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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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| Date | February 6, 2026 |

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| Market Segment | Not applicable |

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| Comments |

**The "Post-Study" Election Mechanism** V-WireTM supports the use of **Controllable Load Resource (CLR)** status as a tool to resolve interconnection constraints identified during the Full Interconnection Study (FIS).

* We recommend that Planning Guide Revision Request (PGRR) 134 explicitly authorize a **"Conditional Interconnection Election"** *after* the FIS is completed.
* **The Use Case:** If an FIS determines that a Large Load request (e.g., 200 MW) is partially constrained by transmission limits (e.g., only 100 MW is available firm), the Load should have the right to interconnect the *incremental* capacity immediately by designating that portion as a CLR.

**Bridging the Gap to Firm Service** This mechanism preserves the status quo while solving the delay for the final tranche of power.

* **Firm Tranche:** The load receives standard interconnection for the capacity available today (e.g., the first 100 MW).
* **Interim CLR Tranche:** For the capacity restricted by identified transmission upgrades, the Load may elect CLR status to interconnect on an interim, non-firm basis.
* **The End State:** This designation serves as a bridge. Once the identified Transmission Service Providers (TSPs) upgrades are energized, the Load may transition that capacity to standard Firm Service, or choose to remain a CLR based on its operational preference.

**Operational Security via Nodal Settlement** By electing CLR status for the constrained tranche, the Load accepts **Nodal Settlement** (per NPRR1188, Implement Nodal Dispatch and Energy Settlement for Controllable Load Resources) and the associated dispatch obligations. This ensures that the interim capacity is "Price Responsive" and effectively managed by SCED, removing the reliability risk from the TSP while allowing economic development to proceed years ahead of the upgrade schedule.

**Conclusion** We urge ERCOT to frame CLR designation not as a prerequisite for study, but as a **remedy for identified constraints.** This allows Loads to "Connect and Manage" the specific megawatts that would otherwise be stranded, utilizing private capital (e.g., behind-the-meter resources) to bridge the gap until public infrastructure catches up. **Crucially, this approach maintains grid safety and stability under "status quo" operations.** By leveraging the Nodal Market to manage congestion, ERCOT can efficiently utilize 100% of requested available grid capacity and integrate more load without imposing new manual burdens on Control Room Operators or compromising system reliability.

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| Revised Cover Page Language |

None.

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| Revised Proposed Guide Language |

None.