



PGRR144: ERCOT Responses and Additional Revisions

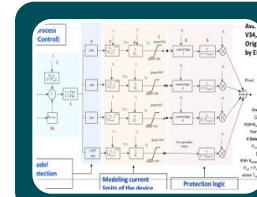
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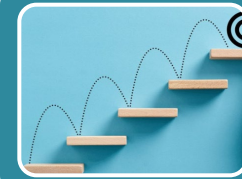
June 2026

Background

- ERCOT submitted [PGRR144](#) (*Dynamic Model Submission and Review Requirements for Large Loads including Large Electronic Loads*) in Feb 2026 and is currently under stakeholder review process
- ERCOT received various stakeholders' comments and submitted a response and further edits to PGRR144 on April 8 and May 5
- In response to DCC's comments on June 5, ERCOT submitted a response and edits to PGRR144 on June 11, 2026



Clarifies dynamic data requirements and require model quality test



Clarifies LL dynamic model data submission milestones for review



Clarifies process for potential material changes to the existing LELs

Comment 1: Clarification on model quality test and compliance requirement for non-LCL in Section 6.2(6)

Stakeholder Comments:

- DCC proposed clarifying the non-LCL large voltage disturbance test
- DCC proposed that for non-LCL, ERCOT evaluate based on the test whether the submitted model reasonably reflects the facility's voltage disturbance response characteristics
- DCC also proposed that, for non-LCL, the test is not intended as a ride-through compliance demonstration

ERCOT Response:

- On the compliance point, ERCOT generally agrees with the concept but does not believe that compliance language belongs in this section because Section 6.2(6) addresses model data and model quality testing requirements, while compliance requirements are addressed elsewhere
- On the model evaluation point, ERCOT did not accept the proposed language because ERCOT cannot determine from the review whether a submitted model actually reflects the facility's characteristics
- ERCOT partially accepted DCC proposal. ERCOT clarified that, for non-LCLs, the test is intended to understand the facility's voltage disturbance response characteristics, while retaining the expectation for accurate dynamic model data.

Comment 2: Replace "ILLE" with "LCL" in Section 9.2.1.1 and 9.6(1)(f)

Stakeholder Comments:

- DCC proposed to replace "ILLE" with "LCL" since the processes are related to the existing customer, not an entity that wants to interconnect to the grid.

ERCOT Response:

- ERCOT replaced "ILLE" with "Entity" in Section 9.2.1.1 to address DCC's comment and clarify that the review process applies to the party proposing the modification.
- ERCOT retained "ILLE" in Section 9.6(1)(f) because that provision applies to a LCL prior to Initial Energization and therefore remains within the Large Load interconnection process

Comment 3: Replace "modification" with "update," rename Section 9.2.1.1 title, and remove ERCOT's rejection authority in Section 9.2.1.1

Stakeholder Comments:

- DCC proposed to replace "modification" with "update" throughout Section 9.2.1.1 and rename the section title to "Review of Existing Large Computational Load Model Updates."
- DCC also proposed to remove ERCOT's proposed ability to reject a change for an existing, energized business in Texas.

ERCOT Response:

- ERCOT did not accept those proposals.
- First, ERCOT retained the term 'modification' because it is already used consistently throughout PG 9 and PGRR145. It does not carry any generation specific meaning
- Second, ERCOT retained review authority because this section applies to proposed future modifications before implementation, not to an LCL's existing operations. If the proposed modification is not approved, the LCL can continue operating under its current configuration
- Finally, ERCOT retained the three-outcome review structure because it provides a clear and actionable result from the review process. However, ERCOT revised the rejection criterion to provide a clearer basis for when a modification may be rejected

Comment 4: Change review standard and remove approval language in Section 9.6(1)(f)

Stakeholder Comments:

- DCC proposed changing ERCOT's review from evaluating impacts on the previous stability study to simply determining whether the LCL complies with NOG Section 2.15.
 - "is expected to adversely impact the results from the previous stability study"
- DCC also proposed removing the approval language in Section 9.6(1)(f)
 - "the submission is approved, or if additional information is required."

ERCOT Response:

- First, compliance with NOG Section 2.15 does not necessarily mean the LCL behaves the same way it was assumed to behave in the previous stability study. Changes in behavior, such as post-fault reconnection, could affect the study results even if the LCL remains compliant
- Therefore, ERCOT retained the review standard of determining whether updated dynamic data could adversely impact the results of the previous stability study. This is also consistent with the approach adopted in PGRR145
- Second, ERCOT retained the approval language because Section 9.6(1)(f) serves as a pre-energization checkpoint. Removing it would eliminate a clear review outcome before Initial Energization

Next Step

- ERCOT appreciates stakeholders' support and constructive feedback on the updated PGRR144 and looks forward to the July ROS vote

Question?

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