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| PGRR Number | [134](https://www.ercot.com/mktrules/issues/PGRR134) | PGRR Title | Interconnection Studies Reform for Dispatchable Loads |

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| Market Segment | Not applicable |

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| Comments |

From Emerald AI’s vantage point, the core issue is not whether AI developers are willing to create dispatchable solutions for grid connection– many are. The core issue is whether they can *underwrite* that flexibility. The comments in ERCOT’s NPRR1284 proceeding made this point plainly: if a Controllable Load Resource (CLR) product offers nodal dispatch with no way to understand the probability, depth, and duration of interruptions, a multi-billion-dollar campus simply cannot price the risk. What they are asking for is not iron-clad immunity from curtailment; it is a framework that makes curtailment *bankable*.

ERCOT’s NPRR1188 / PGRR134 design is the first framework in the country that actually points to that outcome. ERCOT should participate robustly with stakeholders Nodal dispatch of CLRs in SCED, with a defined Resource Node Settlement Point and five-minute Base Points, gives AI loads something they do not have in PJM or elsewhere: a concrete, model-to-operations construct around which to build a private “firming” stack. When a Large Load can see how LLIS-identified constraints map to SCED curtailment, builders and investors can start answering the real diligence questions: How often is this node likely to be constrained? Under which contingencies? At what prices? And what combination of on-site flexibility, storage, backup, and portfolio solutions do we need to maintain target uptime?

That is precisely the problem Emerald AI is solving in other markets today. In Virginia, Emerald is partnering with Digital Realty and NVIDIA to deliver a flexible AI campus as a controllable asset rather than a flat block of demand – demonstrating that, given the right telemetry, controls, and settlement architecture, large electronic loads can be dispatched like generation in reverse. Nothing about that investment is inherently “Virginia-only.” The gating factor is not capital or technology; it is whether the host utility- grid offers a clear pathway that marries planning-grade studies with dispatchable operation of load.

PGRR134, implemented alongside NPRR1188, is how ERCOT becomes that proving ground. It links the LLIS outcome to an optional CLR energization path, makes clear that SCED governs CLR consumption while firm upgrades continue on their normal track, and defines the conditions under which non-thermal limits still gate energization.

That linkage is what allows private parties like Emerald’s customers to take real delivery risk – and to invest in flexibility, software, and behind-the-meter solutions – in exchange for earlier, provisional energization. Without it, “flexible load” in Texas risks looking like it does elsewhere: a vague promise, with no way for developers to evaluate, much less finance, the interruption risk they are being asked to carry.

From Emerald AI’s perspective, allowing ILLEs to use the CLR pathway defined by NPRR1188 and PGRR134 is not a favor to developers; it is the mechanism by which Texas turns nodal dispatch into a globally credible investment signal. If ERCOT shows that dispatchable large loads can safely energize earlier, support reliability, and accelerate transmission upgrades, the result will not be one or two bespoke projects. It will be a wave of AI and cloud investments that come to Texas *because* there is a transparent, anchored pathway to make flexibility bankable.

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| Revised Cover Page Language |

None

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| Revised Proposed Guide Language |

None