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Subject: STACK Feedback on Proposed ERCOT Batch Study Process (Batch Zero A Eligibility)
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Dear ERCOT Team,

STACK appreciates the opportunity to provide feedback on the proposed Batch Study framework.

In defining Batch 0A eligibility, ERCOT should prioritize highly advanced, capital-committed projects that have taken material commercial positions based on final executed interconnection agreements. ERCOT's current proposal to apply an expected energization date threshold of 6/30/27 risks arbitrarily excluding significantly advanced projects from Batch Zero A and imposing delays by forcing those projects into Batch Zero B or later studies. As it stands, ERCOT's proposal could even disrupt projects that are in active construction, resulting in significant liability for developers or cancelation of projects and stranding utility assets.

Instead, Batch Zero A eligibility should consider project maturity criteria such as execution of a final interconnection agreement, posting of substantial financial security, receipt of applicable zoning entitlements and site plan approval, advancement of power infrastructure works, and procurement of long-lead equipment for substation buildout.

To further protect capital and contractual commitments made in reliance upon executed interconnection agreements, ERCOT should avoid splitting campus projects among several Batches. ERCOT can achieve this goal by providing that all firm load requests located on contiguous parcels under common ownership with individual executed interconnection agreements be included within Batch Zero A if any of the associated load requests meet the Batch Zero A criteria.

Thank you for your consideration. We look forward to continued engagement through the

stakeholder process to support outcomes that best serve the ERCOT grid and large-load customers.



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