



## Item 4: High-Impact Policy Discussions in the Stakeholder Process

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Board of Directors Meeting

April 20-21, 2026

### **Purpose**

Provide an update on key policy issues currently in the stakeholder process

### **For information**

No action is requested; for discussion only.

### **Key Takeaways**

- Addressing issues related to the interconnection and reliability of Large Loads continues to be a key area of focus and collaboration with the Commission and stakeholders.
- New key initiatives regarding Firming and the proposed Batch Study Process have been added this cycle.
- ERCOT continues to work on highlighting key revision requests to the Board earlier and provide visibility on the evolution of issues through the stakeholder process.



# Key Commission Priorities for 2026-2027

ERCOT and PUC Staff worked to develop [performance measures](#) for each key Commission priority, including milestones and target completion dates for each measure. ERCOT will file quarterly updates at the Commission.

## Real-Time Co-optimization + Batteries (RTC+B)

- Implementation and stabilization of RTC+B, including any improvements needed for Ancillary Service Demand Curves (ASDCs)

## Senate Bill (SB) 6 (89R)

- Implementation of SB 6 provisions relating to the planning for, interconnection and operation of, and costs related to providing service for certain electrical loads

## Dispatchable Reliability Reserve Service (DRRS)

- Implementation of a new DRRS Ancillary Service as required by House Bill (HB) 1500 (88R)

## Implementation of Ancillary Service Study Findings

- Address the findings and next steps from Commission's [2024 Ancillary Services Study](#) required by SB 3 (87R)

## Large Load Interconnection

- Improving processes and timelines for the interconnection of large loads in the ERCOT power region.



# Dispatchable Reliability Reserve Service (DRRS)

**HB 1500 (88R)** requires ERCOT to develop and implement an Ancillary Service program to procure dispatchable reliability reserve services on a Day-Ahead and Real-Time basis to account for market uncertainty.

## **NPRR1309**

### **Dispatchable Reliability Reserve Service Ancillary Service**

**Board Priority** - Primary revision request to establish DRRS as an Ancillary Service that addresses supply and demand forecast uncertainty and reduces the volume of Reliability Unit Commitments (RUCs). Intended to deliver all aspects of DRRS required by PURA § 39.159(d)

- **Posted: November 20, 2025**
- **Current Status: at TAC for consideration in April**

## **NPRR1310**

### **Dispatchable Reliability Reserve Service Plus Energy Storage Resource Participation and Release Factor**

**Urgent** - Revision request proposes an ESR participation model in DRRS and a Release Factor concept that provides optionality for DRRS to also be used as a mechanism to support resource adequacy.

- **Posted: November 20, 2025**
- **Current Status: tabled at PRS pending revisions to remove ESR functionality**

## **Next Steps:**

March, the Commission provided guidance regarding policy issues concerning ESR participation in DRRS

ERCOT will work with PUC Staff to develop a separate NPRR in line with [recommendations](#) to limit participation to ESRs with sufficient storage capacity (MWh) to discharge at their maximum sustained discharging capability (MW) for at least four hours and that can provide off-line DRRS up to the power output (MW) it can reach within two hours of being called on for deployment.

### **Key Takeaways:**

- NPRR1309 remains on track for consideration at the June Board.
- Energy Storage Resource (ESR) functionality will be removed from NPRR 1310 and addressed in a separate revision request per Commission guidance.



# Large Load Issues - Senate Bill (SB) 6 (89R) Implementation

<p>Net Metering Arrangements Involving a Large Load Co-Located with an Existing Generation Resource (PURA §39.169)</p>	<ul style="list-style-type: none"> <li>• PUC Project No. 58479, <b>new 16 TAC §25.205 adopted in March 2026</b></li> <li>• Rule codifies the process for the Commission's evaluation of a net metering arrangement involving a Large Load and co-located with an existing Generation Resource along with the criteria used to evaluate the arrangement.</li> </ul>
<p>Large Load Forecasting Criteria (PURA §37.0561)</p>	<ul style="list-style-type: none"> <li>• PUC Project No. 58480, <b>new 16 TAC § 25.370 adopted in February 2026</b></li> <li>• Rule establishes criteria for ERCOT to include Large Loads in the forecasts that Transmission Service Providers (TSPs) submit to ERCOT for purposes of developing transmission planning and resource adequacy models and reports.</li> <li>• Rule also establishes criteria for TSPs to reasonably determine existing and forecasted load (see <i>HB 5066 (88R)</i>).</li> <li>• The Commission also approved an ERCOT compliance plan to ensure the 2026 Regional Transmission Plan (RTP) complies with rule.</li> </ul>
<p>Large Load Interconnection Standards (PURA §37.0561)</p>	<ul style="list-style-type: none"> <li>• PUC Project No. 58481, <b>expected August 2026</b></li> <li>• Rulemaking will establish standards for the interconnection of Large Load customers in ERCOT that support business development while minimizing the potential for stranded infrastructure costs and maintaining system reliability.</li> </ul>
<p>Reliability Service to Competitively Procure Demand Reductions from Large Loads (PURA §39.170)</p>	<ul style="list-style-type: none"> <li>• PUC Project No. 58482, <b>expected October 2026</b></li> <li>• Rulemaking will codify requirements for ERCOT to develop a new reliability service that competitively procures demand reductions from loads with a demand of <math>\geq 75</math> MWs to be deployed in the event of an anticipated emergency condition.</li> </ul>
<p>Evaluation of Transmission Cost Recovery (SB 6 Section 6 (a)-(c))</p>	<ul style="list-style-type: none"> <li>• PUC Project No. 58484, <b>expected December 2026</b></li> <li>• Project will evaluate whether the existing 4CP methodology continues to appropriately assign costs for transmission investment or if an alternative methodology would more appropriately assign the costs of providing access and codify any recommendations in a subsequent rulemaking.</li> </ul>



# Large Load Issues – Batch Study Process

The volume and changing characteristics of Large Loads seeking ERCOT interconnections have uncovered new challenges which require planning processes to evolve to reliably connect Load.

**Growing demand necessitates an evolution of Large Load Interconnection in ERCOT from ad hoc to batch-based planning.**

## PGRR145, Batch Zero Process for Large Load Interconnections

- Creates a transitional Batch Zero for ERCOT to study on a system-wide basis the reliability impacts of Large Loads that meet certain study maturity and commitment criteria.
- Batch Zero is a bridge between existing and new processes.
- *Posted: March 4, 2026*  
*Current Status: at ROS, stakeholder consideration at a series of workshops and special subcommittee meetings*

## NPRR1325, Related to PGRR145, Batch Zero Process for Large Load Interconnections

- Defines essential terminology related to the transitional Large Load interconnection process, the Batch Zero Process, and modifies the Regional Planning Group (RPG) procedures to allow for a new category of projects that result from the Batch Zero Process.
- *Posted: March 4, 2026*  
*Current Status: at PRS, stakeholder consideration at a series of workshops and special subcommittee meetings*
- **Both Batch Zero revision requests are expected to be at the Board for consideration in June.**

### Key Issues for Next Phase :

- Continuing Batch Study Process and transition to Regional Planning Group (RPG)
- Controllable Load Resource (CLR) and Bring Your Own Generation (BYOG)



# Large Load Issues – Large Electronic Load Ride-Through Requirements

Board Priority revision requests seek to establish new grid stability rules for data centers & crypto mining facilities through frequency and voltage ride-through requirements for Large Electronic Loads.

## [NOGRR282](#), Large Electronic Load Ride-Through Requirements



**Key Policy Issue:** places requirements on Customers of LEL facilities

- Establishes frequency and voltage ride-through requirements to ensure LELs do not present a reliability risk to the system by tripping when frequency and voltage excursions within a specified range occur.
- **Posted: November 14, 2025**  
**Current Status: at TAC for consideration in April**
- In April, ROS voted to recommend approval with one opposing vote and eight abstentions.

## [NPRR1308](#), Related to [NOGRR282](#), Large Electronic Load Ride-Through Requirements



**Key Policy Issue:** defines Large Electronic Loads (LELs)

- Creates a sub definition under Large Loads to identify LELs as a Large Load where 50% or greater of the Demand at the site consists of power electronic based load, specifically computational load, such as data centers and cryptocurrency mining facilities.
- **Posted: November 14, 2025**  
**Current Status: at TAC for consideration in April**
- In April, ERCOT submitted comments to revise the new Large Load term to be “Large Computational Load (LCL)” instead of “Large Electronic Load (LEL)” to avoid conflicts with an existing acronym.

**Key Takeaway:** Timelines in place for a TAC recommendation regarding [NOGRR282](#) and [NPRR1308](#) for consideration at the June Board.

## Firm Fuel Supply Service (FFSS)

In January, the Commission adopted new [16 TAC §25.520](#), relating to Firm Fuel Supply Service (FFSS). The rule codifies the criteria for a Resource to participate in the FFSS program and implementation requirements for ERCOT.

ERCOT is moving forward with the development of FFSS Phase 3 through NPRR1275 and an additional revision request to codify program requirements.

Phase 3 provisions are expected to be in place for the 2026-2027 winter season FFSS procurement period.

### NPRR1275, Expansion of Qualifying Pipeline Definition for Firm Fuel Supply Service in Phase 3

Amends the definition for FFSS Qualifying Pipeline as recommended by TAC in May 2023 under [NPRR 1169](#) so that additional Generation Resources that are capable of running on natural gas stored offsite would be eligible to provide FFSS.

- **Posted: February 25, 2025**
- **Current Status: at the Board for consideration**

### Next Steps:

ERCOT is drafting an NPRR to incorporate FFSS Phase 3 requirements from 16 TAC §25.520 into the Protocols including offer caps for each resource category and budget allocation between the three categories.

- **Target Posting: May 2026**

ERCOT will move forward with Phase 3 through a Request for Proposal (RFP) issued on or before August 1, 2026, under the authority of the rule.

# Residential Demand Response (RDR)

**Developing a Residential DR Program is a key ERCOT corporate priority for 2025.** RDR represents a source of capacity that is not fully enabled today. There is an opportunity for ERCOT to collaborate with stakeholders to develop a program that can incent and grow RDR capacity as an additional resource that can help support system reliability.

## NPRR1296

### Residential Demand Response Program

Establishes a program to enable residential Customers with smart responsive appliances or devices to reduce the system Load during peak Net Load hours in exchange for an incentive payment.

The RDR Program would offer an incentive payment for Retail Electric Providers (REPs) and Non-Opt-in Entities (NOIEs) (via their QSEs) to develop programs to incent RDR with a focus on high seasonal net load hours.

- **Posted August 26, 2025**
- **Current Status: remains tabled at PRS, referred issue to WMS and RMS**

ERCOT filed comments in January to address stakeholder feedback that the RDR program should be incorporated in the Reliability Deployment Price Adder (RDPA) to support market prices and investment signals.

RDR is a key consideration in ERCOT's strategic review of load participation and Demand Response in ERCOT assessed in the Charles River Associates [report](#).

#### Key Policy Issues:

- Role of RDR in helping to address near-term resource adequacy concerns
- Customer incentives and market signals



# Reliability Procurement Process Improvements

Following recent experiences with Reliability Must-Run (RMR), Must-Run Alternative (MRA) and Contract for Capacity (C4C) proposals, ERCOT has reviewed lessons learned and proposed potential process improvements.

## NPRR1315, Changes to Process of Evaluating the Potential Needs for Additional Capacity

Adds notification requirements for ERCOT to notify the Commission when it determines that additional capacity is needed to prevent an imminent Emergency Condition and prior to entering into any contract for additional capacity.

Revision request would also extend the study horizon for evaluating and potentially contracting for capacity to prevent anticipated load shed events and expand the set of eligible Resources that can respond to the Requests for Proposal (RFPs) to include new Resources.

•**Posted: December 19, 2025**

•**Current Status: tabled at PRS**

*ERCOT filed comments in April and is continuing to address stakeholder concerns.*

## NPRR1316, Implement an Annual ERCOT RFI Process to Gather Information Related to Retirement and Mothballing Plans of Select Resources

Adds an annual requirement for any Resource Entity that owns or operates a thermal generating unit that is identified by ERCOT to be at risk of being retired or mothballed to respond to a Request for Information (RFI) regarding public or non-public retirement or mothball plans, as well as likelihood of retirement or mothballing if there are no such public or non-public plans.

•**Posted: December 19, 2025**

•**Current Status: Impact Analysis consideration at May PRS**

*PRS unanimously endorsed as amended by ERCOT comments.*

## NPRR1319, Modifications to Seasonal Mothball Periods and Clarification to Evaluation Process

Expands the prohibition for placing a Generation Resource on a seasonal mothball status to include the winter season, (December, January, and February) and clarifies ERCOT's next steps after a proposal to be placed on seasonal mothball status has been evaluated.

•**Posted: December 29, 2025**

•**Current Status: tabled at PRS, referred issue to ROS and WMS endorsed**

*Based on stakeholder feedback, ERCOT is proposing to keep only the existing summer seasonal mothball prohibition and continue to evaluate the effects of seasonal mothballing on winter reliability.*

**Key Takeaway:** ERCOT held a workshop in March and is working to address stakeholder comments on NPRR1315 to allow for continued movement in order to potentially seek approval at the June Board.

# Generation Firming Requirements

[HB 1500 \(88R\)](#) requires the PUC to implement performance requirements for certain Generation Resources with interconnection agreements signed on or after January 1, 2027. Per [16 TAC §25.65](#), ERCOT must develop protocols to implement the rule and identify how performance will be validated for a Distribution Generation Resource, an Energy Storage Resource (ESR), and a Load Resource that assumes a firming obligation

## NPRR1328

### Establishment of Generation Firming Program

Incorporates new Generation Firming Program requirements for all Generation Resources with an original Standard Generation Interconnection Agreement (SGIA) executed on or after January 1, 2027, beginning one year after the Generation Resource's Commissioning Date.

Provides details on the administration of the Generation Firming Program, including definitions, timing requirements, processes for submitting Firming Transfers to ERCOT, specific calculations for measuring performance and applying exemptions, and associated market-facing reporting.

- **Posted: April 2, 2026**
- **Next Steps: PRS granted Urgent status; tabled at PRS**

#### Key Takeaways:

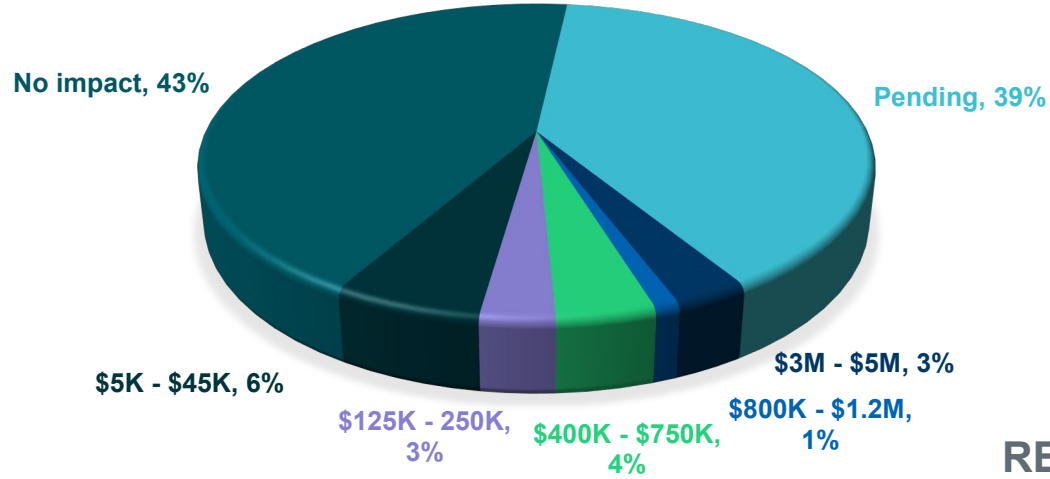
- NPRR1328 creates a new section of the Protocols, 28 Generation Firming Program
- The Generation Firming Program must be implemented no later than December 1, 2027.

# Appendix

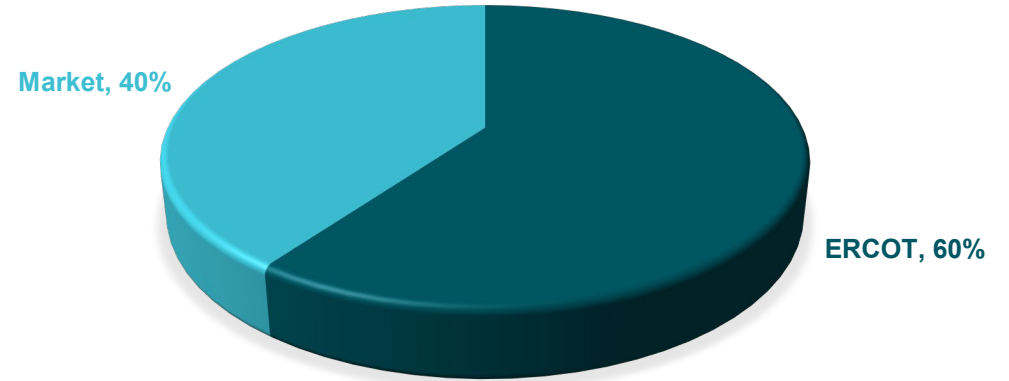
- Appendix A: 70 Revision Requests in Process
- Appendix B: Aging Revision Requests
- Appendix C: Statistics – New Revision Requests Submitted
- Appendix D: Acronyms

# Appendix A: 70 Revision Requests in Process

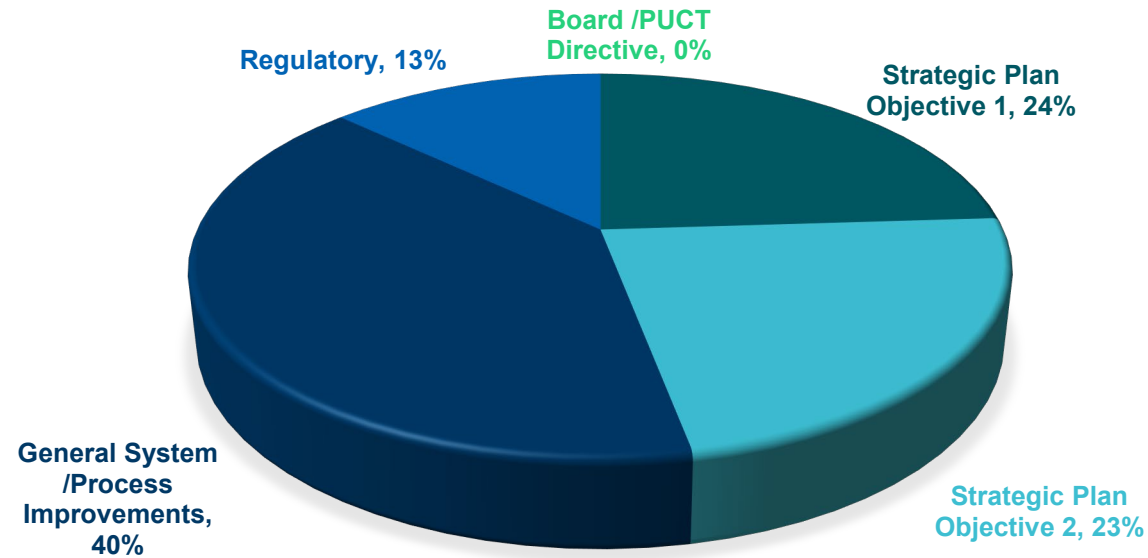
### BUDGETARY IMPACTS



### SPONSORSHIP

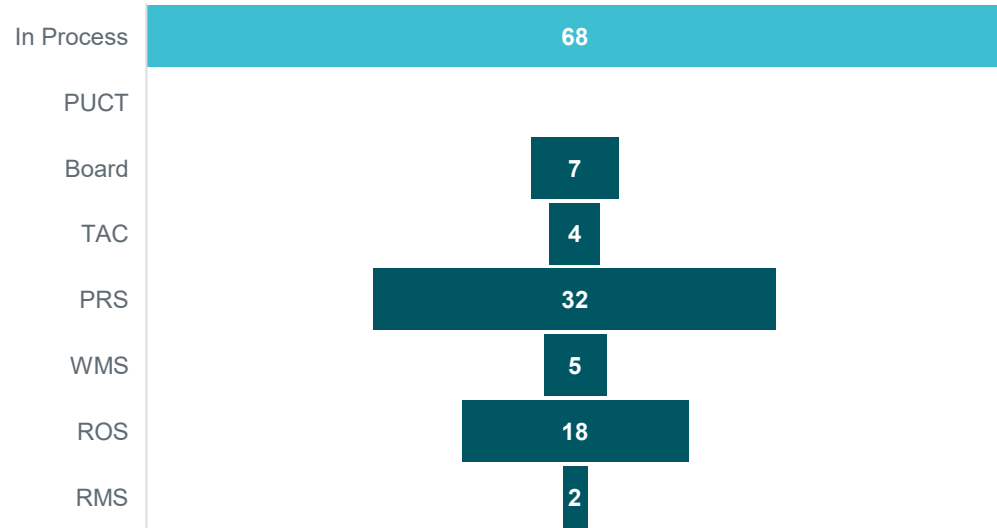


### REASON FOR REVISION

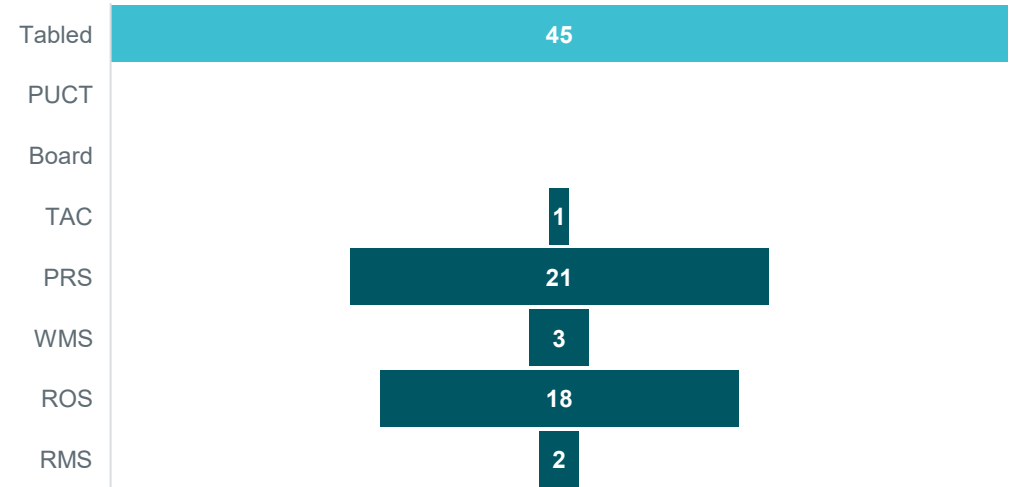


# Appendix A: 70 Revision Requests in Process

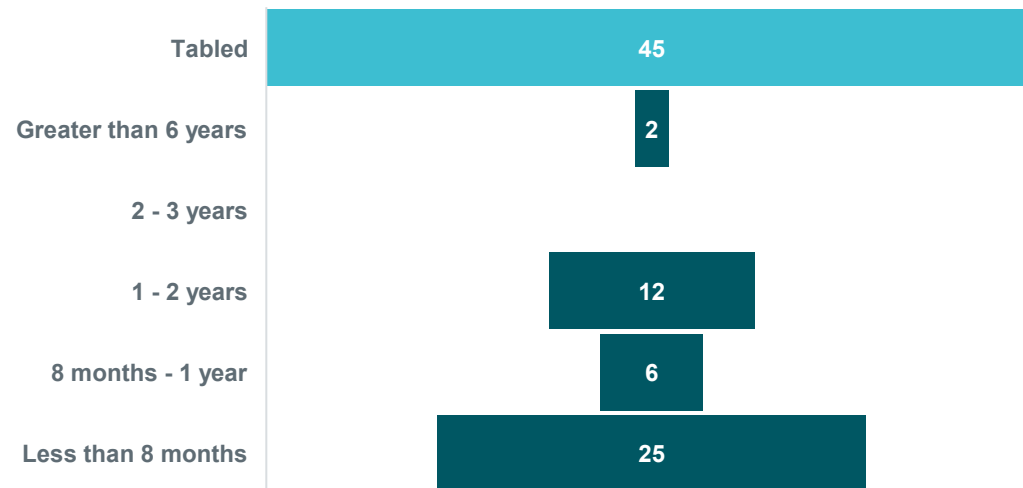
LOCATION OF REVISION REQUESTS



LOCATION OF TABLED REVISION REQUESTS



LENGTH TABLED



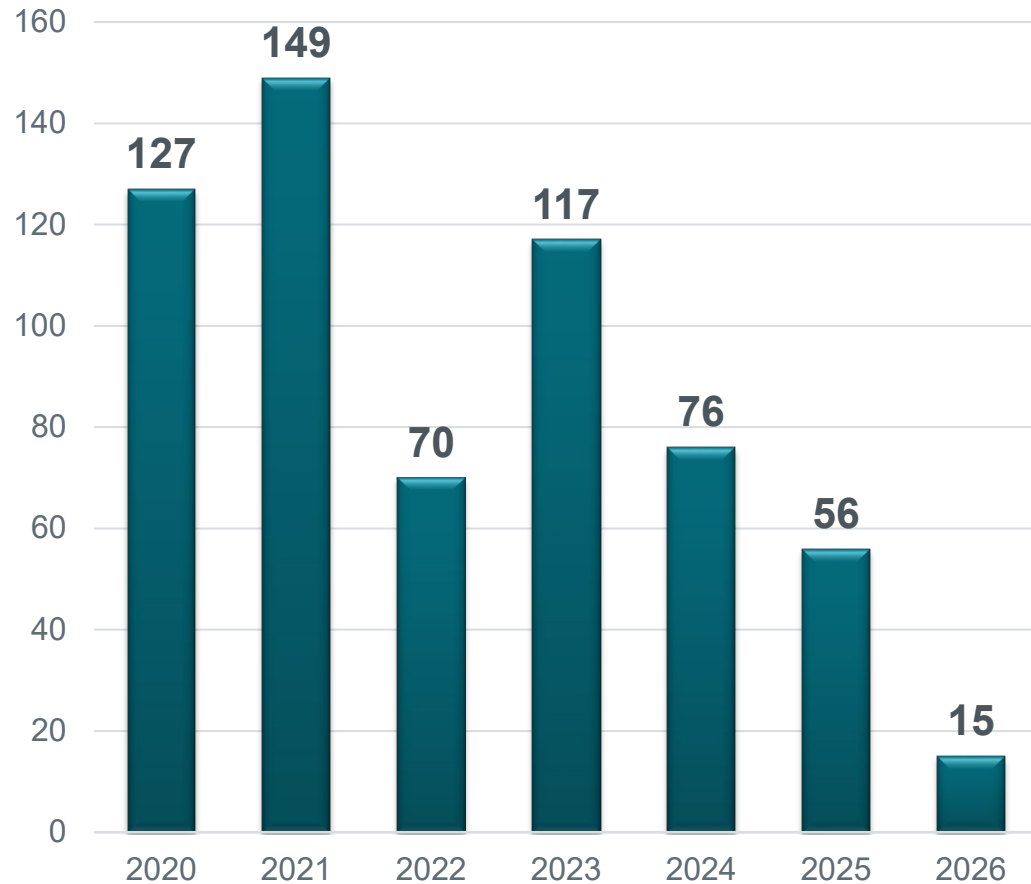
# Appendix B: Aging Revision Requests

Revision Request	Length Tabled	Notes
<b>NPRR956, Designation of Providers of Transmission Additions (and related PGRR073) [ERCOT]</b>	Greater than 6 years (7/7/19)	Tabled at PRS. Entities filed suit in the U.S. District Court for the Western District of Texas to challenge the validity of Senate Bill 1938. Recently, the District has issued a verdict against SB 1938 - a decision that is likely to be appealed. ERCOT will continue to comply with SB 1938 unless and until a final judicial determination requires otherwise.
<b>NPRR1070, Planning Criteria for GTC Exit Solutions. [EDF Renewables / Pattern Energy]</b>	4 - 5 years (4/15/21)	Tabled at PRS. ERCOT requested NPRR be tabled until resolution of related PUCT Rulemaking (see 10/22/21 ERCOT comments). Referred to OWG, PLWG, WMWG for further discussion. Awaiting comments from the sponsor to update the proposal for continued stakeholder discussion.
<b>NPRR1255, Introduction of Mitigation of ESRs [ERCOT]</b>	1 - 2 years (10/17/24)	Tabled at PRS. ERCOT filed comments in April 2025 modifying the original proposal based on discussions with stakeholders. PRS referred the issue to WMS for continued review of this modified proposal. Referred to CMWG for further review.
<b>PGRR122, Reliability Performance Criteria for Loss of Load [ERCOT]</b>	1 – 2 years (12/5/24)	Tabled at ROS. ROS referred to DWG and PLWG, but the Large Load Working Group (LLWG) is also discussing. ERCOT has conducted studies and presented to LLWG the possibility of supporting more than the 1,000 MW of Load loss proposed in PGRR122, and is continuing to monitor the studied areas and will keep LLWG updated.
<b>NPRR1264, Creation of a New Energy Attribute Certificate Program, &amp; Associated Guide Revisions (and related Guide Revisions) [TEBA]</b>	1 – 2 years (1/15/25)	Tabled. 3/5/26 ERCOT comments under consideration.
<b>NPRR1272, Voltage Support at Private Use Networks [Occidental]</b>	1 – 2 years (3/12/25)	Tabled at PRS. Referred to ROS. ROS assigned to PLWG/VPWG.
<b>PGRR124, ESR Maintenance Exception to Modifications [Tesla]</b>	8 months – 1 year (3/6/25)	Tabled at ROS. The sponsor has had conversations with ERCOT Staff regarding advanced grid services and has requested this item remain tabled.
<b>NPRR1214, Reliability Deployment Price Adder Fix to Provide Locational Price Signals, Reduce Uplift and Risk [Joint Sponsors]</b>	8 months – 1 year (5/14/25)	Tabled at PRS. ERCOT Staff has prepared a draft white paper of outstanding issues related to this issue for continued discussions with stakeholders.
<b>NPRR1278, Establishing Advanced Grid Support Service as an Ancillary Service [Engine/Jupiter]</b>	8 months – 1 year (5/14/25)	Tabled at ROS and WMS. At the April WMS, the sponsor noted recent discussions on ESRs at the PUCT and announced plans to renew NPRR1278 discussions at WMWG.
<b>NPRR1284, Guaranteed Reliability Load Process (and related PGRR126) [Cholla]</b>	8 months – 1 year (6/11/25)	Tabled at ROS and WMS. This NPRR and PGRR have been tabled while the market focuses on the “Batch Zero” study process within PGRR145/NPRR1325.

# Appendix B: Aging Revision Requests

Revision Request	Length Tabled	Notes
<b>NPRR1286, Establish Multi-Value Criteria for Resiliency-Related Transmission Project Evaluation [ERCOT]</b>	8 months – 1 year (6/11/25)	Tabled at PRS. Referred issues to ROS and being discussed at PLWG.
<b>PGRR128, Regional Transmission Plan Review of Grid Enhancing Technologies [TEBA]</b>	8 months – 1 year (7/10/25)	Tabled at ROS. Out of ongoing discussions with stakeholders, the sponsor submitted comments with further revisions on 3/30/26 for discussion at the 4/13/26 PLWG meeting.

# Appendix C: Statistics – New Revision Requests Submitted



## New Revision Requests submitted since February Board:

- [OBDRR055](#), Revisions to Non-Spinning Reserve Deployment and Recall Procedure for RTC+B
- [PGRR143](#), Steady State Planning Schedule Posting Location Update
- [PGRR144](#), Dynamic Model Submission and Review Requirements for Large Loads including Large Electronic Loads
- [NPRR1322](#), 60-Day Disclosure of the Day-Ahead Market (DAM) Ancillary Service Only Offer Awards
- [NPRR1323](#), Correction to Inadvertent Removal of Real-Time MCPC Capping for NPRR1290 Phase 2
- [NPRR1324](#), Clarification of the Process to Determine RUC Warmth State
- [PGRR145](#), Batch Zero Process for Large Load Interconnections
- [NPRR1325](#), Related to PGRR145, Batch Zero Process for Large Load Interconnections
- [NPRR1326](#), Add Energy Storage Resource (ESR) State of Charge (SOC) Information to the Ancillary Services Capacity Monitor
- [NOGRR286](#), Addition of 765-kV Operational Voltage Limits
- [NPRR1327](#), As-Built for NPRR1281, Improvements to Alternate FFSS Resource Designation
- [NPRR1328](#), Establishment of Generation Firming Program

## Appendix D: Acronyms

Acronym	Term
4CP	Four Coincident Peak
ASDC	Ancillary Services Demand Curve
C4C	Contract for Capacity
CMWG	Congestion Management Working Group
COPMGRR	Commercial Operations Market Guide Revision Request
DRRS	Dispatchable Reliability Reserve Service
DWG	Dynamics Working Group
EAC	Energy Attribute Credit
ESR	Energy Storage Resource
FFSS	Firm Fuel Supply Service
LCL	Large Computational Load
LEL	Large Electronic Load
LLWG	Large Load Working Group
LPGRR	Load Profiling Guide Revision Request
MCPC	Market Clearing Price for Capacity
MRA	Must-Run Alternative
MW	Megawatt
MWh	Megawatt-hour
NOGRR	Nodal Operating Guide Revision Request
NOIE	Non Opt-In Entity
NPRR	Nodal Protocol Revision Request
OBDRR	Other Binding Document Revision Request
OKR	Objectives and Key Results
OWG	Operations Working Group
PGRR	Planning Guide Revision Request
PLWG	Planning Working Group

# Appendix D: Acronyms

Acronym	Term
PRS	Protocol Revision Subcommittee
QSE	Qualified Scheduling Entity
RDPA	Reliability Deployment Price Adder
RDR	Residential Demand Response
REP	Retail Electric Provider
RFI	Request for Information
RFP	Request for Proposal
RMGRR	Retail Market Guide Revision Request
RMR	Reliability Must Run
RMS	Retail Market Subcommittee
ROS	Reliability and Operations Working Group
RRGRR	Resource Registration Glossary Revision Request
RTC+B	Real-Time Co-optimization plus Batteries
RTP	Regional Transmission Plan
RUC	Reliability Unit Commitment
SGIA	Standard Generation Interconnection Agreement
SMOGRR	Settlement Metering Operating Guide Revision Request
SOC	State of Charge
SPWG	System Protection Working Group
TAC	Technical Advisory Committee
TSP	Transmission Service Provider
VCMRR	Verifiable Cost Manual Revision Request
VPWG	Voltage Profile Working Group
WMS	Wholesale Market Subcommittee
WMWG	Wholesale Market Working Group