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Item 15.1.4.3: ERCOT Comments on NPRR1325 and PGRR145

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Vice President, Interconnection & Grid Analysis

Board of Directors Meeting

June 1-2, 2026

Purpose

Provide the Board with background information and content overview for PGRR145 and NPRR1325.

Voting Items

Current voting items: PGRR145 and NPRR1325

Key Takeaways

- ERCOT undertook an extensive and accelerated stakeholder process to develop revision requests that transition the Large Load interconnection study process from individual studies to a batch study.
- The key components of PGRR145 and NPRR1325 include the study inclusion criteria, the Batch Zero study, a developer commitment period, the Refinement Study, RPG review, Provisional Controllable Load Resource framework, and Withdrawal-Limited Private Use Network framework.

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ERCOT undertook an extensive, continuous dialogue with stakeholders to shape the Large Load interconnection process

80+

Number of meetings with stakeholders[1]

~500

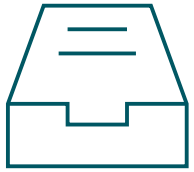
Average participants per workshop[2]

200+

Hours of live discussion with stakeholders

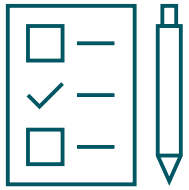
9

PUCT Open Meetings attended[3]



100+

Public filings received *(related to PGRR145)*



~200

Survey responses collected and analyzed

290+

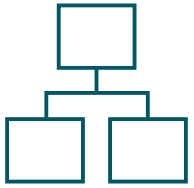
Comments addressed *(related to PGRR145)*

9

Published ERCOT comments to PGRR145/NPRR1325

~30

ERCOT people directly engaged



~10

ERCOT departments involved

NOTE: as of May 2026

1. Including 1:1 interviews, workshops, LLWGs, PRS, ROS and TAC meetings | 2. Including both online and in person participants | 3. From Dec 2025 to May 2026

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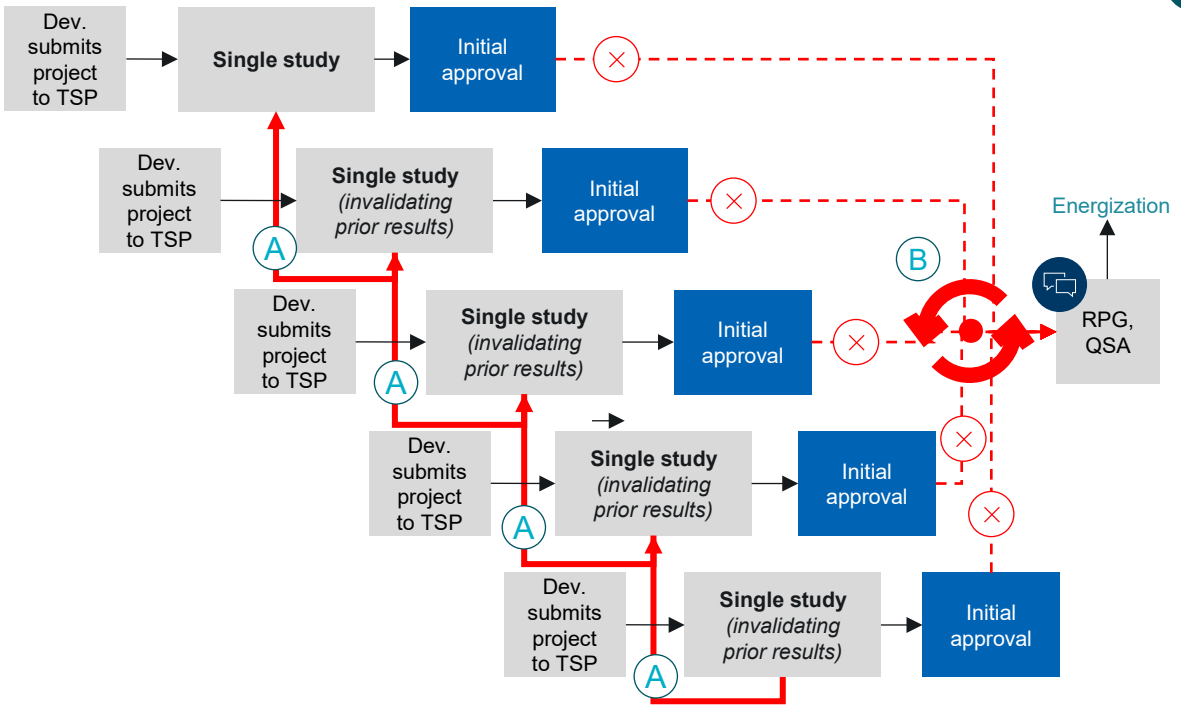
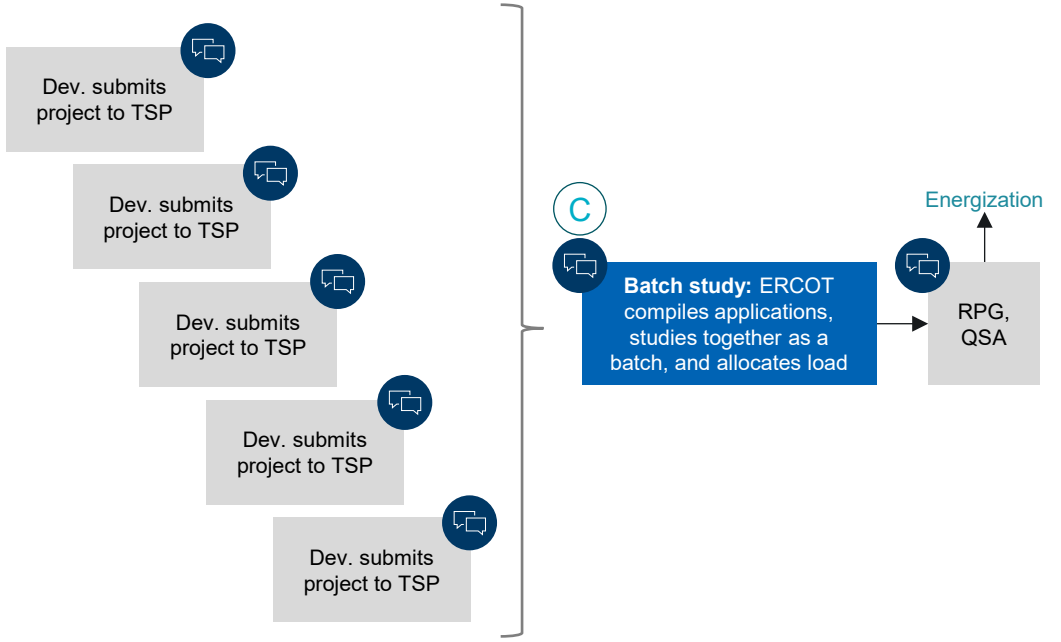
The batch study process increases outcome certainty and transparency while limiting restudy risk

Communication point | Non-ERCOT action | ERCOT action

From the existing single study process…



…to the new batch study process



A **Frequent restudies required**
If another project impacts the same transmission zone, all previous studies are invalidated and impacted projects which haven't yet energized must be restudied

B **Restudy loop**
In the absence of capacity reservation, projects can be repeatedly pulled into restudies as new requests enter the system, delaying approvals and potentially extending timelines by years

C **Batching process**
On an annual basis, all submitted requests are clustered and studied together; allocated capacity coming out of the study is "reserved" to prevent restudies

Transparent communications
Along with the new batch study process, ERCOT is redesigning the study communication process to have clearly defined touchpoints and transparent information handovers

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

Detailed next

Batch Zero PGRR145 Building Blocks

Inclusion criteria
Who enters Batch Zero

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

Batch Zero Study
System-wide assessment

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

- Single system-wide interconnection study:
  1. **Allocation of load by year via updated LCPs**
  2. **Identification of initial transmission upgrade set**
  3. **Financial commitment requirements**

Commitment Gate
Who stays in

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 Study
Right-sizing the plan

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

Transmission Plan to RPG
Actionable output

Translation of study results into a single actionable transmission plan

- Bundled transmission plan submission to RPG
- 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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Batch Zero eligibility framework determines how each Large Load is treated

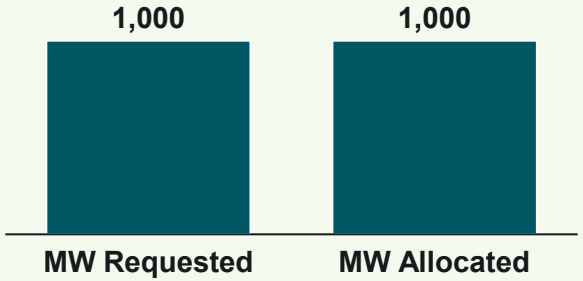
Batch Zero Entry Path
Large Loads may enter Batch Zero through different pathways (e.g., LLIS[1], RPG[2], NMA[3]), reflecting varying levels of prior study completion, planning alignment, and maturity

PGRR145 Eligibility Framework

Batch Zero Requirements
Each Large Load must satisfy defined eligibility requirements (e.g., site control, financial commitments) that demonstrate project readiness and determine its treatment

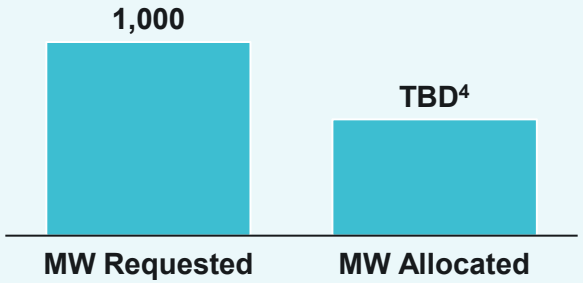
Base Load

Included as base load with MW effectively locked in, not subject to further study or reallocation



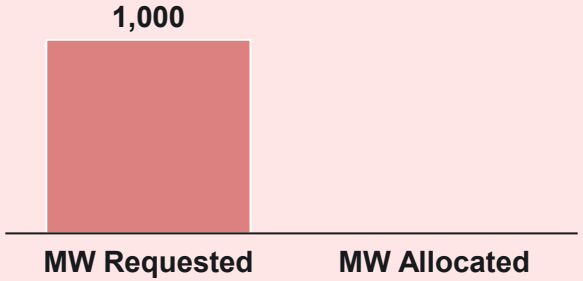
Studied Load

Included in Batch Zero, with MW allocation determined through system-wide study based on system capability and reliability constraints



Excluded Load

Excluded from Batch Zero, receives no MW allocation, and must wait for a future batch



1. Large Load Interconnection Study | 2. Regional Planning Group | 3. Net Metering Arrangement | 4. Allocation is subject to a minimum allocation threshold below which a Large Load's allocated peak Demand is reduced to zero MW. The threshold is generally 100 MW, or 90% of requested peak Demand for Large Loads requesting 100 MW or less. PCLRs and WLPUNs are not subject to a minimum allocation threshold

Batch Zero treatment depends on entry pathway and ERCOT study-validation outcomes

		Treatment in Batch Zero	
Entry path	**Applicability**	**Base Load**	**Studied Load**
Previously energized loads	Existing loads already energized and operating	Large Load achieved Initial Energization before 7/10/26 (including loads energized before 3/25/22 or during the interim LLIS period)	
QSA / Interim Voltage Ride-Through	Load evaluated through interim ERCOT reliability/ stability screening	Request qualified for quarterly stability assessment or interim voltage ride-through review by 5/1/26	
Regional Planning Group (RPG) Project	Load led to the need for an RPG transmission project	Request included in RPG submitted before 12/15/25 and deemed complete and valid by ERCOT, including through the ranking methodology for projects endorsed between 3/4/26 and 7/10/26[1]	Request included in RPG submitted before 12/15/25 and endorsed between 3/4/26 and 7/10/26, but not deemed complete and valid through ERCOT's ranking methodology
Permian Basin Reliability Plan	Load incorporated into PUCT-approved PBRP transmission plan	Request included in the Permian Basin Reliability Plan (2024) and contributing to identified transmission need	
Legacy LLIS[3]	Prior LLIS studies demonstrated interconnection feasibility and reliability	Request that satisfied LLIS and interconnection agreement requirements by 3/4/26, or whose studies were deemed complete and valid through ERCOT's ranking methodology between 3/4/26 and 7/10/26[2]	Request with LLIS studies not deemed complete and valid by ERCOT's ranking methodology
Net Metering Arrangement (NMA)	Existing PURA net-metering applications	PURA §39.169 net-metering application submitted on or before 3/4/26 and satisfying Batch Zero qualification requirements	

1. Includes projects whose RPG transmission projects were endorsed between 3/4/26 and 7/10/26 and whose studies were deemed complete and valid through ERCOT's ranking methodology under Section 9.2.1.4(4) | 2. Includes projects evaluated under Section 9.2.1.4(4) and deemed complete and valid by ERCOT | 3. Legacy LLIS projects included as Studied Loads may elect PCLR or WLPUN treatment pursuant to Planning Guide Sections 9.2.2.1 and 9.2.2.2

NOTE: Slide assumes projects satisfied all applicable Batch Zero readiness, financial security, disclosure, and documentation requirements

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Large Load Interconnection Status (as of May 19, 2026)

1 LLIS projects that met Planning Guide 9.4 and 9.5 by March 4 and are eligible to be included as **base load in Batch Zero**

2a LLIS projects that met PG 9.4 and 9.5 between March 4 and May 19 **are eligible** to be included as **base load in Batch Zero**. (7.4 GW)

2b LLIS projects that met PG 9.4 and 9.5 between March 4 and May 19 **may be eligible** to be included as **base load in Batch Zero**. However, **TSP notified of potentially invalid studies** and restudy may be needed for base load. Otherwise studied load. (6.3 GW)

2c LLIS projects that met PG 9.4 and 9.5 between March 4 and May 19 **may be eligible** to be included as base load in Batch Zero. Study validity under ERCOT review. (3.1 GW)

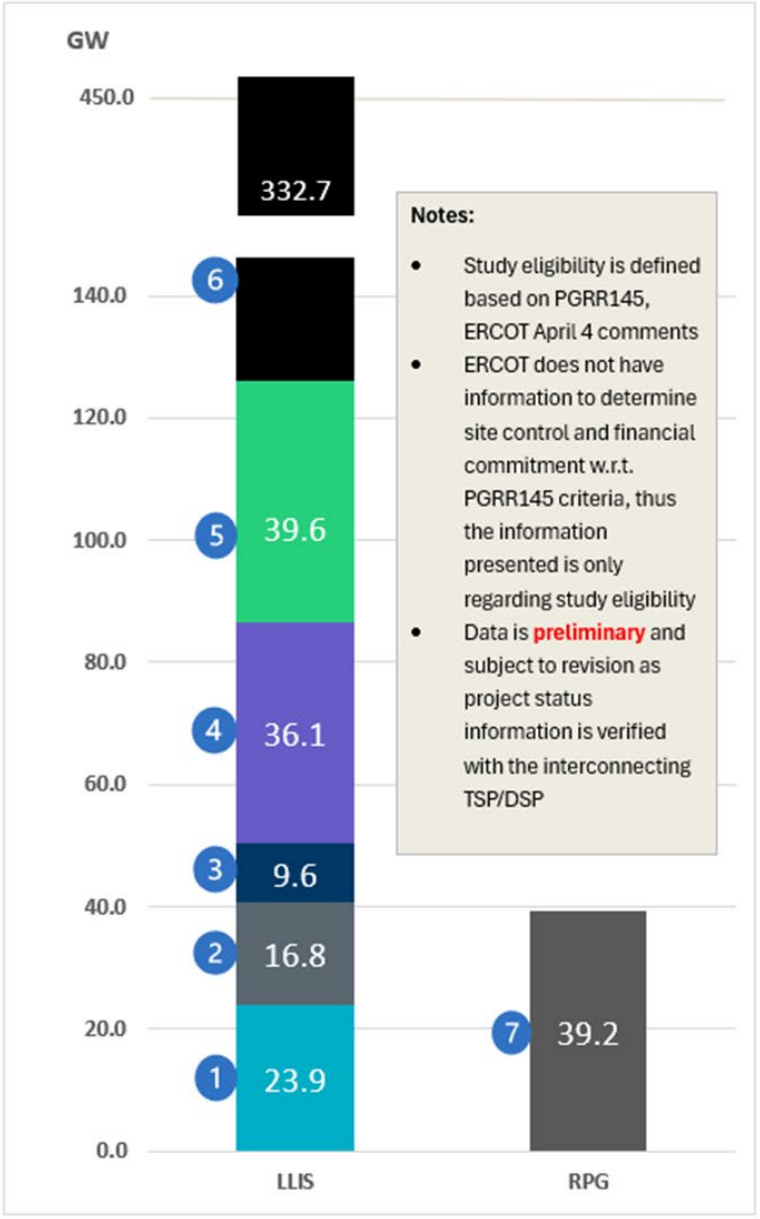
3 LLIS projects that have met PG 9.4 but not 9.5
- Eligible to be included as **studied load in Batch Zero**
- **May be** eligible to be included as **base load in Batch Zero** if meet PG 9.5 by July 10 but must have studies checked for validity

4 LLIS projects that have not met PG 9.4 but have at least one study complete, thus are eligible to be included as **studied load in Batch Zero**
- **May be** eligible to be included as **base load in Batch Zero** if meet PG 9.4 and PG 9.5 by July 10 but must have studies checked for validity

5 LLIS projects that have studies started but none completed
- May be eligible to be included as **studied load in Batch Zero** if a study is completed
- **May be** eligible to be studied as **base load in Batch Zero** if meet PG 9.4 and 9.5 by July 10 but must have studies checked for validity

6 LLIS projects that do not have studies started. **Unlikely to be included in Batch Zero** unless studies are started and completed by July 10

7 Large Loads included in approved RPG studies. These are eligible to be included as **base load in Batch Zero but may have studies checked for validity**. Some of these may already be included in the LLIS column. ERCOT will verify **potential duplication in the LLIS column** in the near future.



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ERCOT sequentially evaluates legacy interconnection studies based on timing to determine eligibility for treatment as base load

Source: RPG, LLIS

Process for evaluating study validity for loads that qualify after March 4

Step 1: Date ordered list

- RPG A – Loads 1&2 (Apr 15, 2026)
- LLIS – Load 1 (Apr 28, 2026)
- 1
  - RPG B – Load 1 (May 3, 2026)
  - LLIS – Load 2 (May 3, 2026)
- RPG C – Loads 1, 2, 3 (Jun 10, 2026)
- LLIS – Load 3 (Jun 22, 2026)
- LLIS – Load 4 (Jul 8, 2026)

Step 2: Sequential Evaluation

- ✓ RPG A – Loads 1&2 (Apr 15, 2026)
- ✓ LLIS – Load 1 (Apr 28, 2026)
- ✓ RPG B – Load 1 (May 3, 2026)
- ✗ LLIS – Load 2 (May 3, 2026)
- ✓ RPG C – Loads 1, 2, 3 (Jun 10, 2026)
- ✗ LLIS – Load 3 (Jun 22, 2026)
- ✓ LLIS – Load 4 (Jul 8, 2026)

Key Takeaways

- **Study validity check is necessary to ensure loads classified as base load do not exceed transmission system reliability limits**
- **Loads with a milestone date[1] on or before March 4, 2026 that meet the criteria in Section 9.2.1.4(3) are considered to have valid studies** with no additional evaluation
- **ERCOT orders remaining loads sequentially by milestone date to evaluate legacy interconnection studies**
  - 1 **If two loads share the same date, ERCOT applies pathway-based tie-breakers** (e.g., RPG-based loads prioritized over LLIS, then submission timing)
- **Earlier loads are validated first**; subsequent ones remain valid only if previously validated loads are either outside the study area or included in the study

1. Milestone date reflects the date the load meets the applicable criteria under Section 9.2.1.4 (e.g., RPG endorsement date or date legacy LLIS and interconnection agreement requirements are satisfied)

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PCLR and WLPUN frameworks expand Batch Zero through flexible-load and generation-backed interconnection pathways

PCLR and WLPUN introduce optional pathways and provide ILLEs additional flexibility in how large loads are interconnected and operated

Path of PGRR145 and NPRR1325 towards governance approval

1 → 2 → 3

1 Core Batch Zero architecture established

- PGRR145
- NPRR1325

March 4: ERCOT filed PGRR145 and NPRR1325

Establishes foundational framework for Batch Zero execution and LLI processing

2 PCLR framework integration

- PGRR145
  - PCLR comments
- NPRR1325
  - PCLR comments

April 17: PCLR introduced as modular enhancement via comments to PGRR145 / NPRR1325

Enables early shaping of controllable load pathway without delaying core filing

3 WLPUN framework integration

- PGRR145
  - PCLR comments
  - WLPUN comments
- NPRR1325
  - PCLR comments
  - WLPUN comments

May 2: WLPUN introduced as modular enhancement via comments to PGRR145 / NPRR1325

Enables integration of generation-backed load pathway without delaying core filing

What PCLR[1] and WLPUN[2] enable

PCLR

Operationalizes flexible large-load participation

- Embeds controllable load directly into ERCOT SCED and dispatch frameworks
- Allows partial firm service ahead of full transmission buildout
- Creates a pathway for reliability-aware curtailment and congestion management

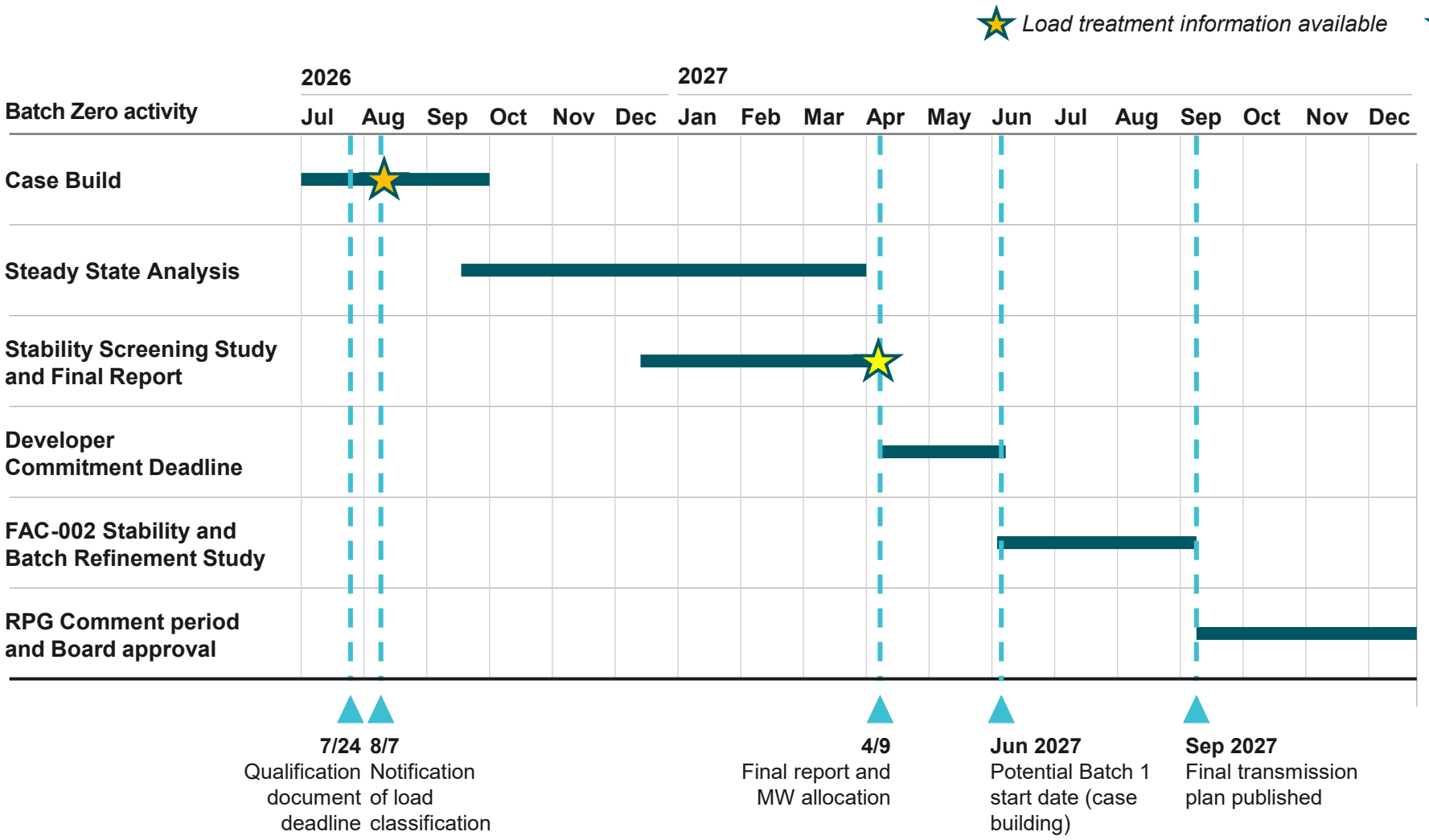
WLPUN

Enables generation-backed load growth

- Allows co-located generation and load to operate behind enforceable MW withdrawal limits
- Reduces incremental transmission dependency by netting on-site generation against load
- Supports higher load growth through enforceable MW limits

1. Provisional Controllable Load Resource | 2. Withdrawal-Limited Private Use Network

Batch Zero implementation timeline spans from Jul-2026 through Sep-2027 across study, commitment, and refinement phases



Key Highlights

- **~8 months from classification to MW allocation:** ERCOT progresses from load classification (Aug-2026) through system-wide study analysis to preliminary MW allocations (Apr-2027)
- **~13 months to final transmission planning:** Batch Zero continues through refinement studies and RPG review before final transmission-plan publication (Sep-2027)

Source: ERCOT PGRR145, ERCOT NPRR1325

Next steps: Batch Zero transitions into implementation through phased stakeholder onboarding and qualification activities

May 15

Batch Zero Readiness Kickoff/Meeting 1

ERCOT walks stakeholders through Batch Zero deadlines, submission processes, attestations, and required forms to prepare ILLEs and T(D)SPs for implementation

Board Approval- Early June

ERCOT documentation release

ERCOT officially distributes all documentation to ILLEs and T(D)SPs; and validate as documents are submitted

July 10

Study and model submission deadline

LL projects not submitting models and required information by this deadline will be excluded from Batch Zero

July 24

Final eligibility submission deadline

TSPs/DSPs must submit all required qualification materials (e.g., attestations, disclosures, financial security confirmations, dynamic data determinations) to ERCOT

Aug 7

Batch Zero classification notifications

ERCOT notifies ILLE of any identified deficiencies in submitted models or required information

Aug 31

Batch Zero final inclusion notification

Any LL projects with incomplete data or unresolved model issues remaining after this date will also be excluded from Batch Zero

Weekly Stakeholder Readiness meetings

Key stakeholder positions raised at 5/19 TAC and related ERCOT considerations

Topic	Stakeholder position	ERCOT considerations
RPG-backed load eligibility	**Extend the March 4, 2026 RPG endorsement cutoff so certain RPG-backed projects can retain Base Load treatment** and associated transmission capacity already planned for those projects	**Extending the RPG cutoff would require revalidation of previously approved LLIS studies and potential re-ranking of projects already deemed valid**, reducing certainty for existing projects
Flexible-load eligibility carveout	**Create a narrow "studied and allocated" eligibility pathway for certain mature seam-boundary projects[1] delayed by legacy TSP coordination issues**, particularly where projects elect flexible WLPUN or PCLR structures	**Even narrow eligibility expansion increases Batch Zero scope and study complexity**: additional eligibility expansion could impact Batch Zero scope, study timelines, and execution complexity
Treatment of PURA §39.169 net-metering arrangements	**Allow certain mature 2028 NMA projects to participate as "studied and allocated" loads to avoid transition-period delays** and align with SB6 implementation timelines	**Additional Batch Zero expansion could increase study complexity and execution risk;** dedicated NMA provisions were already incorporated into PGRR145

1. Projects located near boundaries between investor-owned utilities and cooperatives/municipal utilities, where interconnection responsibility and study sequencing created coordination challenges