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| PGRR Number | [133](https://www.ercot.com/mktrules/issues/PGRR133) | PGRR Title | Clarifying Legacy Generation Breaker Control for PGRR115 Implementation |

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| Date | January 28, 2026 |

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| Submitter’s Information | |
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| Company | CenterPoint Energy Houston Electric (CEHE); Constellation; Vistra (“Joint Commenters”) |
| Phone Number |  |
| Cell Number |  |
| Market Segment | Investor-Owned Utility (IOU) & Independent Generator |

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| Comments |

Joint Commenters (CEHE, Constellation, Vistra) offer the following comments on Planning Guide Revision Request (PGRR) 133 building on the LCRA November 18, 2025, comments. Joint Commenter comments modify paragraph (2) in two places:

* Clarifies breaker control coordination responsibilities between Transmission Operators (Tos) and Qualified Scheduling Entities (QSEs) for grandfathered Resources, including nuclear generators, addressing concerns raised in TCPA’s November 24, 2025, comments; and
* Clarifies that a grandfathered Resource, including nuclear generators, can maintain its current breaker and equipment configuration unless it makes modifications to the Resource subject to paragraph (1)(c)(iv) of Section 5.2.1 or if the Resource adds a co-located load bringing the total load to 75MW or greater. If a Section 5.2.1(1)(c)(iv) modification is made or a 75MW+ co-located load is added, the Resource must then comply with requirements in paragraph (1).

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| **Revised Cover Page Language** |

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| **Justification of Reason for Revision and Market Impacts** | PGRR115 included one change unrelated to the interconnection of Large Loads – specifically, a revision to Section 5 adding greyboxed Section 5.2.11 that specifies that fault-protective breakers “be under the remote control of the applicable Transmission Operator (TO) and capable of being operated remotely to comply with an instruction from ERCOT.”  The remote operation of generator breakers by a third party presents significant operational concerns for operators of power plants that were built prior to unbundling, where the determination of which breakers are at “each Point of Interconnection (POI)” may not be self-evident. It is not typical for TOs to control generation breakers, and that concern is particularly heightened for nuclear power plants, where remote operation of generator breakers by a third party (including a TO) could represent a security risk. The generator breakers must be under the control of the reactor operator.  Accordingly, to avoid a potential unintended consequence of the phrasing of new Section 5.2.11, an additional paragraph (2) in Section 5.2.11 allows existing generators with a Resource Commissioning Date on or before December 31, 2025 to maintain their current configuration. These units would need to come into compliance with the new requirements in the event a modification changing or adding a POI to the facility (as described in paragraph (1)(c)(iv) of Section 5.2.1) is made or if the Resource adds a co-located load bringing the total load to 75MW or greater. |

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| Revised Proposed Guide Language |

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| ***[PGRR115: Insert Section 5.2.11 below upon system implementation of NPRR1234:]***  ***5.2.11 Required Interconnection Equipment***  (1) Each POI for a Generation Resource, ESR, or SOG interconnected at transmission voltage to the ERCOT System must have a permanent configuration consisting of a station with breakers capable of interrupting fault current to sectionalize the transmission lines connecting the station to the ERCOT System. The generator interconnection breakers at a TSP switching station shall be under the remote control of the applicable Transmission Operator (TO) and capable of being operated remotely to comply with an instruction from ERCOT.  (2) For a Generation Resource, ESR, or SOG with a Resource Commissioning Date on or before December 31, 2025, the applicable breakers described in paragraph (1) of this Section may be remotely controllable at the direction of the TO. The TO shall communicate with the applicable Qualified Scheduling Entity (QSE) as needed to ensure coordination. A Generation Resource, ESR, or SOG with a Resource Commissioning Date on or before December 31, 2025 shall comply with the requirements of paragraph (1) of this Section if a modification subject to the requirements of paragraph (1)(c)(iv) of Section 5.2.1, Applicability, is made, or for the addition of load that would result in the total load co-located with the Generation Resource, ESR, or SOG of 75 MW or greater. |