis, which will not happen if there is more than one path to interconnection.

Finally, PGRR141 opens the door to potential discrimination among interconnecting Large Load entities. For example, PGRR141 because it does not include any guardrails around whether and when a TDSP must allow a Large Load to move forward through a RPG submission instead of the LLIS process and vice versa. It is also unclear whether Large Loads in a RPG submission would have to meet the same criteria as Large Loads being studied through the LLIS.

In light of these concerns, ERCOT requests that PGRR141 be tabled or otherwise not approved at this time.

|  |
| --- |
| Revised Cover Page Language |

None.

|  |
| --- |
| Revised Proposed Guide Language |

None.