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

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| Date | February 4, 2026 |

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| Market Segment | Consumer Industrial |

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| Comments |

Joint Sponsors appreciate the opportunity to offer the following comments in response to comments filed by ERCOT on Planning Guide Revision Request (PGRR) 141.

ERCOT asserts that “PGRR141 would allow Large Loads…to bypass the [LLIS] process if a transmission project proposed for review by the Regional Planning Group (RPG) includes the Large Load.” Joint Sponsors fully refute this characterization.

PGRR141 is not intended to create a loophole or alternative pathway that avoids Large Load technical review, or the batch process. It is a narrow sequencing clarification: where a Large Load has been explicitly included in the scope of an RPG submission and the relevant reliability analysis has been completed and endorsed, that endorsed work can be used in lieu of duplicative standalone LLIS studies that cover the same technical ground. This is consistent with paragraph (2) of Section 9.3.1, Large Load Interconnection Study (LLIS), which already recognizes circumstances where completed interconnection studies may be used in place of a separate LLIS.

Additionally, Joint Sponsors want to be clear that they support the move to a system-wide batch study process, as substantiated by their filings at the Commission. ERCOT argues that a batch study requires “a single, comprehensive study based on a snapshot…that gives everyone…equal treatment” and that an RPG-based mechanism would “make it impossible to get a good snapshot.” Joint Sponsors agree with ERCOT’s definition and objective but disagree that PGRR141 conflicts with it.

An endorsed RPG assessment is, in practice, a defined-scope, stakeholder-visible “snapshot” applied consistently to the loads included in that proposal. For substantiated loads already studied in that context, forcing a separate LLIS sequence increases churn and re-start risk – the exact dynamic ERCOT flags as a core problem today. As demonstrated in Nodal Protocol Revision Request (NPRR) 1321, Batch Alpha, PGRR141 can therefore function as a pragmatic transition tool that achieves ERCOT’s stated objectives on a faster and more transparent timeline and reduces redundant study work while stakeholders finalize a durable and permanent batch framework.

Accordingly, Joint Sponsors are comfortable with a short tabling of PGRR141 to allow ERCOT and stakeholders to align on the narrow intent described above. However, Joint Sponsors do not agree that the issues raised by ERCOT are substantive, and we do not view tabling as a basis to delay resolution indefinitely.

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| Revised Cover Page Language |

None.

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| Revised Proposed Guide Language |

None.