

From: [Liz Myers](#)
To: [LLWG Feedback](#)
Subject: Comments on proposed Large Load Batch Study process framework
Date: Thursday, February 5, 2026 4:19:30 PM
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Subject: Comments on proposed Large Load Batch Study process framework

Submitted by:

Infinium Projects, LLC
Industrial Segment
Liz Myers, SVP of Strategy
February 2, 2026

We respectfully submit this letter to encourage ERCOT to provide additional consideration to the determination of large load eligibility for inclusion in Batch 0A of the new large load study process, and to prioritize the advancement of PGRR 134 .

ERCOT needs to accelerate work on PGRR 134 so that NPPRR 1188–compliant Controllable Load Resources (CLRs) can be incorporated into the earliest batch study processes. Infinium, along with 28 other entities, supports PGRR 134 because it establishes true connect-and-manage for large loads in SCED. This framework provides a transparent and bankable market signal that allows loads to voluntarily assume deliverability risk in exchange for faster energization, while incentivizing flexible industrial loads to participate in nodal price formation and support system reliability. ERCOT has a unique opportunity to implement true connect-and-manage faster than any other U.S. market, setting a national benchmark while attracting high-value projects to Texas. The implementation of PGRR134 will have an immediate and positive impact on grid operations.

If CLR updates cannot be incorporated into Batch 0A determinations, we respectfully request that CLR eligibility be evaluated through a separate but contemporaneous and coordinated process aligned with the implementation of NPPRR 1188. Excluding CLRs from timely consideration would undermine reliance interests and commercial decisions made in good faith based on prior ERCOT and TSP communications.

As ERCOT increasingly requires firm commitments from large loads as a condition of participation, it is equally important that ERCOT adhere to previously communicated timelines and execute its programs on schedule. Many loads submitted interconnection requests early and, in reliance on TSP acknowledgments and ERCOT guidance, have made significant and irreversible financial and commercial commitments with the reasonable expectation that NPRR 1188 and PGRR 134 would be implemented as communicated.

Finally, while the proposed criterion to include loads with an approved Steady State study as of January 28, 2026 and an expected energization by June 30, 2027 is directionally reasonable, that metric alone does not fully capture project readiness or execution certainty. We encourage ERCOT to also consider objective indicators of development maturity—such as construction progress, firm financing, executed commercial agreements, and other evidence of readiness—to ensure Batch 0A prioritizes projects that are both capable of and highly likely to energize within the targeted timeframe. Separately ERCOT should consider Batch 0 projects based on the dates that their large load numbers were issued by ERCOT, in conjunction with other criteria. This is the only fair approach given the current circumstances of non-transparent, slow study completion.

We appreciate ERCOT's efforts to manage reliability and implement the new large load framework, and we respectfully request that these considerations be incorporated to support a fair, reliable, and executable Batch study process.

Thank you for your consideration.

Respectfully,

Liz Myers
SVP Strategy
Infinium Projects, LLC

Liz Myers

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