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| PGRR Number | [141](https://www.ercot.com/mktrules/issues/PGRR141) | PGRR Title | Large Load Interconnection Study Reform for Substantiated Load |
| Date Posted | | December 31, 2025 | |
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| Requested Resolution | | Normal | |
| Planning Guide Sections Requiring Revision | | 9.3.1, Large Load Interconnection Study (LLIS) | |
| Related Documents Requiring Revision/Related Revision Requests | | None | |
| Revision Description | | This Planning Guide Revision Request (PGRR) enables more efficient Large Load studies, approvals, and subsequent transmission planning by allowing a Regional Planning Group (RPG) review to be used in place of a separate Large Load Interconnection Study (LLIS) when evaluating a substantiated Large Load interconnection. | |
| Reason for Revision | | [Strategic Plan](https://www.ercot.com/files/docs/2023/08/25/ERCOT-Strategic-Plan-2024-2028.pdf) Objective 1 – Be an industry leader for grid reliability and resilience  [Strategic Plan](https://www.ercot.com/files/docs/2023/08/25/ERCOT-Strategic-Plan-2024-2028.pdf) Objective 2 - Enhance the ERCOT region’s economic competitiveness with respect to trends in wholesale power rates and retail electricity prices to consumers  [Strategic Plan](https://www.ercot.com/files/docs/2023/08/25/ERCOT-Strategic-Plan-2024-2028.pdf) Objective 3 - Advance ERCOT, Inc. as an independent leading industry expert and an employer of choice by fostering innovation, investing in our people, and emphasizing the importance of our mission  General system and/or process improvement(s)  Regulatory requirements  ERCOT Board/PUCT Directive  *(please select ONLY ONE – if more than one apply, please select the ONE that is most relevant)* | |
| Justification of Reason for Revision and Market Impacts | | As of November 2025, ERCOT reported more than 225 GW of Large Load interconnection requests submitted through the interim interconnection process. Less than 4% of these requests have received approval to energize. An additional 7% holds planning study approval and may seek energization approval in the coming years; however, it is unclear to market participants how much of this 7% is approved contingent transmission upgrades that may or may not have been approved through the RPG. Moreover, the pace of approvals has slowed dramatically: of the approximately 11% of loads with planning studies approved to date, only 3% reached this approval in the past two years.  The current Large Load Interconnection Study (LLIS) process, as defined in Section 9, was originally effective for rapidly allocating existing transmission headroom and enabling loads to interconnect within two years. Under today’s interconnection volumes, however, the process is no longer adequate for ensuring timely, coordinated approvals or supporting efficient transmission expansion. ERCOT leadership underscored this challenge at the December Board meeting, noting that the market has “outgrown the process that was established for reviewing these Large Loads” which was “originally set up for about 40 to 50 Loads,” and that with 225 new requests in the past year alone, ERCOT “can no longer be looking at them individually.”  The proposed revisions build on the existing framework by enabling substantiated loads to be studied and approved in parallel with their enabling transmission projects, leveraging the RPG process and long-standing planning practices that have reliably supported large-load interconnections for decades. This approach:   * Aligns with the Protocol definition of LLIS; * Satisfies all North American Electric Reliability Corporation (NERC) FAC-002-2, Facility Interconnection Studies, requirements that motivated creation of LLIS; * Provides load developers greater certainty regarding required transmission upgrades; and * Mitigates the risk of stranded investment in network facilities.   Lancium and Google believe that the interim process and NPRR1234, Interconnection Requirements for Large Loads and Modeling Standards for Loads 25 MW or Greater, were developed to help substantiate loads prior to the transmission planning process. However, Senate Bill 6 (SB6) provides another solution to that problem – site control and a financial show of commitment. Because of that, the RPG process provides a much more efficient way to approve and interconnect substantiated Large Loads in parallel to the enabling transmission.  Importantly, the revisions would also materially reduce the volume of individual studies required of Transmission Service Providers (TSPs) and ERCOT staff. Today, over 134 GW of unapproved load requests specify an in-service date more than two years in the future – representing roughly 60% of the current queue – and these requests are well-suited to coordinated planning through RPG rather than individualized LLIS reviews, especially if they require transmission upgrades to be served reliably. Lancium and Google estimate that this will save significant time and resources for ERCOT and utility staff, and allow Texas to continue to be the best place to build new datacenters and industrial loads in the world.  The time required to permit and build large infrastructure is now a national conversation – and one of the biggest barriers to major projects in the United States. PGRR141 offers a simple, practical reform that could cut the approval time for a Large Load in ERCOT by nearly half.  Finally, the revisions would also allow ERCOT to utilize the RPG as an immediate clustering-style approach for Large Load interconnections, consistent with Google and Lancium’s joint comments at the Commission. While stakeholders and ERCOT will still need to develop a more formalized clustering methodology, utilizing RPG review now prevents a potentially multi-year standstill while new rules are drafted and discussed. This proposed bridging solution is essential to support the rapid influx of new, high-value industries investing in Texas.  Time is of the essence to win this infrastructure race. | |

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| Proposed Guide Language Revision |

***9.3.1 Large Load Interconnection Study (LLIS)***

(1) An LLIS consists of the set of steady-state, stability, short-circuit and other relevant studies that are necessary to determine the reliability impact of a Large Load interconnection on affected Transmission Facilities and identify the Transmission Facilities that are needed to reliably interconnect the new or modified Large Load to the ERCOT System.

(2) If an Interconnecting Entity (IE) or Resource Entity submits a large Generation Resource interconnection request, as defined in Section 5.3, Interconnection Study Procedures for Large Generators, that also includes a co-located Large Load, the Full Interconnection Study (FIS) may be used in place of a separate LLIS. The FIS shall reflect the full requested Load amount and conform to all study requirements detailed in Sections 5.3 and 9.3, Interconnection Study Procedures for Large Loads. For any deadlines or timelines set out in this section that conflict with the deadlines or timelines in Sections 5.2, General Provisions, and 5.3, the deadlines or timelines in Sections 5.2 and 5.3 shall govern.

(3) During the LLIS, the interconnecting Transmission Service Provider (TSP) shall be the lead TSP unless otherwise designated by ERCOT during the study scoping process detailed in Section 9.3.2, Large Load Interconnection Study Scoping Process.

(4) For an interconnection request involving a Large Load interconnecting at distribution voltage, the LLIS shall evaluate only the proposed Load’s transmission-level impacts, if any. The affected Distribution Service Provider (DSP) shall provide the lead TSP with all information concerning the DSP's facilities needed to complete any required studies.

(5) If a transmission project proposed for Regional Planning Group (RPG) review, pursuant to Protocol Section 3.11.4.1, Project Submission, also includes a Large Load, the RPG review may be used in place of a separate LLIS.