

**From:** [Barnes, Bill](#)  
**To:** [LLWG Feedback](#)  
**Cc:** [Mereness, Matt](#); [Billo, Jeffrey](#); [Springer, Agee](#)  
**Subject:** NRG Feedback to ERCOT on the Batch Study Process  
**Date:** Wednesday, February 4, 2026 1:51:21 PM  
**Attachments:** [image001.png](#)

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Thank you for the considerable thought and work put into the proposal for a batch study process for large load interconnections. Please see NRG's feedback below. Don't hesitate to reach out to me with any questions.

**NRG Feedback**

- NRG supports ERCOT's transition to a batch study process for large load interconnections with the goal of streamlining the process to allow for timely interconnection of large loads to support economic growth in Texas.
- NRG appreciates ERCOT's inclusion of rules to accommodate expedited interconnection of large loads that co-locate with new, firm dispatchable generation or agree to be curtailable by operating as a Controllable Load Resource (CLR). However, these rules should be applied as soon as possible (i.e., with Batch Zero B) and need not wait until Batch 1. The magnitude of load growth associated with large load interconnections, even in Batch Zero A & B, highlights the importance of adopting rules to encourage reliable, grid-friendly arrangements immediately. Therefore, NRG recommends ERCOT seek a Good Cause Exception (GCE) with the PUCT, either as part of a broader GCE from the current PGRR115 process or separately, in order to implement the rules for large loads that co-locate with new, firm dispatchable generation and CLRs for Batch Zero B and beyond, rather than starting with Batch 1.
- In order to further encourage large loads to bring their own generation and reduce the reliability impact to the ERCOT system, NRG recommends ERCOT implement the financial security requirements in PUCT Project 58481 (f)(8) based on a contracted peak demand that nets the co-located generation and load based on the co-located generation resource's contribution to ERCOT's net peak load for arrangements that are co-locating large loads with new dispatchable generation.
- NRG recommends that ERCOT continue to evaluate ways to consolidate and streamline the batch studies, annual Regional Transmission Plan, and Regional Planning Group review processes.

Thank you,



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