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| PGRR Number | [138](https://www.ercot.com/mktrules/issues/PGRR138) | PGRR Title | Large Load Interconnection Study Review and Approval Process |
| Date Posted | | December 1, 2025 | |
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| Requested Resolution | | Urgent – Immediate action on this Planning Guide Revision Request (PGRR) is required to prevent Large Load Interconnection Study (LLIS) processing delays from falling out of alignment with ERCOT’s broader regional transmission planning efforts, which are advancing rapidly to support unprecedented load growth. The current open-ended review structure has resulted in a de facto moratorium on new LLIS approvals, with studies remaining open indefinitely and no reliable path to completion. This paralysis risks creating a growing mismatch between LLIS outcomes and the transmission expansion decisions being driven by the loads reflected in these studies. If LLIS studies cannot be completed on a predictable timeline, ERCOT may endorse or initiate major transmission upgrades before it is clear whether the associated Large Load projects will proceed. This exposes existing ratepayers to the cost of substantial transmission investment without the benefit of the new retail load that would otherwise support it. Prompt adoption of the proposed revisions is needed to reestablish clear study endpoints, enforceable timelines, and a process that protects ratepayers while preserving the economic competitiveness of the ERCOT region. | |
| Planning Guide Sections Requiring Revision | | 9.4, LLIS Report and Follow-up | |
| Related Documents Requiring Revision/Related Revision Requests | | None | |
| Revision Description | | This Planning Guide Revision Request (PGRR) modifies Section 9.4 to improve the transparency and efficiency of requirements related to the LLIS report and follow-up. | |
| Reason for Revision | | [Strategic Plan](https://www.ercot.com/files/docs/2023/08/25/ERCOT-Strategic-Plan-2024-2028.pdf) Objective 1 – Be an industry leader for grid reliability and resilience  [Strategic Plan](https://www.ercot.com/files/docs/2023/08/25/ERCOT-Strategic-Plan-2024-2028.pdf) Objective 2 - Enhance the ERCOT region’s economic competitiveness with respect to trends in wholesale power rates and retail electricity prices to consumers  [Strategic Plan](https://www.ercot.com/files/docs/2023/08/25/ERCOT-Strategic-Plan-2024-2028.pdf) Objective 3 - Advance ERCOT, Inc. as an independent leading industry expert and an employer of choice by fostering innovation, investing in our people, and emphasizing the importance of our mission  General system and/or process improvement(s)  Regulatory requirements  ERCOT Board/PUCT Directive  *(please select ONLY ONE – if more than one apply, please select the ONE that is most relevant)* | |
| Justification of Reason for Revision and Market Impacts | | Timely completion of LLISs is essential to maintaining alignment between individual large-load interconnection analyses and ERCOT’s regional transmission planning activities. Regional planning is advancing at a rapid pace to accommodate the significant load growth identified in these studies. When LLIS reviews stall or remain open-ended, ERCOT and Transmission Service Providers (TSPs) are put in a position to advance major transmission projects without reliable confirmation that the corresponding load will materialize. This creates a material economic risk: existing ratepayers may be required to fund extensive transmission upgrades in advance of, or instead of, the new customer base that would otherwise offset these costs.  The current LLIS process allows indefinite comment cycles, repeated restudies, shifting methodologies, and unresolved disputes that prevent timely study resolution. These inefficiencies delay commercial development, distort long-term planning assumptions, and undermine ERCOT’s ability to maintain a rational connection between system upgrades and actual load need. In practice, they also impair project financing, as large-load developers cannot secure capital or advance construction without clear LLIS outcomes, defined upgrade requirements, and confirmed timelines. As a result, prolonged or unpredictable study cycles halt investment decisions, delay load interconnection, and increase the likelihood that transmission projects will proceed without the corresponding load materializing. This planning misalignment elevates the probability of unnecessary or prematurely timed capital investment, with direct consequences to retail electricity prices.  The proposed revisions establish enforceable timelines, restrict restudy to documented reliability needs, require a single consolidated comment round, and define objective criteria for study completion. These measures keep LLIS results aligned with regional transmission planning, provide the certainty needed for efficient capital deployment, and reduce the risk that existing consumers will bear the cost of transmission upgrades unsupported by new load. This directly advances ERCOT Strategic Objective 2 by supporting the region’s economic competitiveness and mitigating upward pressure on retail electricity prices. | |

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| Market Segment | Not applicable |

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| Proposed Guide Language Revision |

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| ***[PGRR115: Insert Section 9.4 below upon system implementation of NPRR1234:]***  9.4 LLIS Report and Follow-up  (1) For each of the Large Load Interconnection Study (LLIS) study elements, the lead Transmission Service Provider (TSP) shall submit a preliminary study report to ERCOT and other directly affected TSPs. The report shall include a description of the study methodology and assumptions, findings, and recommendations. The report shall also identify any changes to the Interconnecting Large Load Entity’s (ILLE’s) Load Commissioning Plan (LCP) to allow for transmission upgrades in accordance with the criteria in Section 9.3.4, Large Load Interconnection Study Elements. The lead TSP may include additional information in the study report and may combine multiple LLIS study elements into a single report.  (2) ERCOT shall review the preliminary study report within ten Business Days and provide to the lead TSP a single, consolidated set of written questions, comments, and proposed revisions necessary to ensure the report complies with the requirements in Section 9.3, Interconnection Study Procedures for Large Loads. ERCOT may extend this review period by an additional 20 Business Days only upon written notice, with such notice provided simultaneously to the lead TSP, all directly affected TSPs, and the ILLE. Directly affected TSPs may submit comments during this review period. Each directly affected TSP shall provide one comprehensive, consolidated set of comments. The lead TSP will not accept further comments after the review window closes. For the avoidance of doubt, the comment periods for ERCOT and directly affected TSPs shall run concurrently, not sequentially. Any extension requests not submitted in writing and not including written notice to the parties outlined in this paragraph will be considered invalid.  (3) An additional study may be required only if ERCOT and the lead TSP jointly determine, during the comment period described in paragraph (2) above, that the preliminary report cannot meet the requirements of Section 9.3 without it. Any such determination must be issued in a single written notice from ERCOT and the lead TSP that confirms it was made within the comment period described in paragraph (2) above, explains why the study was not included in the Final LLIS Study Scope, and provides the basis for adding it under Section 9.3. Directly affected TSPs may not initiate, request, or trigger an additional study, and no comments or submissions from any party may obligate ERCOT or the lead TSP to conduct one. After the close of the comment period in paragraph (2) above, no additional studies may be initiated, requested, considered, or performed except pursuant to paragraph (8) below.  (a) If ERCOT and the lead TSP cannot agree on the need for additional study under paragraph (3) above, the party requesting the additional study shall submit a written summary (the “Restudy Request”) explaining the basis for the request and its applicability under the transmission planning procedures in Section 4 and Section 9.  (b) Restudy Requests must be provided by the TSP to the ILLE in written form, including by email, within three Business Days of either submitting or receiving the request, whichever occurs first.  (c) The ILLE may, at its option, direct the lead TSP to initiate informal and/or formal dispute resolution with ERCOT as needed to resolve the matter, and the TSP shall do so on the ILLE’s behalf upon receiving such direction.  (4) If no additional study is required, the lead TSP shall prepare a final LLIS study report that incorporates all relevant feedback received in paragraph (2) above within ten Business Days.  (a) If additional study is required, the lead TSP shall prepare a final LLIS study report that incorporates all relevant feedback received in paragraphs (2) and (3) above within thirty Business Days.  (5) When complete, the lead TSP shall provide the final report for the LLIS study element(s) to ERCOT and the directly affected TSPs only.  (6) The LLIS is deemed complete when the final report has been provided for all LLIS study elements. The lead TSP shall notify the ILLE in writing when a final report is issued to ERCOT. Within ten Business Days following the completion of the LLIS, ERCOT shall:  (a) Grant unconditional approval for the interconnection of Load in accordance with the schedule in the final LCP, as may be revised by the TSP, for proposed load additions which do not require transmission upgrades;  (b) Determine whether system upgrades recommended to support the full requested Load amount specified in the initial LCP are sufficient based on the report in paragraph (5) above;  (i) Grant conditional approval for the interconnection of Load requiring transmission upgrades in accordance with the schedule in the final LCP, as may be revised by the TSP, as the necessary transmission upgrades identified in the LCP become operational, if ERCOT has determined pursuant to paragraph (a) above that the system upgrades recommended in the LLIS are sufficient to address the reliability risks associated with the proposed load additions;  (ii) For transmission upgrades that are subject to Regional Planning Group (RPG) review as described in Protocol Section 3.11.4, Regional Planning Group Project Review Process, ERCOT shall grant conditional approval either:  (A) If the relevant transmission upgrade(s) receive ERCOT endorsement through the RPG process; or  (B) If ERCOT determines that a project with an equivalent impact on the ability to serve the requested Load has become operational; and  (c) Communicate in writing the approval of the LLIS and the resulting unconditional and conditional Load that may be permitted under the LCP to the lead TSP and directly affected TSPs.  (7) The lead TSP must provide a redacted copy of the final report for each LLIS study element to the ILLE upon request. The redacted report(s) shall conform with Protocol Section 1.3, Confidentiality.  (8) If a material change that impacts one or more LLIS study assumptions occurs before the requirements of Section 9.5, Interconnection Agreements and Responsibilities, have been met, ERCOT or the lead TSP may require one or more LLIS study elements be updated. For purposes of this provision, “material change” is defined as a newly identified Large Loads that meet the criteria set forth in Sections 9.4 and 9.5. ERCOT in collaboration with the lead TSP shall have discretion to determine if a material change under this paragraph impacts any LLIS study assumptions and to require a modification of the study or a restudy be performed. Any modification of the study report under this paragraph shall be treated as an additional study and subject to paragraphs (3) and (4)(a) above.  (9) If the requirements of Section 9.5, have not been satisfied within 180 days after the communication of the approval of the LLIS by ERCOT as described in paragraph (6)(c) above, ERCOT may notify the lead TSP that the project is subject to cancellation. Upon receipt of this notification, the lead TSP may submit a project status update to ERCOT that includes a request for an extension and provides an opinion on whether any of the completed LLIS elements require restudy. If no such project status update is received within 30 days from the date the notice is issued, ERCOT may consider the project canceled.  (10) If the Large Load has not met the requirements for Initial Energization as described in paragraph (1) of Section 9.6, Initial Energization and Continuing Operations for Large Loads, within 365 days after the Initial Energization date identified in the LLIS study report, the lead TSP shall provide an opinion to ERCOT on whether any of the completed LLIS elements require restudy. ERCOT may require one or more LLIS study elements be updated prior to approval of Initial Energization. |