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Item 9.1: Batch Study Update

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Board of Directors Meeting

April 20-21, 2026

Purpose

Provide an update on ERCOT's plan to transition the Large Load Interconnection process to a Batch Study construct.

For information only

No action is requested; for discussion only.

Key Takeaways

- ERCOT and stakeholders have made significant progress on the transition to a batch study process since the February Board meeting and the Batch Zero revision requests are on track for June Board consideration.
- ERCOT is also developing Controllable Load Resource (CLR) and Bring Your Own Generation (BYOG) Protocol language for Batch Zero.

Key Updates Since the February Board Meeting

- ERCOT held six **Batch Study Process workshops** between February 12 and April 9 (total of seven workshops, including February 3 introductory workshop)
- **ERCOT submitted PGRR145 and NPRR1325**, which set forth the Batch Zero study process and inclusion criteria for existing Large Load Interconnection (LLI) requests
- **Forty sets of stakeholder comments have been filed on PGRR145** (as of April 9) with majority of feedback relating to existing LLI eligibility criteria, financial commitment requirements, and study process
- **ERCOT submitted language revisions on March 17 and April 4** to address stakeholder feedback and refine the proposal
- **ERCOT presented draft language for dispatchable load (CLR) in Batch Zero** on April 9
- ERCOT filed a memorandum and presentation with the PUCT on April 10 to raise awareness on **key Batch Zero stakeholder issues**

Key Takeaway: ERCOT and stakeholders have made significant progress on the transition to a batch study process since the February Board meeting and the Batch Zero revision requests are on track for June Board consideration.

PGRR145 defines Batch Zero as a structured process from screening to actionable transmission plan

Batch Zero PGRR145 Building Blocks

Eligibility rules to determine which projects are included in Batch Zero and how they are treated

- Formal classification of projects (base load, studied, excluded)
- Eligibility thresholds and milestones (agreements, readiness)
- Validation and ordering of existing studies

Single ERCOT-led, system-wide study to assess reliability and allocate load

- Single system-wide interconnection study
- Allocation of load by year via LCPs[1]
- Identification of initial transmission upgrade set and financial commitment requirement for each LL project

Formal commitment gate to convert allocated load into firm, financeable demand

- Execution of interconnection agreements and financial commitments
- Acceptance of ERCOT-defined MW allocation and timeline (LCP)
- Automatic removal of non-committed projects

Refinement step to update the plan based only on committed projects

- Re-study limited to committed projects only
- Determination of which upgrades are still required, modified, or removed
- Updated cost estimates and evaluation of alternatives
- No reassessment of financial commitment

Translation of study results into a single actionable transmission plan

- Bundled transmission plan submission to RPG[2]
- Inclusion of cost estimates, need justification, and alternatives
- Direct path from study results to implementation

1. Load Commissioning Plan | 2. Per NPRR1325

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Potential frameworks under consideration and refinement for addressing CLR and BYOG (1/2)

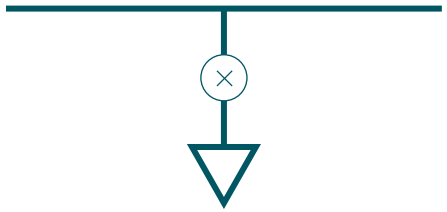
PRELIMINARY

Load Point of interconnection

Provisional Controllable Load Resource (CLR)

Expected PGRR publishing date: Apr 8

Illustrative scheme

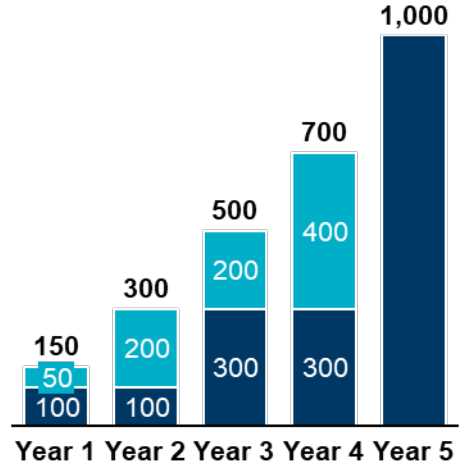


Description

- Large Load participates as a **Provisional Controllable Load Resource (PCLR)**, where a portion of load is firm (LPC) and the remaining load is flexible and subject to dispatch
- The PCLR framework enables Load to consume more energy in unconstrained hours of the day ahead of full transmission build-out, with firm MW defined in the Batch Zero study and non-firm MW managed through SCED

Details

- Split between firm and flexible load defined through the Load Commissioning Plan (LCP) (LPC = firm MW; remaining load operates as PCLR)
- PCLR participates as **dispatchable demand** and must follow SCED basepoints within its operating range
- Full requested load is studied in Batch Zero, with **transmission upgrades identified to transition PCLR to firm service over time**



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Potential frameworks under consideration and refinement for addressing CLR and BYOG (2/2)

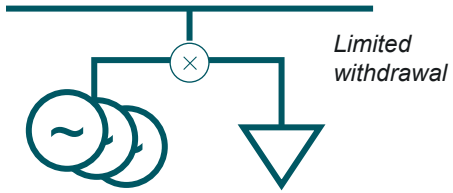
PRELIMINARY

Generator Load Point of interconnection

BYOG Batch Self-Limiting Facility (SLF)

Expected PGRR publishing date: TBD

Illustrative scheme

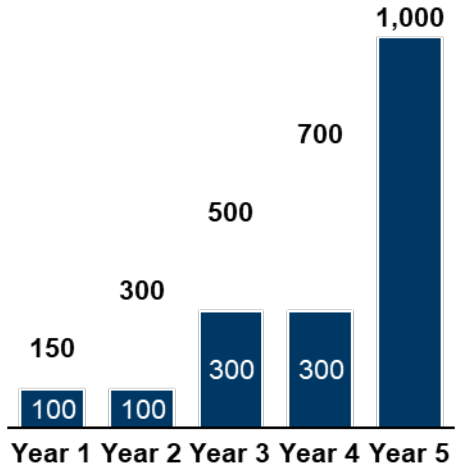


Description

- Site operates with a **fixed transmission withdrawal limit** determined through batch study

Details

- Generation mix may include thermal resources, renewables, and batteries
- A fixed transmission withdrawal limit is established (e.g., 100 MW grid import limit) determined in the batch study
- The **load and generation owners must coordinate operations** to ensure grid imports never exceed the limit
- **Transmission upgrades may be required** if identified by the batch study to meet reliability criteria



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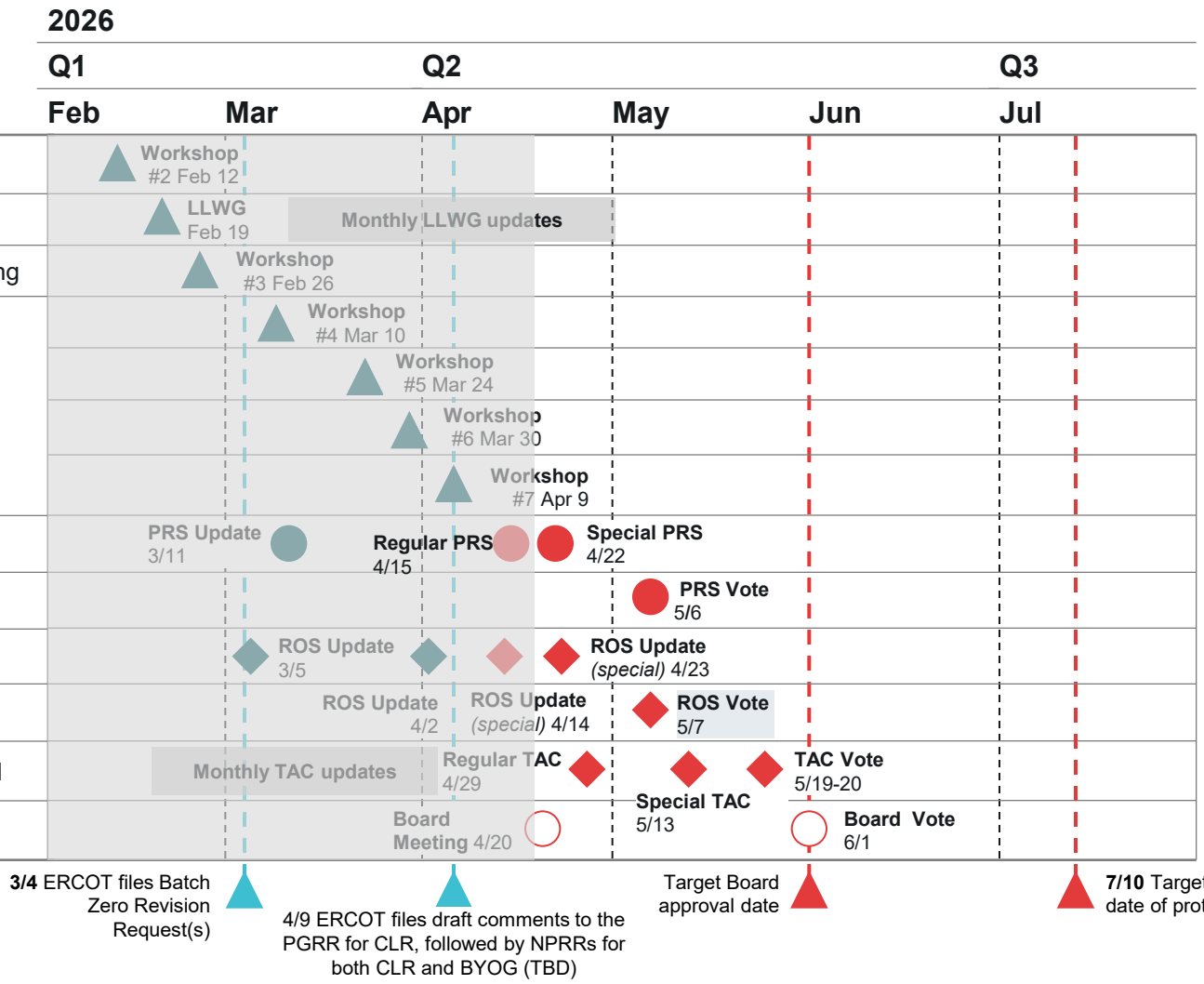
Batch Zero Revision Request Timeline

Note that TAC leadership is involved in considering options to ensure successful review and approval

Forums	Objective
Workshops and working groups	Align stakeholders on direction/scope following Commission decision
	Define the scope, boundaries, and intended role of Batch Zero
	Preview structure/governing concepts of Batch Zero PGRR before filing
	Close outstanding design and drafting issues, incorporate vetted stakeholder feedback, and finalize Revision Request language for committee approval
PRS (Protocols Review Subcommittee)	File NPRR 1325 for Workshops and PRS review
	Endorse NPRR 1325 for advancement to TAC
ROS (Reliability and Operations Subcommittee)	File PGRR 145 for Workshops and ROS review
	Endorse PGRR 145 for advancement to TAC
TAC	Review/endorse combined NPRR/PGRR package for Board approval
ERCOT Board	Consideration of Batch Zero NPRR 1325 and PGRR 145



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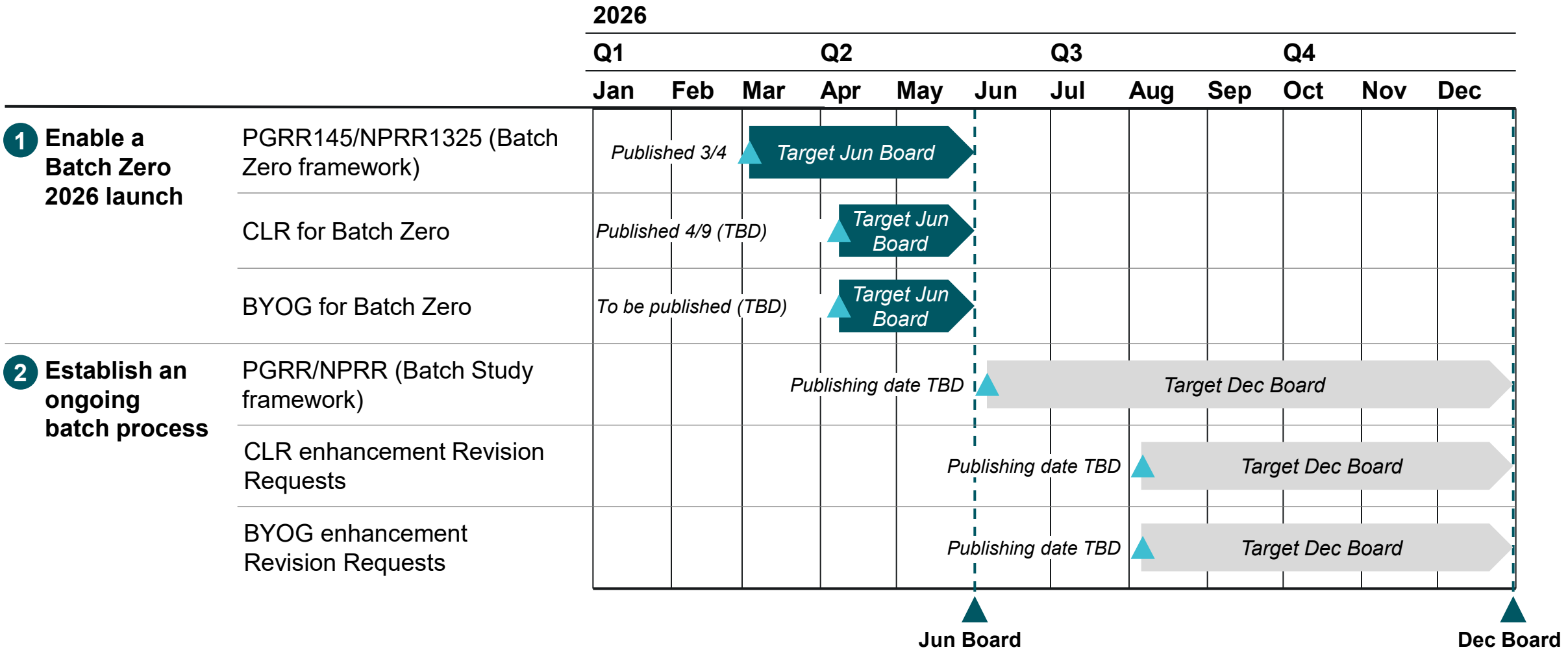
Two-step revision plan: enable Batch Zero now and establish the enduring batch framework



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2026 ReliabilityStandard[1] Assessment timeline

Key milestone

Structured, year-long process to assess system adequacy and inform corrective actions

Dec 2025 – May 2026: Define and approve system assumptions

- **Dec 18, 2025:** Commission reviews assessment roadmap
- **Jan 15, 2026:** ERCOT files modeling assumptions (incl. CONE[2] proposal)
- **Jan 30 – Mar 2:** Staff questions and stakeholder comments
- **Mar 23 – Apr 10:** ERCOT and Staff submit recommended assumptions
- **Apr 17 and May 7:** Commission open meetings to approve assumptions

May – Aug 2026: Assess system adequacy

- **May 15:** Data load into SERVM[3] model
- **May – July:** Model runs and ongoing updates
- **July 29:** Internal results review
- **Aug 13:** ERCOT files reliability assessment (incl. market design options)

Aug – Sept 2026: Validate results with stakeholders

- **Aug 27:** Staff issues questions for comment
- **Sep 28:** IMM evaluation and stakeholder comments due

Oct – Dec 2026: Determine need for action

- **Early Oct:** Staff-led workshop
- **Early Nov:** Staff files final recommendations
- **Nov – Dec:** Commission open meetings
- **Dec 2026:** Final determination on reliability standard

Key takeaways

- **Formal mechanism to evaluate resource adequacy:** year-long process ensures rigorous, data-driven assessment of system reliability
- **Clear decision point in late 2026:** Commission determines whether the system meets the reliability standard and whether intervention is required
- **Potential link to market and policy actions:** results may inform changes to pricing, reserves, and reliability mechanisms if adequacy gaps are identified

1. ERCOT is required to perform a triennial assessment of whether the system meets the reliability standard and is expected to do so over the following three years (16 TAC §25.508) | 2. Cost of New Entry, representing the estimated annualized cost of building new generation capacity and used as a benchmark in adequacy modeling | 3. Strategic Energy & Risk Valuation Model used by ERCOT to simulate system conditions and assess resource adequacy under different scenarios

Source: PUCT Project No. 58777, Staff Memorandum on 2026 Reliability Standard Assessment Roadmap (Dec 11, 2025)