

**From:** [Orijit Ghoshal](#)  
**To:** [LLWG Feedback](#)  
**Subject:** Tract Comments on ERCOT Batch Workshop  
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Tract appreciates the work ERCOT has put into the Batch Study proposal and the opportunity to comment. Overall, we understand the need to move to a batch process but believe that projects that are ready (site ownership, local approvals in place, able to meet financial security requirements, and long-lead equipment ordered and securitized) should be prioritized instead of projects that simply have aggressive energization dates. In addition to the feedback contained in Tract's survey response, comments at the 2/3/26 workshop, and interview with ERCOT and McKinsey, Tract has specific feedback on the following slides in ERCOT's presentation at the 2/3/26 Batch Study Workshop:

**Slide 18:**

Option 4 should for Batch 0 A inclusion should be amended to requiring that all LLIS studies be submitted rather than completed, this is consistent with 9.4.1 of the Planning Guide. If ERCOT believes this would unworkably increase the MWs in Batch 0 A, then ERCOT can and add the requirement that long lead equipment be ordered and securitized. This is objectively verifiable information that demonstrates project readiness.

Option 5 for Batch 0 A inclusion should be expanded to February 1, 2028 instead of cutting of energization dates at June 30, 2027. This aligns more closely with industry standard construction timelines for large loads. If ERCOT believes this would unworkably increase the MWs in Batch 0 A, then ERCOT can and add any or all of the following requirements: (1) site ownership; (2) having long lead equipment ordered and securitized; and/or (3) having local approvals in place to allow construction of the project (e.g. zoning, development agreement, or letter from County Judge affirming no zoning required).

In the alternative, Option 5 should allow construction power subject to an agreement with the DSP/TSP that energizes by 6/30/2026 to count as project energization.

**Slide 19:**

ERCOT should clarify which projects were exempt from the interim LLI process. One interpretation is that exempt projects are large load requests that requested

energization dates at least two years from when the request was submitted, and which were submitted prior to December 2025 (i.e. when PGRR 115 became effective).

**Slide 8:**

ERCOT should make steady-state power flow and transient stability case files available to batch study participants. While we understand confidentiality concerns, case availability is essential for developers to holistically understand their project risk profile before committing significant capital. ERCOT's Nodal Protocol 1.3.1.2.(a) states "Data comprising Load flow cases, which may include estimate peak and off-peak Demand of any Load" are not considered Protected Information. Providing case access with appropriate guardrails such as anonymization of customer identities aligns well with ERCOT's nodal protocols.

The consequences of withholding cases are particularly important given ERCOT's stated intention to use conservative stability screening methodologies. Conservative screening, while appropriate from a reliability perspective, will inevitably produce false positives as highlighted by ERCOT. Without access to stability cases, developers who receive adverse stability findings have no ability to independently assess whether identified issues are genuine constraints, a result of conservative assumptions, or are identified in error. This forces a difficult choice: either accept potentially lower allocations and put up required financial commitments to proceed or withdraw at Step E as the project looks infeasible even when the underlying concern may not be valid. Case availability would allow developers to evaluate these findings, conduct supplemental analysis where warranted, and make informed go/no-go decisions based on a complete understanding of project risk.

ERCOT should provide case access under appropriate protections: requiring NDAs with restrictions on use and dissemination including anonymizing load data. ERCOT could limit distribution to registered participants with legitimate technical needs and even introduce additional guardrails if required. This process would protect commercially sensitive information while enabling the technical due diligence required to make substantial financial commitments. This approach has been successfully employed across organized markets. Implementing a similar approach would benefit ERCOT, which would gain additional quality assurance through stakeholder engagement with study inputs and results.

**Orijit Ghoshal**

Vice President, Government and  
Regulatory Affairs

Tract



[orijit.ghoshal@tract.com](mailto:orijit.ghoshal@tract.com)



406.202.4519



[www.tract.com](http://www.tract.com)