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Filed Date - 2026-10-20 08:36:26 AM

Control Number - 60410

Item Number - 1

CONFIDENTIAL-FILING MEMORANDUM

TO: Commission Staff

FROM: Mesquite H2, LLC (“Mesquite H2”)

DATE: 10/19/2026

RE: PUC Docket No. _____, *Mesquite H2, LLC’s Complaint and Appeal of Decisions of the Electric Reliability Council of Texas and Request for Good Cause Exception to Expedite Proceedings*

In PUCT Docket No. _____, Mesquite H2 designates the following filing as partially protected material: Mesquite H2, LLC’s Complaint and Appeal of Decisions of the Electric Reliability Council of Texas and Request for Good Cause Exception to Expedite Proceedings and related attachments. This document contains Mesquite H2’s confidential and protected information.

The following pages are redacted for the reasons stated below:

- Bates-stamped pages 000029 – 000036; 000055 – 000172
 - Disclosure of the redacted information would reveal non-public confidential Batch Zero Load information.
- Bates stamped pages 000037 – 000054
 - Disclosure of the redacted information would reveal confidential settlement negotiation information.

The information qualifies as protected material because it constitutes non-public confidential information related to Mesquite H2’s Batch Zero Load information and settlement negotiations.

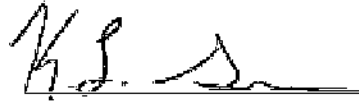
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Mesquite H2 acknowledges that the confidential filing status of this document may be subject to challenge by another party in the proceeding or by the presiding officer.



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PUC DOCKET NO. ____

MESQUITE H2, LLC'S COMPLAINT AND APPEAL OF	§ § § § §	PUBLIC UTILITY COMMISSION OF TEXAS
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**MESQUITE H2, LLC'S COMPLAINT AND APPEAL OF DECISIONS OF THE
ELECTRIC RELIABILITY COUNCIL OF TEXAS AND REQUEST FOR GOOD
CAUSE EXCEPTION TO EXPEDITE PROCEEDINGS**

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PUC DOCKET NO. ____

MESQUITE H2, LLC'S COMPLAINT	§	PUBLIC UTILITY COMMISSION
AND APPEAL OF	§	
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	§	OF TEXAS
	§	

**MESQUITE H2, LLC'S COMPLAINT AND APPEAL OF DECISIONS OF THE
ELECTRIC RELIABILITY COUNCIL OF TEXAS AND REQUEST FOR GOOD
CAUSE EXCEPTION TO EXPEDITE PROCEEDINGS**

TO THE HONORABLE CHAIRMAN AND COMMISSIONERS OF THE PUBLIC
UTILITY COMMISSION OF TEXAS:

Pursuant to 16 Tex. Admin. Code ("TAC") § 22.251, Mesquite H2, LLC ("Mesquite") files this complaint and appeal challenging the Electric Reliability Council of Texas, Inc.'s ("ERCOT") decision to classify Mesquite's Batch Zero load, BZ-17 (the "Mesquite Project"), as studied load rather than base load. Mesquite is an Interconnecting Large Load Entity ("ILLE") that is developing the Mesquite Project, a data center load that has been assigned the Batch Zero classification number BZ-17. South Texas Electric Cooperative, Inc. ("STEC") is the Interconnecting Transmission Service Provider ("TSP") for the Mesquite Project. ERCOT issued the classification notice on September 3, 2026, stating that Mesquite had not satisfied Planning Guide Sections 9.4 and 9.5, now renumbered as Sections 9.9 and 9.10, but did not identify the specific alleged deficiency.¹

Mesquite timely disputed the classification on September 9, 2026, under Planning Guide Section 9.3.1(2)(a).² ERCOT met with Mesquite and STEC on September 14, 2026, and denied

¹ Attachment A.

² Attachment B.

the dispute, while waiving the Alternative Dispute Resolution (“ADR”) process described in ERCOT Protocols Section 20.³

Mesquite requests that the Commission reverse ERCOT's decision and direct ERCOT to classify the Mesquite Project as Batch Zero base load under Planning Guide Section 9.2.1.1(1)(e). In the alternative, Mesquite requests a good cause exception excusing any delay by the TSP in providing ERCOT with a separate Section 9.4 and 9.5 confirmation e-mail and the same classification relief. Because continued treatment as studied load will cause material and potentially irreversible harm, Mesquite also requests a good cause exception to the procedural requirements of 16 TAC § 22.251 as necessary for expedited resolution of this appeal.

This complaint and appeal is timely because it is filed within thirty-five days of ERCOT's September 14, 2026 denial.

I. EXECUTIVE SUMMARY

By July 10, 2026, Mesquite satisfied all the requirements of Planning Guide Section 9.4 (now Section 9.9), as ERCOT had approved all the studies required under the legacy Large Load Interconnection Study (“LLIS”) process by that date. By that same date, Mesquite also satisfied the requirements of Planning Guide Section 9.5 (now Section 9.10), including: executing a facilities extension agreement with STEC, which satisfied the requirement to execute an interconnection agreement or equivalent service extension agreement; providing the required written acknowledgment to notify STEC of certain changes in the Large Load project information; providing notice to proceed; and posting the required financial security. Despite Mesquite's timely satisfaction of the Planning Guide Section 9.4 and 9.5 criteria and STEC's timely submission of Mesquite's qualification materials, ERCOT's September 3, 2026 classification notice stated that

³ Attachment C.

Mesquite had been classified as studied load because Mesquite had not met the Section 9.4 and 9.5 criteria, without specifying why.⁴ Mesquite subsequently learned that ERCOT is taking the position that a Section 9.4 and 9.5 TSP confirmation must have been separately e-mailed to LargeLoadInterconnection@ercot.com by July 10, 2026, in order for an ILLE to be included in Batch Zero as base load.⁵

To begin, ERCOT's denial of base load classification is not clearly supported by a reading of the ERCOT Planning Guide, which depends on a series of cross-references within that Guide: Section 9.2.1.1(1)(e)(i) requires ERCOT to determine that a Large Load had a “complete and valid” set of interconnection studies by July 10, 2026; Section 9.2.1.4(4)(a)(ii)(B) explains when legacy LLIS studies qualify as complete and valid; and ERCOT interprets that provision as importing Section 9.5(1)(a)'s TSP-confirmation requirement and an unstated July 10 deadline for that confirmation. But neither Section 9.5(1)(a) nor Section 9.2.1.1(1)(e)(i) expressly imposes such a deadline. By contrast, where the Planning Guide requires notice to ERCOT by a specific date, it says so expressly. STEC nevertheless provided written confirmation to ERCOT on July 24, 2026. Reading an unstated confirmation deadline into these provisions is not a reasonable construction of the Planning Guide and would penalize Mesquite based on a timing requirement the Guide never clearly states.

Second, ERCOT's denial relies on a deadline requirement not referenced in any of ERCOT's Batch Zero readiness materials. Those materials identified July 10, 2026, as the deadline for ERCOT study approvals and ILLE submissions to their Interconnecting TSP or DSP, and July 24, 2026, as the deadline for TSPs and DSPs to submit complete Batch Zero eligibility

⁴ Attachment A.

⁵ Attachment D.

packages to ERCOT.⁶ ERCOT's guidance further indicated that LargeLoadInterconnection@ercot.com was reserved for legacy interconnection process questions, such as ongoing study reviews and dynamic model submissions, while BatchZero@ercot.com was the channel for Batch Zero eligibility submissions.⁷

Third, ERCOT's denial is unjust as Mesquite met all the required substantive conditions by July 10th. Thus, ERCOT's denial was not based on any failure to complete, submit, or obtain approval of required studies, interconnection agreements, notice to proceed, or financial qualifications, but solely on the timing of STEC's confirmation of requirements being met by Mesquite. Denying base load treatment on that basis elevates form over substance and produces an unjust result untethered to the purpose of the Planning Guide's eligibility requirements.

Mesquite respectfully submits that the Commission find that Mesquite satisfied the Planning Guide Section 9.2.1.1 criteria by the applicable deadlines and that ERCOT erred in classifying Mesquite as studied load rather than base load. In the alternative, to the extent the Commission concludes that a separate Section 9.4 and 9.5 confirmation e-mail to LargeLoadInterconnection@ercot.com was required by July 10, 2026, Mesquite requests that the Commission grant a good cause exception excusing any delay in that notice. Mesquite additionally requests that the Commission act expeditiously and grant a good cause exception to the procedural timelines in 16 TAC § 22.251.

⁶ Attachment F - See slides 3, 6, 7, 10, 12, 13, 17, and 18. Some slides have been modified with red boxing for the reader. See also Attachment F at questions 20, 69, 72, and 95.

⁷ See Attachment F at slide 31 (yellow highlighting added); Attachment F at questions 63 and 75.

II. PARTIES

The names and addresses of Mesquite and its authorized representatives are as follows:

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Mesquite agrees to accept electronic service. Mesquite requests that service of all pleadings be made on each of the above listed individuals.

Mesquite seeks relief against ERCOT. ERCOT's contact information is set forth below:

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Other interested parties include STEC. STEC's authorized representative is:

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III. STATEMENTS REQUIRED BY 16 TAC SECTION 22.251(E)(2)(B)

Pursuant to 16 TAC § 22.251(e)(2)(B), a formal complaint regarding conduct of ERCOT requires the complaint to include certain pieces of procedural and historical statements. Those required materials are as follows:

A. Description of Underlying Proceedings or Related Proceedings.

As discussed previously, on September 9, 2026, Mesquite submitted its dispute over the classification set forth in the September 3, 2026, classification notice of the Mesquite Project as studied load pursuant to Planning Guide Section 9.3.1. On September 14, 2026, ERCOT, STEC, and Mesquite met to discuss the dispute. ERCOT denied Mesquite's Section 9.3.1 dispute on the same day. Mesquite subsequently reached out to ERCOT for an informal discussion, and Mesquite, STEC, and ERCOT met to discuss additional issues relating to the denial on October 2, 2026. On October 6, 2026, ERCOT notified STEC and Mesquite that it had reviewed the Batch Zero dispute and the additional information discussed at the meeting, and ERCOT affirmed its denial of the dispute.

In its denial of the Section 9.3.1 dispute on September 14, 2026, ERCOT waived the ADR process under the ERCOT Protocols. This appeal has been timely filed as required by 16 TAC § 22.251(e) within 35 days of the completion of ERCOT's dispute process.

B. Affected Entities

The affected entities include Mesquite, STEC, and ERCOT. If the Commission grants relief to Mesquite, our understanding is that Mesquite's inclusion as base load will not affect the status of other Loads that have provisionally qualified because the Batch Zero Interconnection Study has not commenced.

C. Description of ERCOT Conduct for Which Relief Is Sought

Mesquite seeks relief from the Commission to direct ERCOT to designate the Mesquite Project as base load that is not subject to additional study in the Batch Zero process consistent with Planning Guide Sections 9.2.1.1(1)(e). In the alternative, Mesquite asks that the Commission grant a good-cause exception excusing any delay in STEC's notice to ERCOT confirming Mesquite's satisfaction of the Planning Guide Sections 9.4 and 9.5 criteria and in conjunction with granting this good-cause exception, Mesquite also asks that the Commission direct ERCOT to designate the Mesquite Project as base load under Planning Guide Section 9.2.1.1(1)(e).

D. Statement of ERCOT Procedures, Protocols, Binding Documents, Bylaws, Articles of Incorporation, or Laws Applicable

Planning Guide Section 9.3.1 allows loads to dispute ERCOT's Batch Zero determinations. Both 16 TAC § 22.251(d) and Section 20 of the ERCOT Protocols require parties complaining of a decision, act, or omission by ERCOT to submit to ADR at ERCOT before initiating a complaint proceeding at the Commission, unless ERCOT agrees to waive ADR. In the instant case, ERCOT waived ADR.

Mesquite alleges that the following Protocols, rules, and statutes are at issue in this matter and were violated by ERCOT or are relied upon in bringing forth this complaint:

PURA § 39.001(c) — Mandates that regulatory authorities and independent organizations treat all market participants in a nondiscriminatory manner.

PURA § 39.151(a) — The independent organization must ensure access to the transmission and distribution systems for all buyers and sellers of electricity on nondiscriminatory terms.

PURA § 39.151(d) — An independent organization certified by the Commission is directly responsible and accountable to the Commission. The Commission has complete authority to oversee and investigate the organization's finances, budget, and operations as necessary to ensure the organization's accountability and to ensure that the organization adequately performs the organization's functions and duties.

PURA § 39.151(g-6) — Provides that ERCOT'S protocols and rules remain subject to the Commission's oversight and review.

16 TAC § 22.5(b) — Authorizes the Commission to grant exceptions to any requirements of the chapter, including the procedural timelines of 16 TAC § 22.251.

16 TAC § 22.251 — Prescribes the procedure by which an entity, including the commission staff and the Office of Public Utility Counsel, may appeal a decision made by ERCOT.

16 TAC § 25.3(b) — Authorizes the Commission to make exceptions to Chapter 25 for good cause.

16 TAC § 25.361(b) — ERCOT shall perform the functions of an independent organization under the Public Utility Regulatory Act (“PURA”) § 39.151 to ensure access to the transmission and distribution systems for all buyers and sellers of electricity on nondiscriminatory terms and to ensure the reliability and adequacy of the regional electrical network.

16 TAC § 25.361(b)(16) — Requires ERCOT to perform any additional duties required under Chapter 25, Commission orders, and ERCOT rules.

16 TAC § 25.503(f)(2)(C) — Provides that a market participant may be excused from compliance with ERCOT instructions or Protocol requirements for other good cause, for so long as the condition continues.

Planning Guide Section 9.2.1.1 — Provides the criteria for inclusion in Batch Zero as base load not subject to additional study, including the requirement that a Large Load have complete and valid interconnection studies.

Planning Guide Section 9.2.1.4 — Establishes the process by which ERCOT evaluates existing interconnection studies for Large Loads and determines, in consultation with the Interconnecting DSP and/or TSP, whether those studies are complete and valid for purposes of Batch Zero eligibility.

Planning Guide Section 9.3.1 — Provides the overview, procedures, and timelines governing the Batch Zero interconnection study process, including ERCOT's evaluation and study of qualifying Large Loads.

Planning Guide Sections 9.4 and 9.5 (now Sections 9.9 and 9.10) — Sets forth ERCOT's legacy study and pre-energization requirements for Large Loads, including requirements related to the execution of an interconnection or equivalent service extension agreement, written acknowledgment of load modification obligations, notice to proceed, and financial security, that an ILLE and Interconnecting TSP must satisfy before ERCOT can approve Initial Energization.

E. Statement of Whether Complainant Used the Applicable ERCOT Procedures for Challenging or Modifying the Complained-of Conduct

Mesquite disputed ERCOT's determination pursuant to Planning Guide Section 9.3.1; ERCOT denied the dispute. ERCOT subsequently waived ADR.

F. Statement Related to Suspension

Mesquite is not requesting that the Commission suspend ERCOT's decision while this case is pending.

G. Statement on Jurisdiction

The Commission has jurisdiction over this matter under PURA § 39.151(d-4)(6), which authorizes the Commission to resolve disputes between ERCOT and persons affected by ERCOT's acts or omissions. PURA § 39.151 provides the Commission with complete oversight authority over ERCOT and ERCOT's administration of the Protocols adopted in furtherance of PURA and Commission Rules. The Commission also has jurisdiction under 16 TAC § 22.251, which specifies the procedure by which an entity may appeal a decision by ERCOT.

IV. STATEMENT OF ISSUES

Under 16 TAC § 22.251(e)(2)(C), a complainant must provide “a detailed and specific statement of all issues or points presented for commission review.” Accordingly, Mesquite presents the following issues to the Commission:

- 1) Did the Planning Guide require that a confirmation email by the TSP regarding ILLE requirements of Sections 9.4 and 9.5 be separately submitted by July 10, 2026, in order for an ILLE to be classified as base load in Batch Zero?
- 2) Did ERCOT's own Batch Zero guidance require that a Planning Guide Section 9.4 or 9.5 confirmation be separately submitted to LargeLoadInterconnection@ercot.com by July 10, 2026, in order for an ILLE to be classified as base load in Batch Zero?
- 3) If the Commission determines that STEC was required to separately notify ERCOT by July 10, 2026, of Mesquite's satisfaction of Sections 9.4 and 9.5, does

good cause exist under 16 TAC § 25.503(f)(2)(C) or otherwise to excuse that notice being delayed until July 24, 2026 when all substantive requirements were timely met?

- 4) Did ERCOT treat other large loads in a manner consistent with its treatment of the Mesquite Project with respect to the Section 9.4 and 9.5 notification requirement?

V. STATEMENT OF FACTS

Under 16 TAC § 22.251(e)(2)(D) a complainant must provide a statement of facts without argument. Mesquite presents the following:

Mesquite is developing a data center load, the Mesquite Project, which has been designated as BZ-17 in Batch Zero. STEC is the Interconnecting TSP for the Mesquite Project.

ERCOT approved the steady state study on May 20, 2026, the short circuit study on June 23, 2026, and the dynamic stability study on July 10, 2026. Thus, the Mesquite Project satisfied the study requirements under Planning Guide Section 9.4 by July 10, 2026. By that same date, Mesquite also satisfied the requirements of Planning Guide Section 9.5 (which was renumbered to Section 9.10 on July 11, 2026), as follows:

- **Interconnection Agreement or Equivalent Service Extension Agreement.** STEC and Mesquite executed a facilities extension agreement, consistent with the requirement in Planning Guide Section 9.10.1(1)(a)(i) to execute all required interconnection agreements or equivalent service extension agreements with the Interconnecting TSP.⁸
- **Written Acknowledgment.** Mesquite provided STEC with written acknowledgment of its obligations to notify STEC of changes to the Large Load

⁸ Attachment G.

project information or to the load composition, technology, or parameters as described in Planning Guide Section 9.2.3, and to maintain load consumption at or below the levels of peak demand established in its Load Commissioning Plan, consistent with Planning Guide Section 9.5.1(1)(a)(ii).⁹

- **Notice to Proceed.** Mesquite provided STEC with notice to proceed with the construction of all required interconnection facilities, as required under Planning Guide Section 9.5.1(1)(a)(iii).¹⁰
- **Financial Security.** Mesquite provided STEC with the required financial security, applicable payments, and agreements required to fund all required interconnection facilities, consistent with Planning Guide Section 9.5.1(1)(a)(iv).¹¹

On July 24, 2026, STEC submitted Mesquite's Batch Zero qualification materials via upload to a shared link which ERCOT provided for that purpose, and STEC e-mailed BatchZero@ercot.com confirming that “STEC has uploaded the Batch Zero Submission for BZ-17 to the provided shared folder.”¹² The materials uploaded by STEC included the Load Information Form (“LIF”) for the Mesquite load. In that form, STEC selected “LLIS Only” as the study path used to establish the load levels and schedule in the Load Commissioning Plan, indicating that Mesquite had fulfilled the legacy study requirements under Planning Guide Sections 9.4 and 9.5.¹³

STEC also confirmed that the Mesquite load had a “complete and valid interconnection study determination,” that Mesquite had provided the required written acknowledgment, that

⁹ Attachment II.

¹⁰ Attachment I.

¹¹ Attachments J, K and L.

¹² Attachment M.

¹³ Attachment N.

Mesquite had issued notice to proceed, and that Mesquite had provided the required financial security.¹⁴

On September 3, 2026, ERCOT notified STEC, and STEC in turn notified Mesquite, that Mesquite had been classified as studied load rather than base load because Mesquite had purportedly not met the criteria in Planning Guide Sections 9.4 and 9.5.¹⁵

VI. ARGUMENT

A. Mesquite Timely Satisfied Planning Guide Sections 9.4 and 9.5, and STEC Timely Submitted Mesquite's Batch Zero Qualification Materials to ERCOT

By July 10, 2026, Mesquite satisfied all the requirements of Planning Guide Section 9.4 (now Section 9.9): ERCOT approved the steady state study on May 20, 2026, the short circuit study on June 23, 2026, and the dynamic stability study on July 10, 2026.¹⁶ By that same date, Mesquite also satisfied the requirements of Planning Guide Section 9.5 (now Section 9.10), including executing a facilities extension agreement with STEC¹⁷, providing STEC with the required written acknowledgment¹⁸, providing STEC with notice to proceed with construction of all required interconnection facilities¹⁹, and providing STEC with the required financial security and related agreements²⁰. On July 24, 2026, STEC submitted Mesquite's complete Batch Zero qualification package to ERCOT by uploading it to a shared folder link that ERCOT had provided for that purpose, and STEC separately e-mailed BatchZero@ercot.com to confirm the submission.²¹

¹⁴ Attachments M and N.

¹⁵ Attachment A.

¹⁶ Attachment O.

¹⁷ Attachment G.

¹⁸ Attachment H.

¹⁹ Attachment I.

²⁰ Attachment J, Attachment K, and Attachment L.

²¹ Attachment M.

As laid out below, there is nothing in the Planning Guide that required STEC to additionally e-mail a Section 9.4 or Section 9.5 confirmation to LargeLoadInterconnection@ercot.com by July 10, 2026, as a condition of Batch Zero base load classification. Nor is there anything from ERCOT's own guidance, including its July 9, 2026 Batch Zero readiness workshop and Batch Zero FAQs that directed a July 10, 2026 deadline for this task. Finally, as there is no dispute that Mesquite met the underlying requirements of Planning Guide Section 9.4 and 9.5, denial of base load treatment based on the timing of a TSP confirmation would be unjust.

1. Planning Guide Language Itself Not Clearly Establish a July 10 TSP Confirmation Deadline for Batch Zero Eligibility

To begin, ERCOT's stated basis for denying base load classification rests on a specific chain of cross-references in ERCOT's Planning Guide:

(1) Section 9.2.1.1(1)(e)(i) requires ERCOT to have determined that Mesquite has a “**complete and valid set of interconnection studies**,” as of July 10, 2026, under Section 9.2.1.4;

(2) Section 9.2.1.4(4)(a)(ii)(B), part of 9.2.1.4, *Evaluation of Existing Interconnection Studies for Large Loads*, describes whether ERCOT will consider certain previous studies to be “complete and valid” for Large Loads that have not yet energized and provides two paths within 9.2.1.4(4)(a)(ii) under subsections (A) **or** (B) under which a Large Load can be deemed to have complete and valid studies; (B) is the path under which a Large Load satisfied the study requirements in the legacy LLIS process pursuant to “Section 9.9 and Section 9.10...on or before July 10, 2026”; and

(3) ERCOT reads that cross-reference of 9.2.1.4(4)(a)(ii)(B) as importing the legacy Section 9.5(1)(a) requirement that the TSP must affirmatively confirm to ERCOT that the ILLE has satisfied Section 9.5, not merely that the compliance occurred by July 10. Furthermore, **no such confirmation requirement** appears in the legacy Planning Guide Section 9.4, so a TSP

confirmation should not be interpreted as a requirement to satisfy the legacy study requirements in Section 9.4. Furthermore, ERCOT would not need an Interconnecting TSP or DSP to provide notification that an ILLE has met the study requirements in Section 9.4 because ERCOT itself is responsible for approving the studies required under Section 9.4.

Neither Section 9.4 nor Section 9.5(1)(a) contains a July 10, 2026 deadline, or any deadline for that matter, so the reader also has to carry the deadline to this section for the daisy chain to work. That reading is not compelled by the text. Where the drafters intended to impose deadlines by which notice must be provided to ERCOT, they said so expressly and repeatedly — subsections (ii) through (viii) of Section 9.2.1.1(1)(e) each independently state “[o]n or before July 24, 2026, the Interconnecting DSP or Interconnecting TSP has informed ERCOT” of a specific attestation. Subsection (i) contains **no** comparable date or notice language at all— that effort was left to Section 9.2.1.4(4)(a)(ii)(B), *a provision written to describe how ERCOT validates historical study completeness, not to create an independent notice deadline*. STEC in fact transmitted written confirmation of Mesquite's compliance to ERCOT on July 24, 2026.²² Reading an unstated, non-parallel confirmation deadline into subsection Section 9.2.1.1(1)(e)(i) — when the drafters evidently knew how to include deadlines and chose not to for that subsection — is not a reasonable construction of the Planning Guide. Penalizing Mesquite on that basis would hold Mesquite to a timing requirement that neither Section 9.2.1.1 **nor** Section 9.2.1.4 **nor** Section 9.5(1)(a) ever straightforwardly stated.

Furthermore, while ERCOT's position to establish a July 10 deadline eventually flows down to Section 9.5(1)(a), Section 9.5(1) specifically directs that ERCOT “**shall not allow Initial Energization**” until it receives confirmation from the interconnecting TSP that certain

²² Attachment M.

prerequisites have been satisfied. By its plain language, therefore, Section 9.5.1(1)(a) governs ERCOT's authorization of Initial Energization, *not* whether a Large Load has satisfied the requirements for inclusion in Batch Zero. ERCOT's reading effectively transforms a provision governing future Initial Energization into a retroactive prerequisite for Batch Zero eligibility. Nothing in Section 9.5.1(1)(a) suggests that the timing of a TSP's confirmation determines whether a project qualifies for Batch Zero treatment. (No provision in PGRR 145 compels this interpretation either.) Rather, the provision simply prohibits ERCOT from authorizing Initial Energization until the specified confirmations have been received. Because Initial Energization was not imminent, the absence of a confirmation letter by July 10 had no practical bearing on ERCOT's ability to comply with Section 9.5.1(1)(a).

2. ERCOT's Batch Zero Guidance Did Not Clearly Establish a July 10 TSP Confirmation Deadline for Batch Zero Eligibility

Neither PGRR 145 nor ERCOT's Batch Zero guidance indicated that, by July 10, 2026, the Interconnecting TSP or DSP had to separately notify ERCOT at LargeLoadInterconnection@ercot.com that the ILLE had satisfied the Planning Guide Section 9.4 or Section 9.5 requirements. Under Planning Guide Section 9.2.1.4(4)(a), ERCOT includes a Large Load for consideration in the ranking process for "complete and valid studies" if (i) the Interconnecting TSP has, by July 24, 2026, determined the dynamic data submitted by the ILLE is not expected to adversely impact the results from the previous stability study, and (ii) the Large Load met the requirements of Planning Guide Sections 9.4 and 9.5 on or before July 10, 2026. Mesquite's ILLE-side obligations under Planning Guide Sections 9.4 and 9.5 were satisfied by July 10, 2026, as set forth above, and STEC was required to submit Mesquite's complete Batch Zero eligibility package to ERCOT by July 24, 2026, which it did.

ERCOT's Batch Zero readiness materials confirm this timeline. ERCOT's final Batch Zero readiness workshop, held on July 9, 2026, indicated that July 10 was both the last day for ERCOT to review and approve studies under the legacy process and the deadline for the ILLE to submit required Batch Zero eligibility materials to the Interconnecting TSP or DSP, while July 24 was the deadline for the TSP or DSP to submit complete Batch Zero eligibility packages and supporting materials to ERCOT. ERCOT further stated that the inclusion and treatment of Large Loads in Batch Zero would be determined by the status of qualifying studies as they stood at the end of the day on July 10, 2026, not by whether the TSP or DSP had separately e-mailed confirmation to ERCOT by that date.²³ ERCOT's Batch Zero FAQs and related guidance indicated that LargeLoadInterconnection@ercot.com was the channel for existing LLIS process questions, such as ongoing study reviews, dynamic model submissions, and existing interconnection study coordination, while BatchZero@ercot.com was the channel for submission of completed Batch Zero eligibility packages.²⁴ ERCOT conducted eight multi-hour Batch Zero readiness workshops and released more than 100 formal FAQs, none of which indicated that an Interconnecting TSP or DSP had to send a Section 9.5 confirmation e-mail to LargeLoadInterconnection@ercot.com in order for an ILLE to satisfy the Planning Guide Section 9.2.1.1(1)(e) requirements.

3. Denial of Base Load Classification When all Underlying Planning Guide Requirements Were Met is Removed from Purpose of Planning Guide Section 9

Finally, the unreasonableness of ERCOT's position is underscored by the nature of the alleged deficiency. By July 10, 2026, ERCOT had already reviewed and approved Mesquite's steady-state, short-circuit, and dynamic stability studies, satisfying the requirements of Planning

²³ Attachment F. See slides 3, 6, 7, 10, 12, 13, 17, and 18. Some slides have been modified with red boxing for the reader. See also Attachment F at questions 20, 69, 72, and 95.

²⁴ See Attachment F at slide 31 (yellow highlighting added), and Attachment F at questions 63 and 75.

Guide Section 9.4 (now Section 9.9).²⁵ There is no dispute that ERCOT possessed and approved those studies or was fully aware of their contents. (ERCOT thus did not require notification from STEC that the Mesquite Project had satisfied the Section 9.4 study requirements, because ERCOT itself had approved the studies.) Further, all Planning Guide Section 9.5 (now Section 9.10) requirements (interconnection agreements, acknowledgement by ILLE of obligations, financial security, and notice to TSP to proceed with construction) had all been met. Thus, ERCOT did not deny Mesquite base load treatment because the required substantive conditions had not been met. Instead, ERCOT denied base load treatment based on the timing of a confirmation regarding compliance with the requirements. Under these circumstances, denying Mesquite base load classification imposes an untenable consequence that is removed from the underlying purpose of the Planning Guide's eligibility requirements and is an unjust result.

Because Mesquite met the substantive criteria and STEC complied with ERCOT's published submission process and deadline, ERCOT erred in classifying the Mesquite Project as studied load, and the Commission should direct ERCOT to classify the Mesquite Project as base load not subject to additional study.

B. In the Alternative, Good Cause Exists to Excuse Any Delay in Submitting Confirmation of Mesquite's Compliance with Planning Guide Sections 9.4 and 9.5

To the extent the Commission determines that ERCOT's guidance did in fact require a separate Section 9.4 and/or Section 9.5 confirmation e-mail by July 10, 2026, Mesquite requests, in the alternative, that the Commission grant a good cause exception excusing any delay in providing that notice.²⁶ The Commission "may make exceptions to this chapter for good cause."

²⁵ Attachment O.

²⁶ Mesquite maintains that no confirmation requirement exists in Planning Guide Section 9.4, and there is no textual basis for identifying one in that section. To the extent a confirmation requirement exists in Section 9.5, such confirmation is required only as a prerequisite for approving Initial Energization.

16 TAC § 25.3(b). The Commission has complete authority over ERCOT's operations, and ERCOT's rules remain subject to Commission oversight. PURA § 39.151(d), (g-6). Exercising that authority, the Commission has granted exceptions to 16 TAC § 25.361(b)(16), which requires ERCOT to perform the duties required by its rules, to permit ERCOT to deviate from deadlines in the ERCOT Protocols.²⁷ The Commission has done so for Batch Zero itself, granting ERCOT's request for good cause exceptions to near-term Planning Guide Section 9 deadlines, including ERCOT's own August 7, 2026 classification deadline.²⁸ Additionally, to the extent the notice obligation ERCOT identifies belonged to STEC, 16 TAC § 25.503(f)(2)(C) provides that a market participant may be excused from compliance with ERCOT instructions or Protocol requirements for good cause, among other grounds, for so long as the underlying condition continues. Good cause exists here because Mesquite, in fact, satisfied the substantive Planning Guide Sections 9.4 and 9.5 criteria by July 10, 2026; STEC provided ERCOT with written confirmation of that satisfaction by the July 24, 2026 Batch Zero submission deadline that ERCOT itself established; and Mesquite and STEC relied in good faith on ERCOT's extensive Batch Zero guidance. The Commission has already recognized that Batch Zero deadlines may be relaxed and ILLEs may be afforded an opportunity to cure a deficiency, where doing so serves the integrity of the process rather than undermining it.²⁹

Granting a good cause exception here is also consistent with ERCOT's own recognition, reflected in its July 23, 2026 Market Notice regarding good cause exceptions, that strict application of Batch Zero eligibility criteria may be excused in appropriate circumstances.³⁰ In that notice,

²⁷ Project No. 55999, Order Granting Good Cause Exception at 1 (May 2, 2024).

²⁸ Project No. 59142, Order Granting Good Cause Exceptions at 2 (Aug. 20, 2026).

²⁹ See Project No. 59142, Order Granting Good Cause Exceptions at 2 (Aug. 20, 2026).

³⁰ Attachment P – July 23 Market Notice. Note that Mesquite is exploring submitting a good cause exception request to ERCOT through this same market notice as an alternative route of obtaining relief. Mesquite would reassess whether to move forward on this complaint if ERCOT were to grant a good cause exception pursuant to that Market Notice.

ERCOT stated that it “recognizes that, given the short implementation period for [PGRR 145], there are [ILLEs] that can demonstrate that they substantially meet an eligibility criterion but cannot satisfy a specific element of it.” ERCOT further explained that “[u]nder existing procedures, ERCOT may seek a good cause exception from the [PUCT] to waive application of one or more eligibility requirements in Planning Guide Section 9,” citing 16 TAC §§ 25.3(b) and 25.361(b)(16), and that “[w]hile the exception is pending, ERCOT will provisionally consider the specific criterion as met.”

The Market Notice demonstrates why denying relief to Mesquite would be fundamentally inconsistent with the good-cause process ERCOT itself announced. ERCOT expressly acknowledged that the compressed implementation schedule for PGRR 145 could leave an ILLE that “substantially meet[s] an eligibility requirement” unable to satisfy a particular criterion, and ERCOT represented that it could seek a good cause exception and provisionally treat that criterion as satisfied while the request was pending. Mesquite falls squarely within the circumstances ERCOT described. By July 10, 2026, ERCOT had approved the studies underlying Mesquite's eligibility under Planning Guide Section 9.4 and Mesquite had satisfied every substantive requirement of Planning Guide Section 9.5. The only alleged deficiency concerns the timing and destination of STEC's confirmation that Mesquite had completed those substantive steps - a notice concerning facts ERCOT already possessed and had approved. Mesquite had no reason to request a good cause exception by July 24, 2026, because it had satisfied every requirement it was told applied.

The unfairness is compounded by ERCOT's failure to apply to Mesquite the good-cause process described in the Market Notice. ERCOT now treats the alleged notice defect as sufficiently consequential to deny base load classification to the Mesquite Project, yet ERCOT's Market Notice

specifically contemplated provisional treatment and a Commission good-cause request when an ILLE substantially complied but could not satisfy a discrete eligibility criterion. If ERCOT believed that a separate confirmation to LargeLoadInterconnection@ercot.com was required by July 10, Mesquite was an obvious candidate for the good-cause exception process. Instead, ERCOT neither identified the alleged deficiency in time for Mesquite or STEC to address it, nor sought an exception on Mesquite's behalf; ERCOT first identified the purported deficiency in its September 3, 2026 classification notice, after the relevant deadlines had passed.

Mesquite could not have reasonably requested relief by July 24, 2026. Mesquite had satisfied every substantive requirement that it understood to apply, and STEC submitted written confirmation through ERCOT's designated Batch Zero process by the July 24 deadline established by Planning Guide Section 9.2.1.1 and ERCOT's July 23, 2026 Market Notice that ERCOT's guidance appeared to establish for TSP and DSP submissions. A party cannot reasonably be expected to seek an exception from a requirement that ERCOT had not clearly identified, much less from a deficiency that ERCOT did not disclose until weeks later.

Granting relief would therefore vindicate, not undermine, the integrity of the Batch Zero process. It would not excuse the absence of a required study, agreement, financial commitment, or other substantive qualification; it would excuse, at most, a procedural defect in communicating information that ERCOT already possessed. Mesquite would receive only the treatment which ERCOT publicly represented could be available to ILLEs that substantially satisfied the eligibility requirements. Denying relief here, where no other entity would be prejudiced by granting relief to Mesquite, and where ERCOT's own Planning Guide and Batch Zero guidance was at best, unclear, would elevate form over substance and penalize Mesquite for conduct consistent with ERCOT's

published instructions, and would produce the precise inequity ERCOT's announced good-cause process was intended to prevent.

Mesquite requests that the Commission grant a good cause exception excusing any delay in that notice, given that Mesquite satisfied the underlying substantive requirements on time, ERCOT received written confirmation of that satisfaction by the July 24, 2026 Batch Zero submission deadline, and Mesquite made considerable efforts, including participation in ERCOT's Batch Zero readiness workshops, to comply with ERCOT's published guidance. Because classification as studied load rather than base load will have material and potentially irreversible economic consequences for Mesquite, including jeopardizing Mesquite's project timeline, capacity allocation, and customer commitments, Mesquite also requests that the Commission act expeditiously and grant a good cause exception to the procedural timelines in 16 TAC § 22.251.

VII. STATEMENT OF QUESTIONS OF FACT

16 TAC § 22.251(e)(2)(F) requires a complainant to provide "a statement of all questions of fact, if any, that the complainant contends require an evidentiary hearing." For the reasons addressed above, Mesquite believes that the dispute centers around questions of law, specifically interpretation of ERCOT's Planning Guide, general ERCOT guidance on Batch Zero, and whether a good cause exception is appropriate. Mesquite further believes that facts are likely not in dispute with ERCOT.

VIII. NOTICE

Mesquite will provide notice of this complaint to (i) ERCOT's General Counsel and the Office of Public Utility Counsel pursuant to 16 TAC § 22.251(e)(5)(A) and (C) and (ii) STEC. Mesquite requests that the Commission direct ERCOT to provide notice of this complaint to all

qualified scheduling entities (“QSEs”) and the relevant ERCOT committees and subcommittees pursuant to 16 TAC § 22.251(f).

IX. PROPOSED PROCEDURAL SCHEDULE – GOOD CAUSE EXCEPTION REQUEST

Pursuant to 16 TAC § 22.5, the Commission “may grant exceptions to any requirements in this chapter.” Additionally, 16 TAC § 22.251(l) provides that the “presiding officer may grant a request to extend or shorten the time periods established by the rule for good cause shown.” Good cause is warranted here by the timing sensitivity in this case and the need to grant Mesquite's requested relief before the Batch Zero study process begins. Therefore, Mesquite requests a good cause exception to the timing requirements of 16 TAC § 22.251, including an expedited procedural schedule. Mesquite has conferred with ERCOT and STEC, ERCOT opposing the proposed procedural schedule, and STEC supporting the proposed procedural schedule.

Any delay in this proceeding will cause irreparable harm to Mesquite. Mesquite satisfied the Planning Guide Section 9.4 and 9.5 criteria by July 10, 2026, and STEC timely submitted Mesquite's Batch Zero qualification package by the July 24, 2026 deadline. ERCOT's denial of Mesquite's dispute leaves only a narrow window to resolve this matter before the Batch Zero study process begins. Continued delay will further jeopardize Mesquite's deployment schedule, its contractual commitments to customers, and its finances.

Mesquite's proposed procedural schedule is as follows:

Event	16 TAC § 22.251 Deadline	Requested Deadline
Deadline for ERCOT to provide notice per 16 TAC § 22.251(e)	14 days of receipt of the complaint (November 2, 2026)	November 2, 2026 (14 days of receipt of the complaint)
ERCOT response to complaint	28 days of receipt of the complaint (November 16, 2026)	November 9, 2026 (21 days of receipt of the complaint)
Commission Staff comments, Other parties' responses, and Motion to intervene and intervenor response/comments	45 days after the date the complaint is filed (December 3, 2026)	November 18, 2026 (30 days of receipt of the complaint)
Complainant's reply to a party response or Staff comments; request for evidentiary hearing	55 days after the date the complaint was filed (December 13, 2026)	November 24, 2026 (36 days after the complaint is filed)

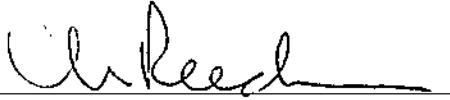
X. CONCLUSION AND PRAYER FOR RELIEF

Mesquite respectfully requests that the Commission (1) find that Mesquite satisfied the Planning Guide Section 9.4 and 9.5 criteria and that STEC timely submitted confirmation of that satisfaction to ERCOT; (2) find that ERCOT violated the Planning Guide by classifying the Mesquite Project as studied load; (3) require ERCOT to reclassify the Mesquite Project in Batch Zero as base load not subject to additional study; (4) in the alternative, grant Mesquite a good cause exception excusing any delay in providing ERCOT with a Section 9.4 and/or Section 9.5 confirmation e-mail and direct ERCOT to classify the Mesquite Project as base load not subject to additional study; (5) grant Mesquite's request for a good cause exception to the procedural timelines of 16 TAC § 22.251, including the expedited procedural schedule set forth above; and (6) grant Mesquite any other relief to which it is justly entitled. Mesquite further requests that the Commission enter its standard form protective order for use in this proceeding.

Dated: October 19, 2026

Respectfully submitted,

HUSCH BLACKWELL LLP

By: 

Chris Reeder

State Bar No. 16692300

Katherine Lengieza Gross

State Bar No. 24065610

Holly Heinrich

State Bar No. 24109990

Markel Perkins

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111 Congress Avenue, Suite 1400

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Chris.Reeder@huschblackwell.com

Katherine.Gross@huschblackwell.com

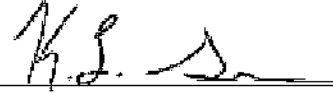
Holly.Heinrich@huschblackwell.com

Markel.Perkins@huschblackwell.com

ATTORNEYS FOR MESQUITE H2, LLC

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this pleading has been forwarded by electronic mail to all parties of record on the 19th day of October, 2026.

A handwritten signature in black ink, appearing to read 'K.L. Gross', is written over a horizontal line.

Katherine Lengieza Gross

AFFIDAVIT

STATE OF ILLINOIS

COUNTY OF COOK

Before me, the undersigned notary public, this day personally appeared Scott Baron, to me known, who being duly sworn according to law, deposes and says:

- 1) "My name is Scott Baron, I am of legal age and a resident of the State of Illinois. I am competent to make the following statements on behalf of Mesquite H2, LLC ("Mesquite").
- 2) I am the President for Mesquite, the asset manager of Mesquite, and have been employed in this capacity since January 17, 2023.
- 3) I have reviewed Mesquite's Complaint and Appeal of Decisions of the Electric Reliability Council of Texas filed by Mesquite, including the Attachments, (herein after, the "Complaint"). The factual statements contained in the Complaint are true and correct to the best of my knowledge.
- 4) The foregoing statements are true and correct to the best of my knowledge and belief."

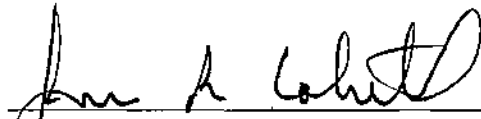


Scott Baron

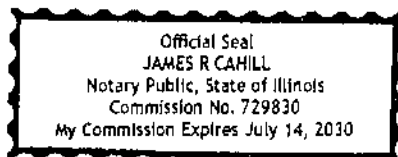
President

Mesquite H2, LLC

SWORN TO AND SUBSCRIBED TO BEFORE ME on the 16th day of October 2026



Notary Public of the Commonwealth of Illinois
My commission expires: July 14th 2030



ATTACHMENT A

[REDACTED]

CONFIDENTIAL AND PROTECTED INFORMATION UNDER THE ERCOT PROTOCOLS

ATTACHMENT B

Classification: Internal Purpose

ERCOT Batch Zero Process: Section 9.3.1 Provisional Classification Dispute Form

Purpose: ERCOT has provisionally classified the Large Load below under Planning Guide Section 9.2.1.2(1) rather than the base load path Section 9.2.1.1(1) under which it was submitted. Under Section 9.3.1(2)(a)(i), the Interconnecting Large Load Entity (ILLE) may dispute the provisional classification if it believes ERCOT based that classification on incomplete or inaccurate information. The ILLE must use this form to establish the basis for that dispute.

Who completes this form: The ILLE completes Sections 1–3 and returns this form to its Interconnecting Transmission Service Provider or Distribution Service Provider (Responsible TSP/DSP), which may add supporting information in Section 4. The Responsible TSP/DSP must email the form to ERCOT at BZReclassification@ercot.com no later than 5:00 p.m. CT on the due date specified in Section 9.3.1(2)(a)(i)–(iii) of the Planning Guide.

Deadline: Please review the applicable deadlines in Planning Guide Section 9.3.1(2)(a)(i). The chronologically dependent deadlines are illustrated below:

- ERCOT notifies the Responsible TSP/DSP of the provisional classification.
- The Responsible TSP/DSP shall notify the ILLE within two Business Days of receipt of ERCOT's notice.
- To initiate a dispute:
 - ILLE must complete and submit this form to the Responsible TSP/DSP no later than three Business Days after receiving notice from the Responsible TSP/DSP; and
 - The Responsible TSP/DSP must submit the completed form to ERCOT by the deadline above (i.e., no later than three Business Days after the ILLE's receipt of notice).
- ERCOT, the ILLE, and the Responsible TSP/DSP shall attempt to resolve the dispute within three Business Days after ERCOT receives notice of an initiated dispute.

1. Large Load Identification*

ILLE Name
Batch Zero
Number (BZ-
Large Load
Facility
Responsible
TSP/DSP

Classification: Internal Purpose

2. Requested Base Load Pathway*

Check the single § 9.2.1.1(1) pathway under which the Responsible TSP/DSP submitted the ILLE's Large Load.

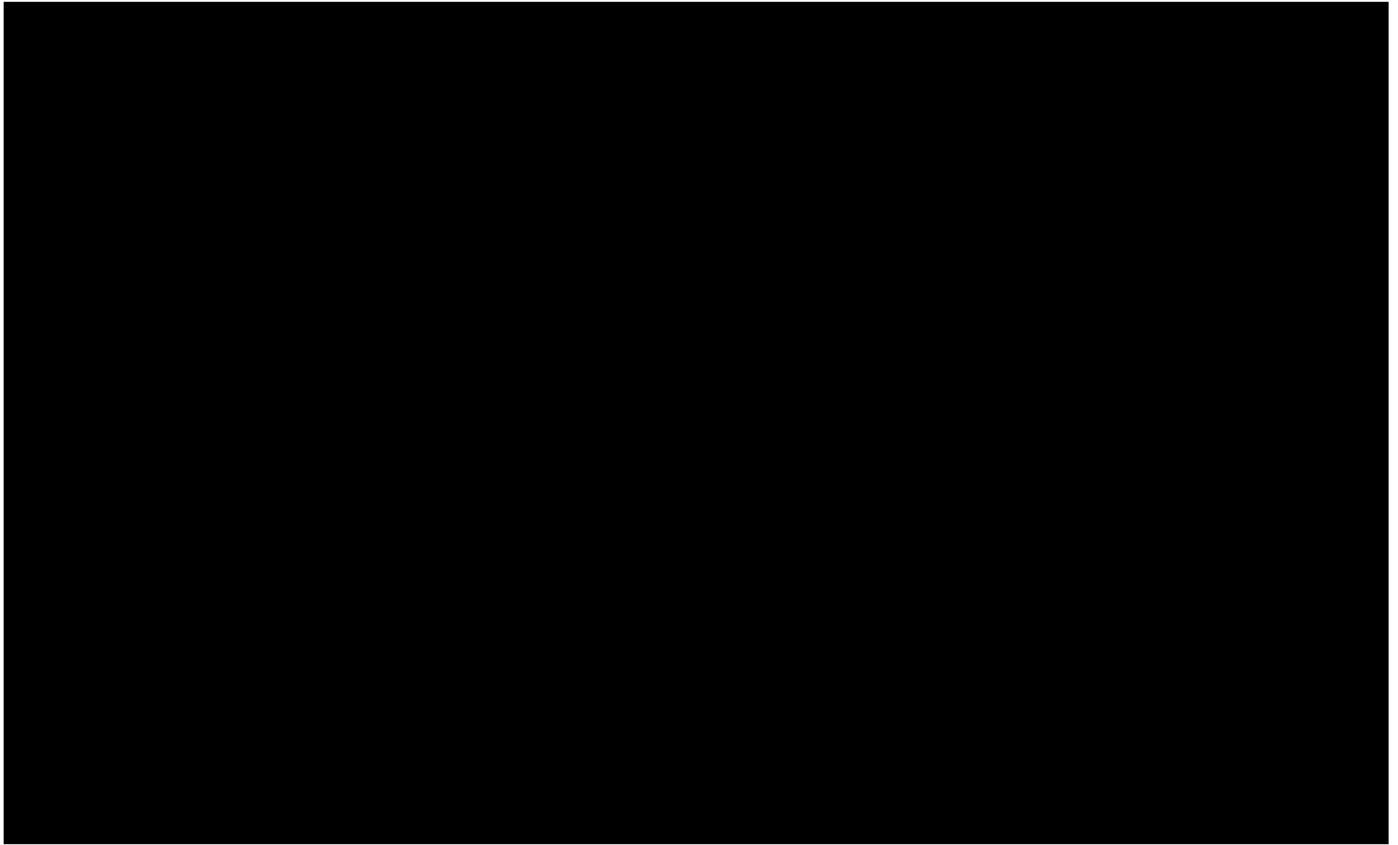
3. Grounds for the Dispute*

State the incomplete or inaccurate information on which you believe ERCOT based its provisional classification. See § 9.3.1(2)(a)(i).

Explain why the ILLE believes ERCOT based its provisional classification on incomplete or inaccurate information and provide all supporting documentation.

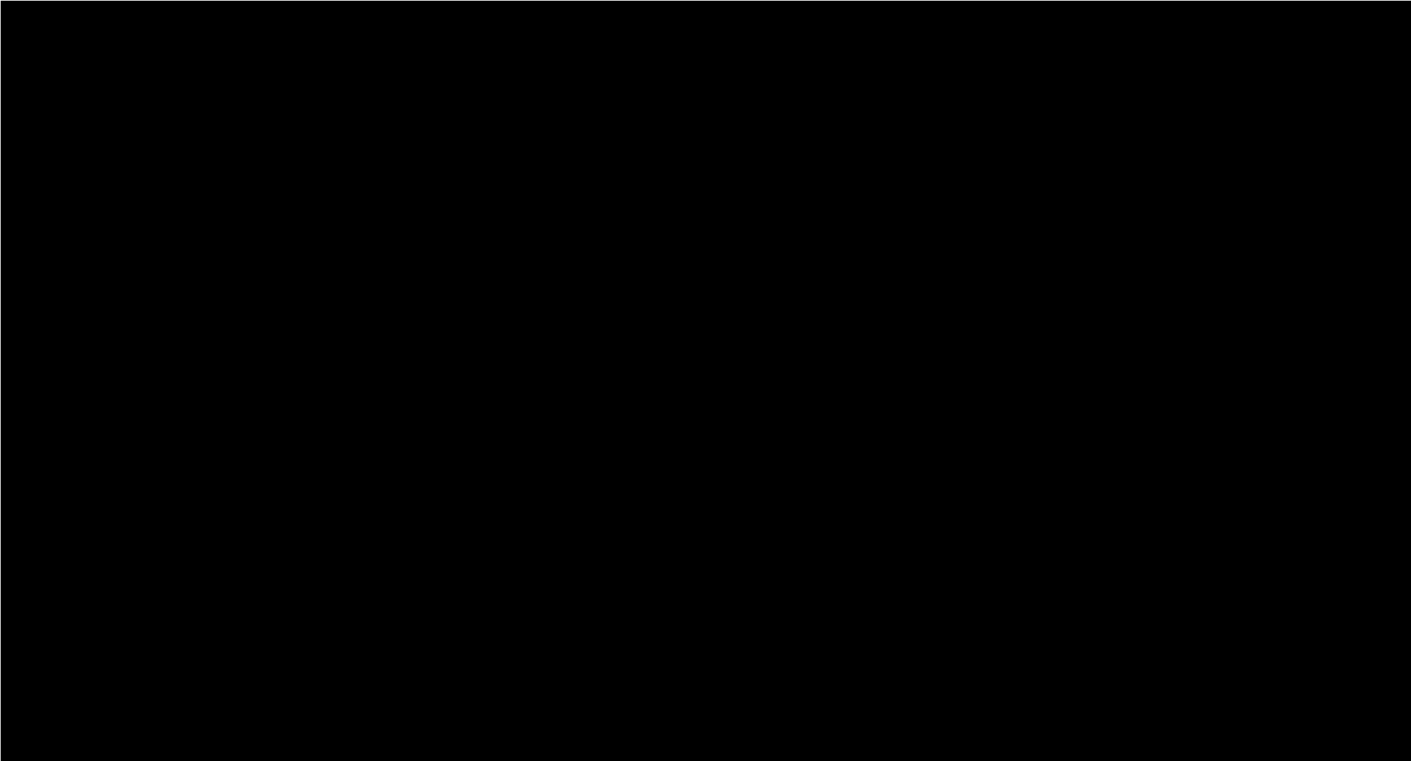
Written explanation

Classification: Internal Purpose

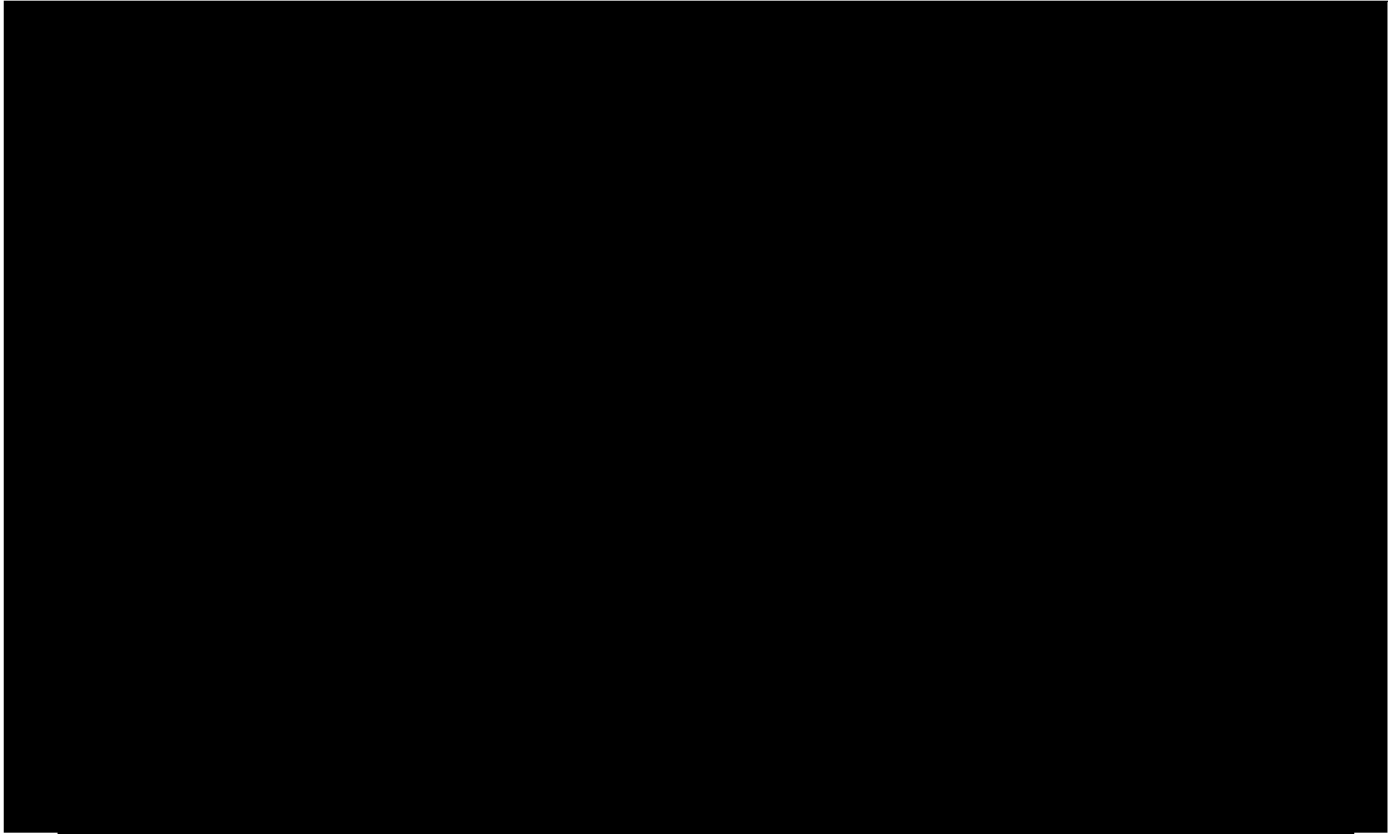


4. Responsible TSP/DSP Supporting Information

To be completed by the Responsible TSP/DSP if it has information relevant to the dispute.

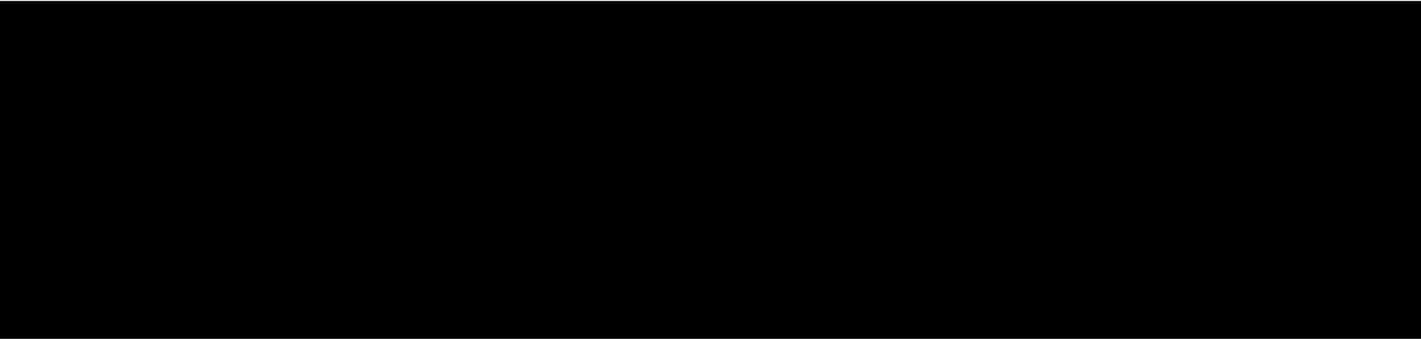


Classification: Internal Purpose



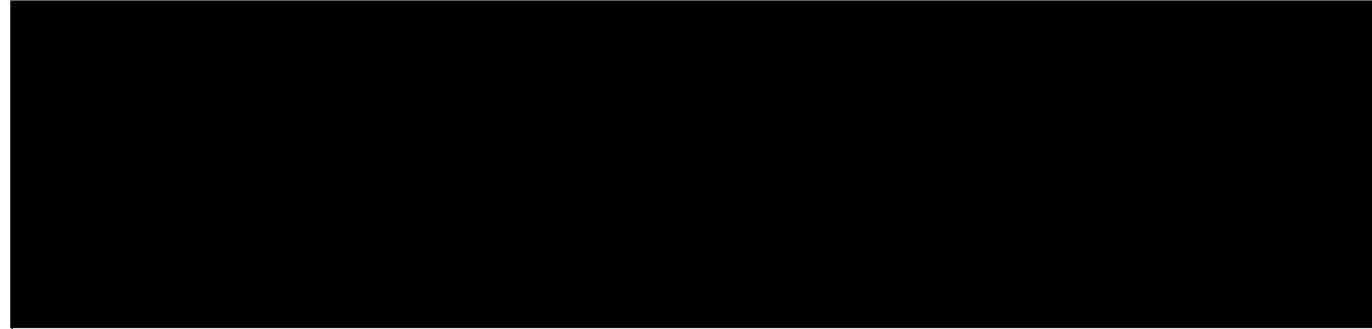
5. Submission and Routing*

Completed by (ILLE)



6. Contact Information for ERCOT Questions/Discussion

Provide contact information for the representatives who will be available to answer ERCOT's questions and to discuss the disputed provisional classification.





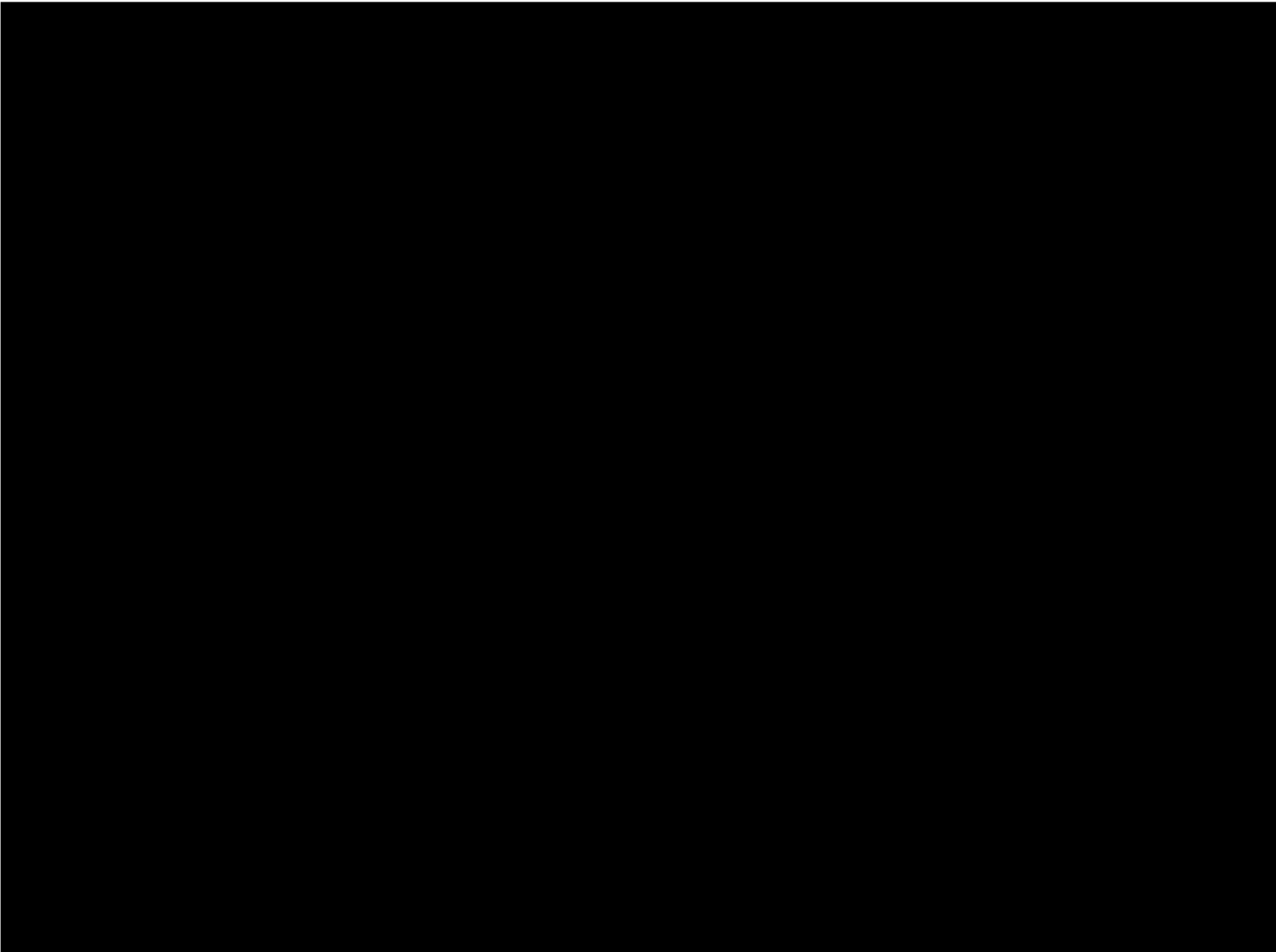
ATTACHMENT C

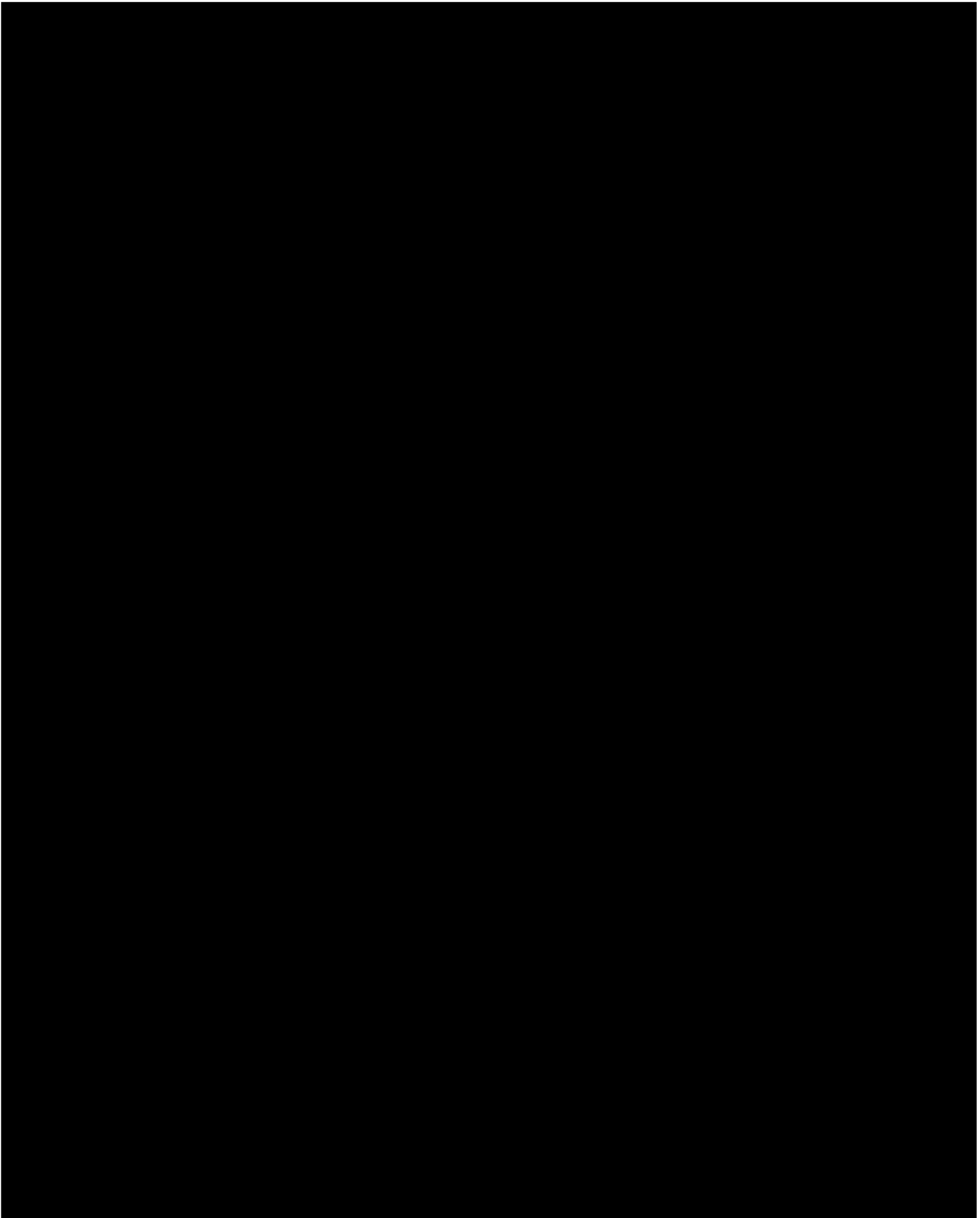


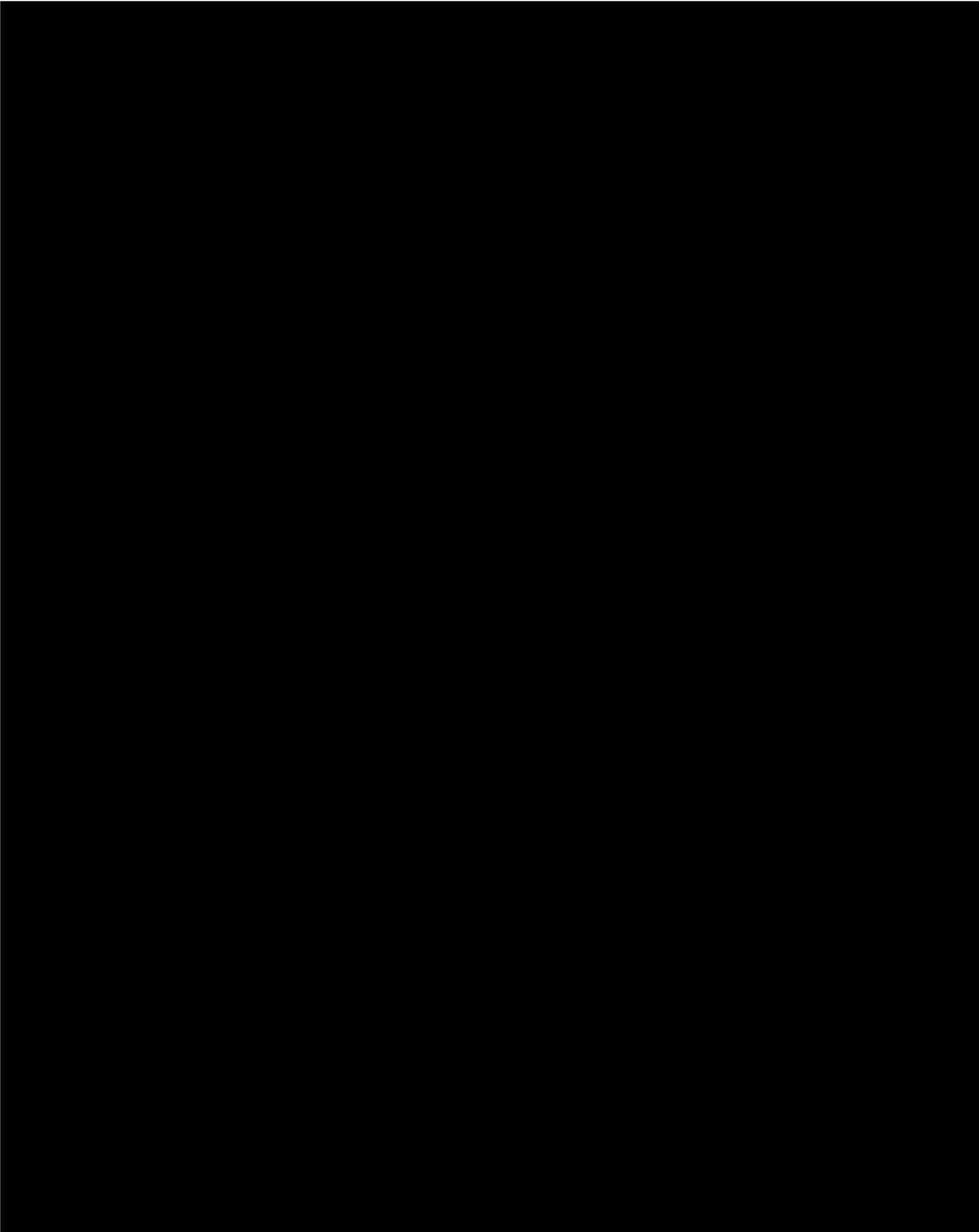
Good evening.

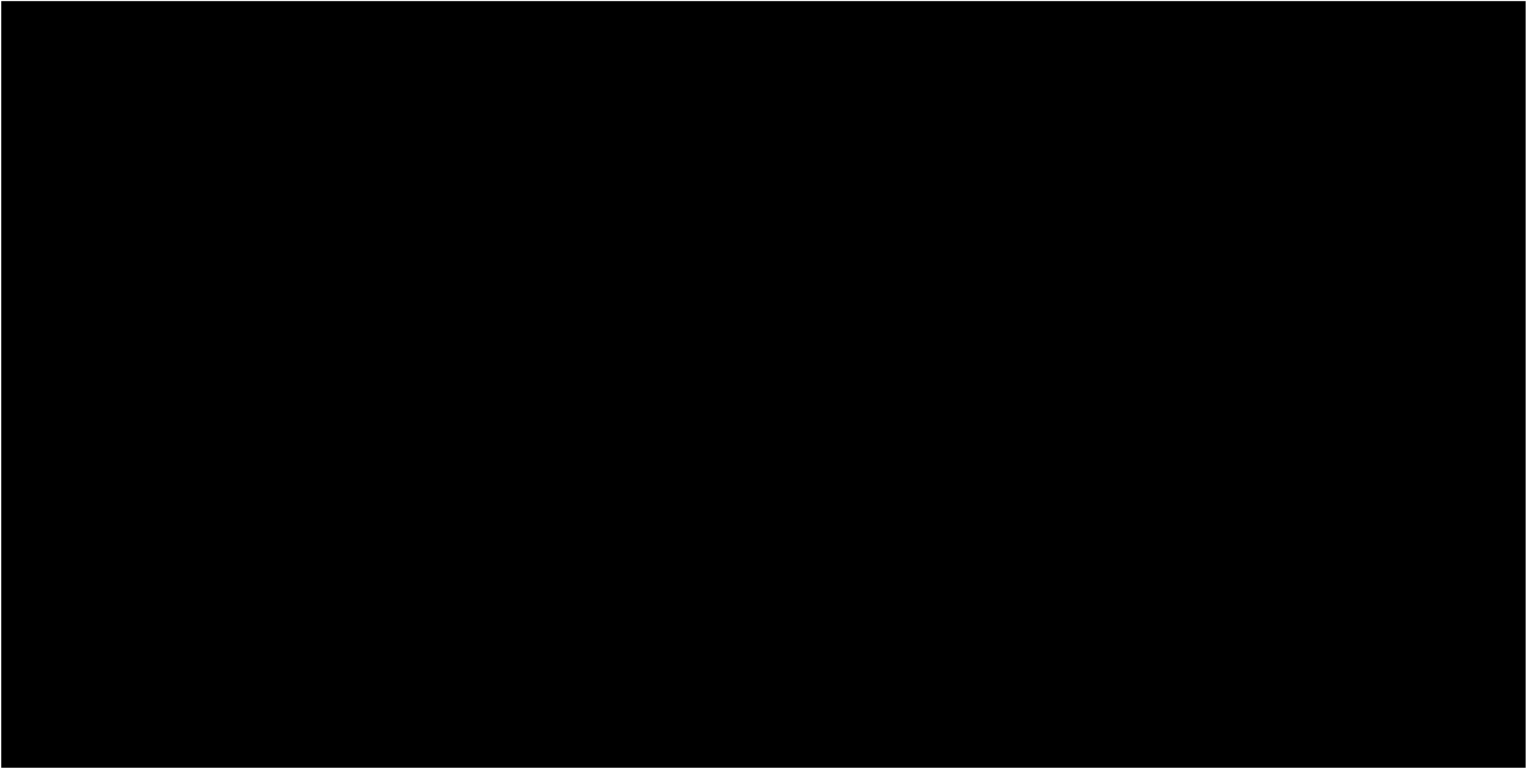
This email confirms that, in accordance with Planning Guide Sec. 9.3.1, ERCOT has reviewed the Batch Zero dispute form and the additional information submitted after the meeting this morning and denies the dispute. Thus, BZ-17's classification as studied load stands. As mentioned during the call, ERCOT waives the ADR process required in the ERCOT Protocols.

Regards,

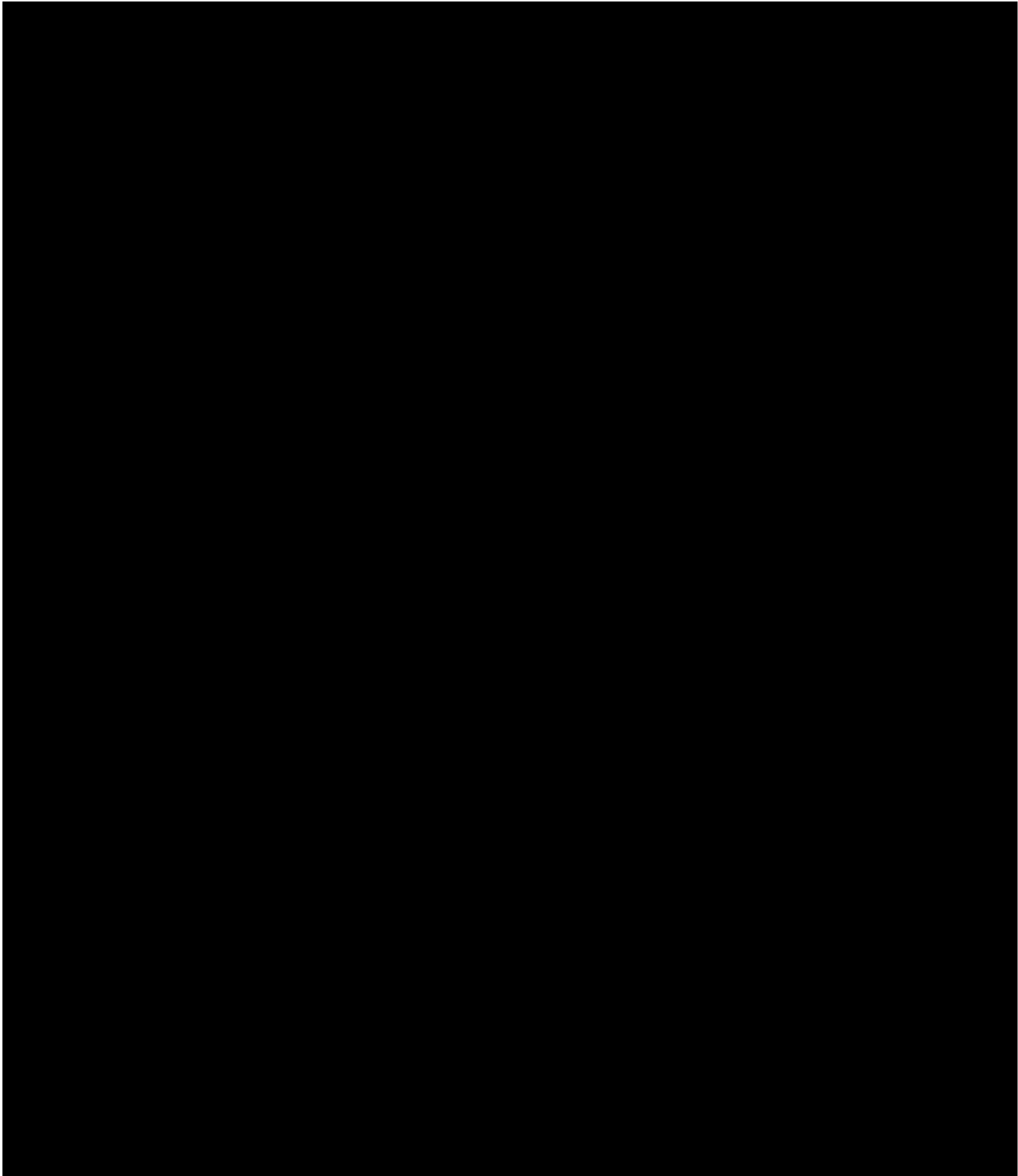






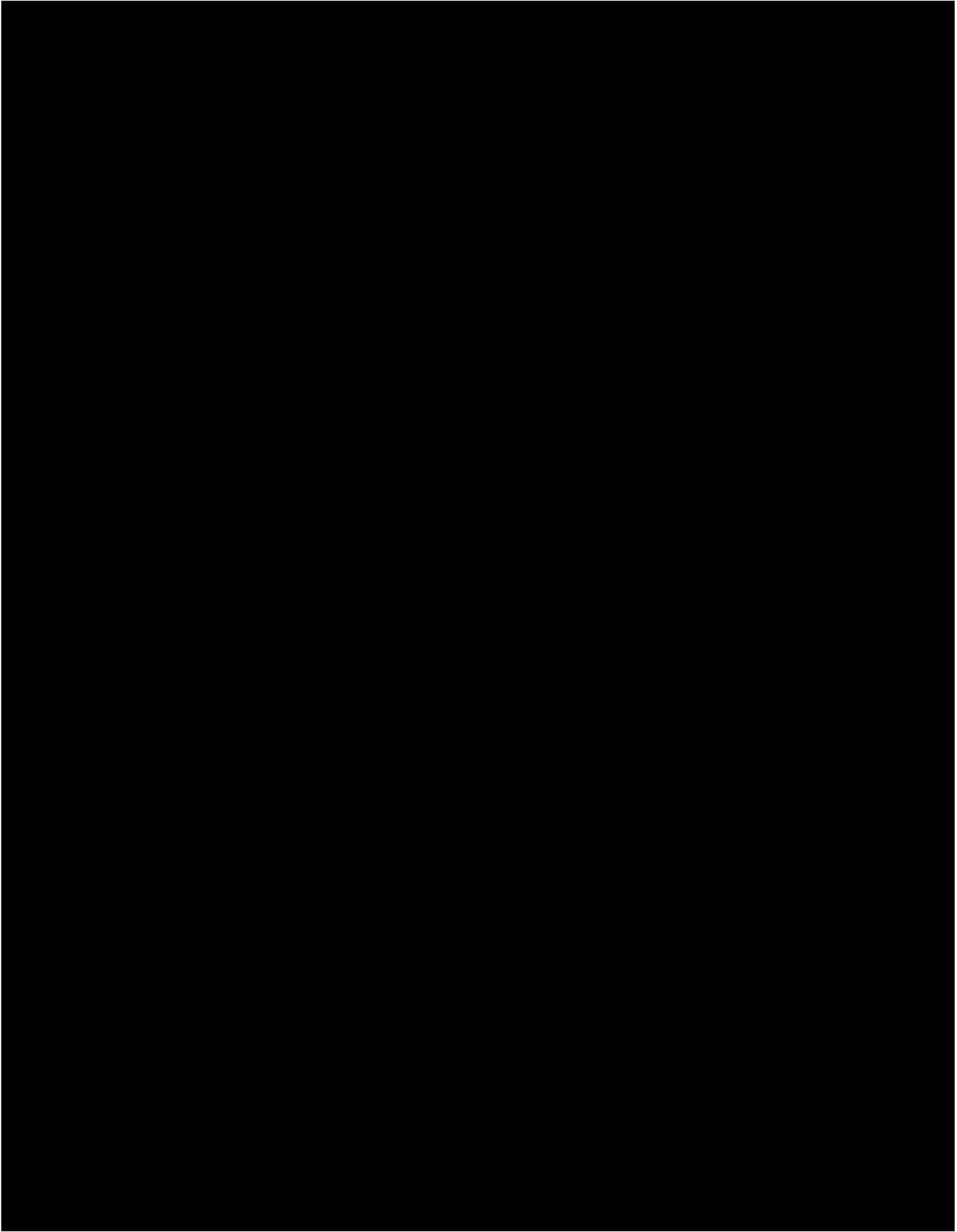


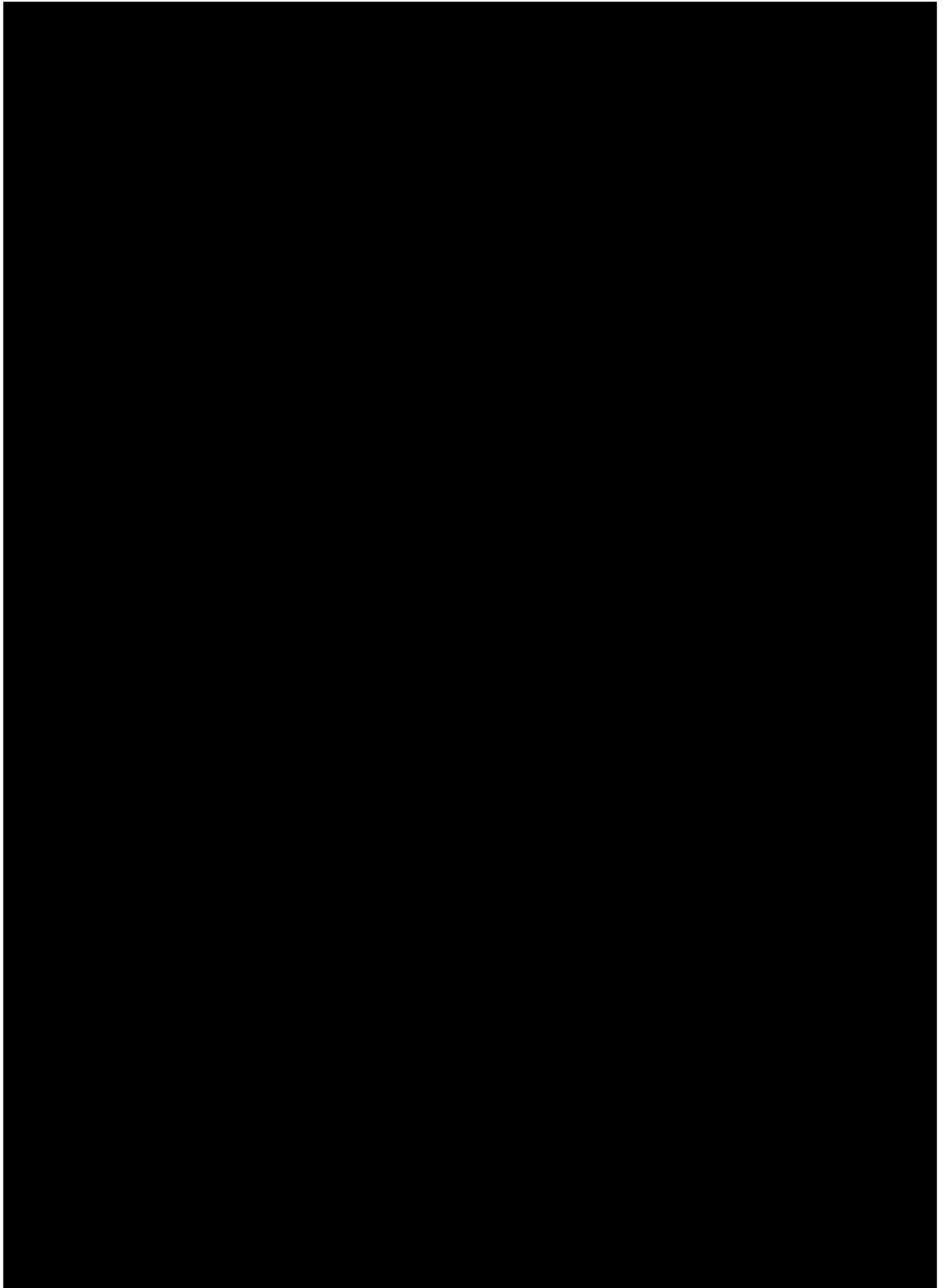
ATTACHMENT D

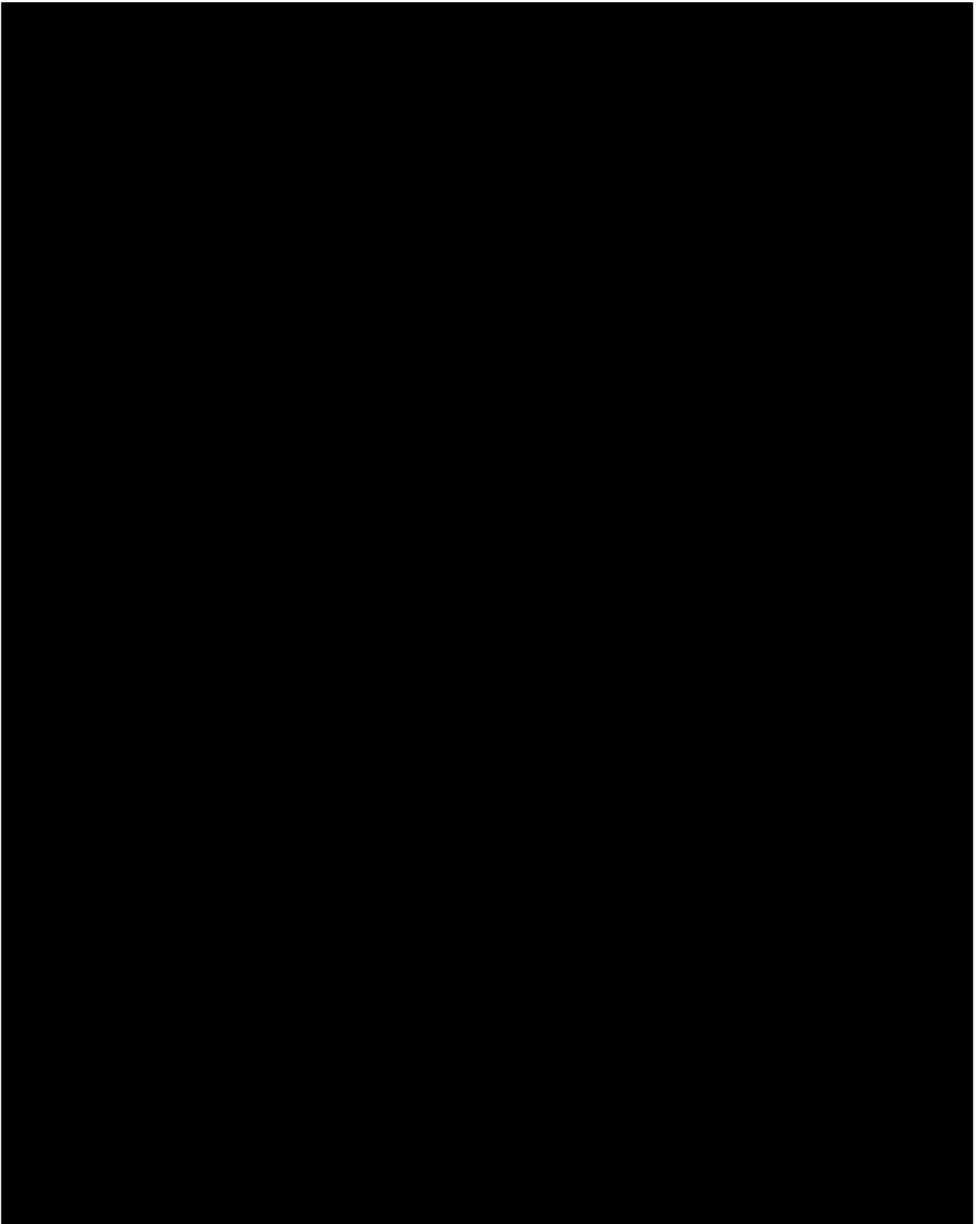


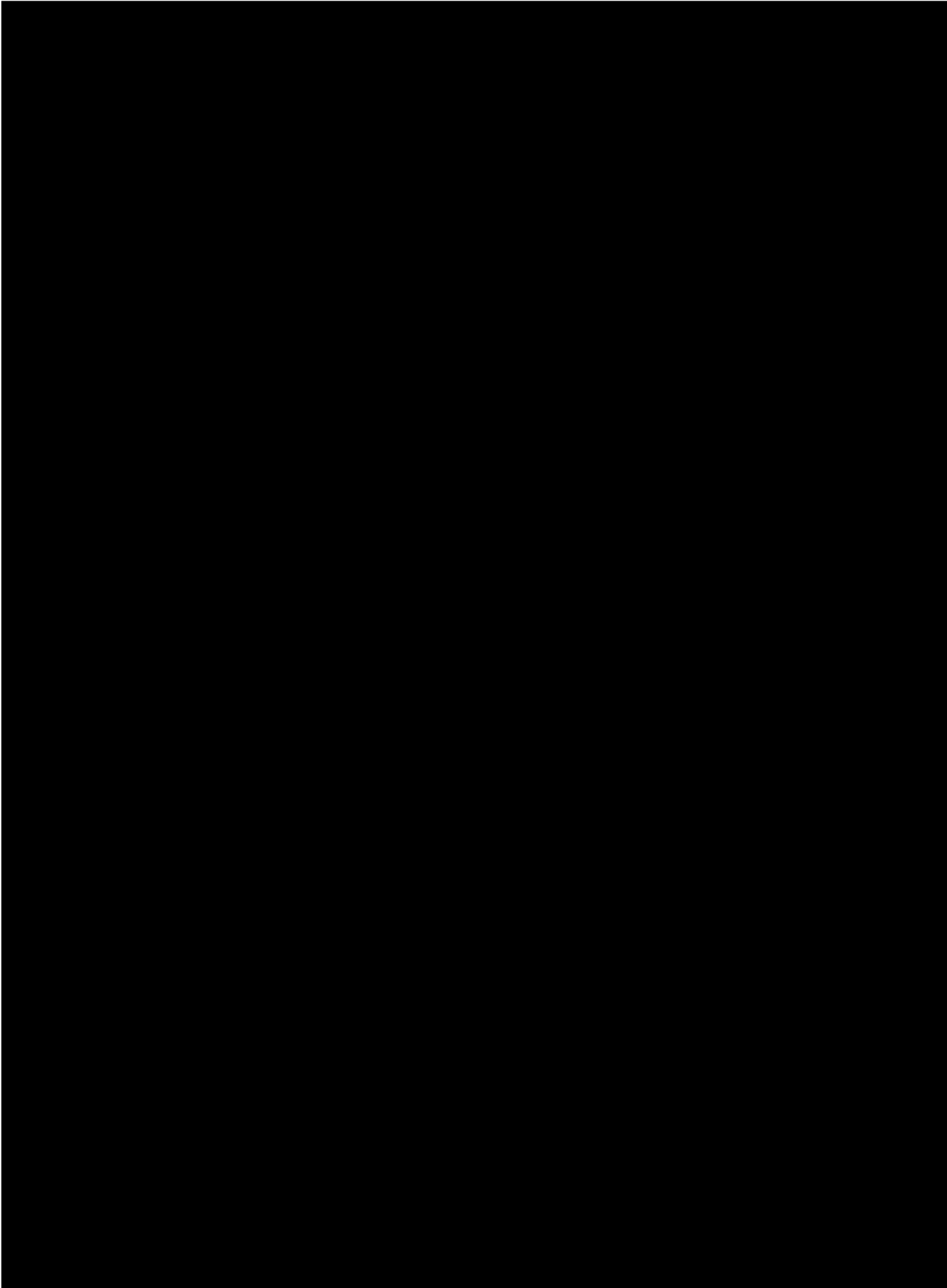
***** EXTERNAL Email *****

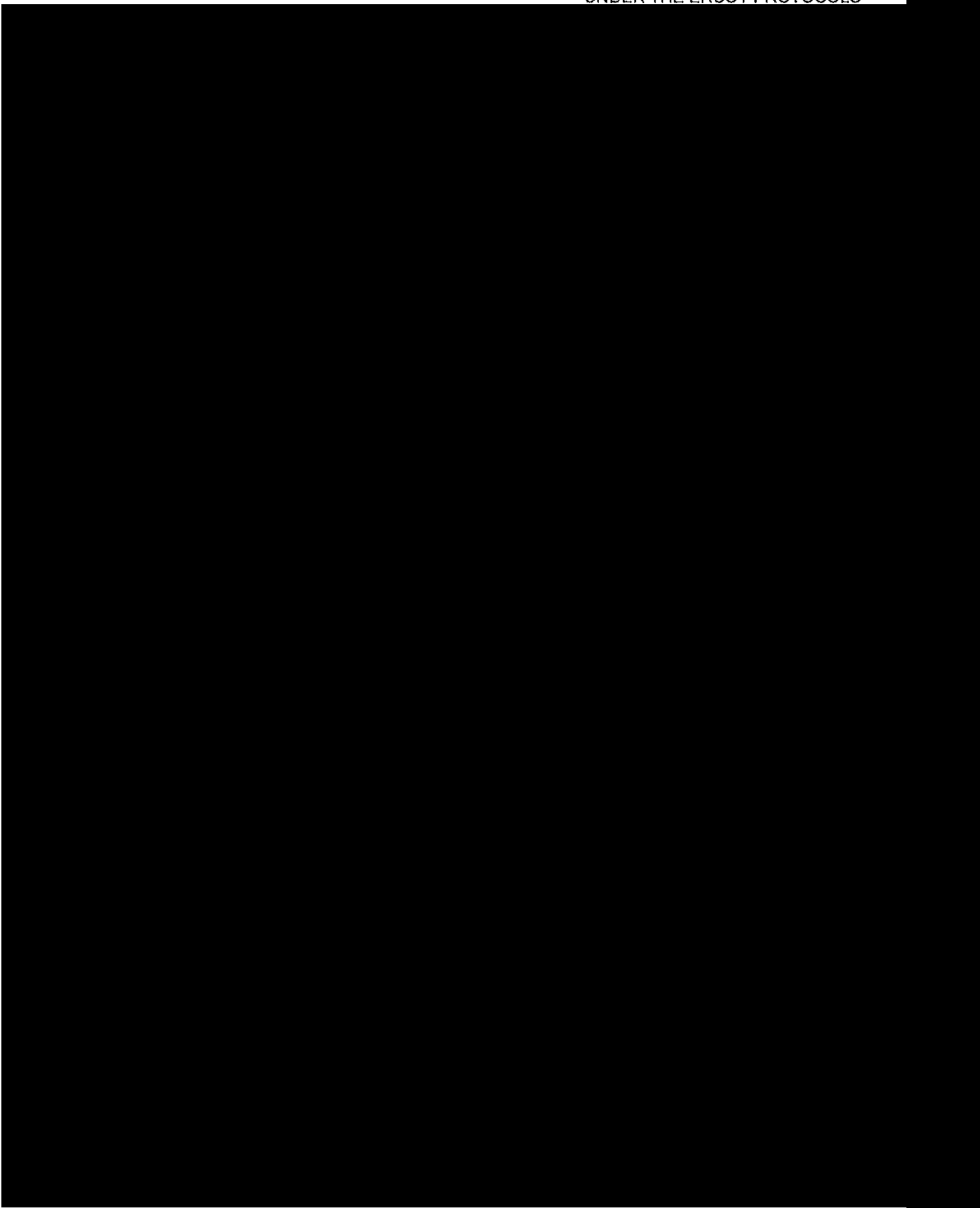
Please be cautious and evaluate before you click on links, open attachments, or provide credentials. As a reminder, please report phishing emails via the Report Phishing button. If the button is not available, then please forward to 'ReportPhishing@ercot.com'

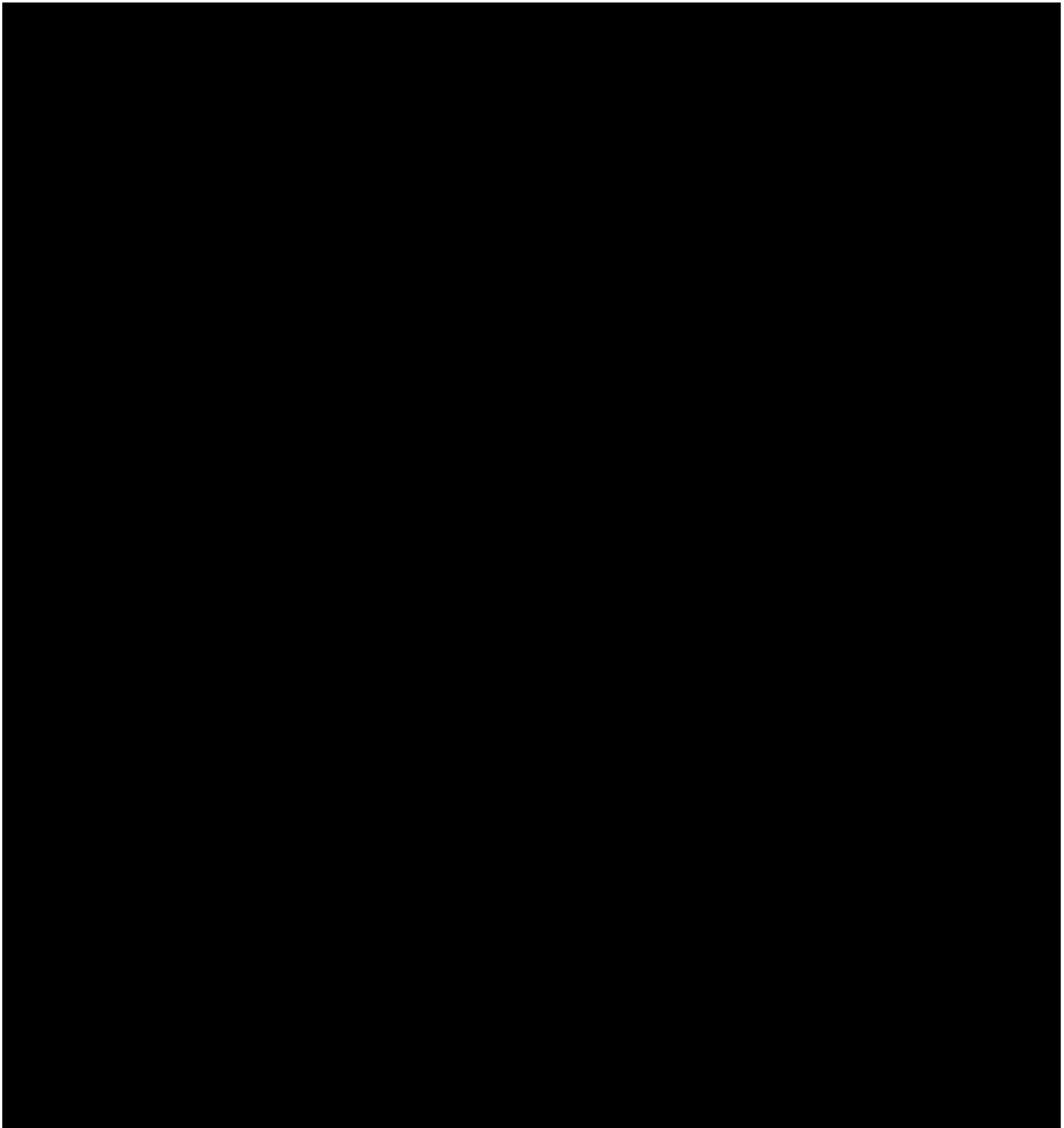












The following files are not convertible:

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6230.1.xlsx	Attachment F - PUBLIC 4919-5416-

Please see the ZIP file for this Filing on the PUC Interchange in order to access these files.

Contact centralrecords@puc.texas.gov if you have any questions.

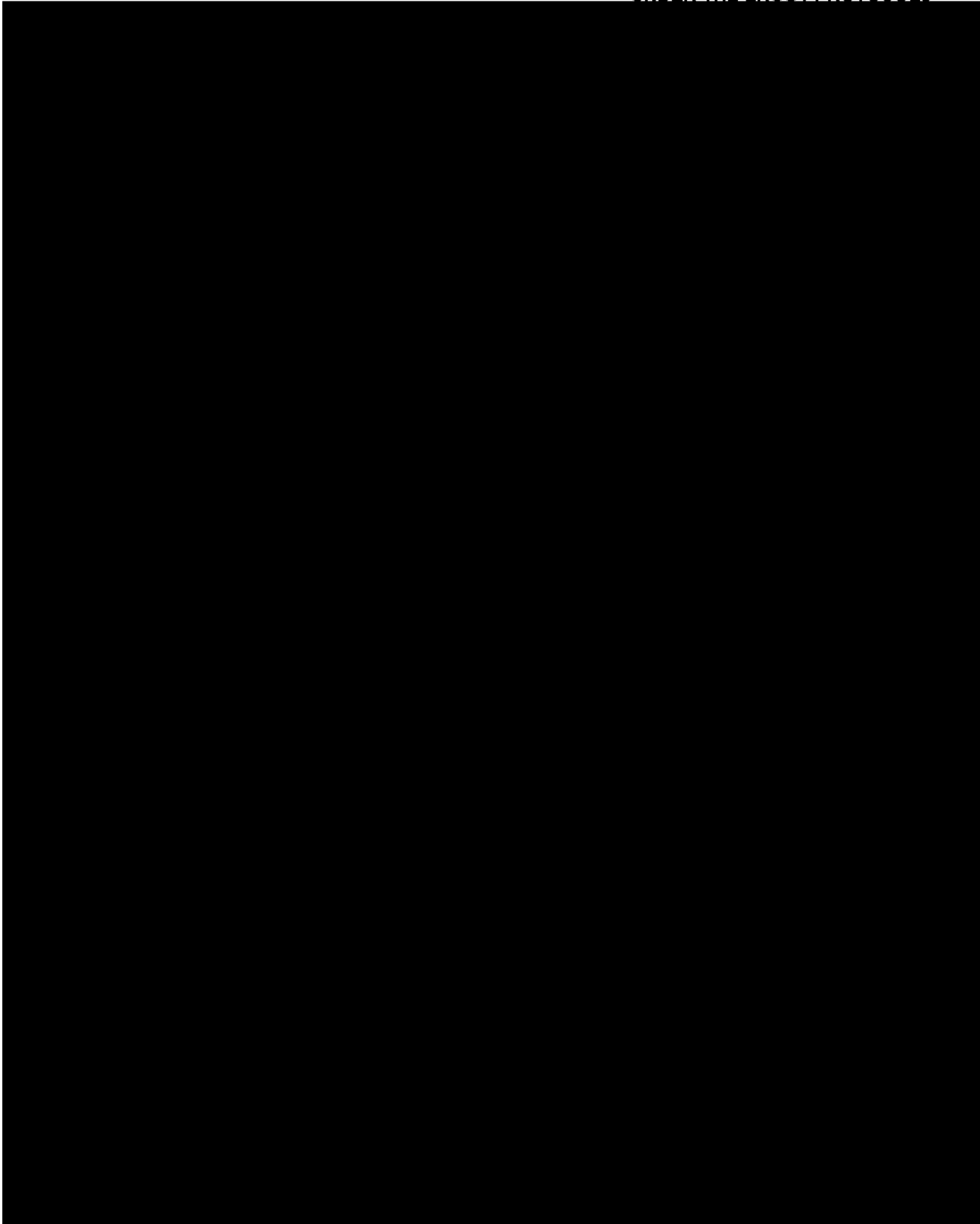
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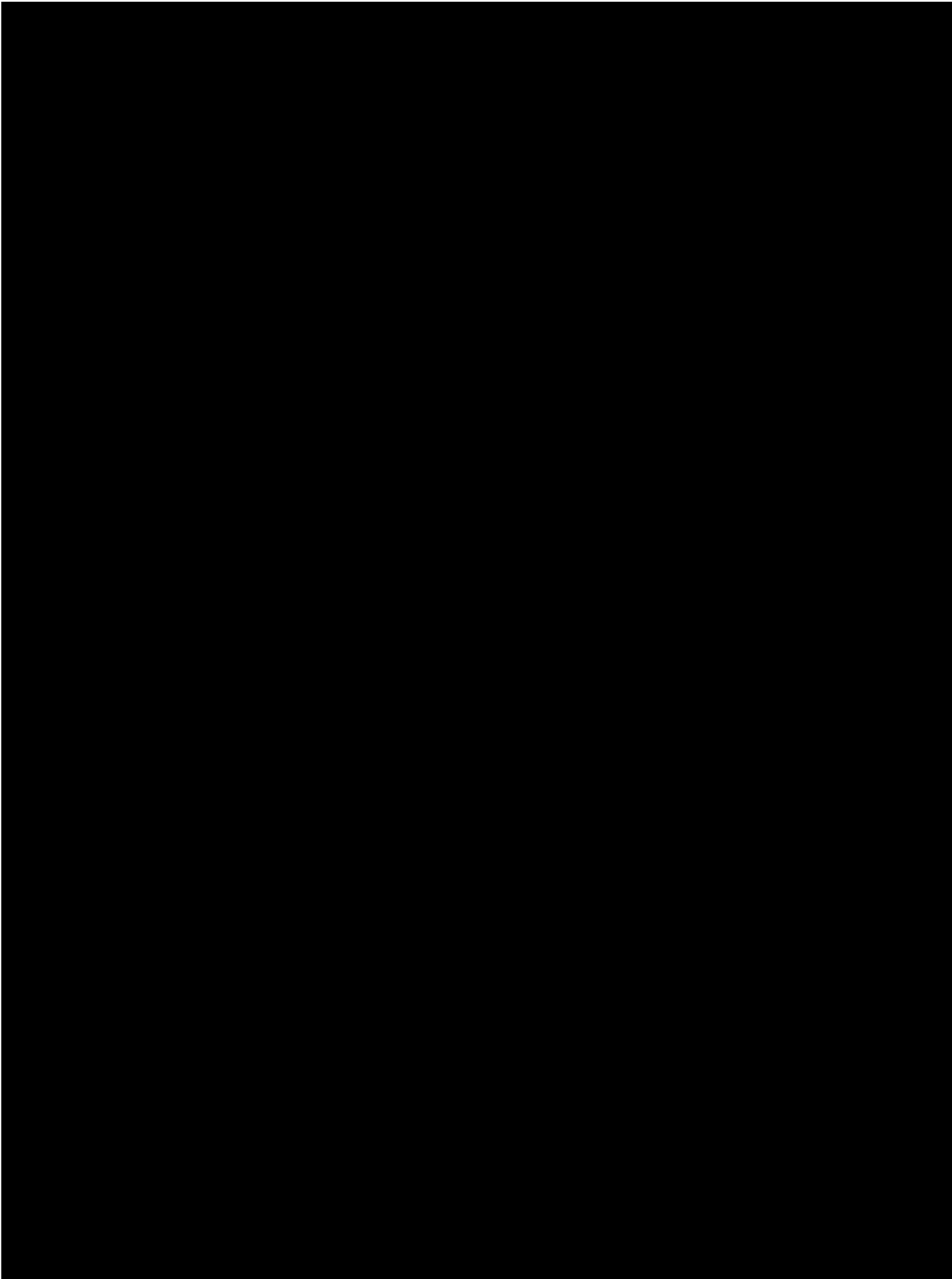
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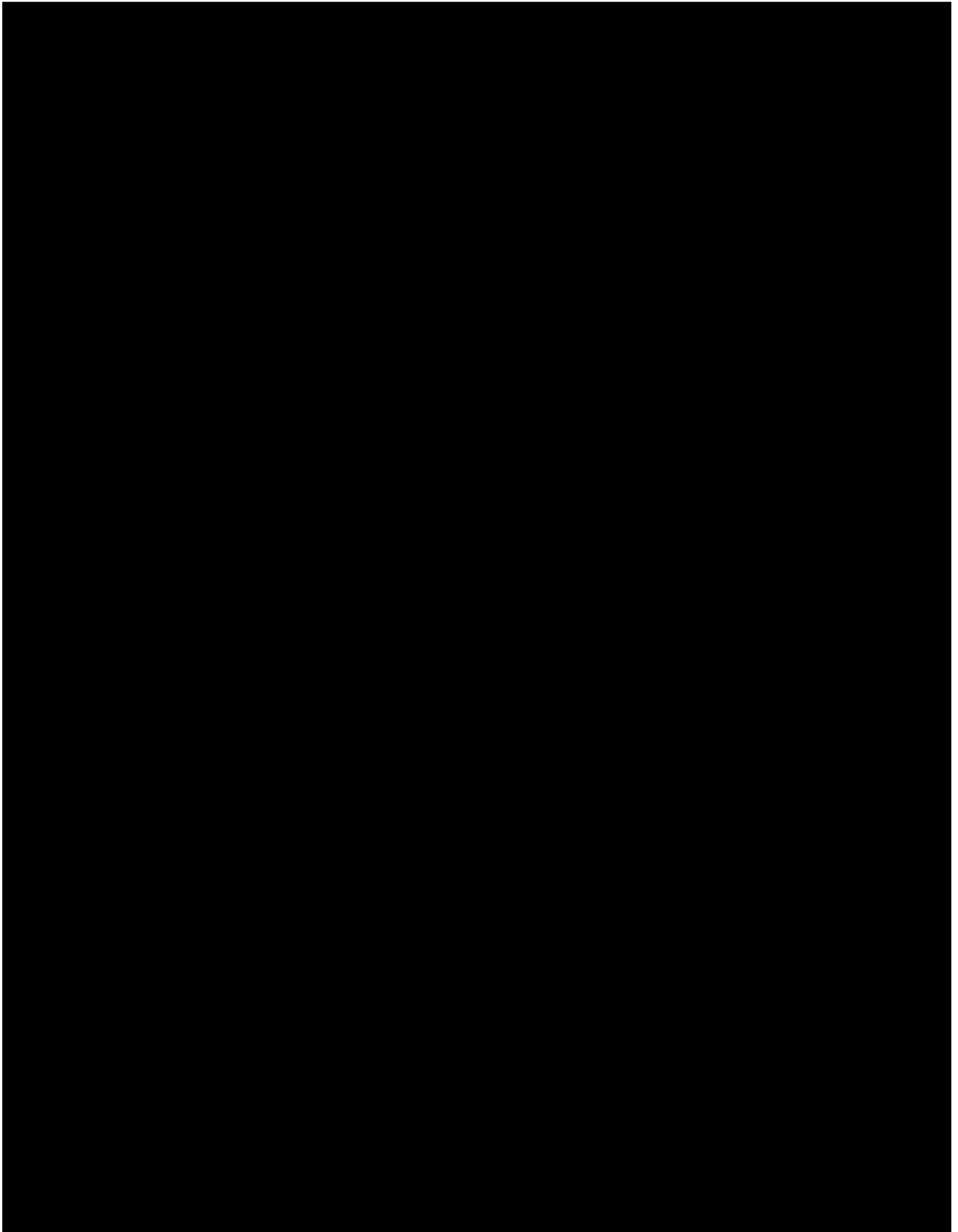
**FACILITIES AGREEMENT
BETWEEN**

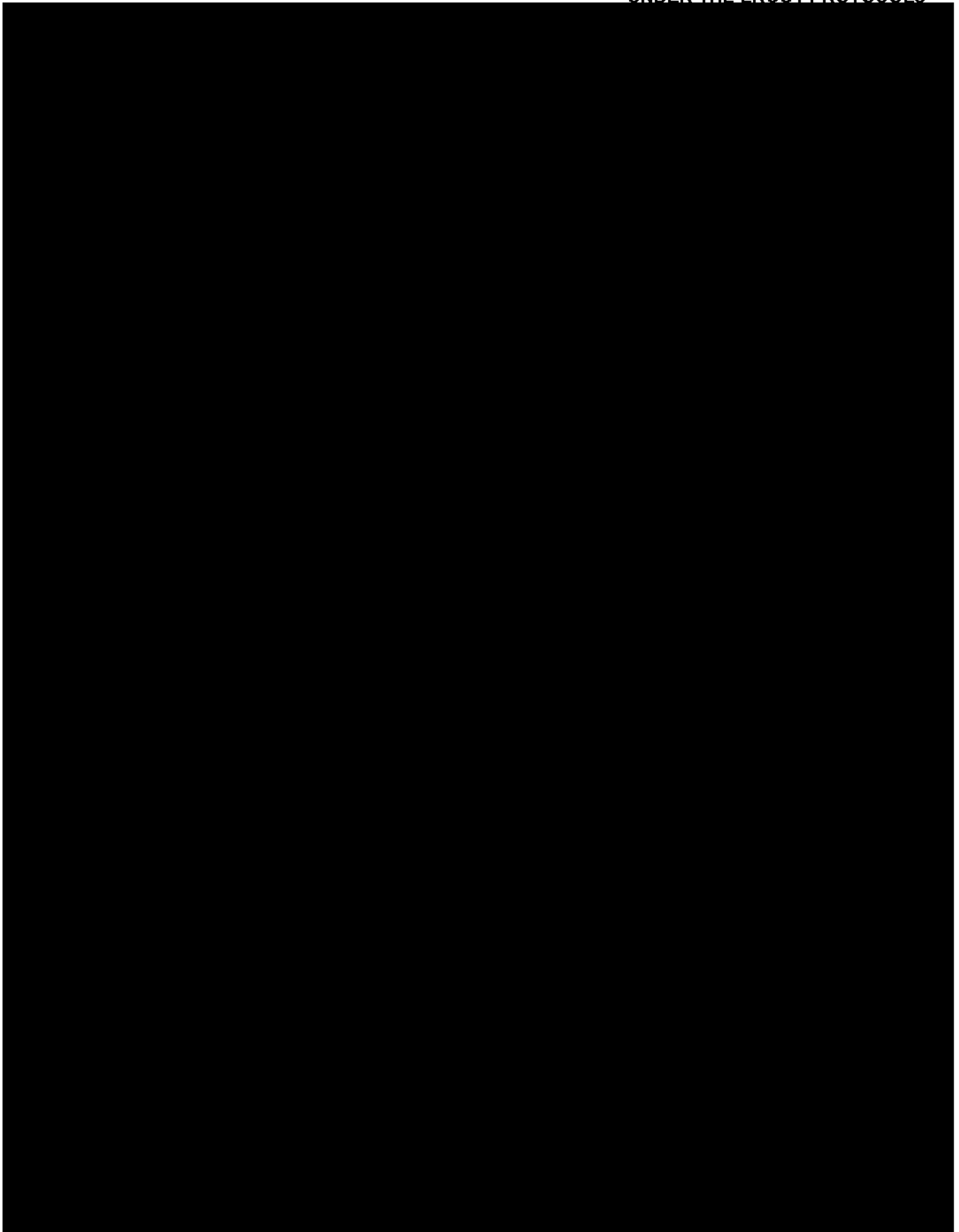
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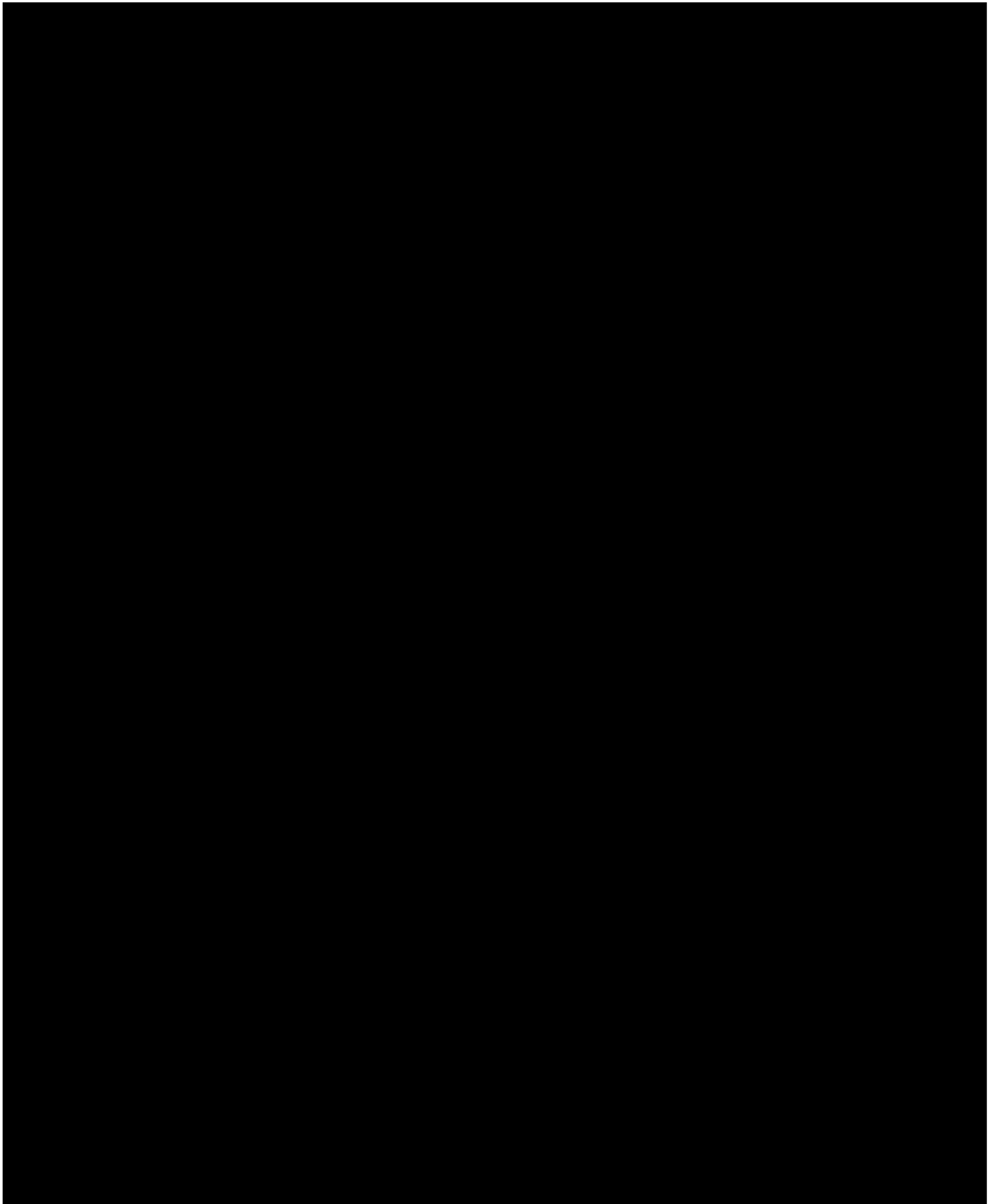
FACILITIES AGREEMENT

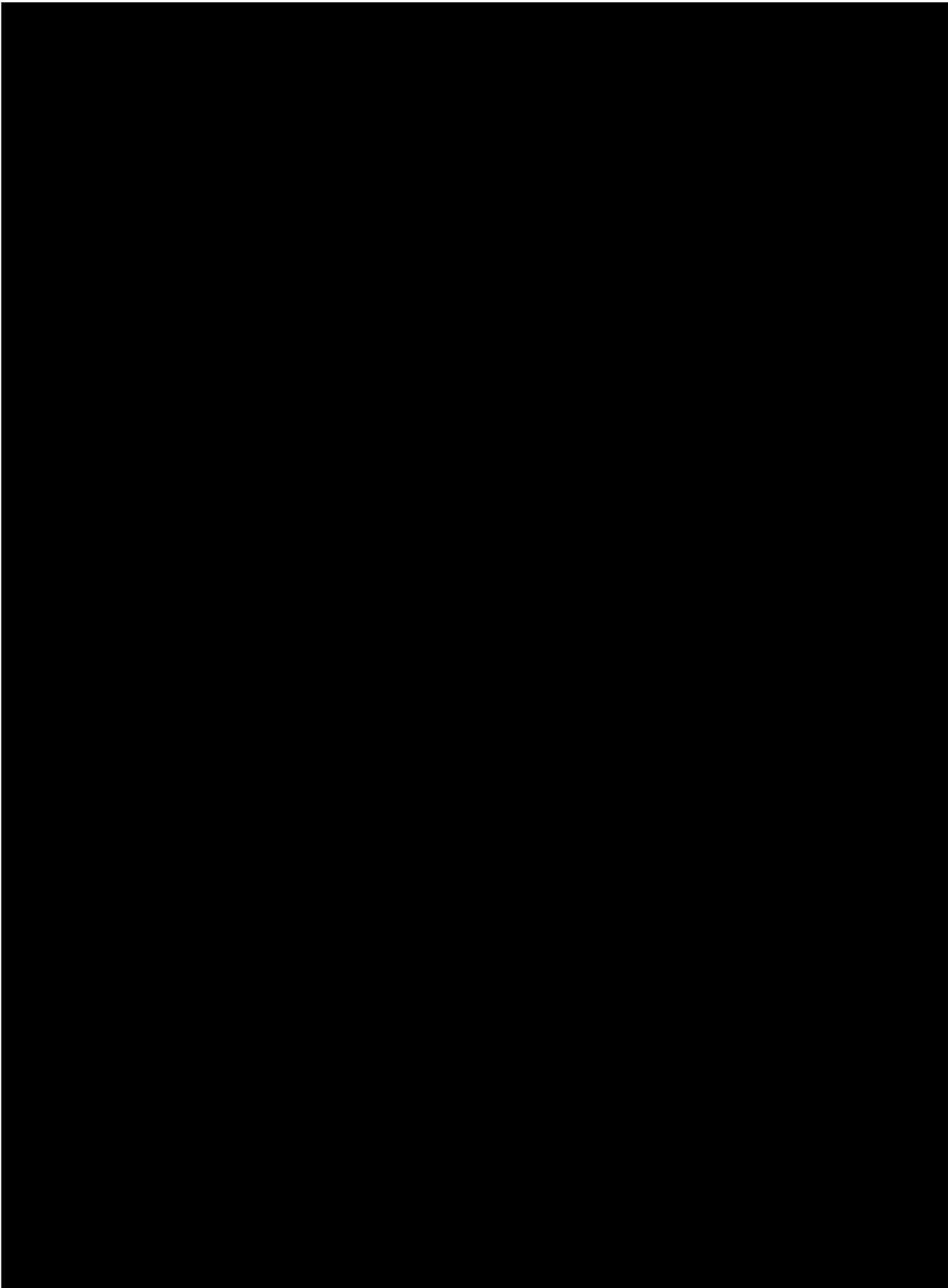


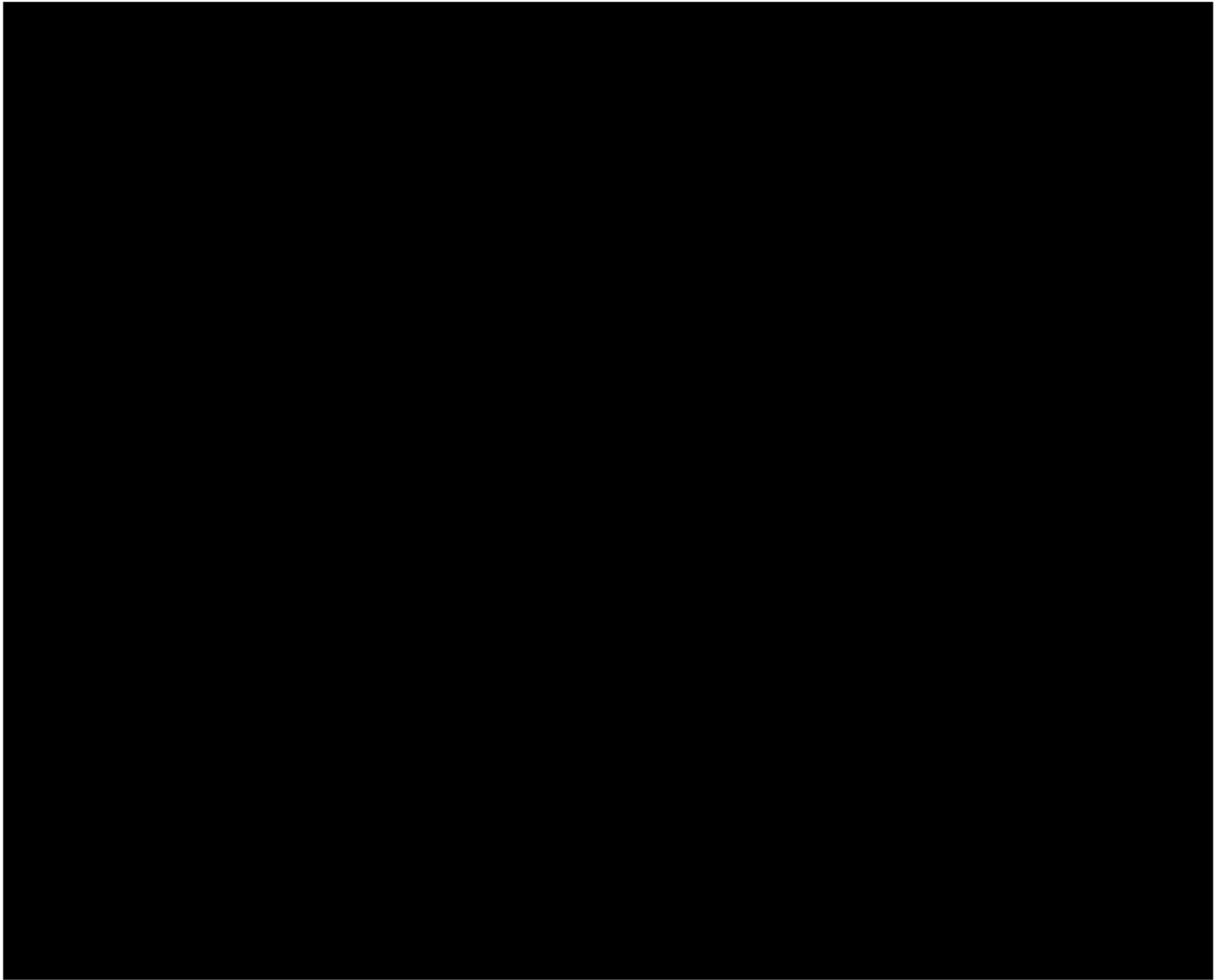


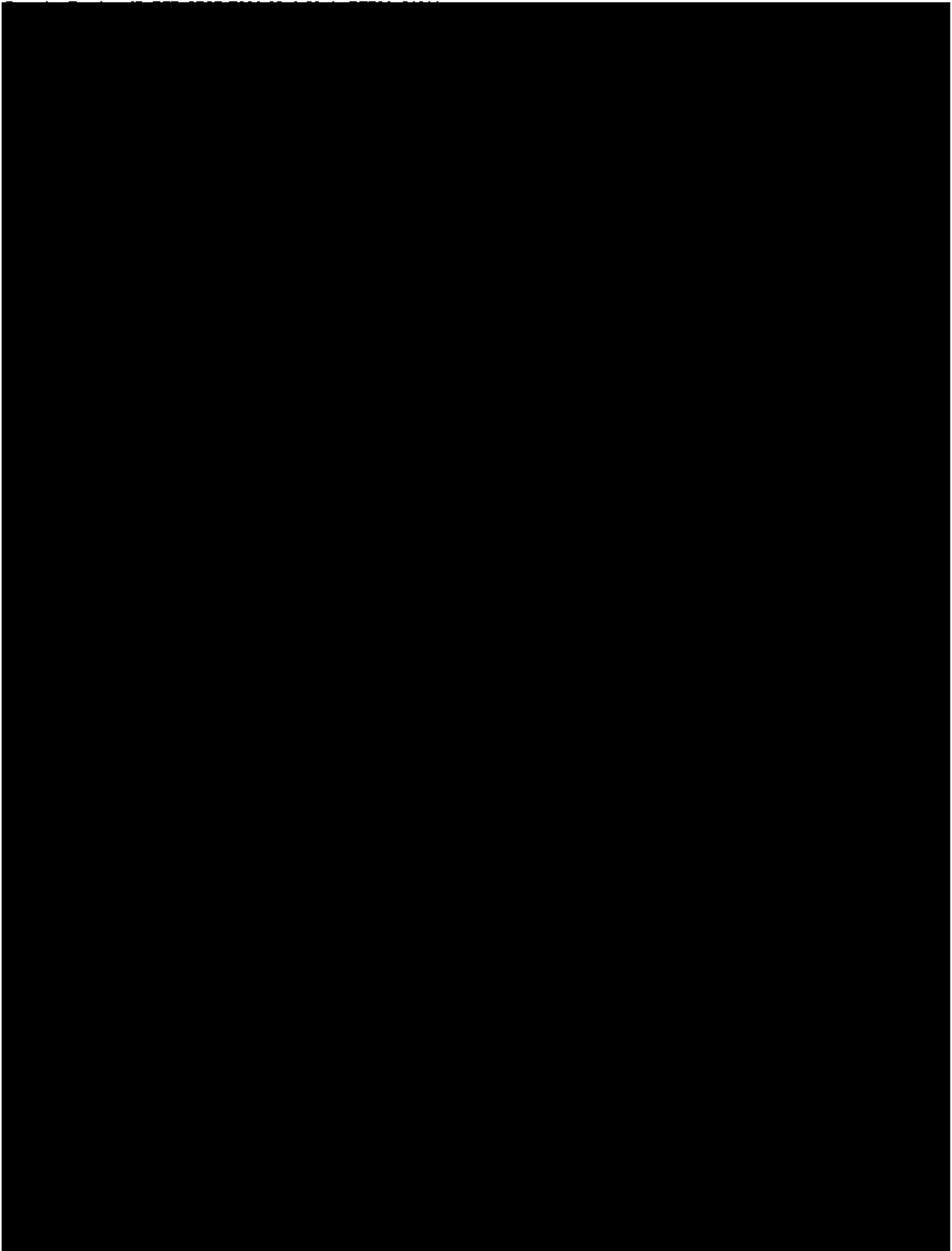














ATTACHMENT H

Customer specific information submitted to ERCOT by an Interconnecting DSP or Interconnecting TSP in this document is considered Protected Information under paragraph (1)(r) of Protocol Section 1.3.1.1, Items Considered Protected Information.

ERCOT Batch Zero Process for Large Load Interconnection: Section 9.2.1.1(1)(e) Attestation Form

Instructions: This Section 9.2.1.1(1)(e) Attestation Form ("Form") must be completed by the designated Interconnecting Large Load Entity (Designated ILLE) named below and sworn to by the Designated ILLE's representative, official, officer, or other authorized person with binding authority over the Designated ILLE. The Designated ILLE acknowledges this Form, together with all attachments hereto, constitutes a single instrument. The Designated ILLE is providing this Form in accordance with Electric Reliability Council of Texas, Inc.'s Planning Guide Section 9.2.1.1(1)(e) as stated in Planning Guide Revision Request 145, which is subject to approval by the Public Utility Commission of Texas. All fields must be completed unless otherwise noted. This Form must be returned to the Interconnecting Transmission Service Provider ("TSP") or Interconnecting Distribution Service Provider ("DSP") named below on or before July 10, 2026. Questions regarding this Form may be sent to: llwg_feedback@ercot.com.

Designated Large Load Information

Identification information provided in this section must be consistent with information provided in the Load Information Form.

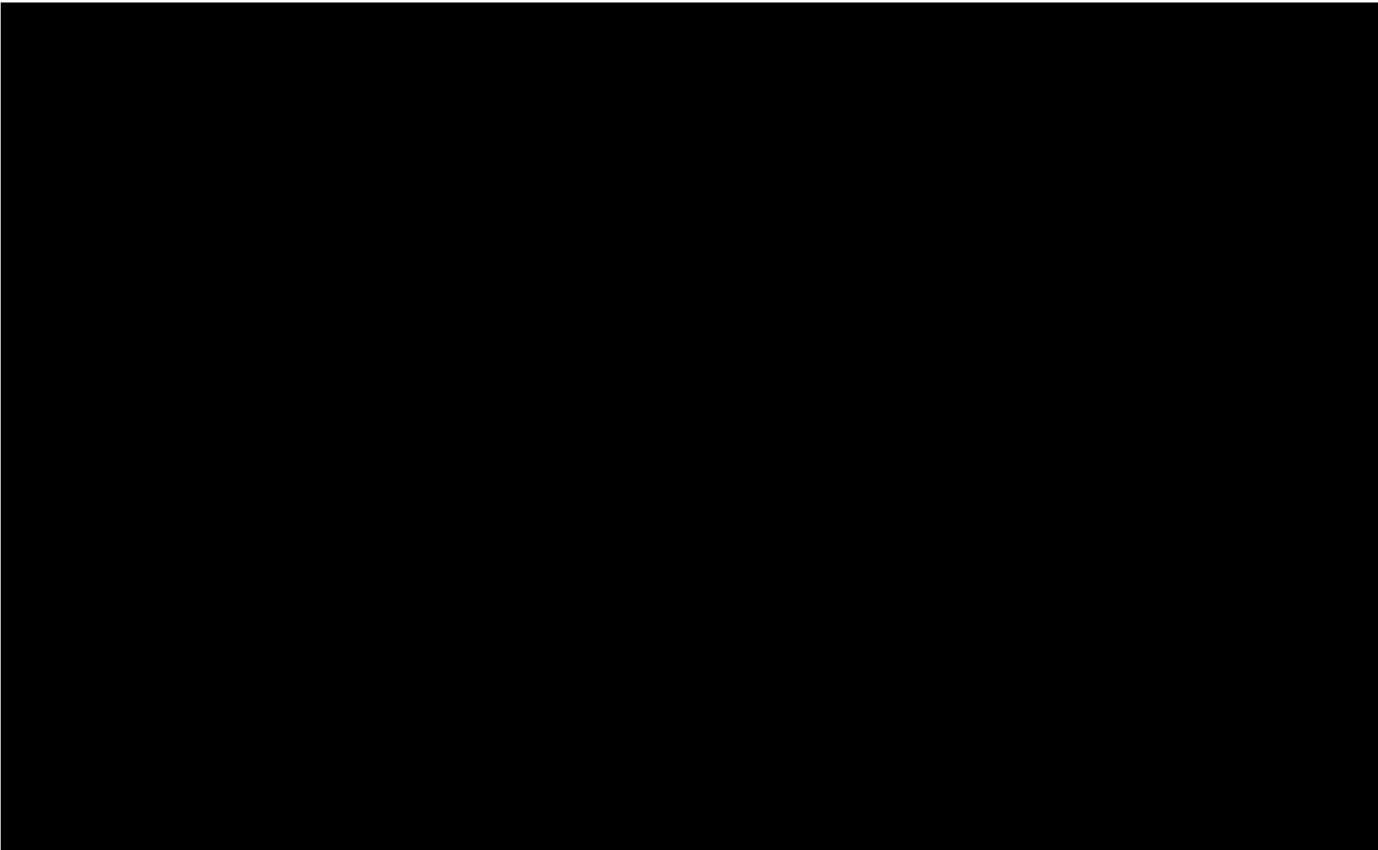
Customer specific information submitted to ERCOT by an Interconnecting DSP or Interconnecting TSP in this document is considered Protected Information under paragraph (1)(r) of Protocol Section 1.3.1.1, Items Considered Protected Information.

Eligibility Information

1. Required Disclosures under Section 9.7 – Section 9.2.1.1(1)(e)(ii)

A. Substantially Similar Request Disclosure, Section 9.7(1)

The Designated ILLE is:



B. Site Studies and Engineering Plans, Section 9.7(2)

The Designated ILLE has submitted in **Attachment 2** its plans, expected timing, and current progress for site-related studies and engineering services required for Large Load development prior to energization. These include, as applicable, geotechnical studies and water, wastewater, or gas-related work. The Designated ILLE will provide updates upon request, which shall occur no more frequently than quarterly.

The Designated ILLE attests that the information contained in **Attachment 2** is complete and accurate as of the date of notarization.

C. Non-ministerial Discretionary Approvals, Section 9.7(3)

The Designated ILLE has submitted in **Attachment 3** its plans, expected timing, and current progress for obtaining non-ministerial discretionary approvals from state and local regulatory authorities required for the development of the Designated Large Load prior to energization. These include, as applicable, permits related to water, air, or backup generation facilities. The

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Designated ILLE will provide updates upon request, which shall occur no more frequently than quarterly.

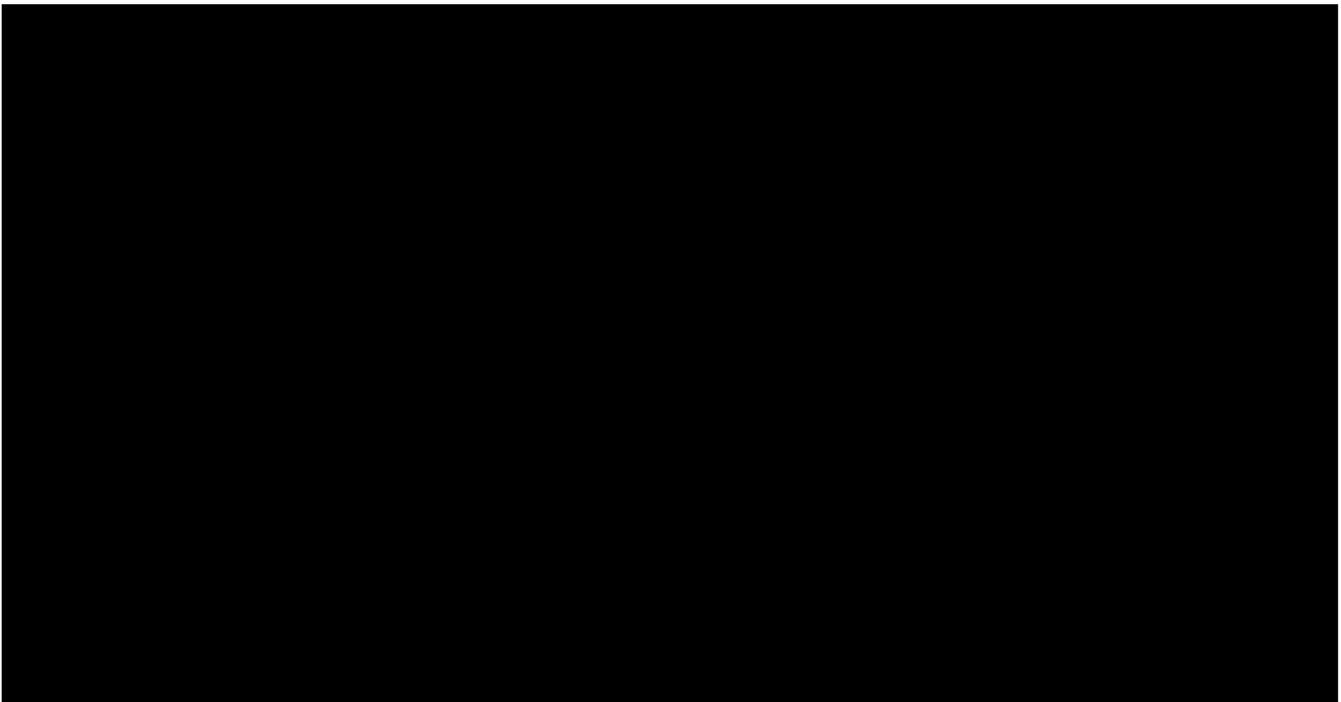
The Designated ILLE attests that the information contained in **Attachment 3** is complete and accurate as of the date of notarization.

D. Phased Energization Schedule, Section 9.7(4)

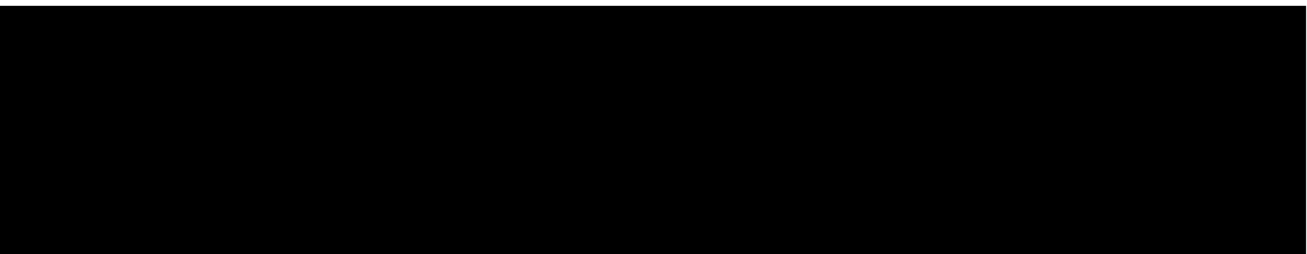
The Designated ILLE has provided its expected schedule, including the quarter and year, for phased energization of the contracted peak Demand expressed in MW, power factor, and megavolt-ampere reactive units as set forth in **Attachment 4**, the Phased Energization/Load Commissioning Plan form, attached hereto and made a part hereof. The schedule must be consistent with the Designated ILLE's current Load Commissioning Plan (LCP) resulting from approved interconnection studies, if applicable.

The Designated ILLE attests that any information included in **Attachment 4** is complete and accurate as of the date of notarization.

E. Backup Generation, Section 9.7(5)



F. Power Procurement Plan, Section 9.7(6)



Customer specific information submitted to ERCOT by an Interconnecting DSP or Interconnecting TSP in this document is considered Protected Information under paragraph (1)(c) of Protocol Section 1.3.1.1, Items Considered Protected Information.



2. Long Lead Equipment – Section 9.2.1.1(1)(e)(iii)

The Designated ILLE has ordered all equipment with a lead time of at least 18 months and will take delivery sufficiently in advance of the Designated ILLE's requested Initial Energization date so the equipment can be installed by the Designated ILLE's requested Initial Energization date.

3. Notice to Proceed – Section 9.2.1.1(1)(e)(iv)

The Designated ILLE has issued a notice to proceed with the construction of all required interconnection Facilities.

4. End-Use Customer – Section 9.2.1.1(1)(e)(v)

5. Site Control Evidence – Section 9.2.1.1(1)(e)(viii)

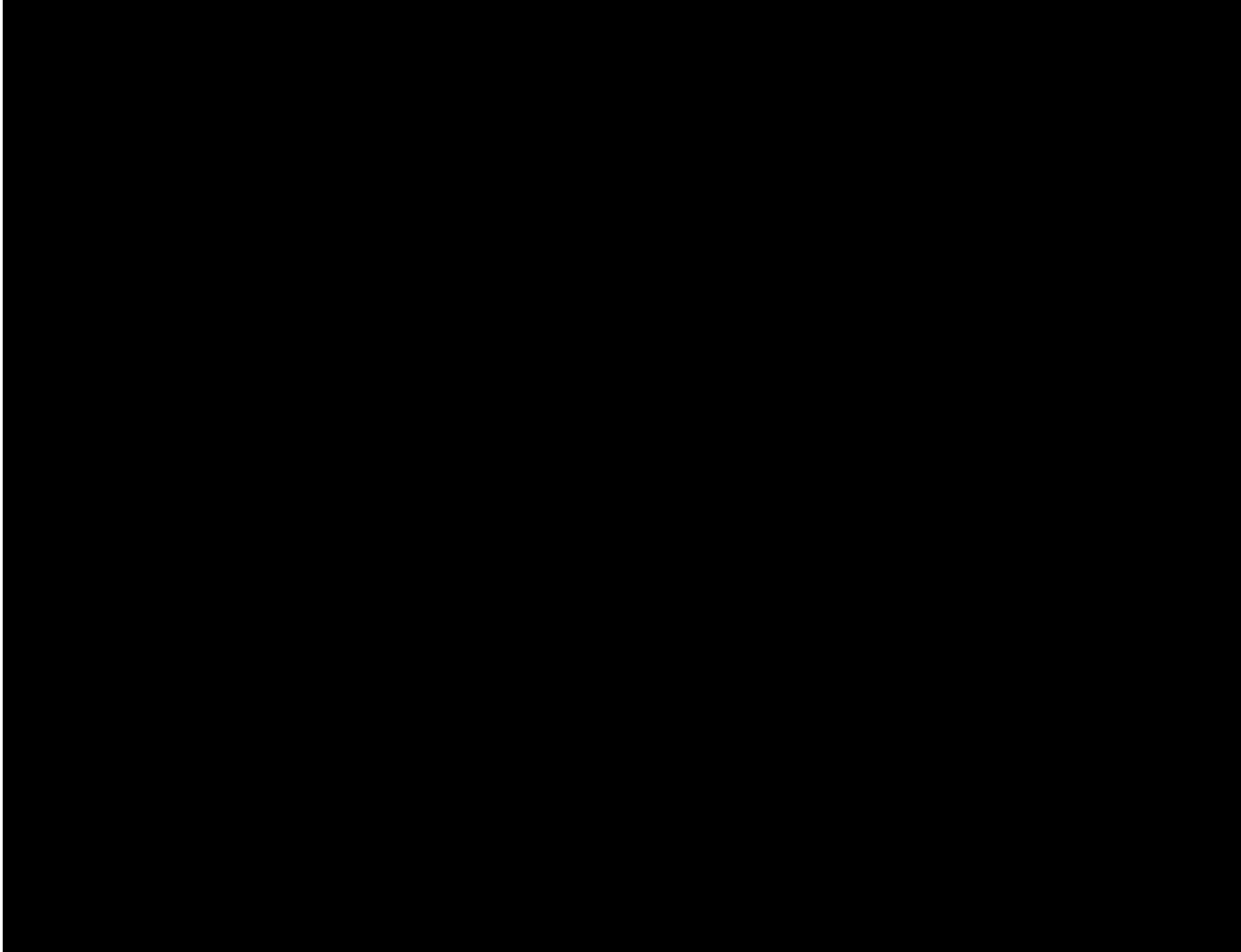
The Designated ILLE holds one of the property interests below in or relating to one or more parcel(s) of land sufficient to accommodate the Designated ILLE's planned Load Facilities at the Designated Large Load location. The supporting documentary evidence is included in **Attachment 5**.

The Designated ILLE attests that the information contained in **Attachment 5** is complete and accurate as of the date of notarization.

6. Designated ILLE Acknowledgment – Section 9.2.2(1)(c)

The Designated ILLE acknowledges its obligations to notify and update the Interconnecting DSP and Interconnecting TSP of changes to the Large Load project information or to the load

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ATTACHMENT 1

[The Designated ILLE to use if it has more than one substantially similar interconnection request. Repeat (a)-(e) below as necessary to disclose multiple substantially similar interconnection requests.]

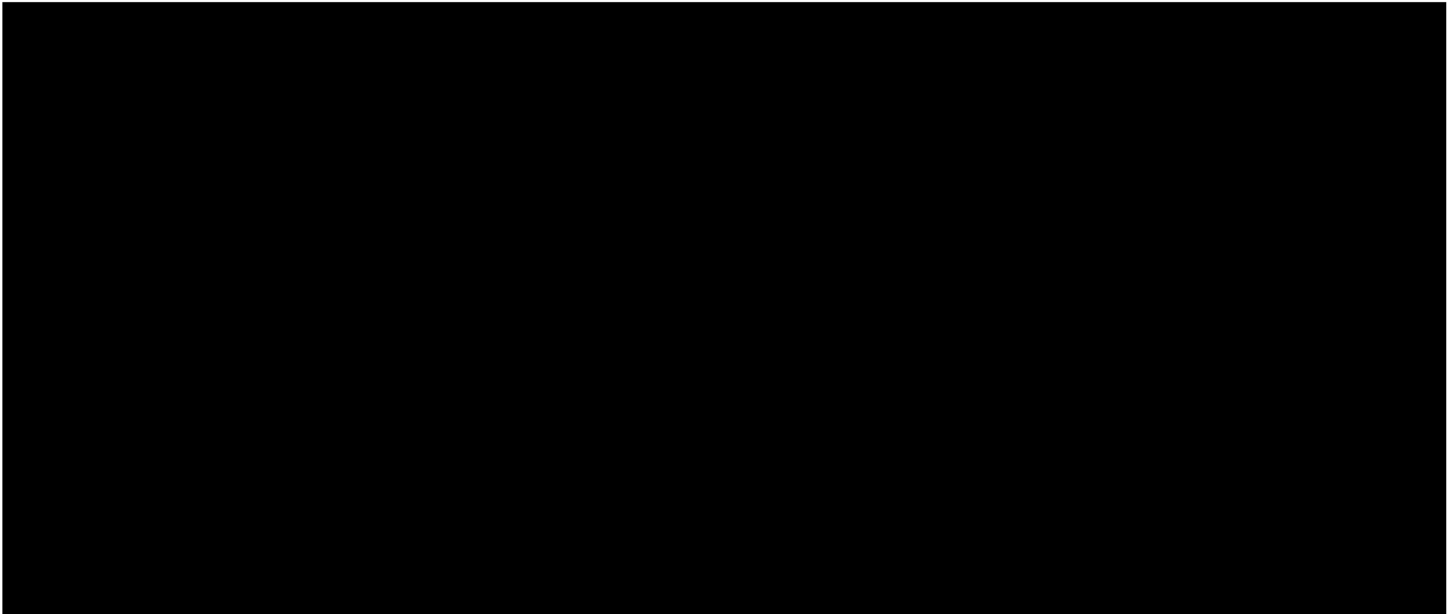
- a) ERCOT-assigned serial number: LLI-____ (if available); Batch Zero Serial Number: BZ-____ (if applicable);
- b) Location (by planning bus or description of planning bus), including the power region and, if in the ERCOT region, the load zone:
_____;
- c) Non-coincident peak Demand (MW value): _____;
- d) Anticipated timing of Initial Energization (Month and Year): _____; and
- e) Interconnecting DSP and/or Interconnecting TSP (as applicable):
_____.

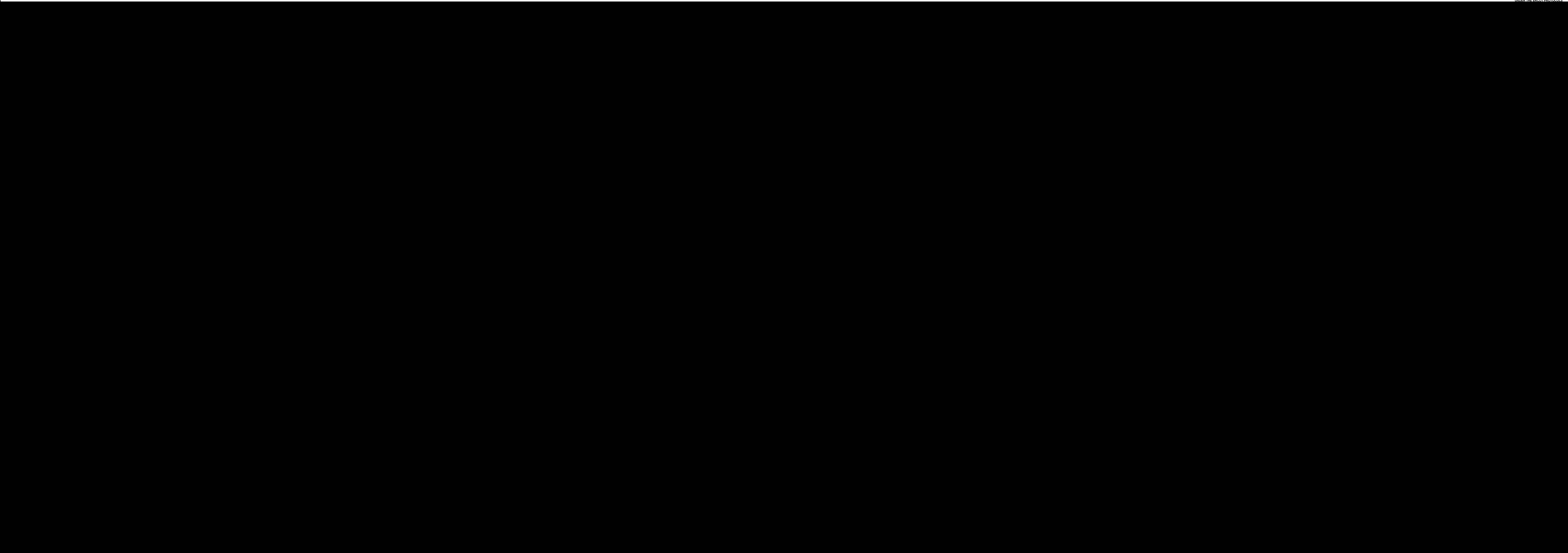
**CONFIDENTIAL AND PROTECTED INFORMATION
UNDER THE ERCOT PROTOCOLS**

Customer specific information submitted to ERCOT by an Interconnecting DSP or Interconnecting TSP in this document is considered Protected Information under paragraph (1)(r) of Protocol Section 1.3.1.1, Items Considered Protected Information.

ATTACHMENT 2

[The Designated ILLE must provide its plans, expected timing, and current progress for site-related studies and engineering services required before energization of the Designated Large Load (e.g., geotechnical surveys, water infrastructure studies, wastewater assessments, or gas-related work), either directly in this attachment or as a separate attachment to this Form.]





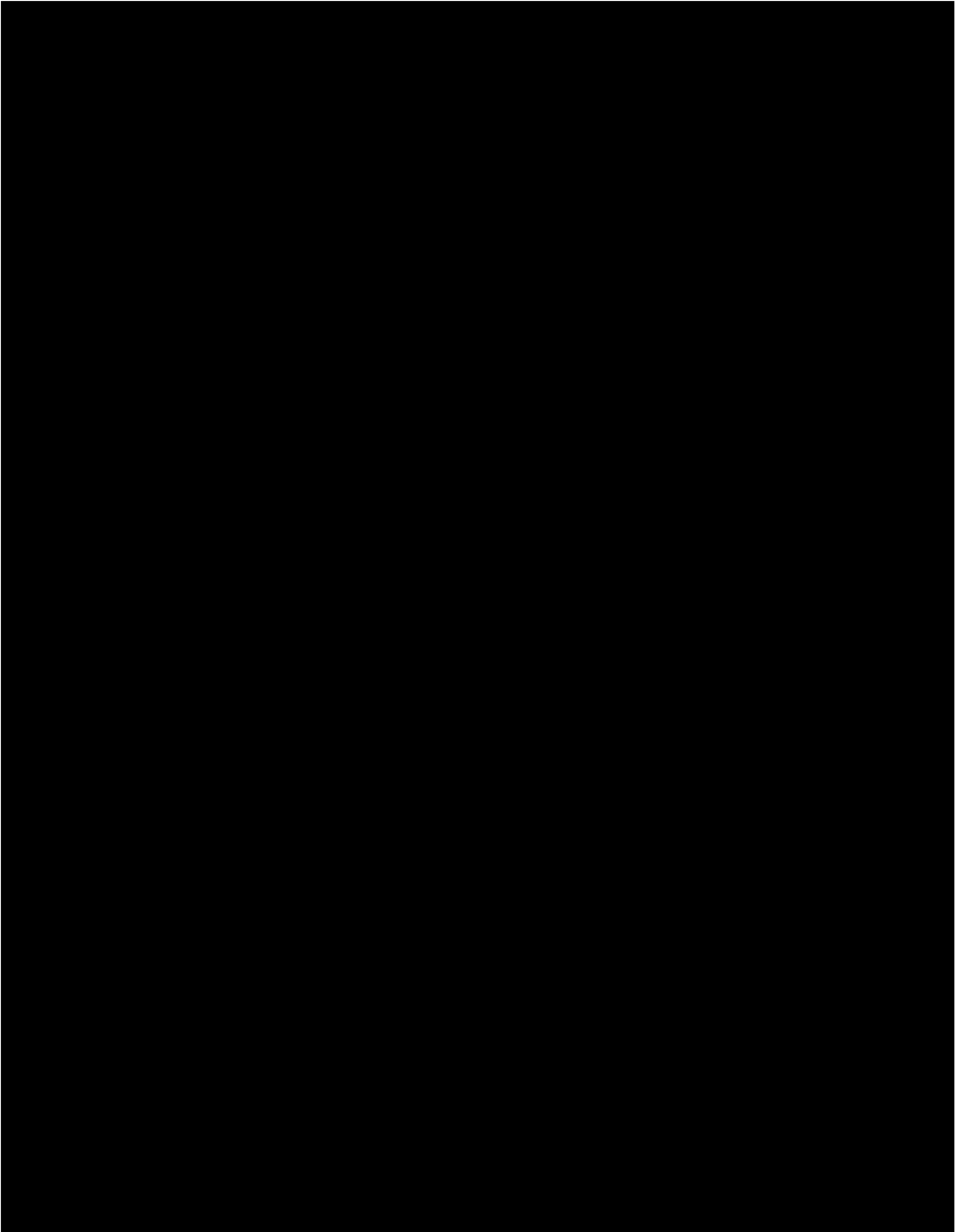
**CONFIDENTIAL AND PROTECTED INFORMATION
UNDER THE ERCOT PROTOCOLS**

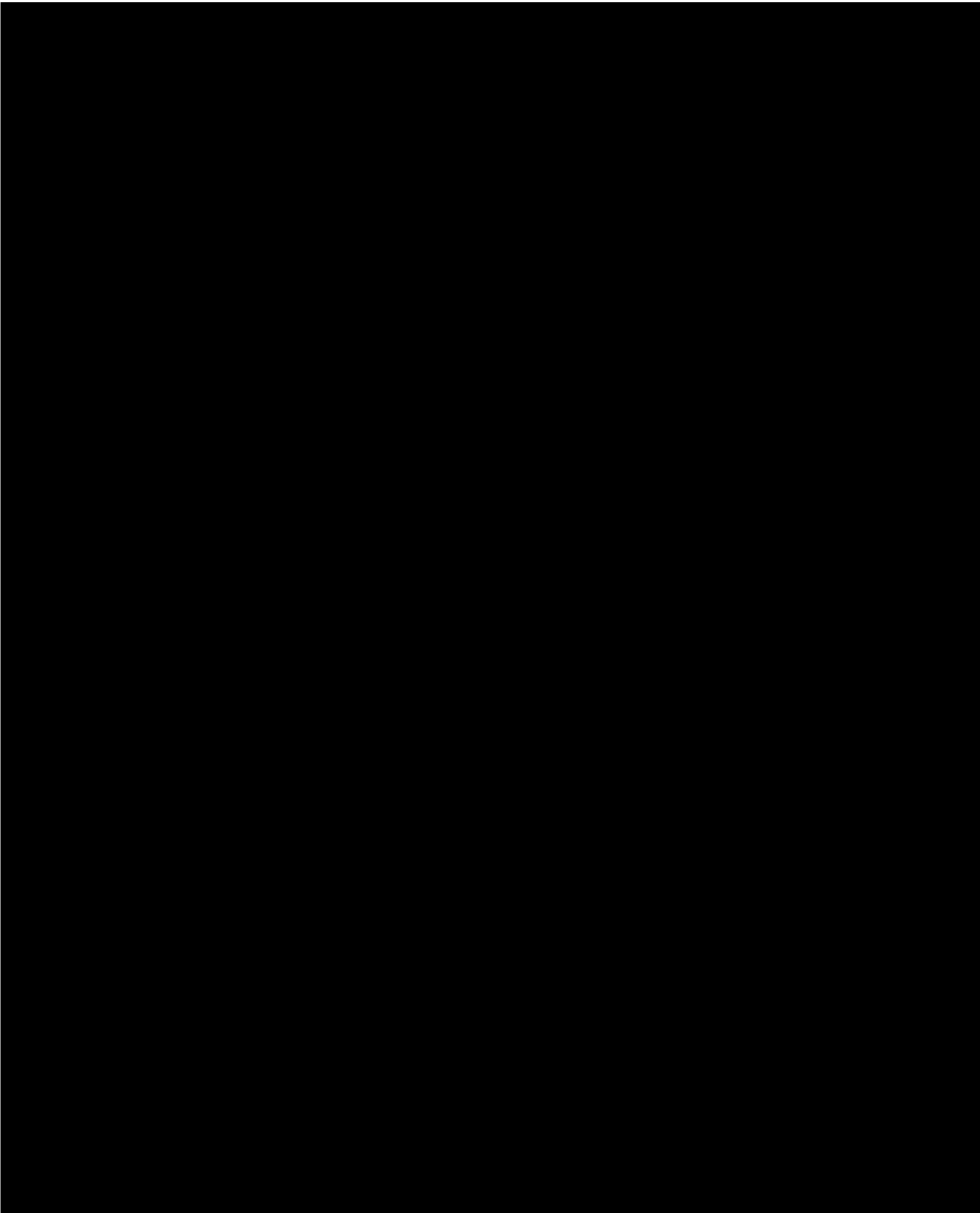
Customer specific information submitted to ERCOT by an Interconnecting DSP or Interconnecting TSP in this document is considered Protected Information under paragraph (1)(r) of Protocol Section 1.3.1.1, Items Considered Protected Information.

ATTACHMENT 3

[The Designated ILLE must provide plans, expected timing, and current progress for obtaining non-ministerial discretionary approvals from state and local regulatory authorities required for development before energization (e.g., permits for water, air, or backup generation), either directly in this attachment or as a separate attachment to this Form.]



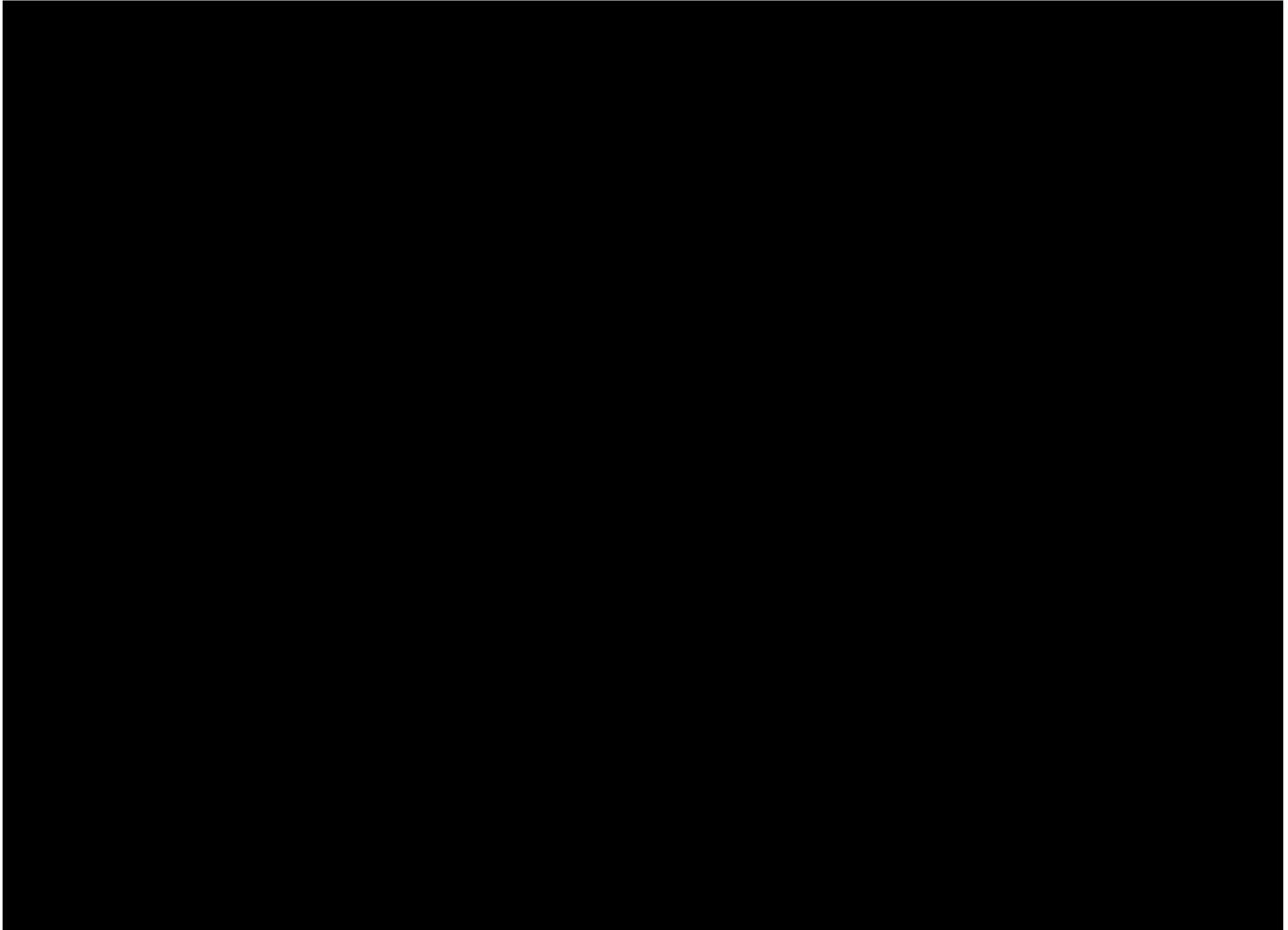




**CONFIDENTIAL AND PROTECTED INFORMATION
UNDER THE ERCOT PROTOCOLS**

Customer specific information submitted to ERCOT by an Interconnecting DSP or Interconnecting TSP in this document is considered Protected Information under paragraph (1)(r) of Protocol Section 1.3.1.1, Items Considered Protected Information.

ATTACHMENT 4



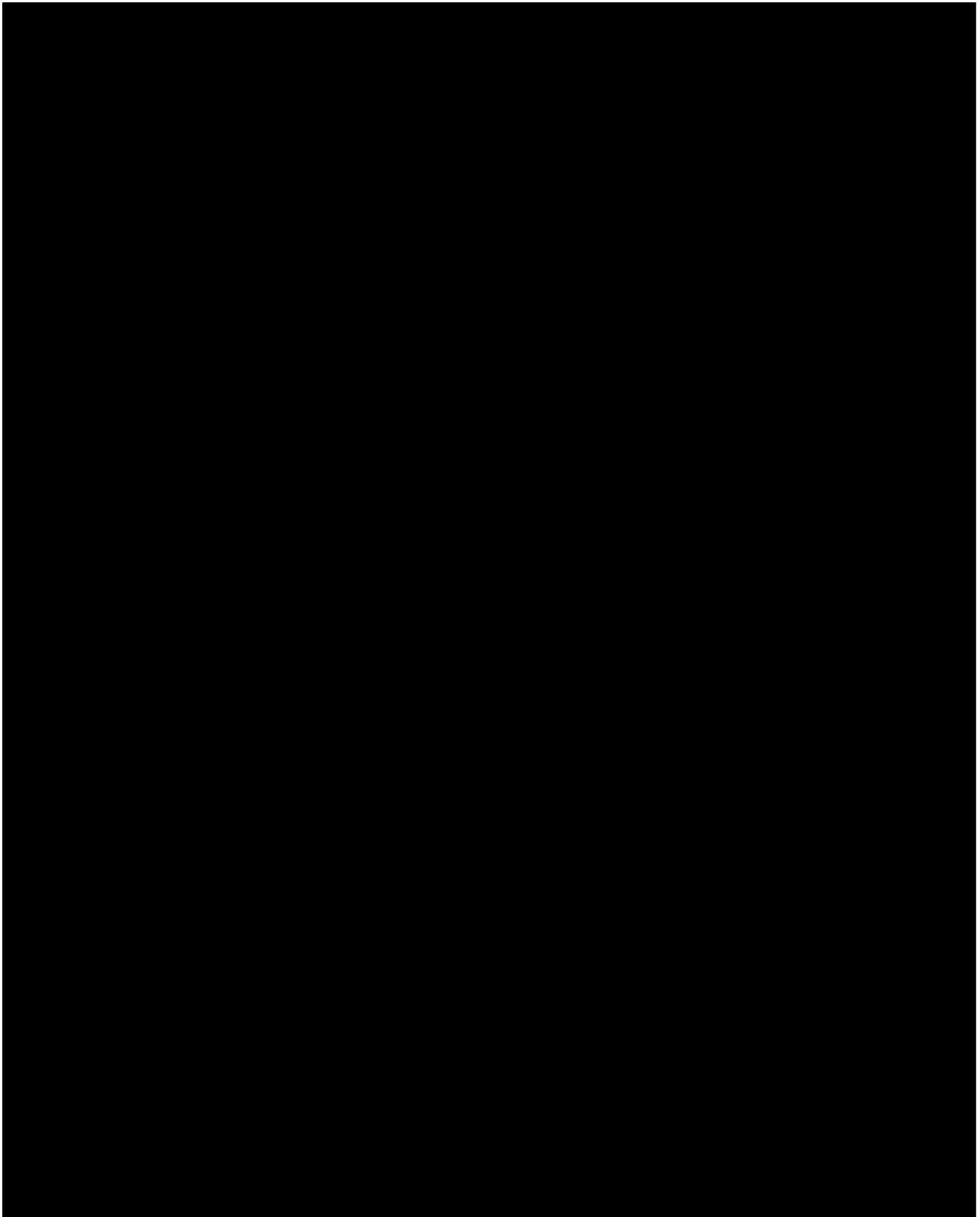
**CONFIDENTIAL AND PROTECTED INFORMATION
UNDER THE ERCOT PROTOCOLS**

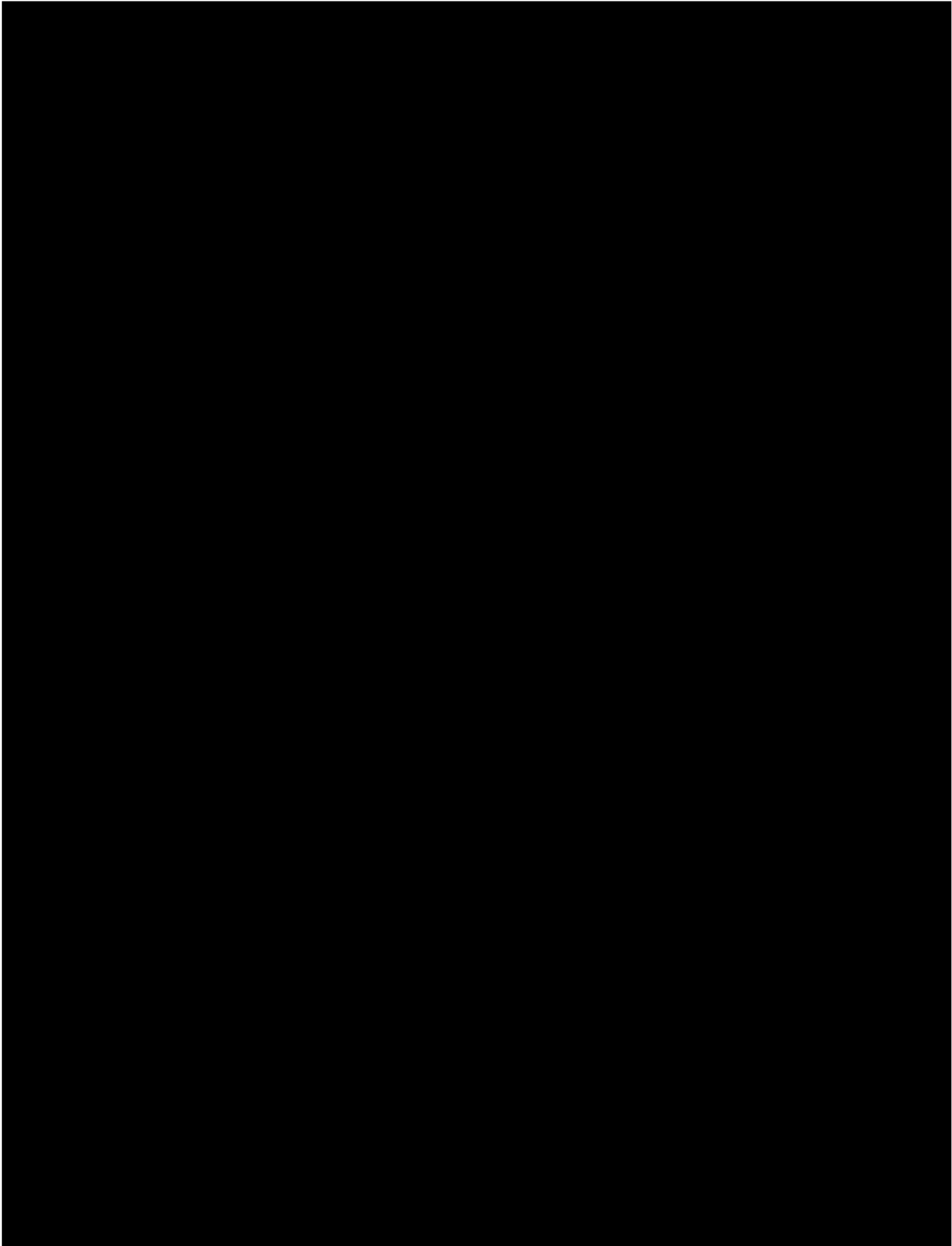
Customer specific information submitted to ERCOT by an Interconnecting DSP or Interconnecting TSP in this document is considered Protected Information under paragraph (1)(r) of Protocol Section 1.3.1.1, Items Considered Protected Information.

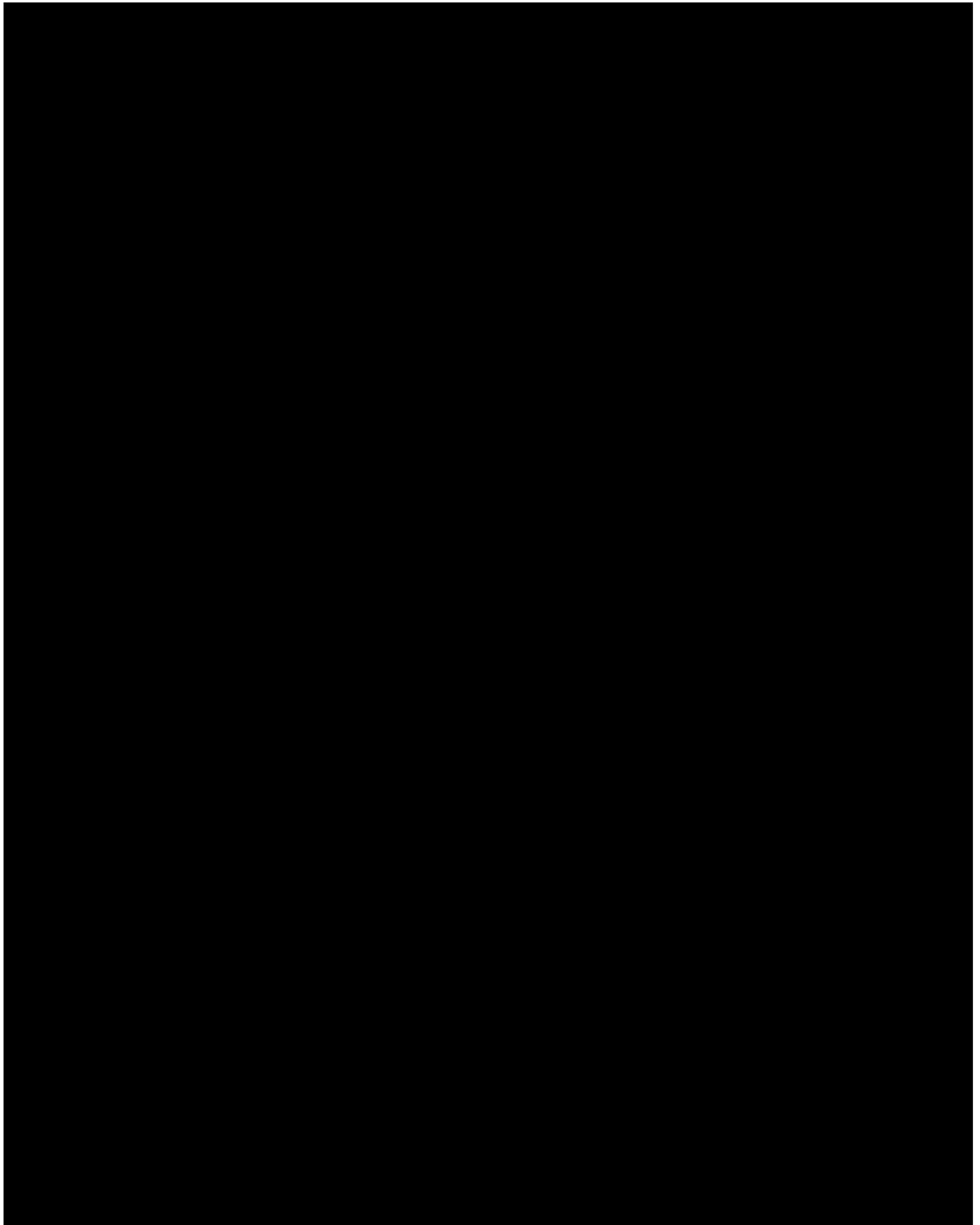
Attachment 5

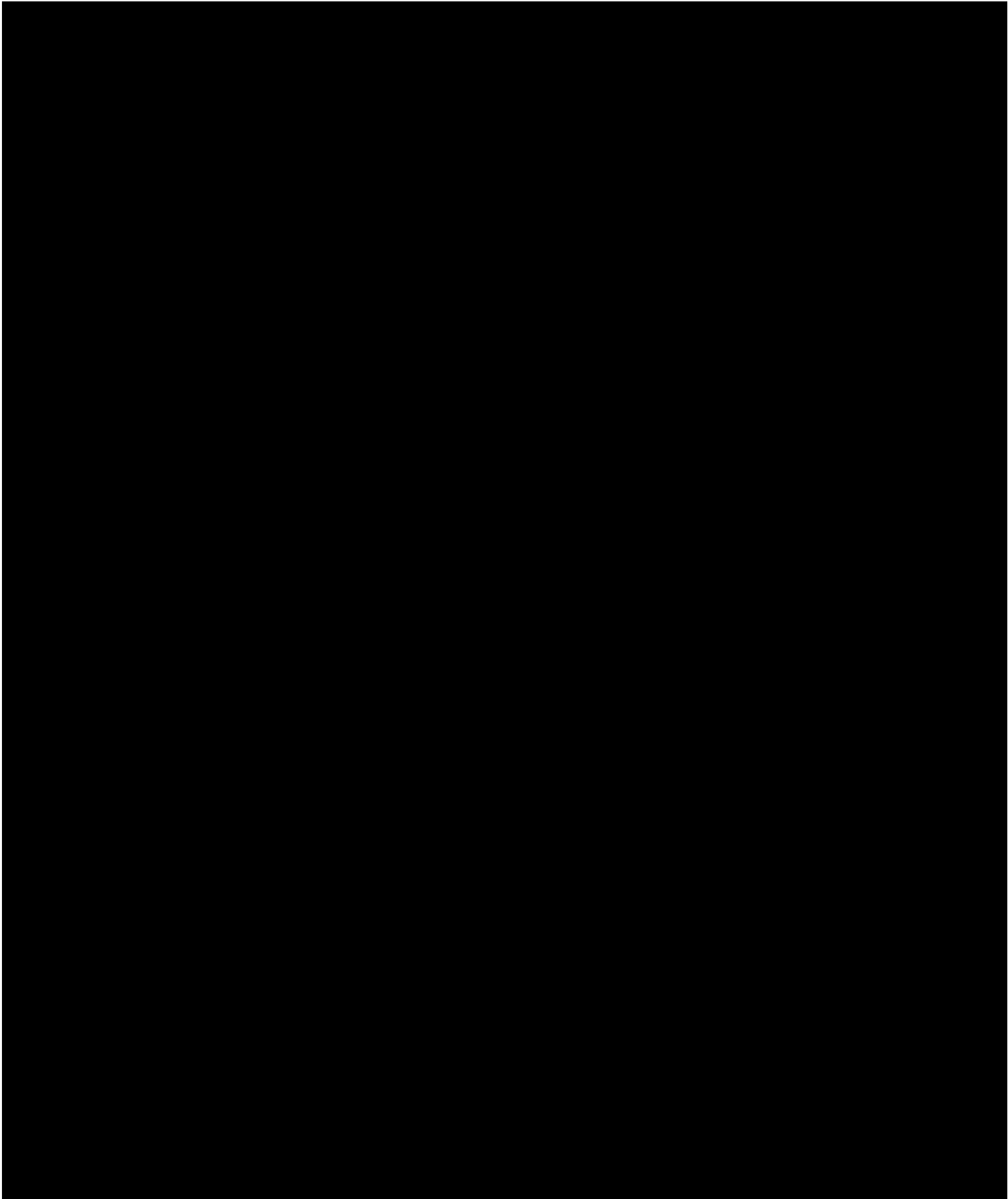
[The Designated ILLE must provide documentary evidence that it holds the property interest designated in Item 5 above. The evidence must demonstrate that the interest relates to one or more parcels of land sufficient to accommodate the Designated ILLE's planned Load Facilities at the Designated Large Load location. Such evidence may be provided directly in this attachment or as a separate attachment to this Form.]

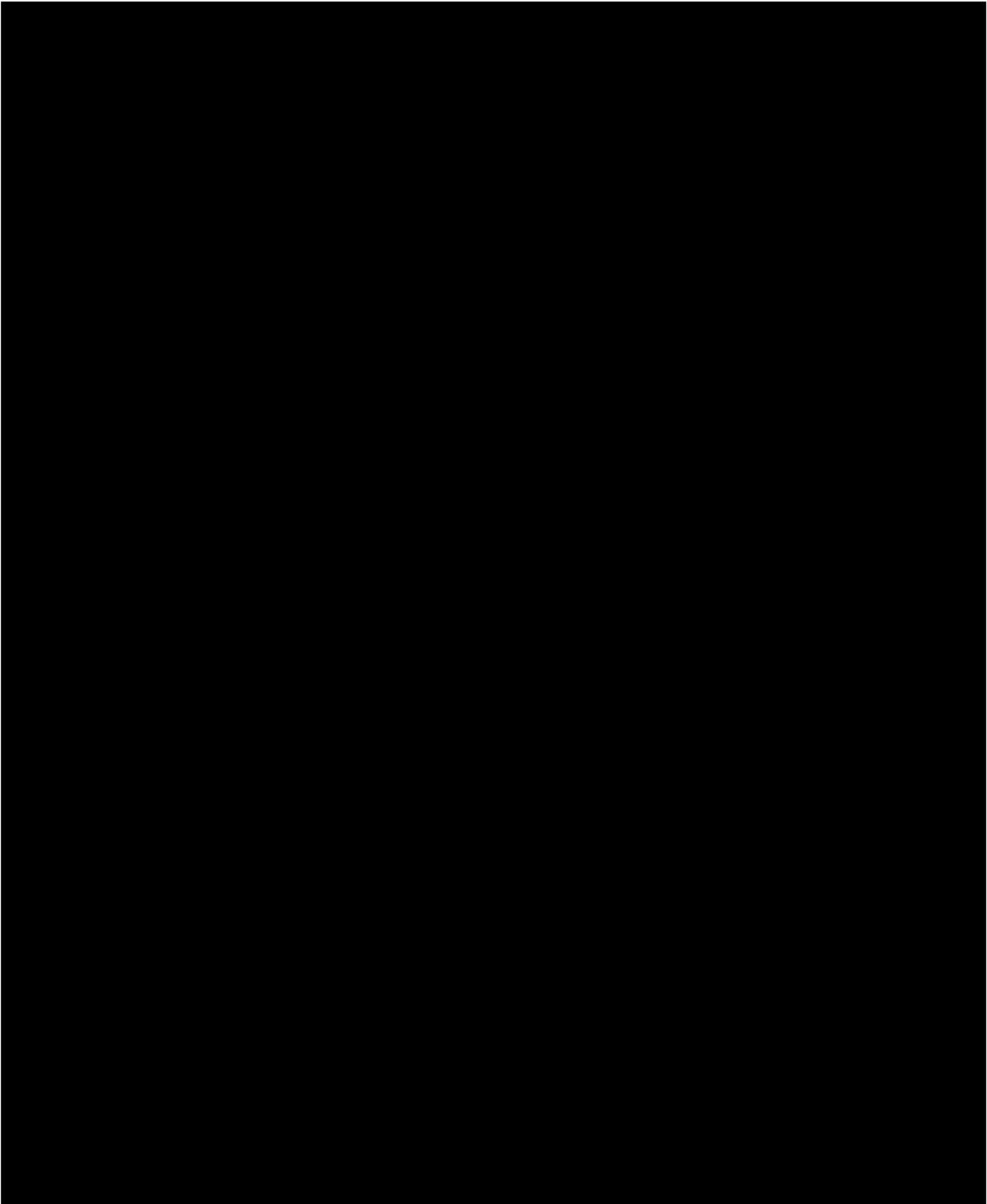


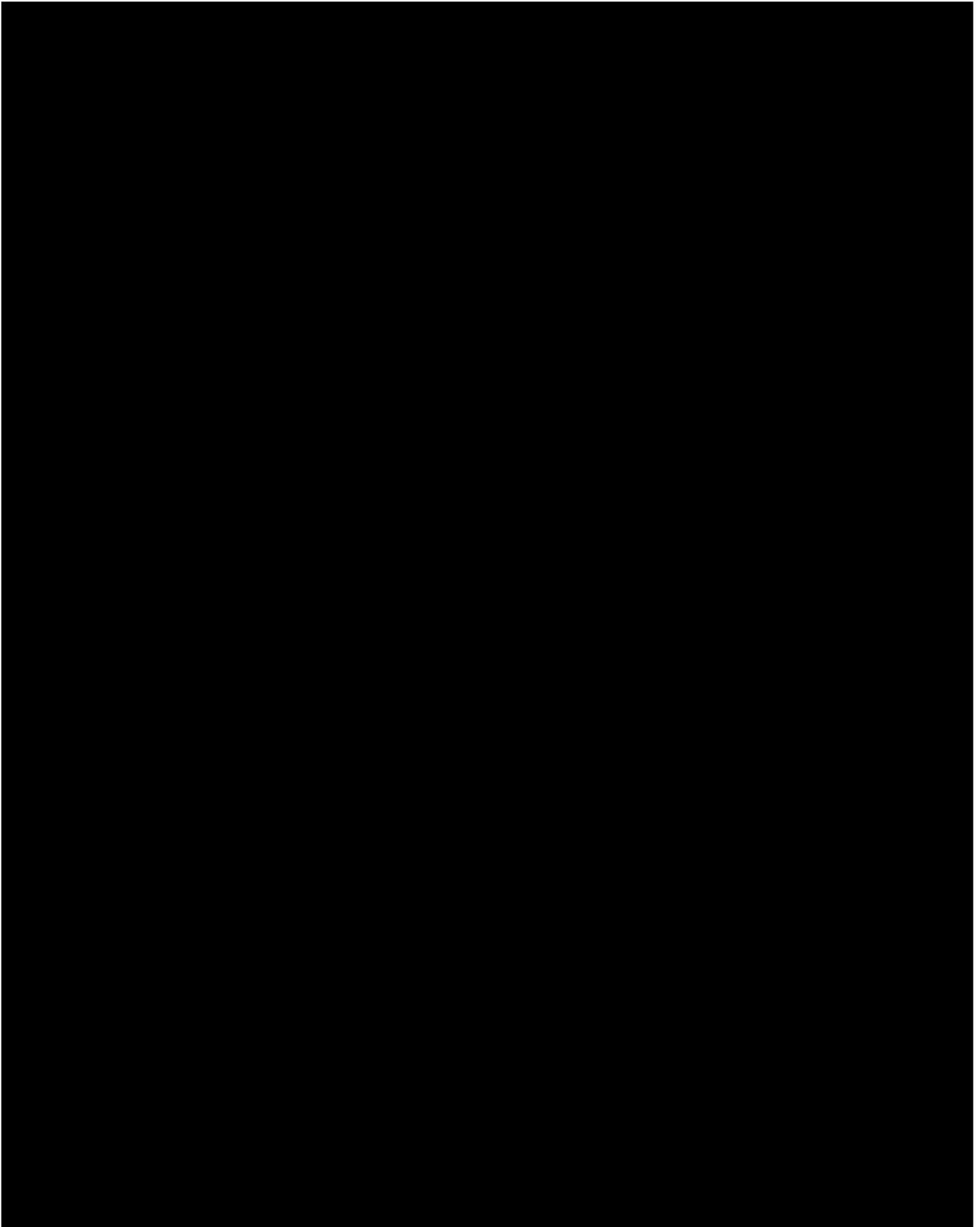


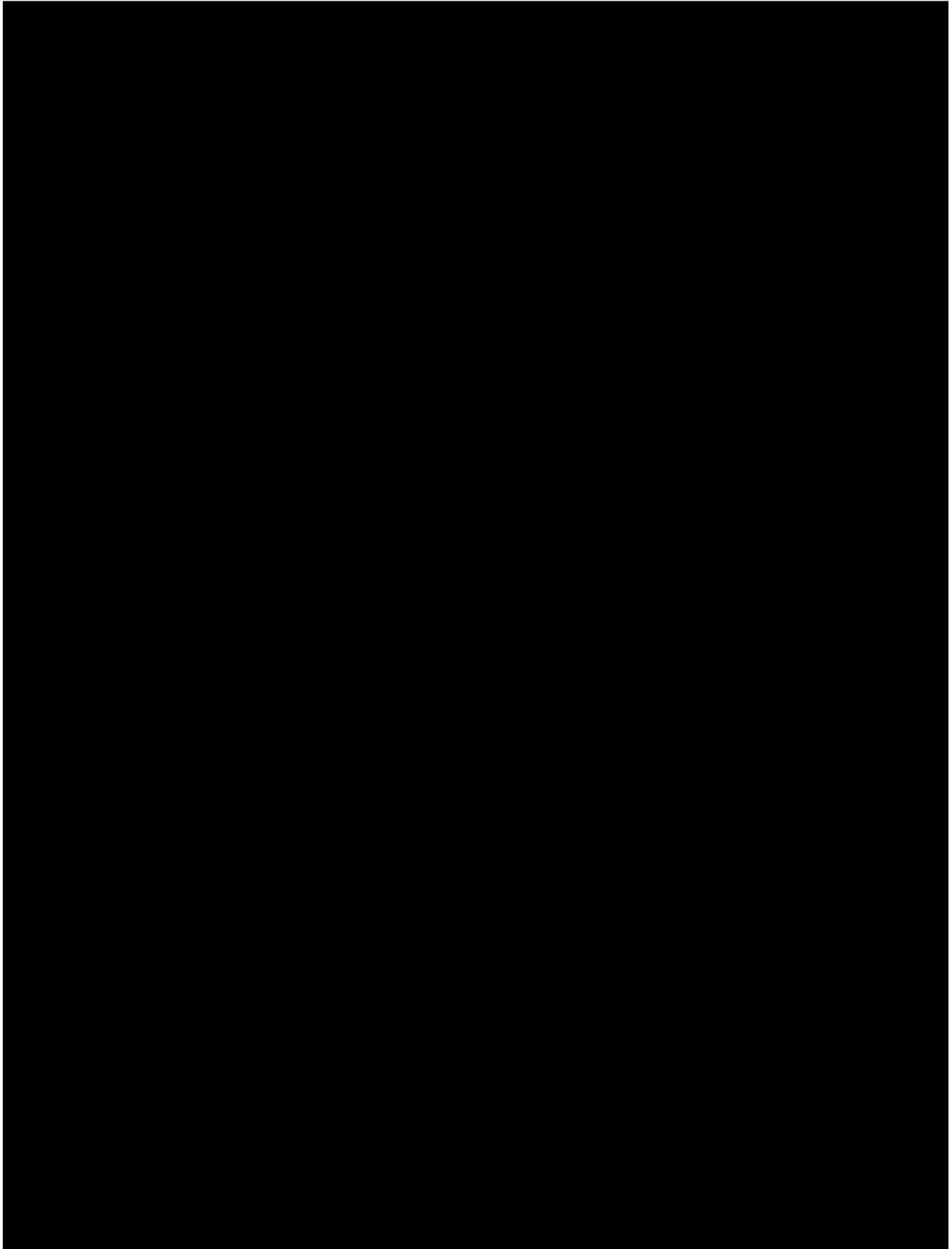


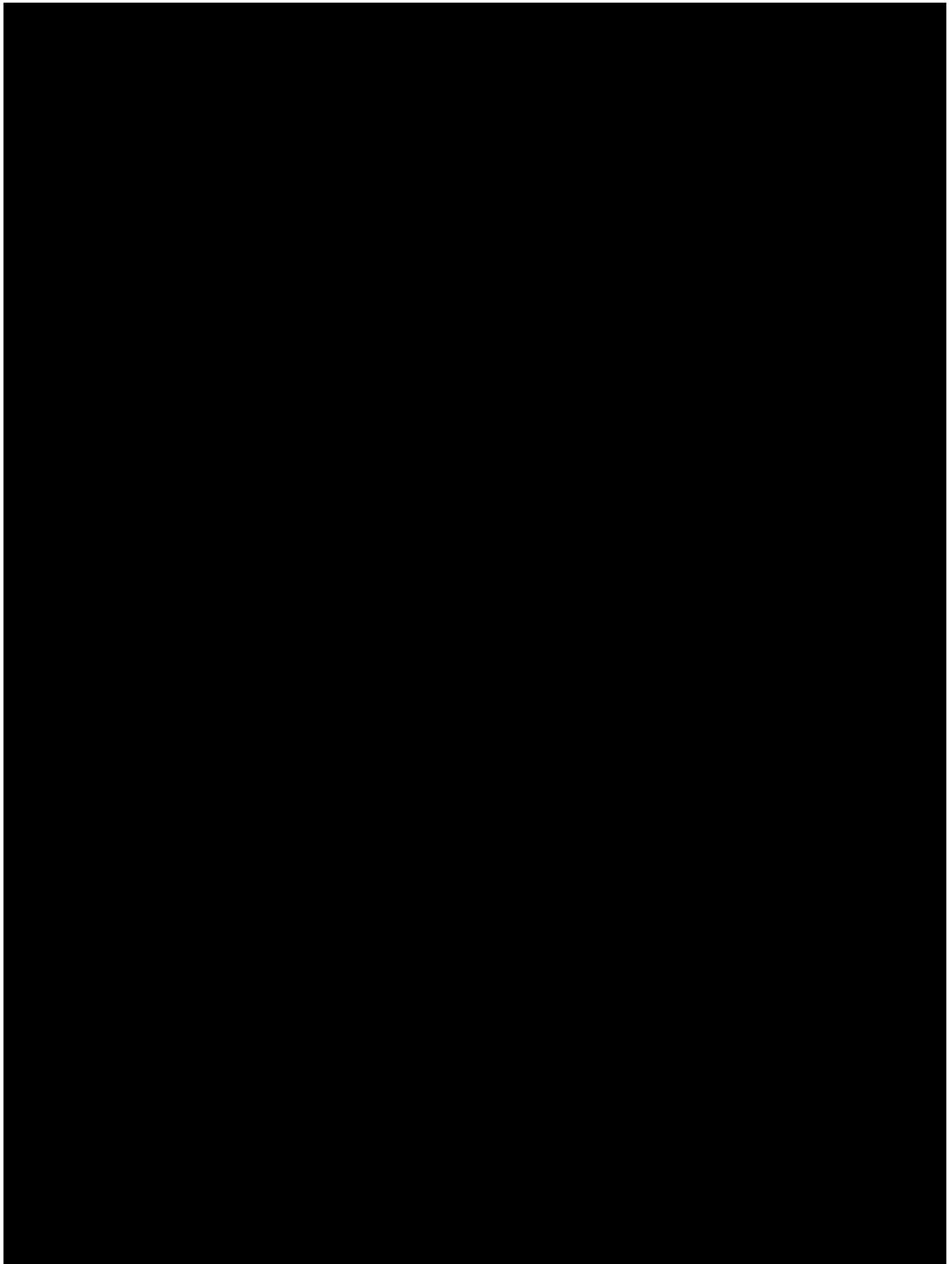


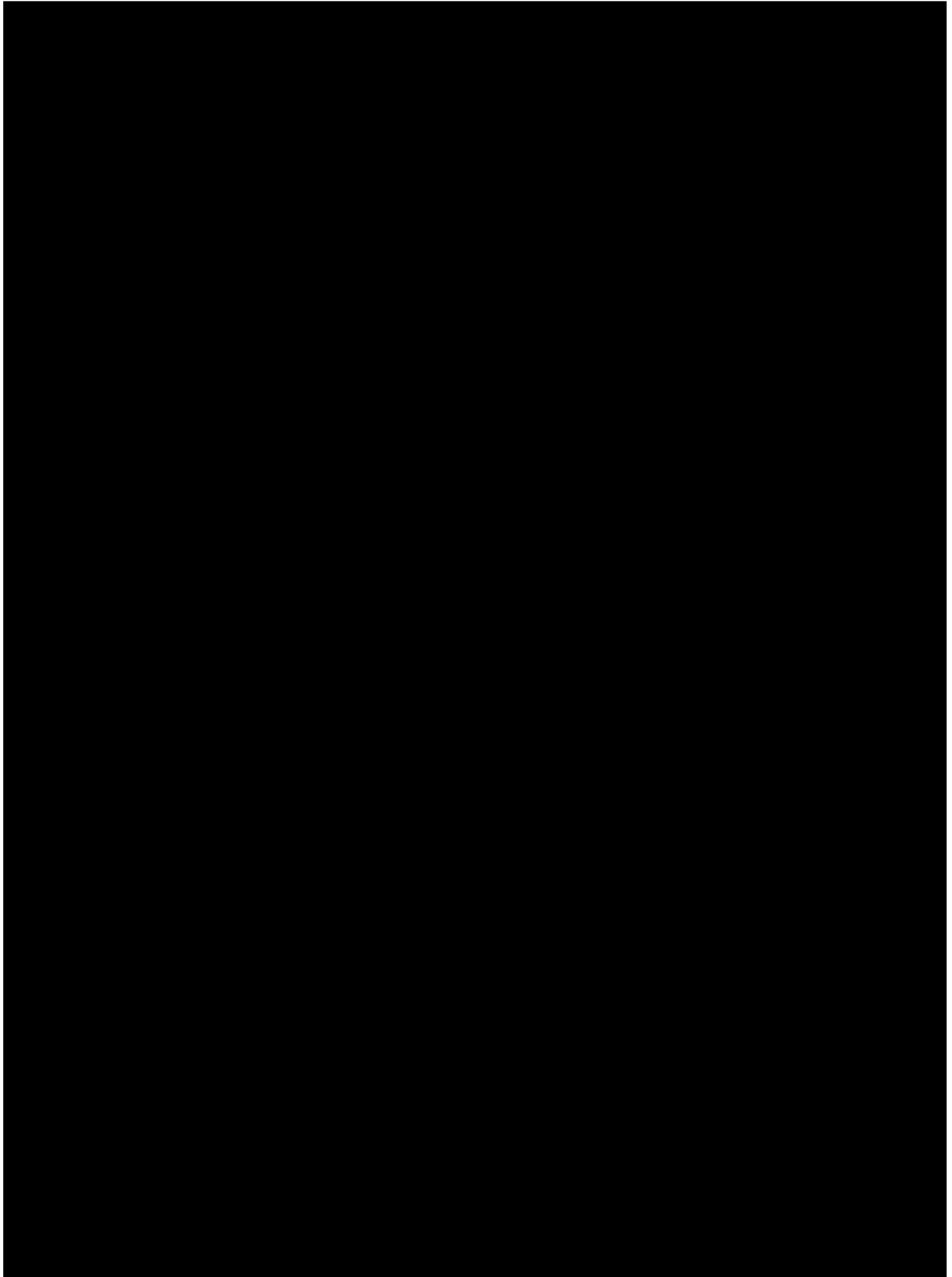


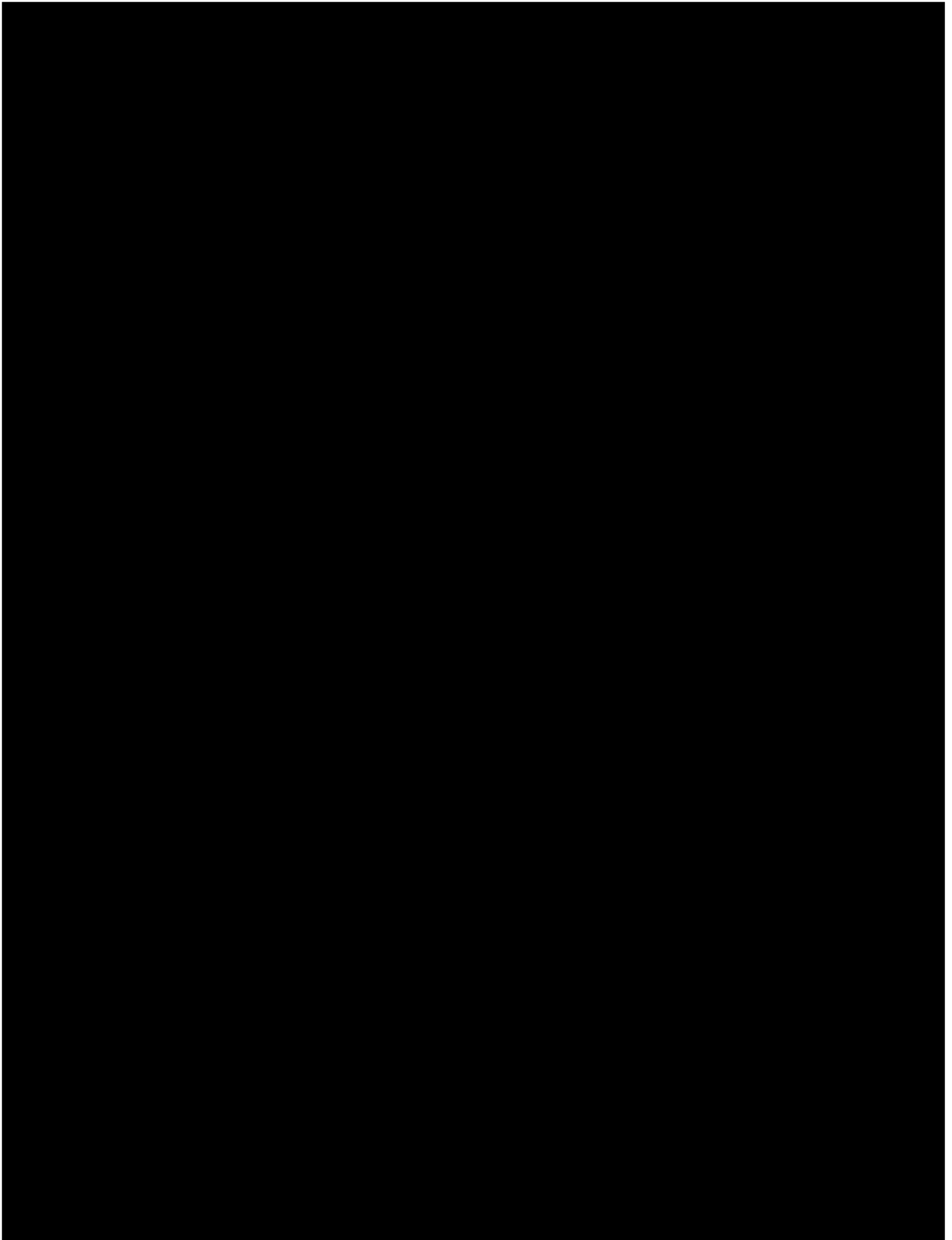


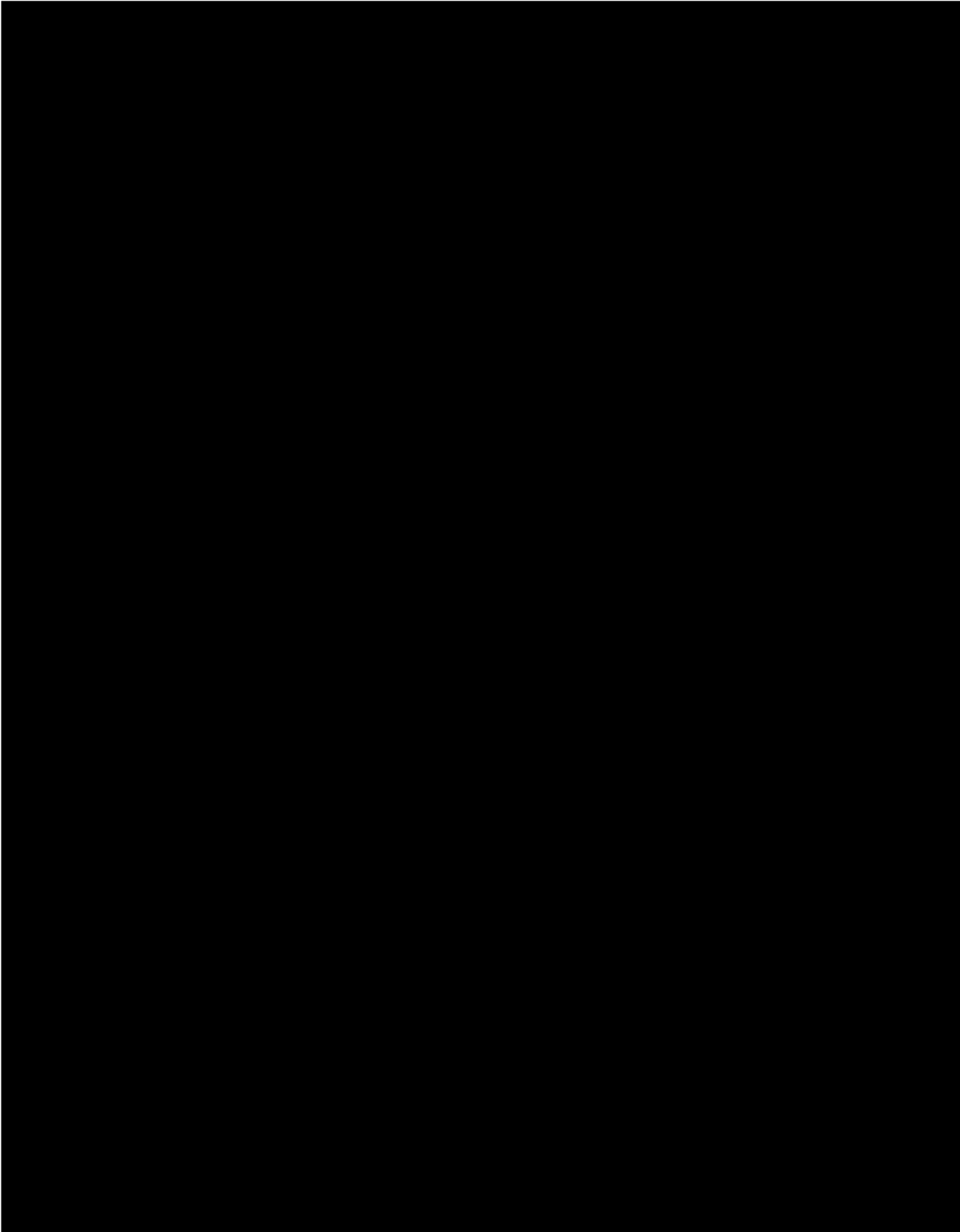


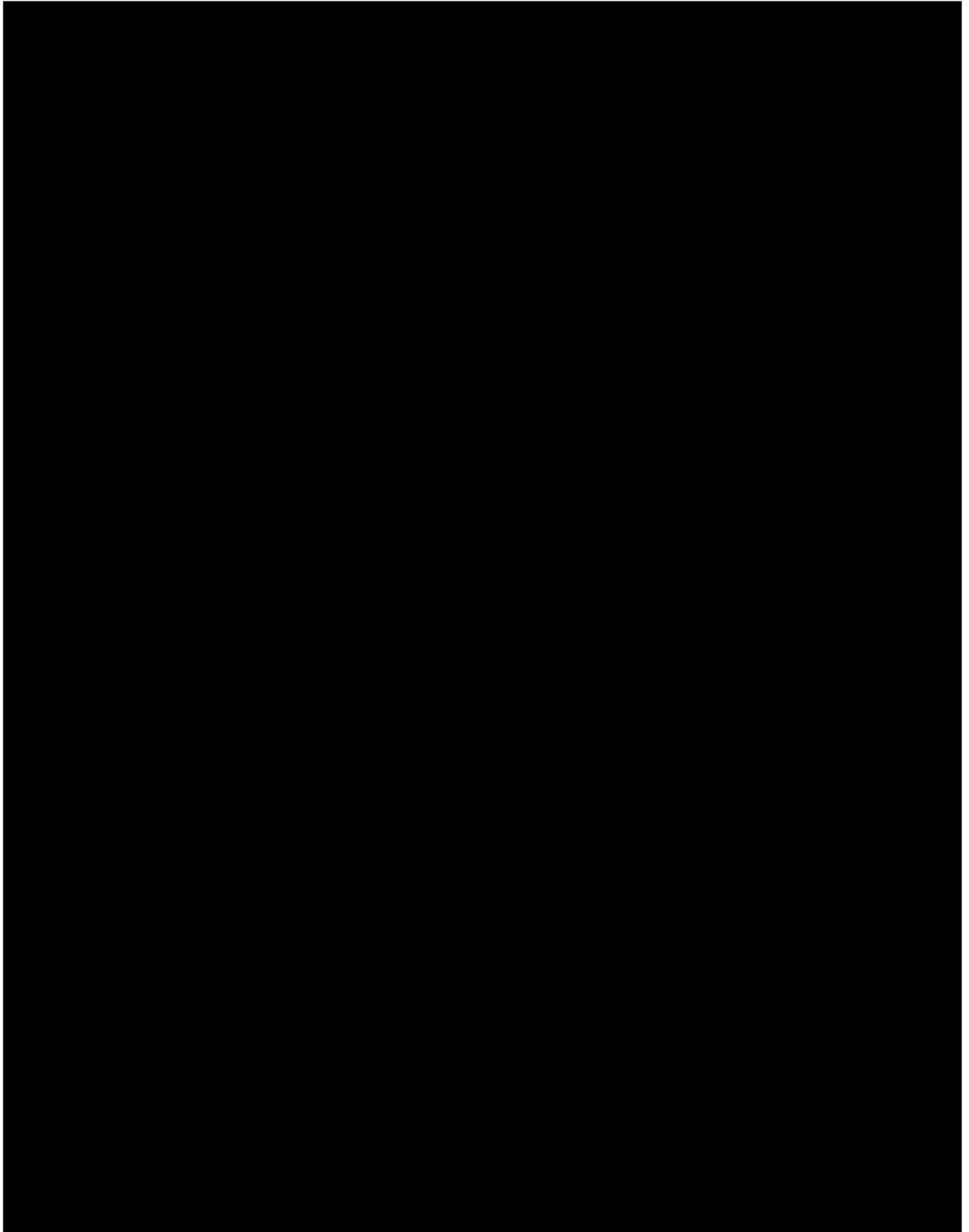


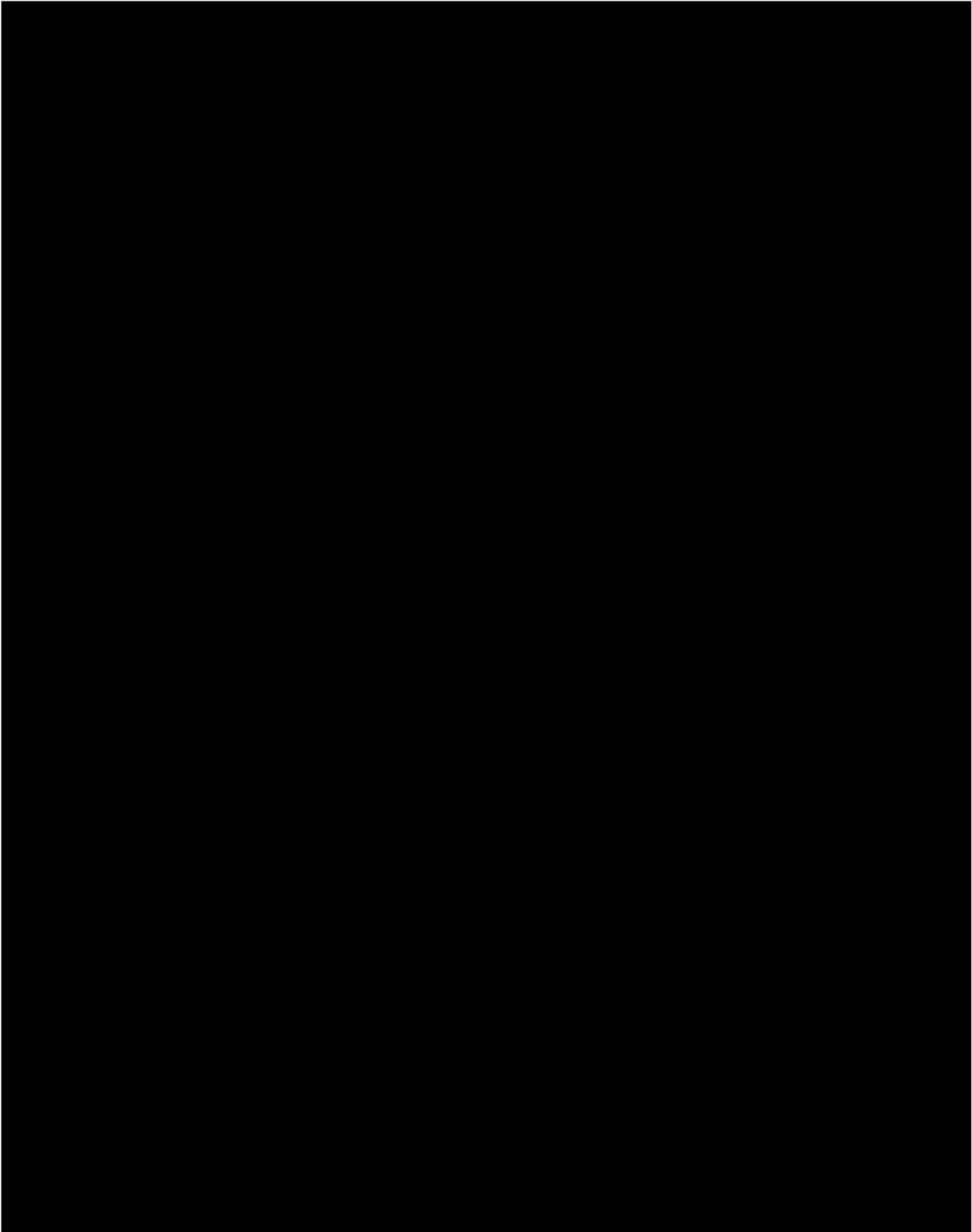


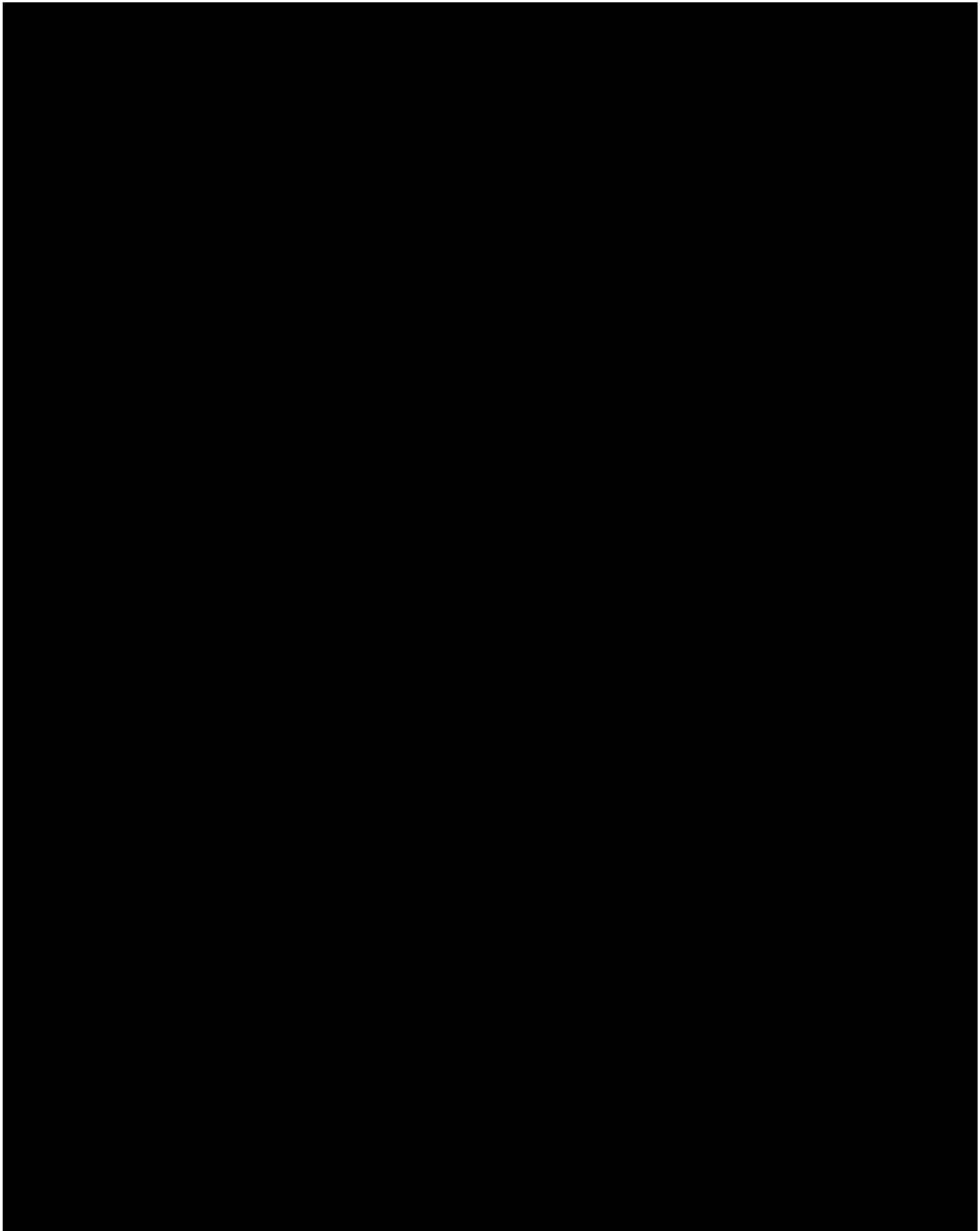


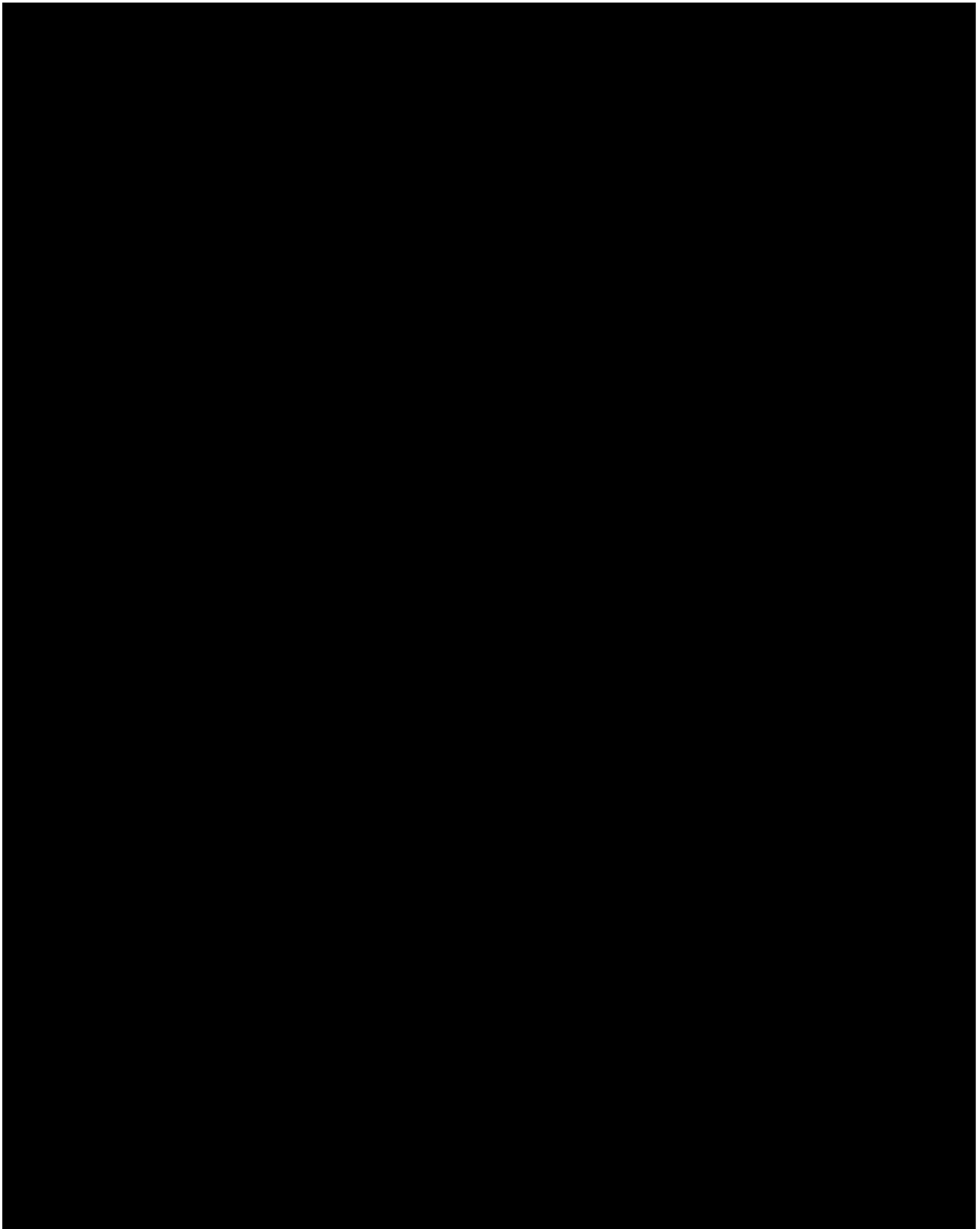


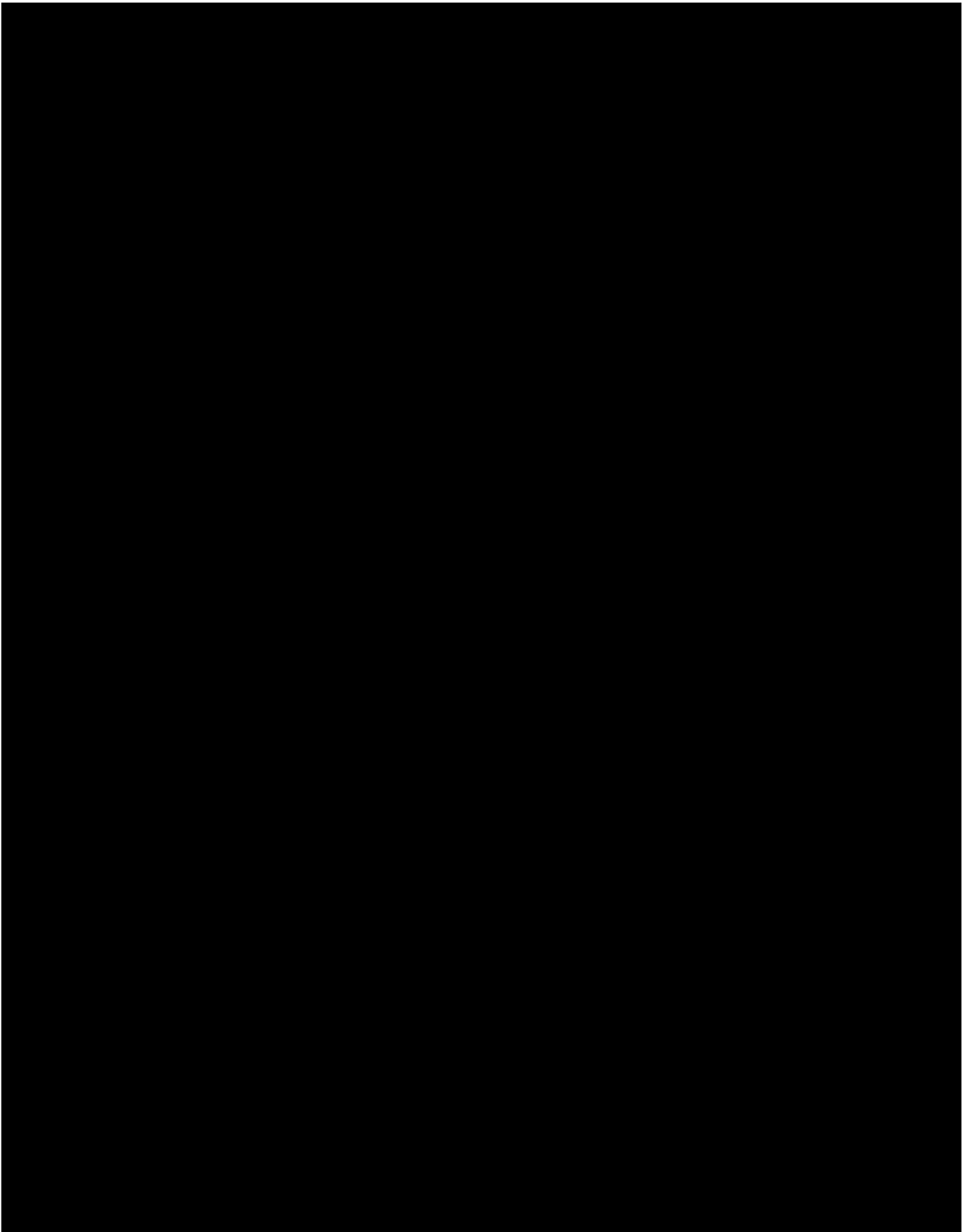


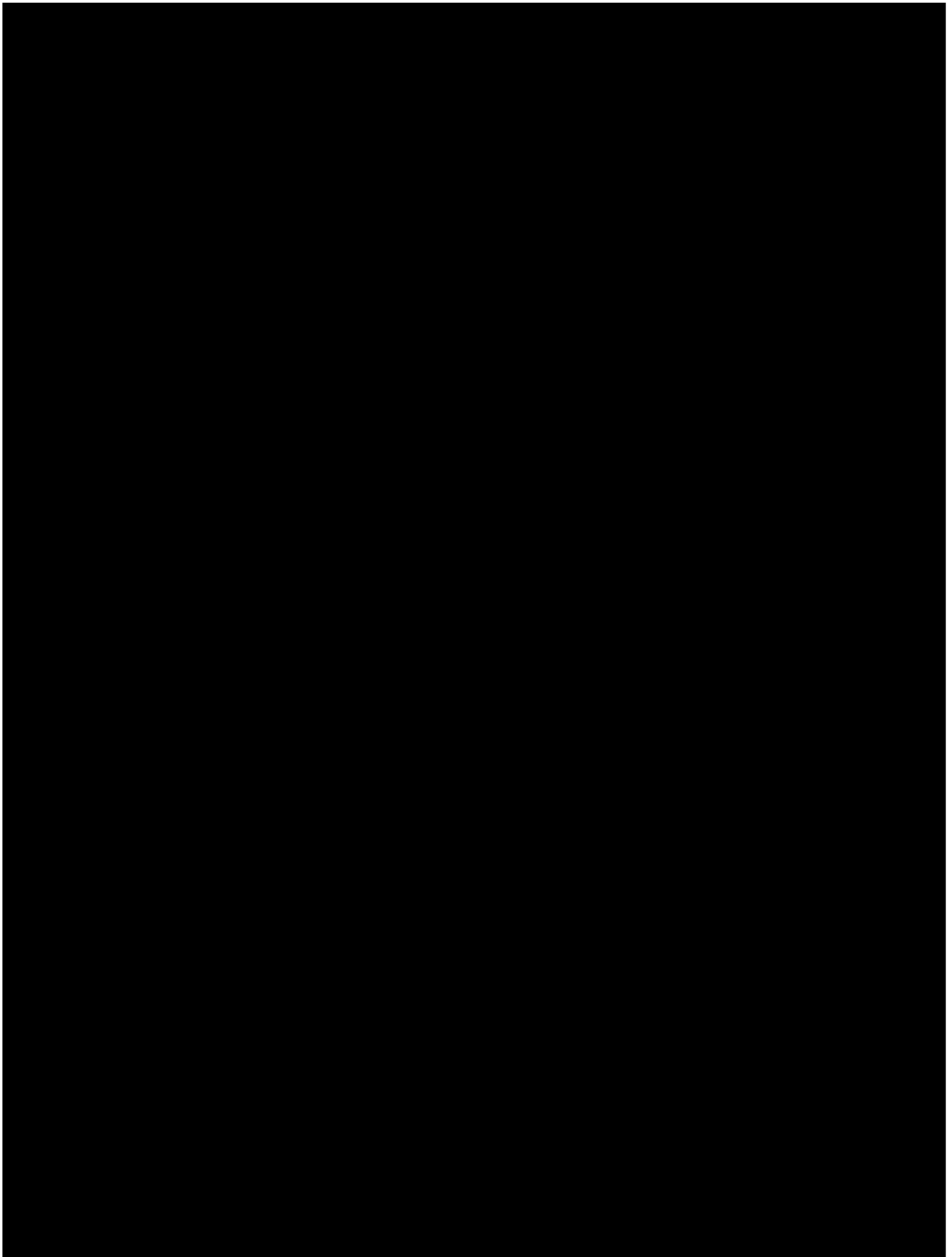


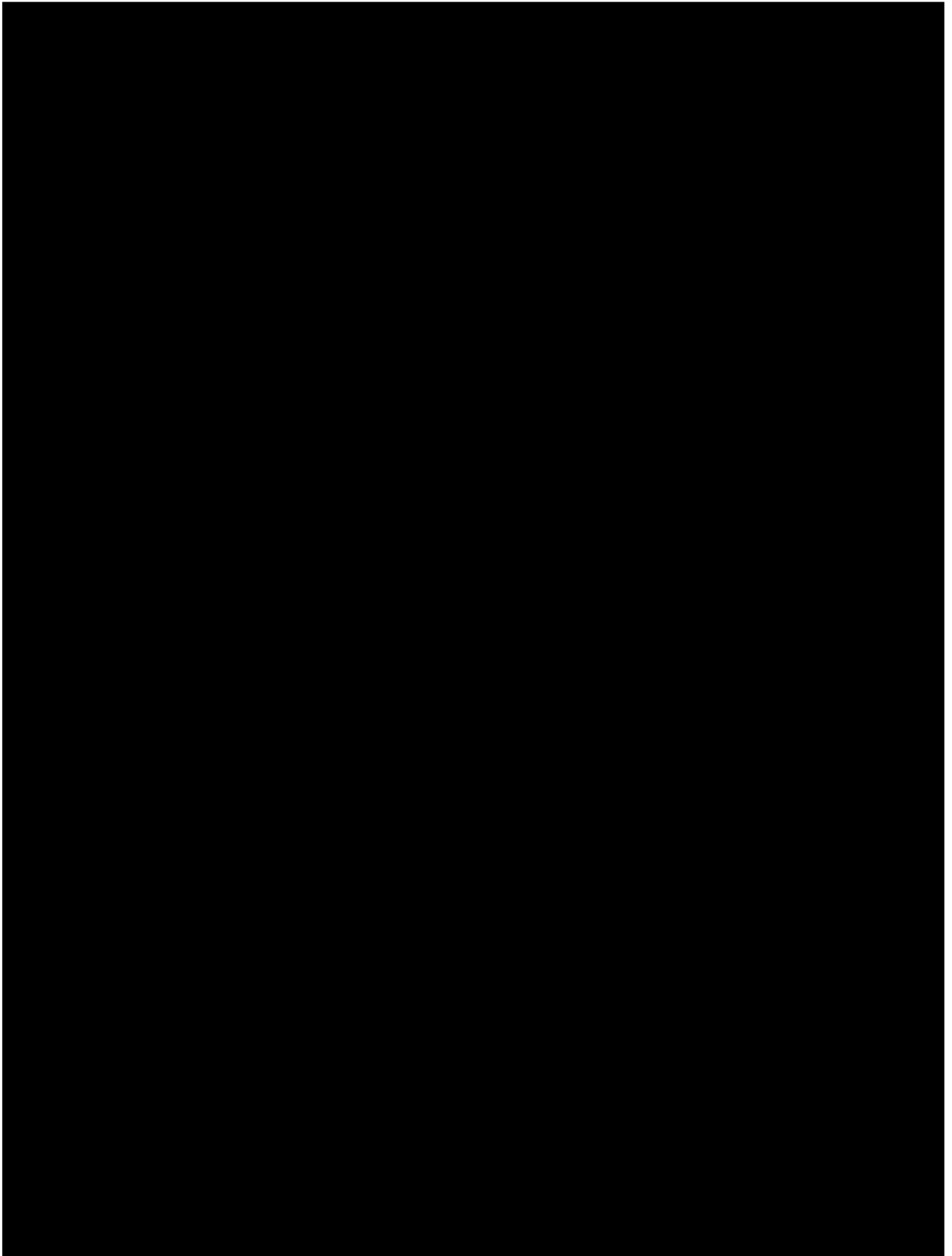


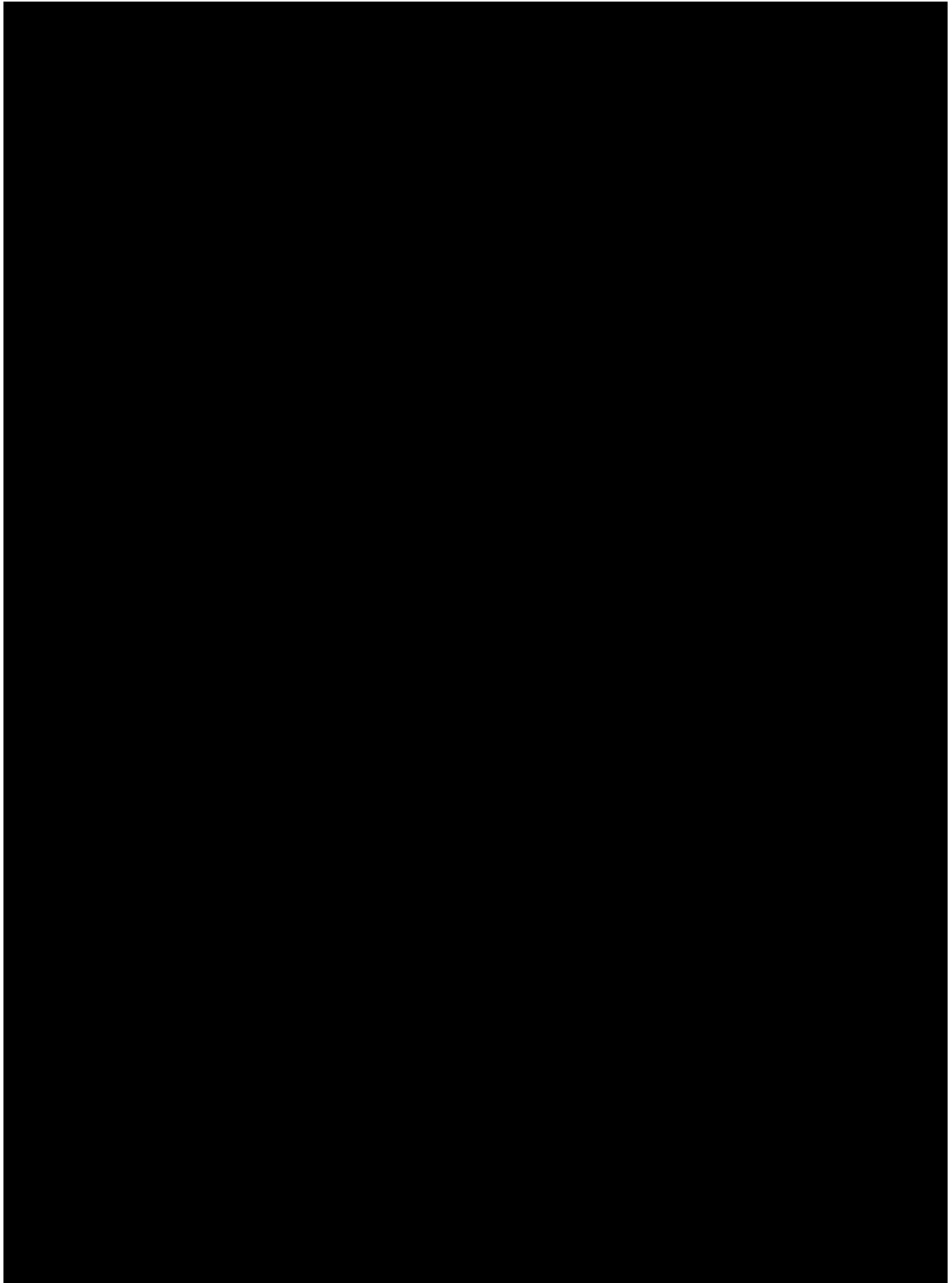


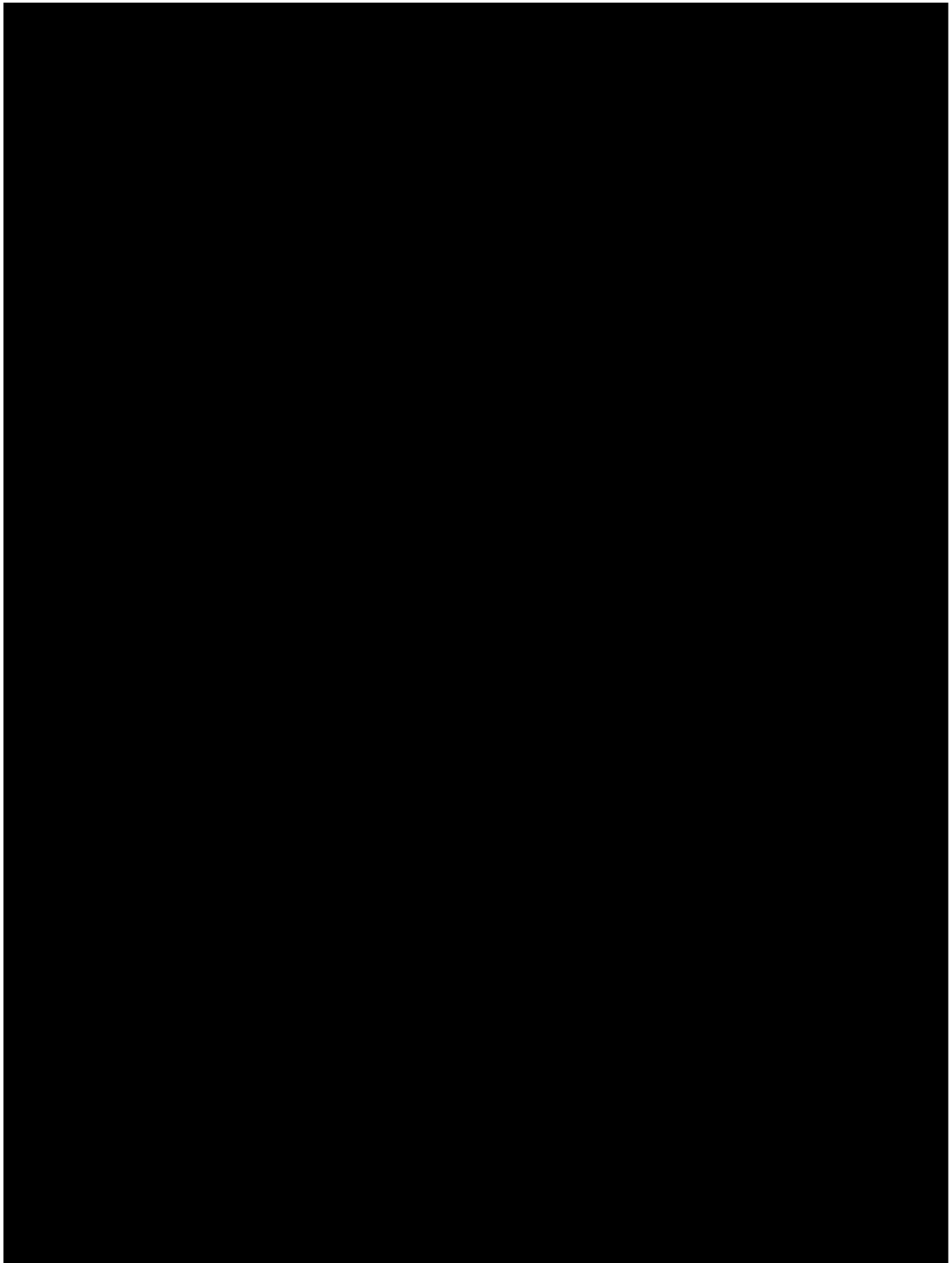


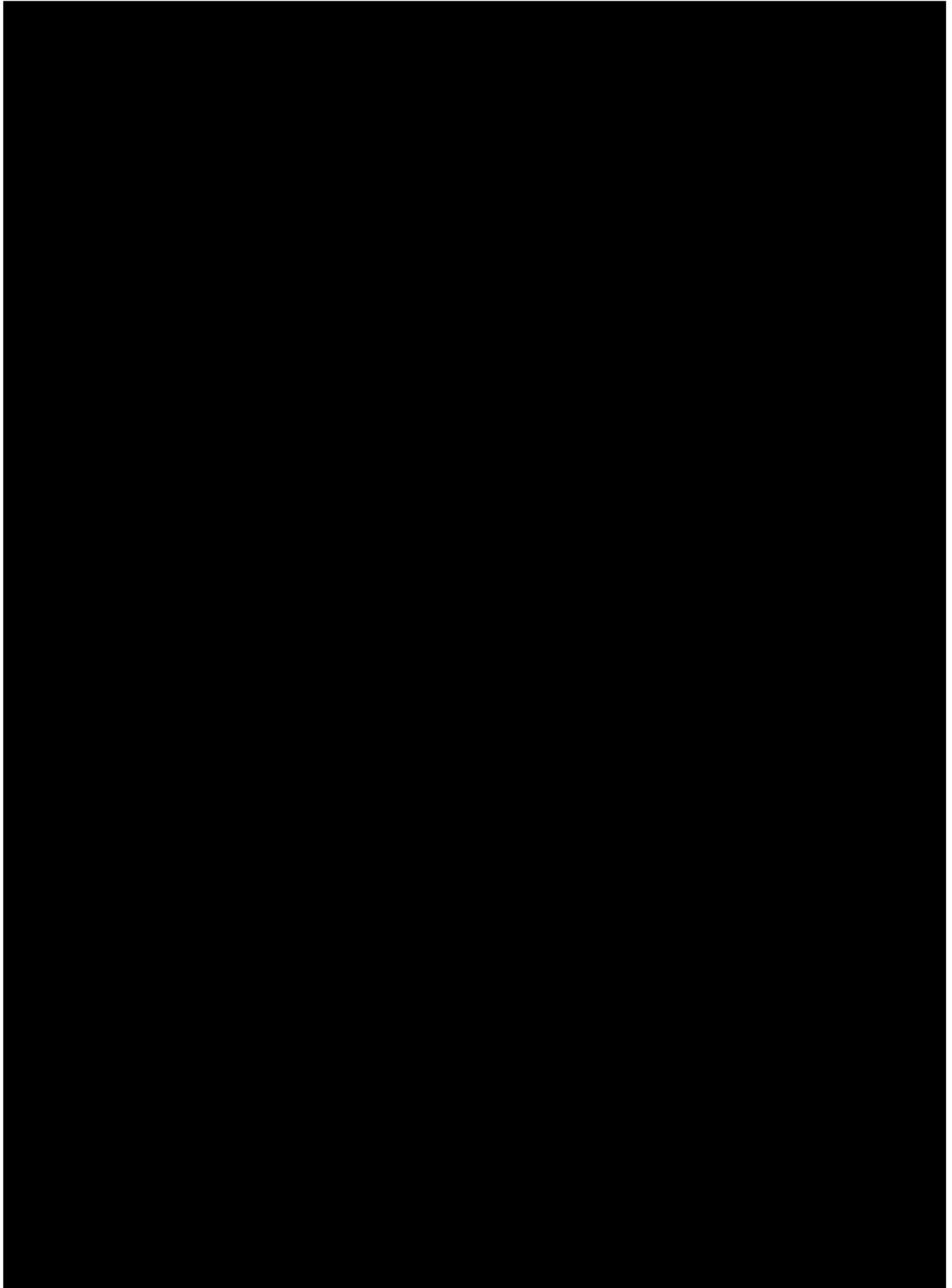


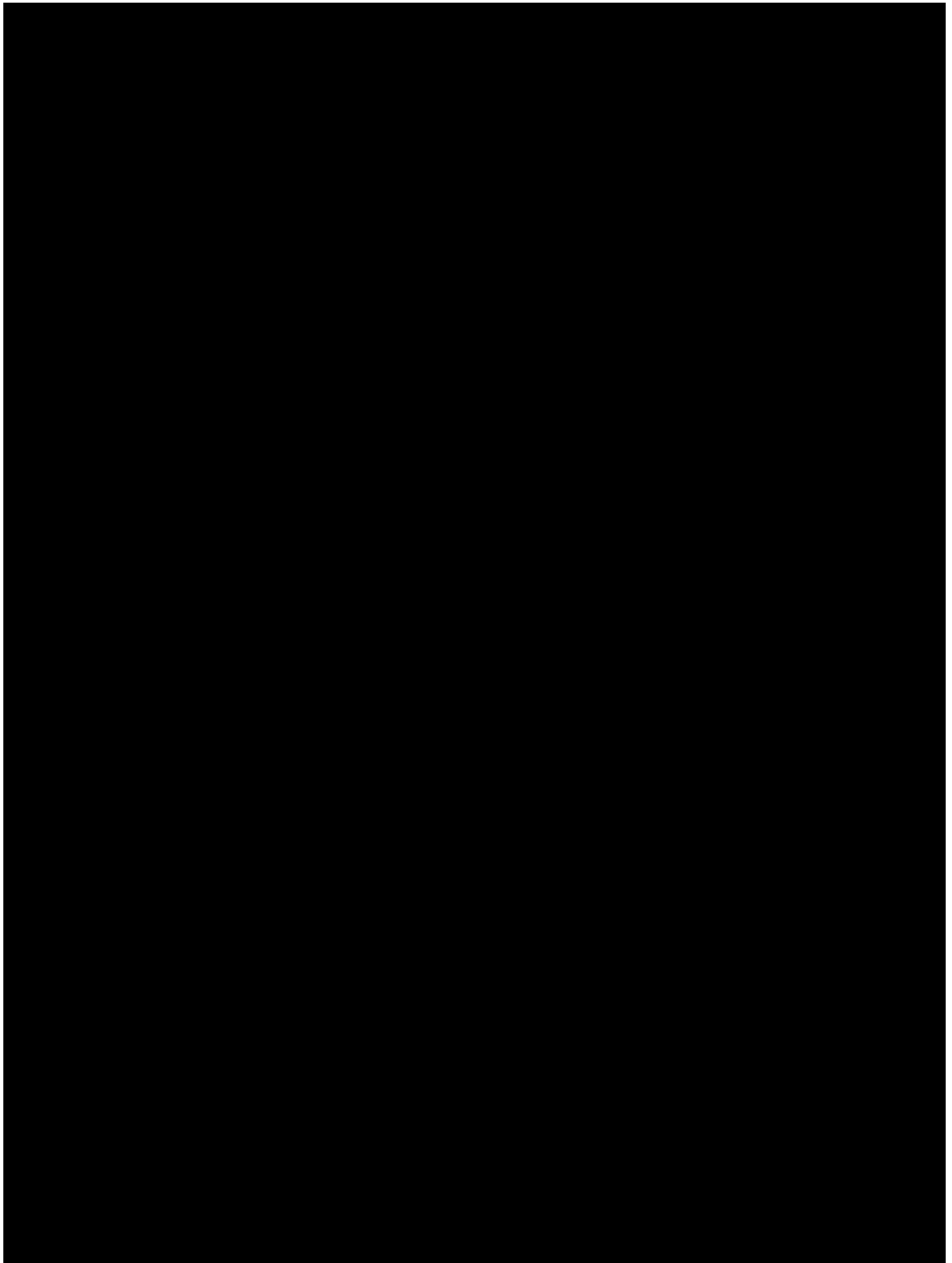


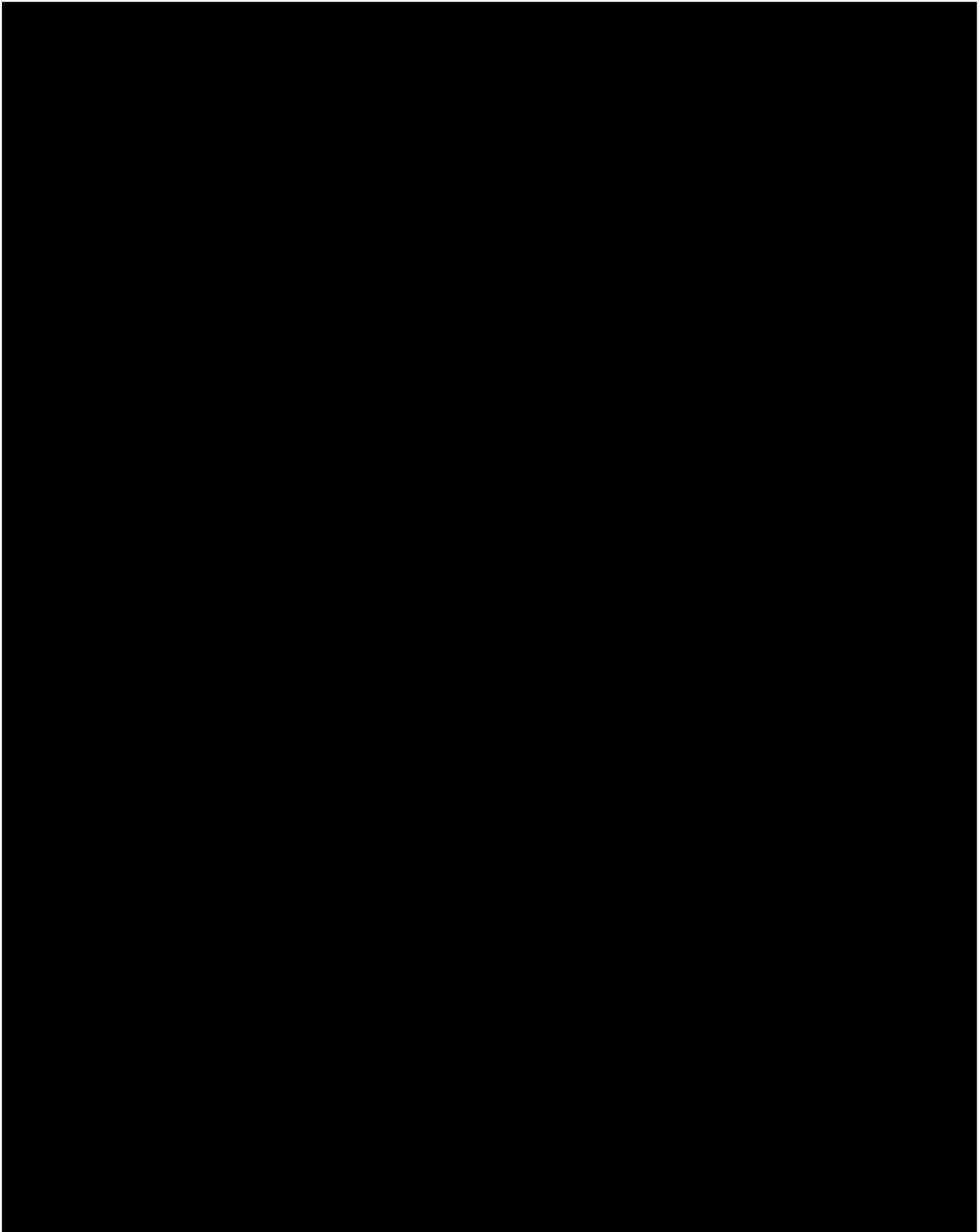


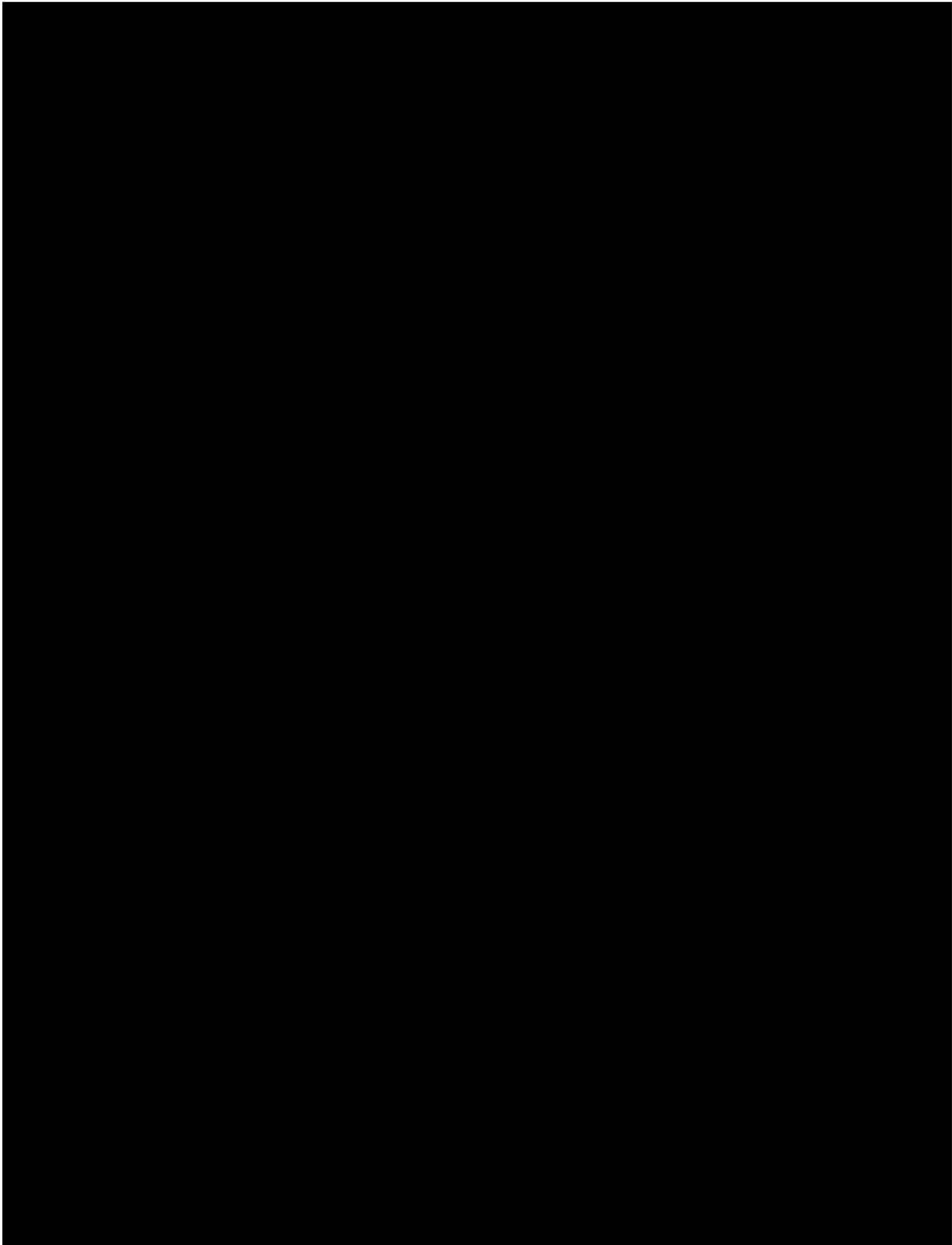


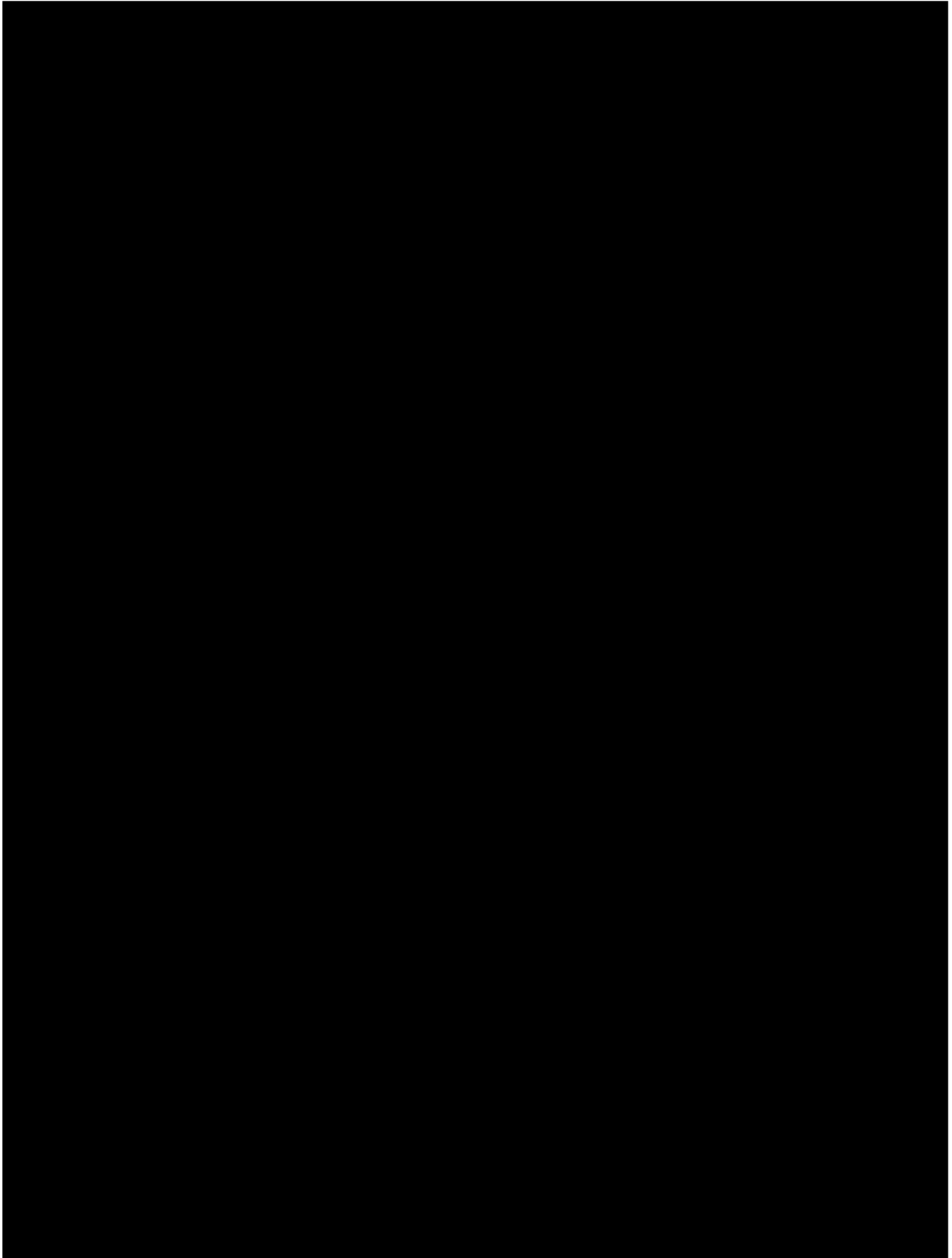


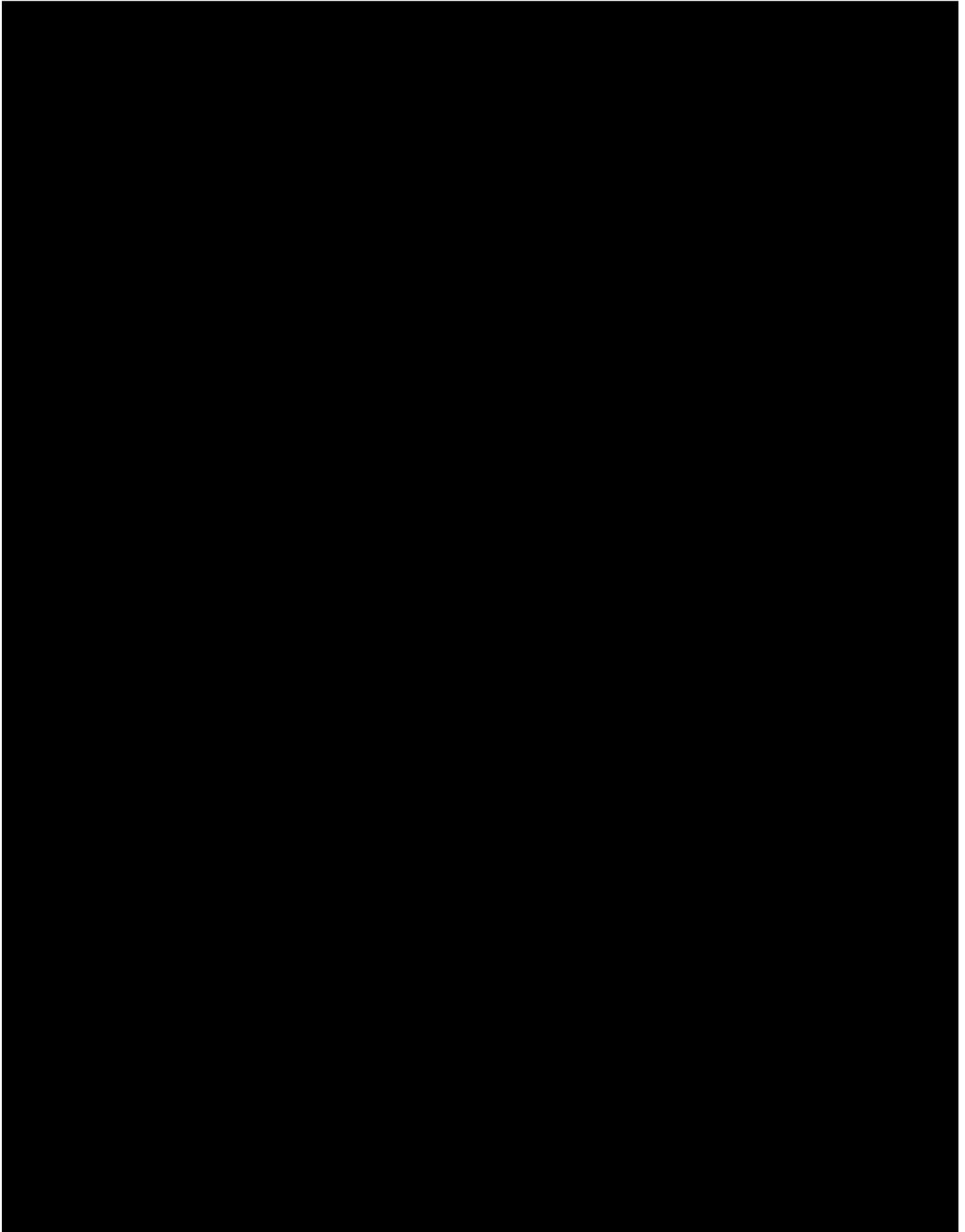


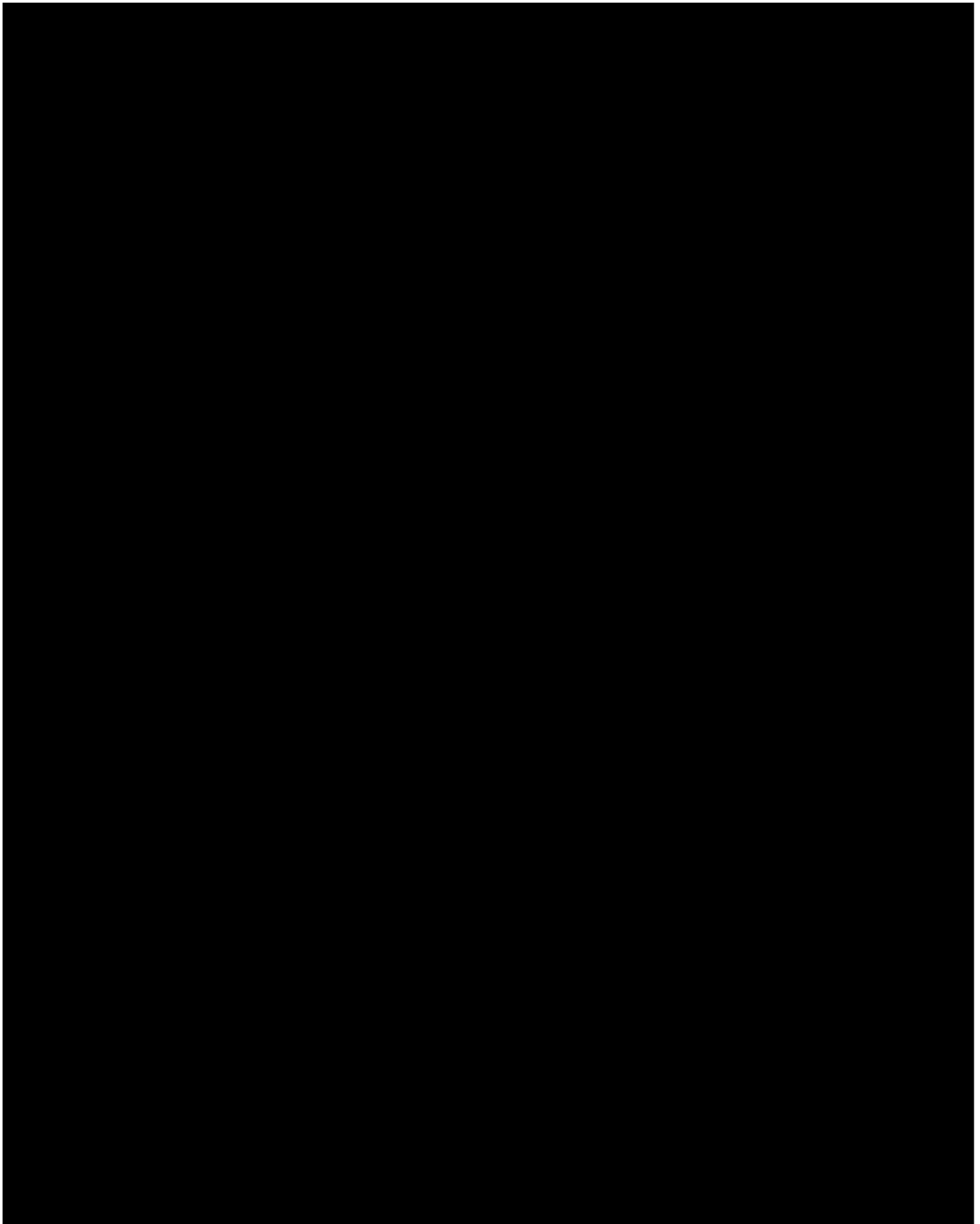


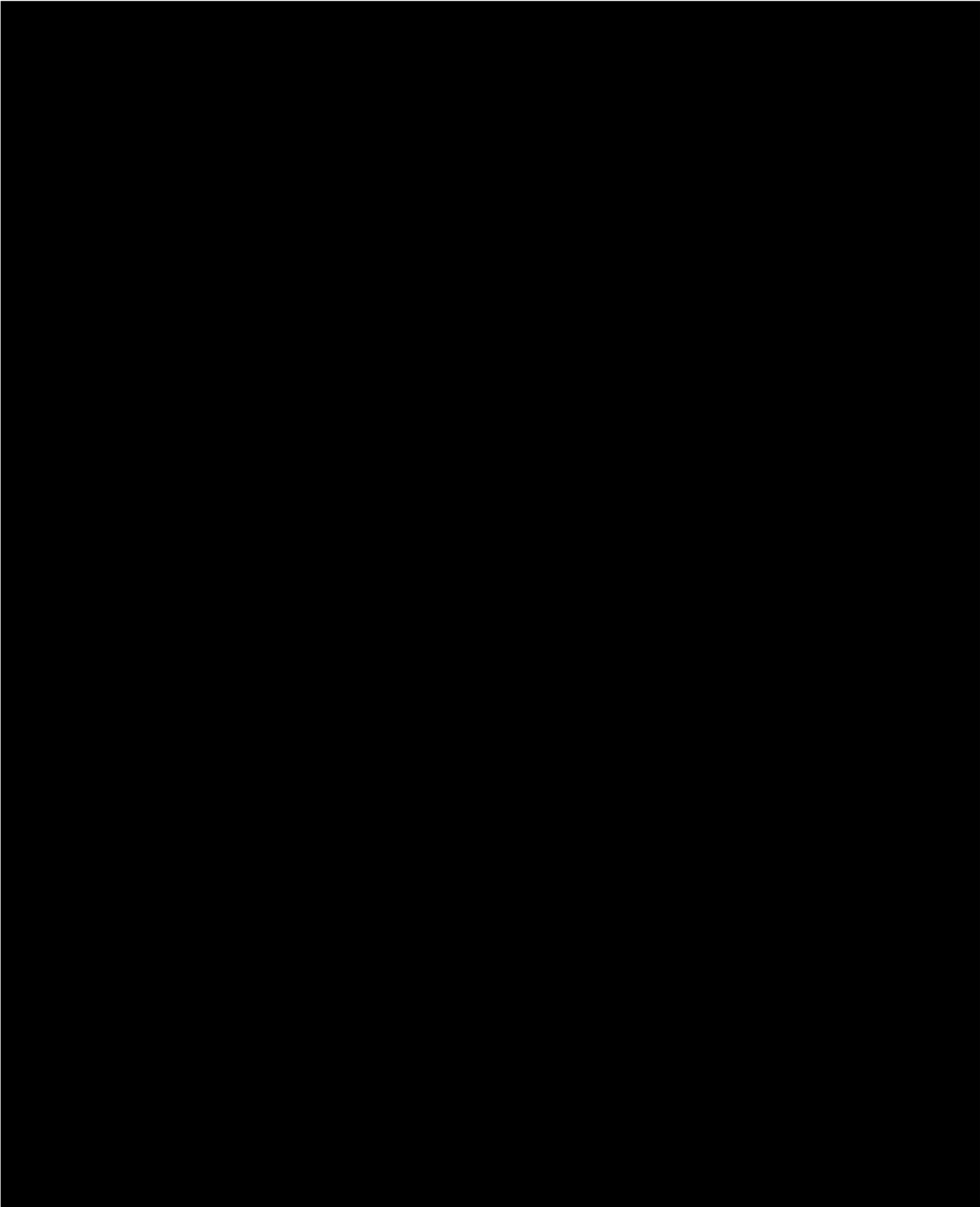


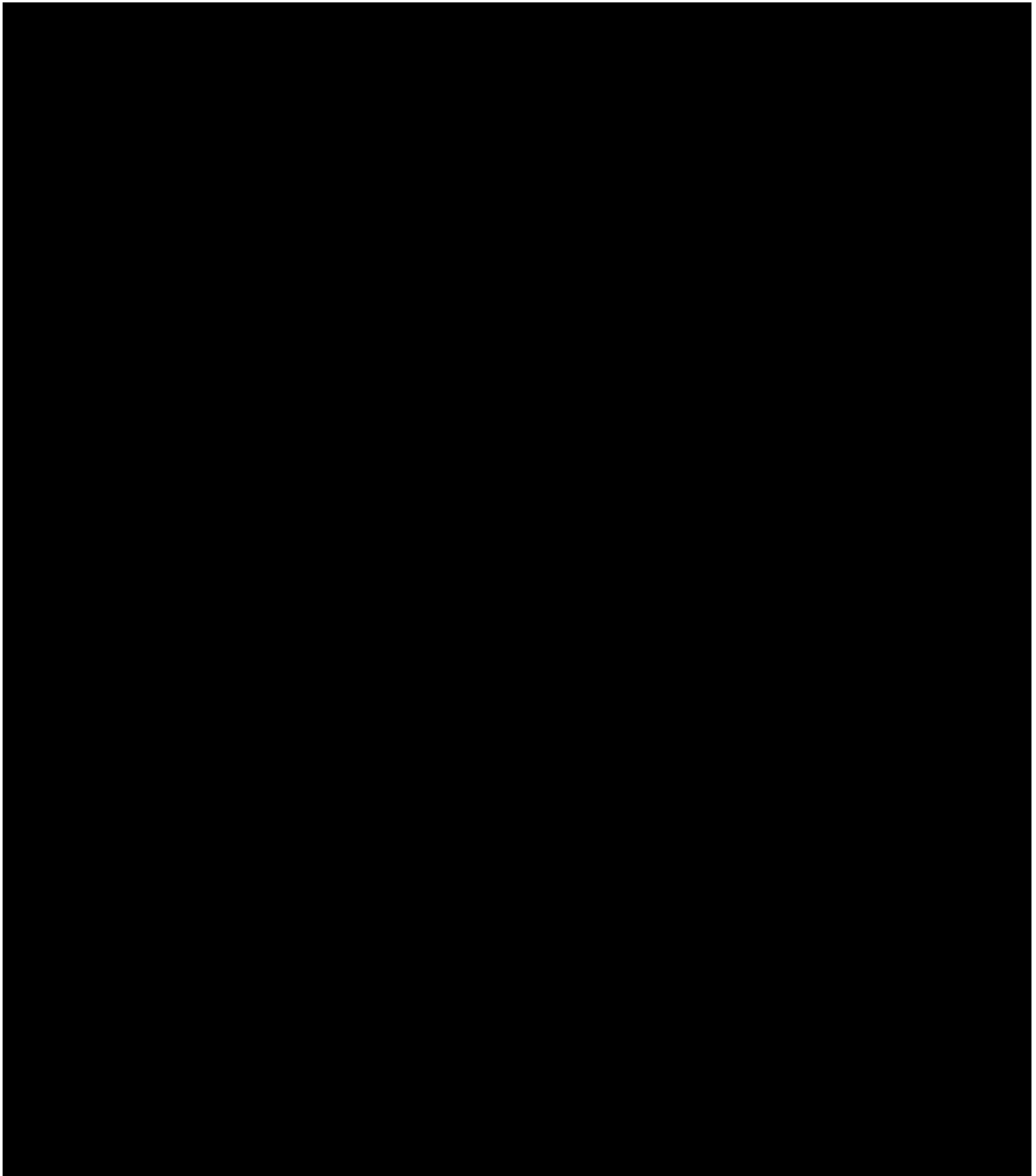


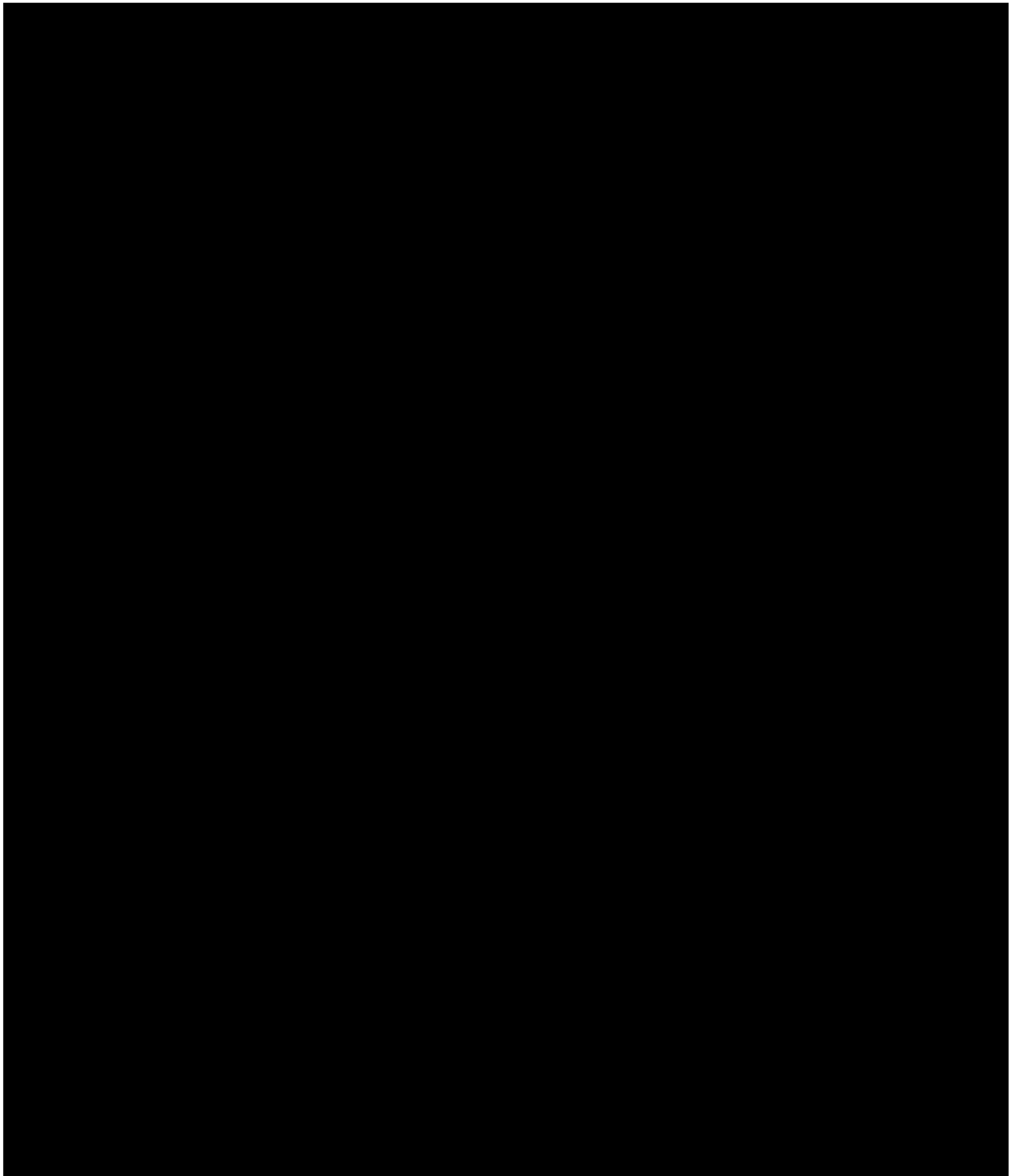


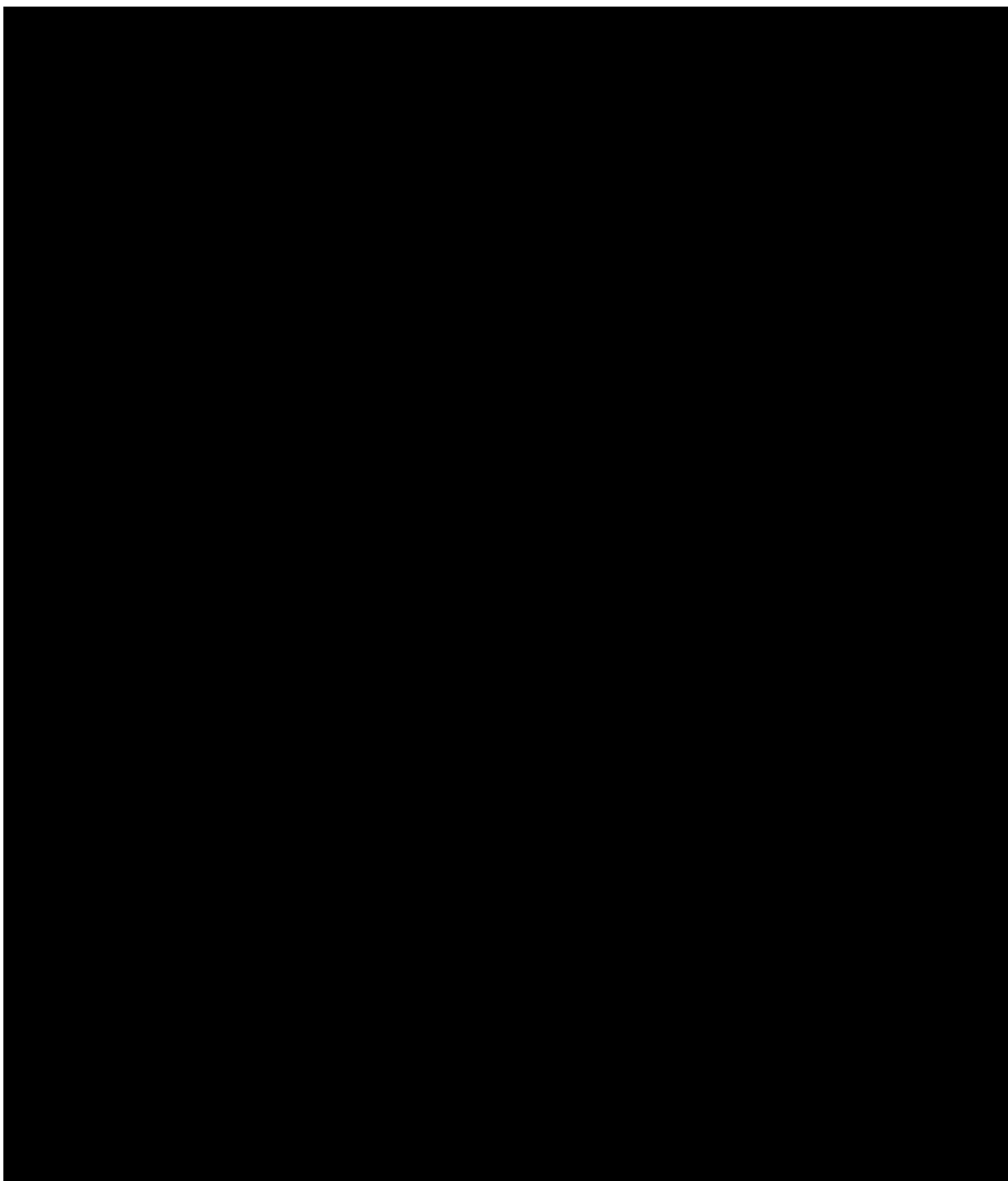


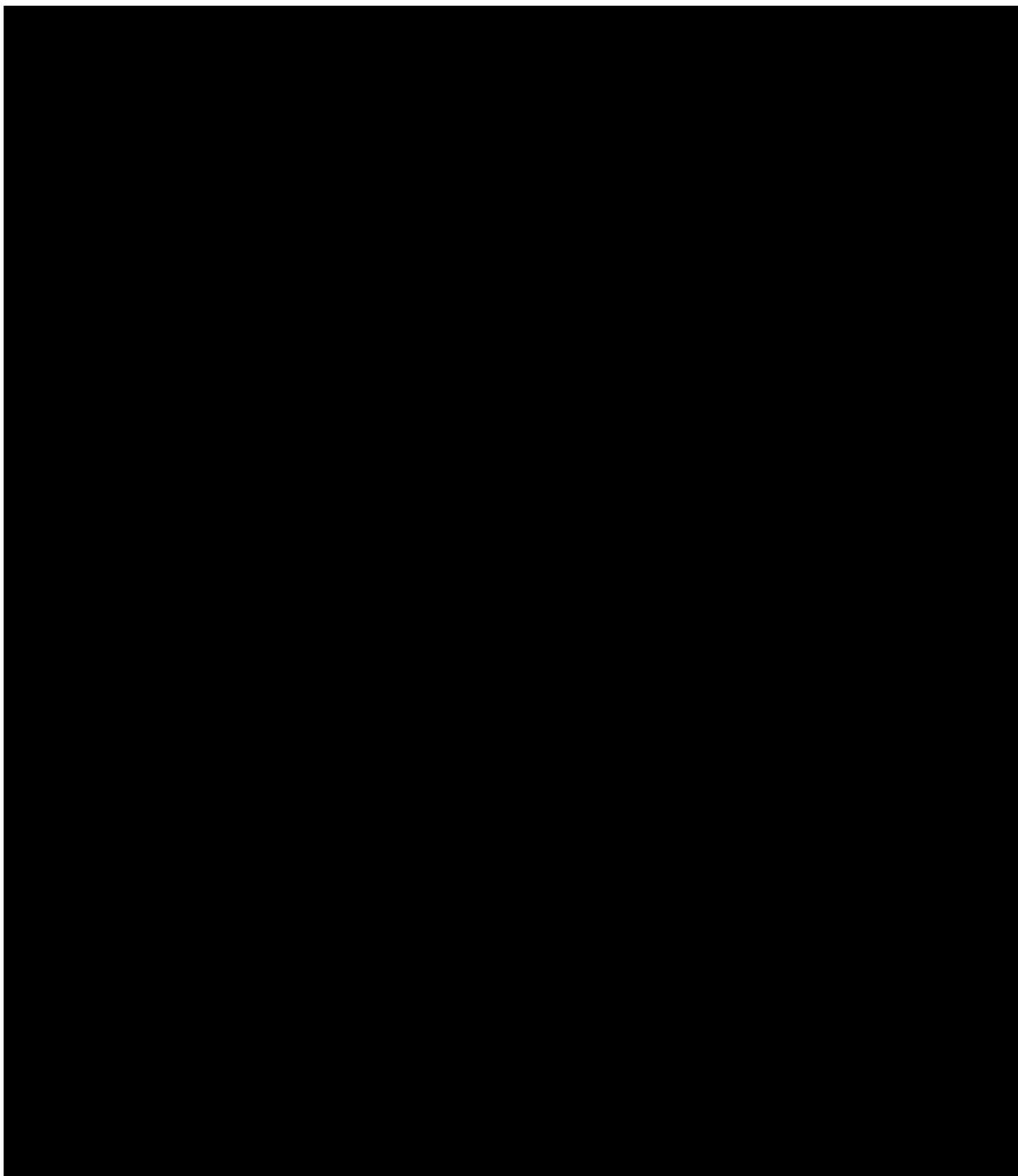


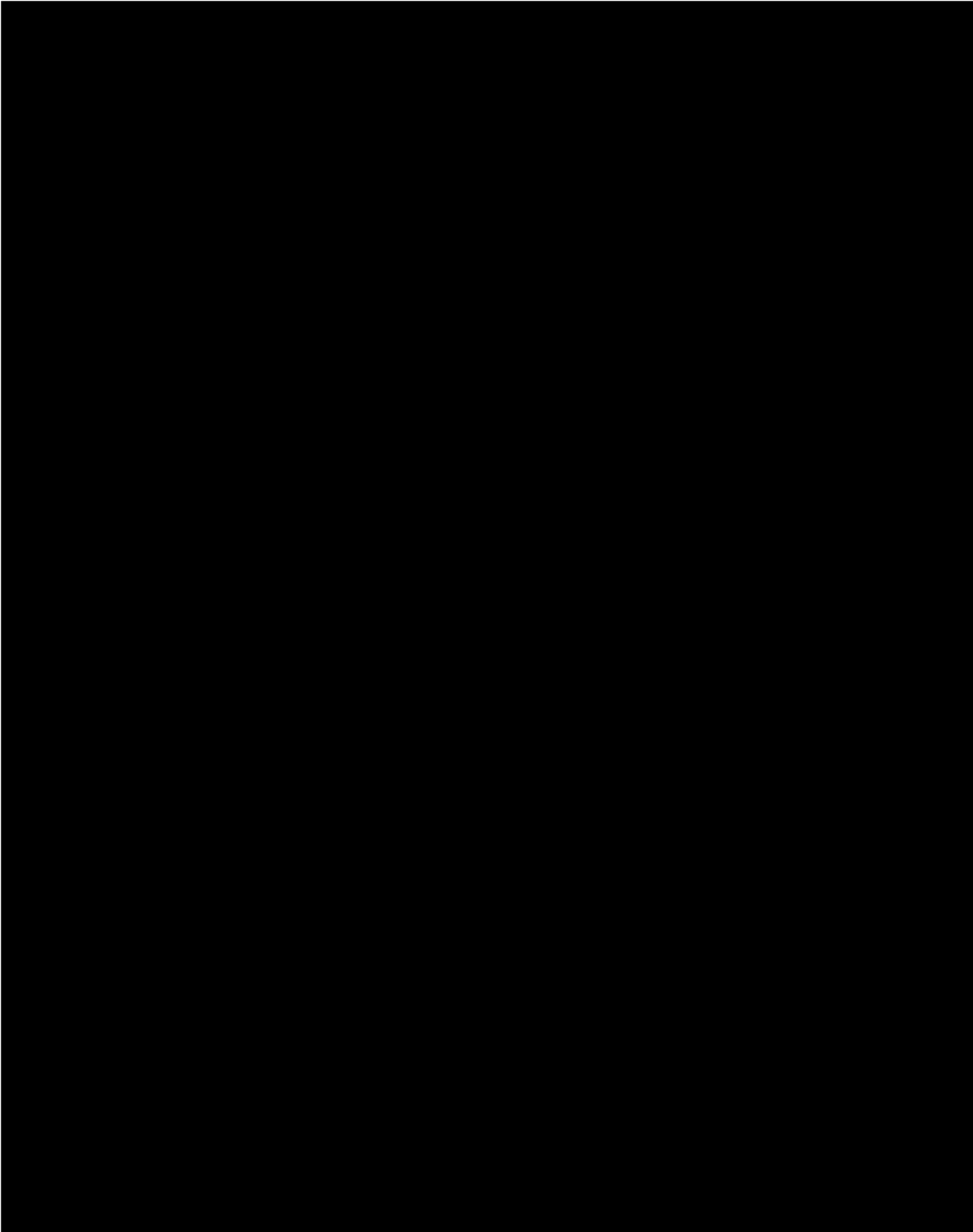


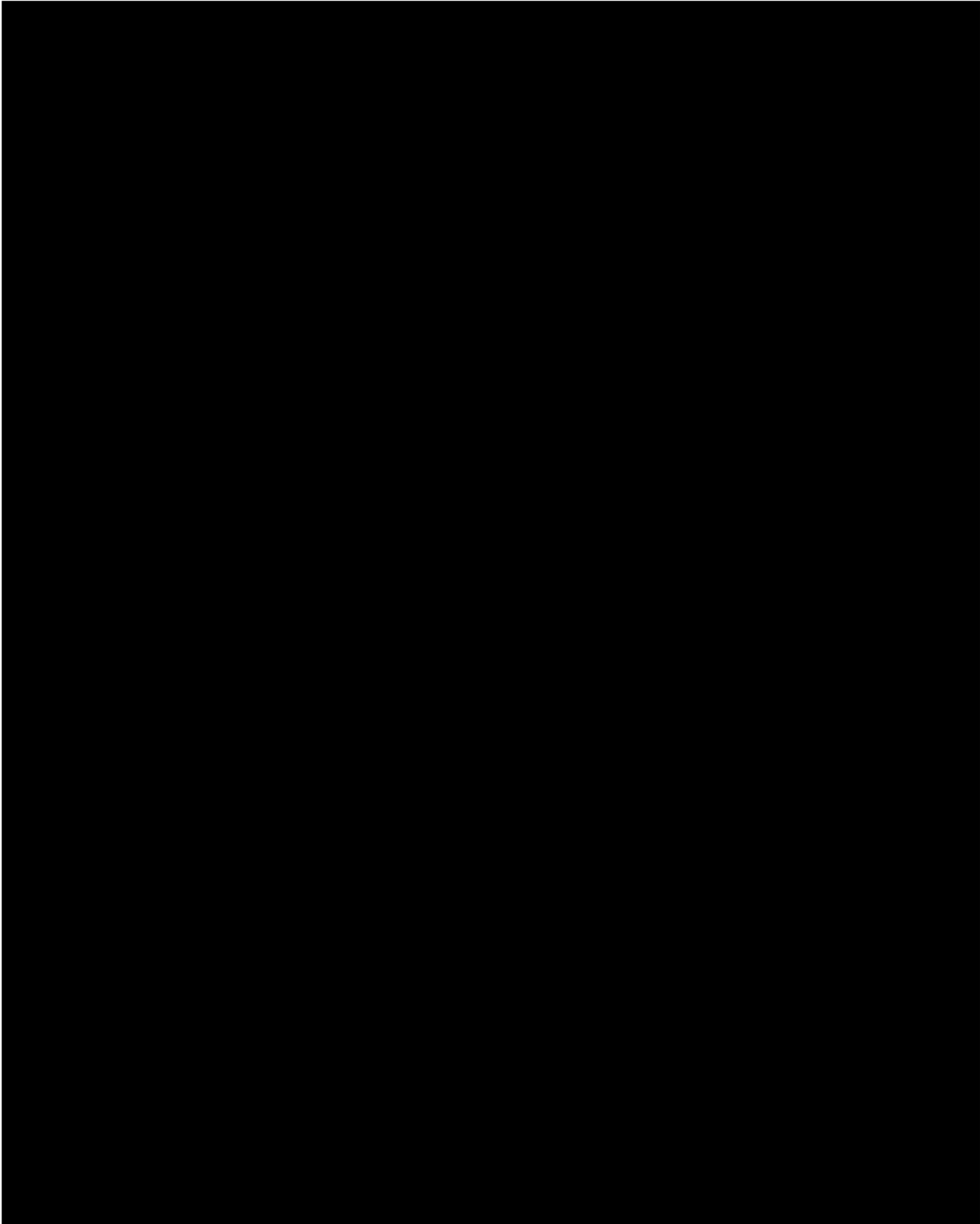


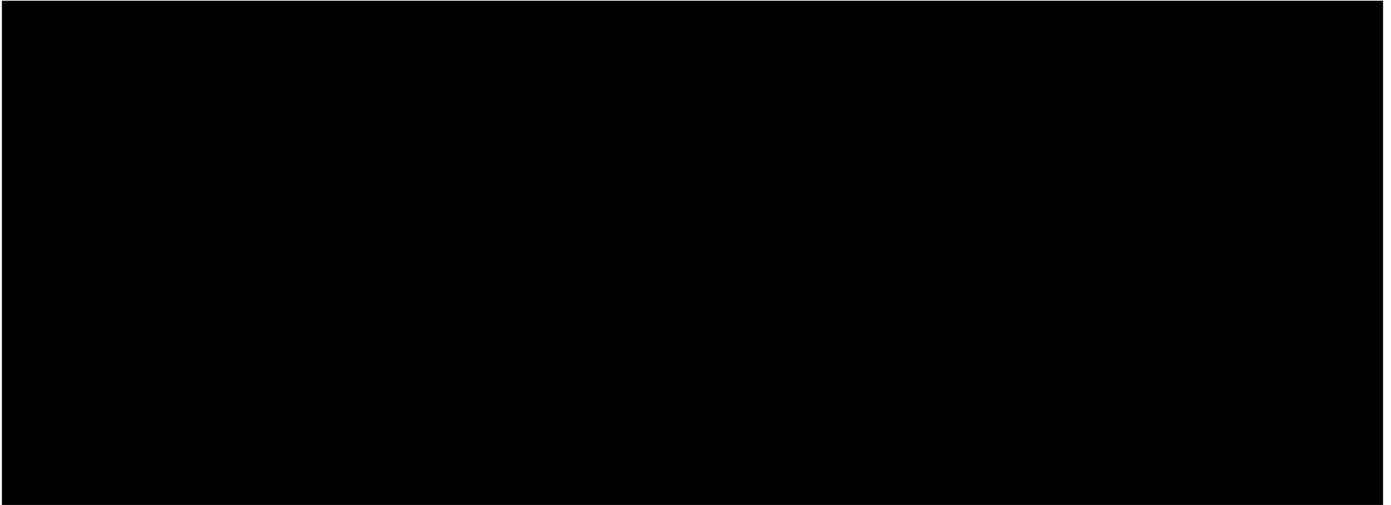


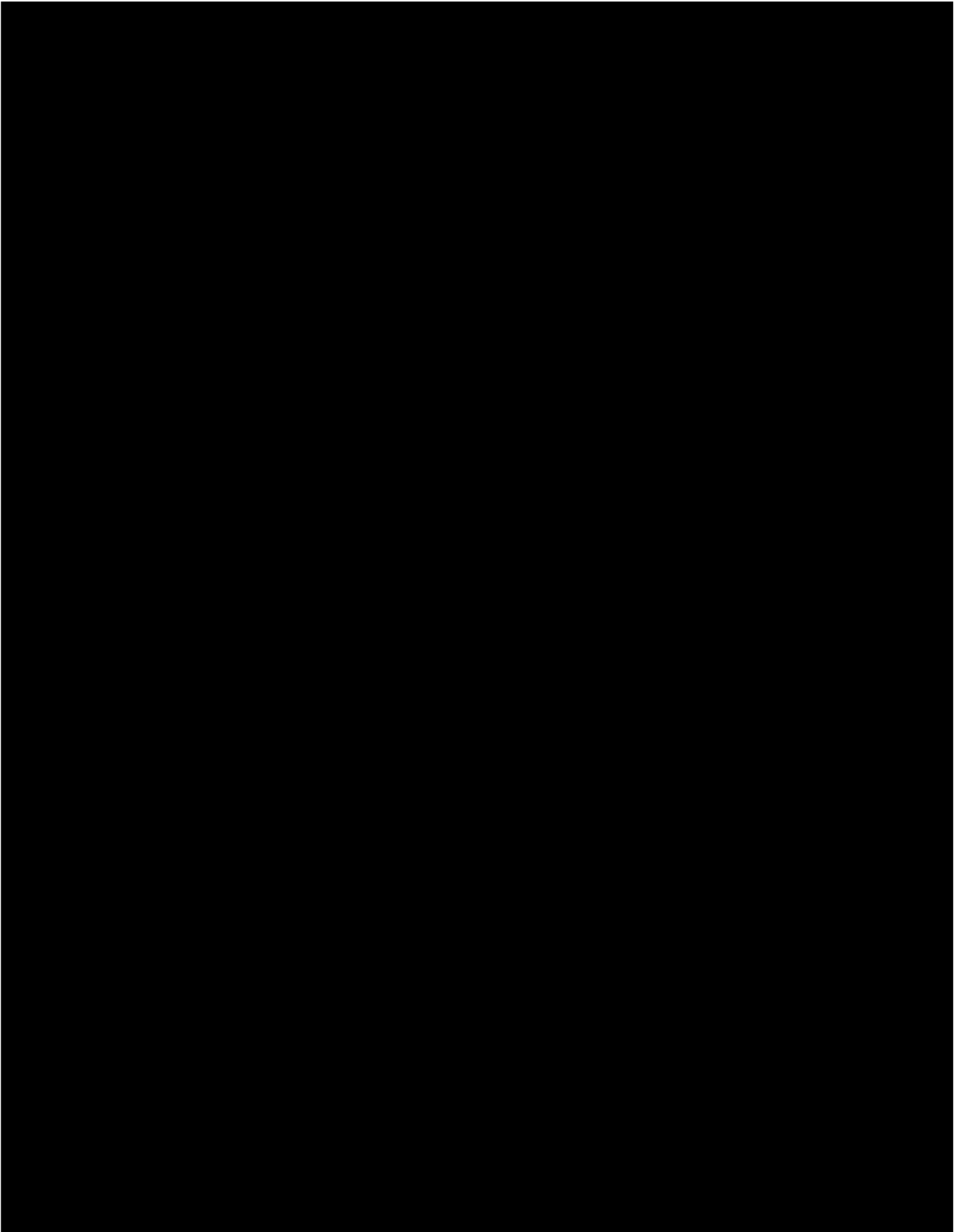




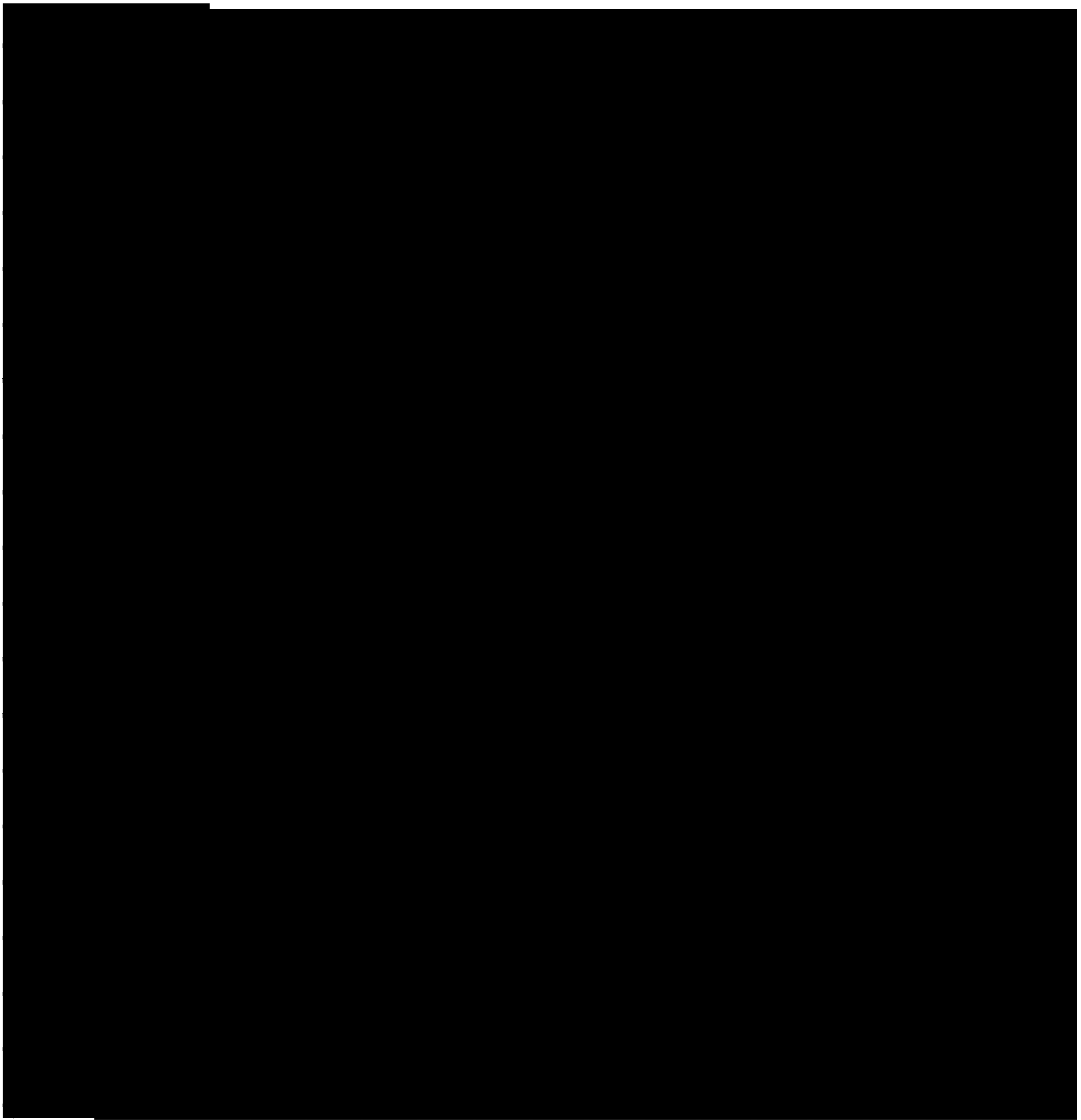


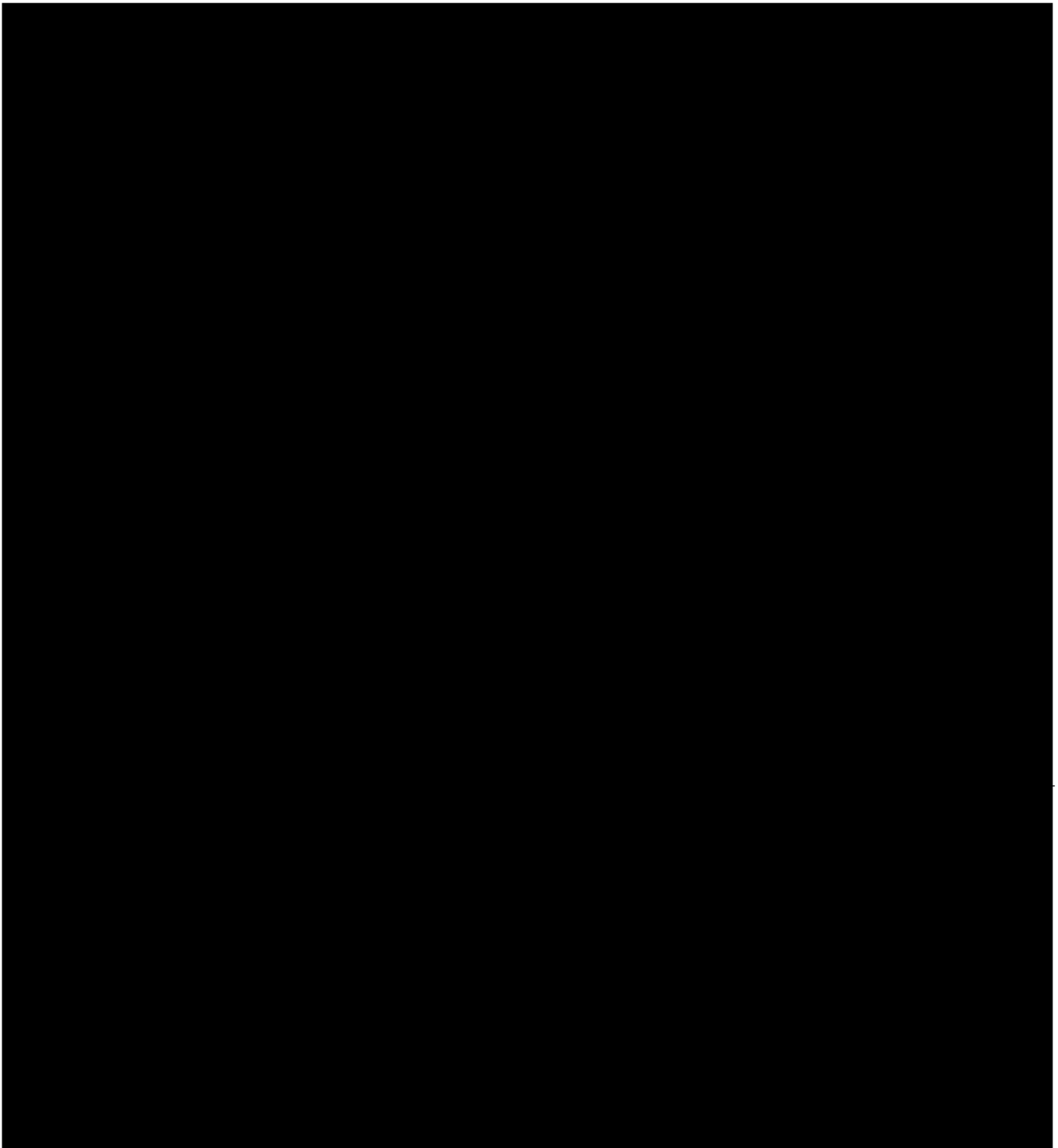


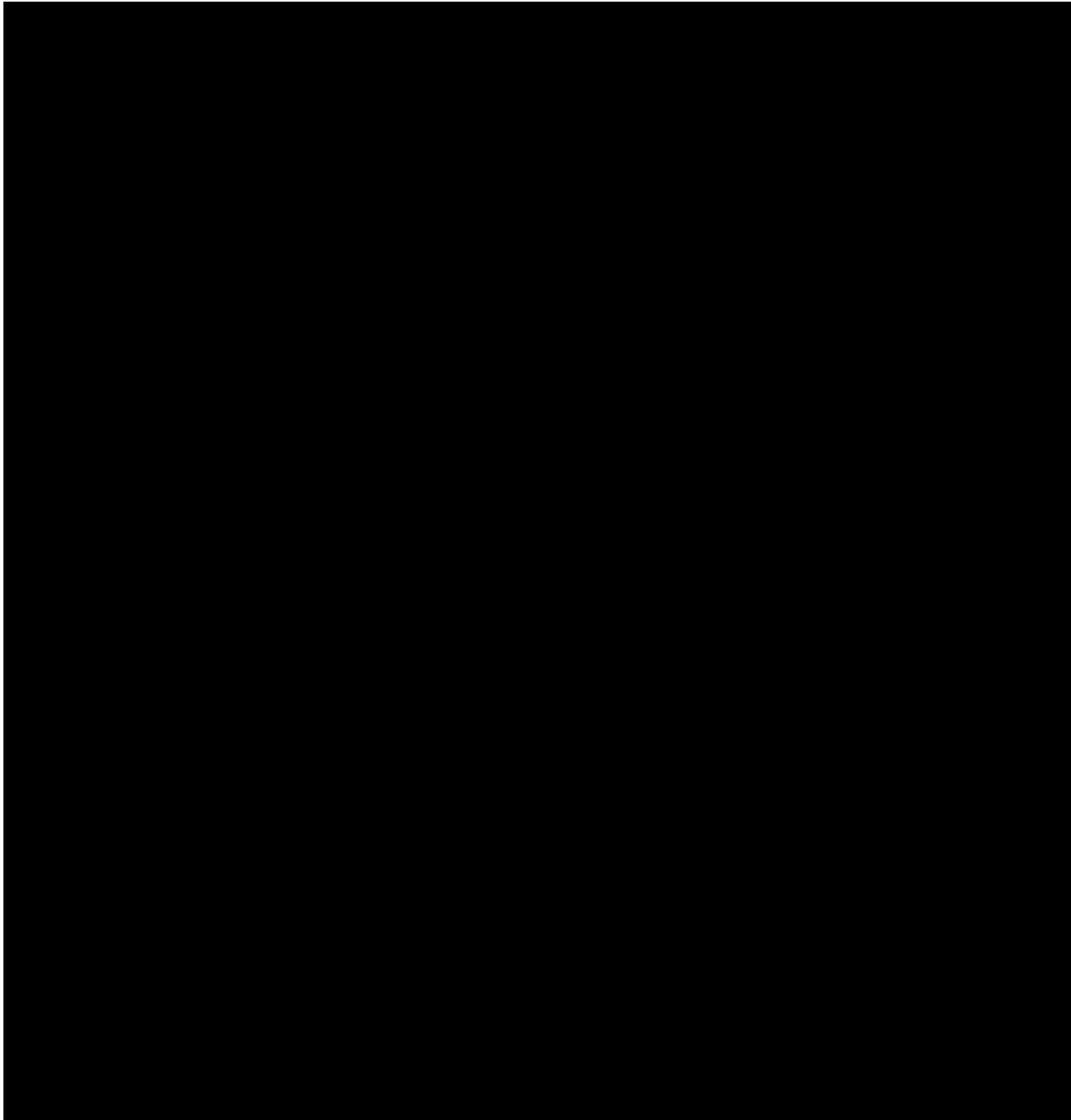


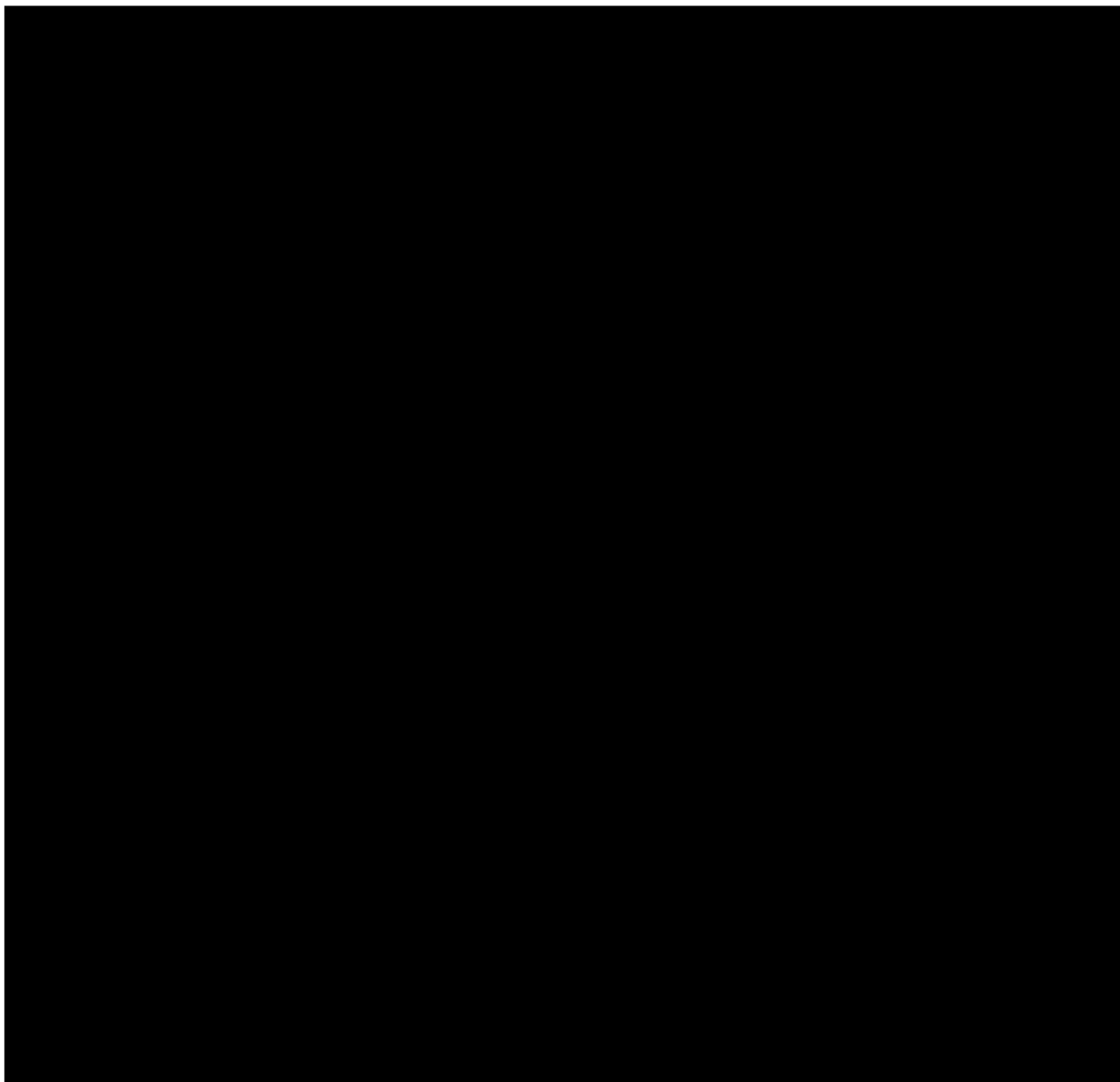


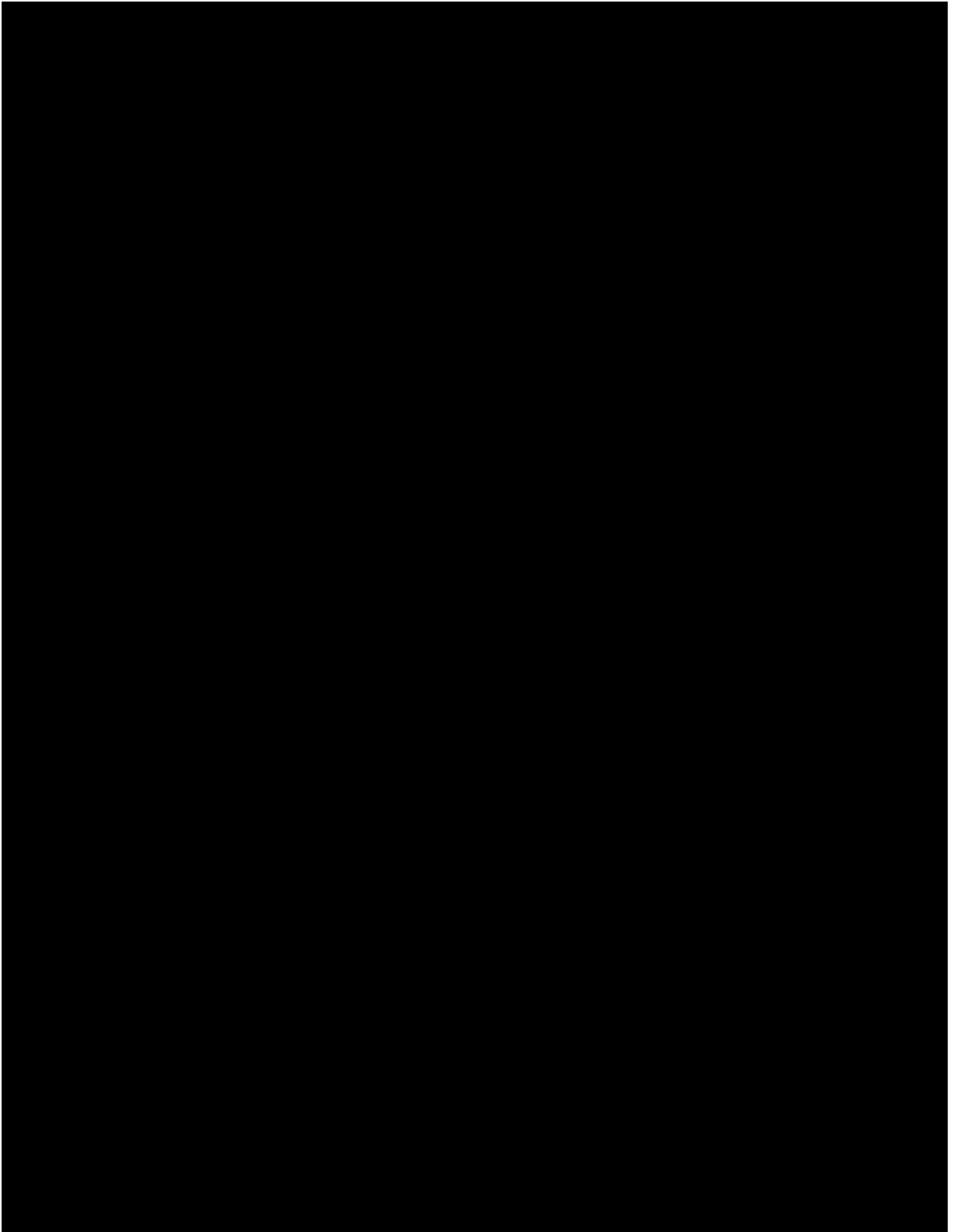


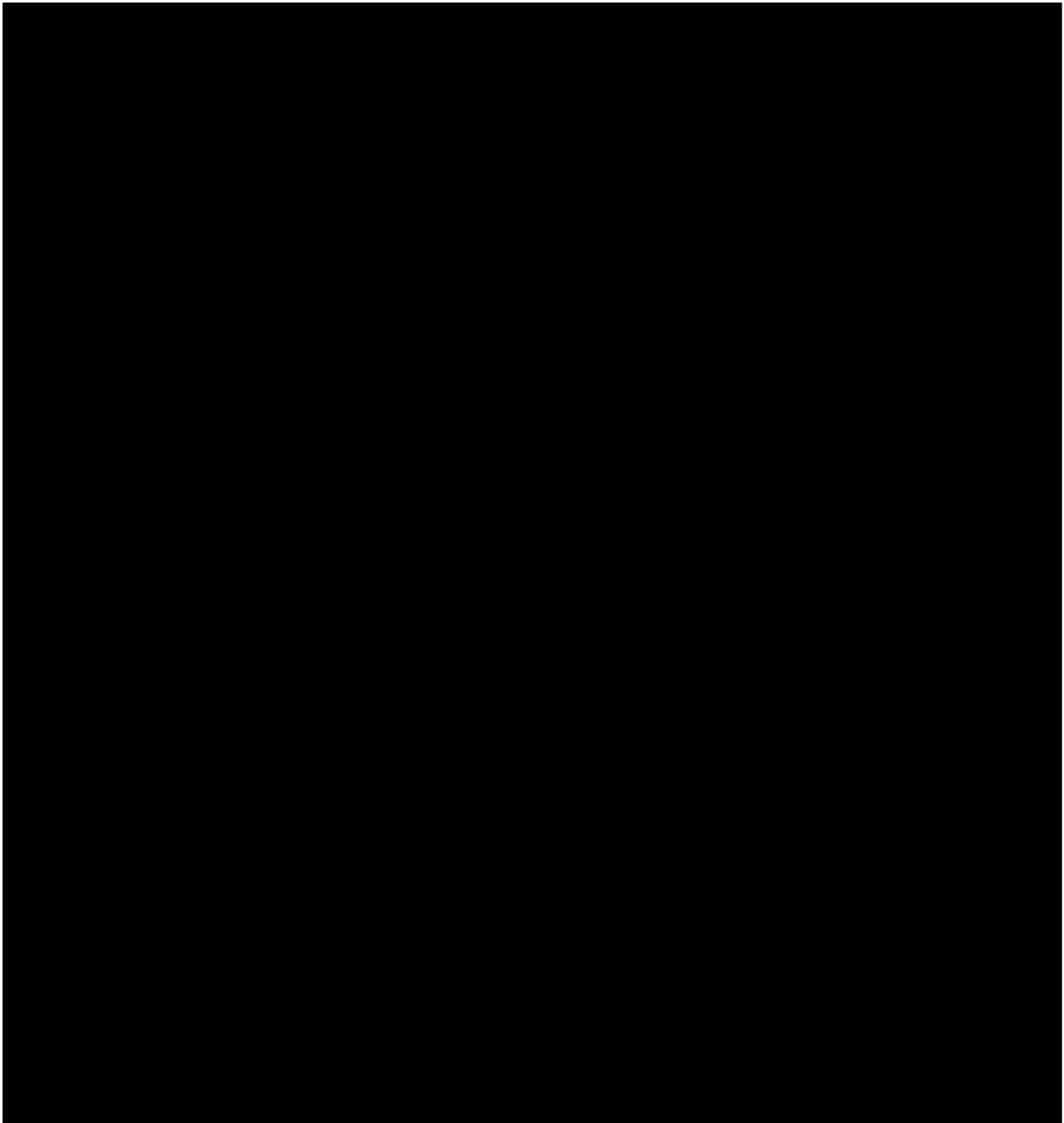


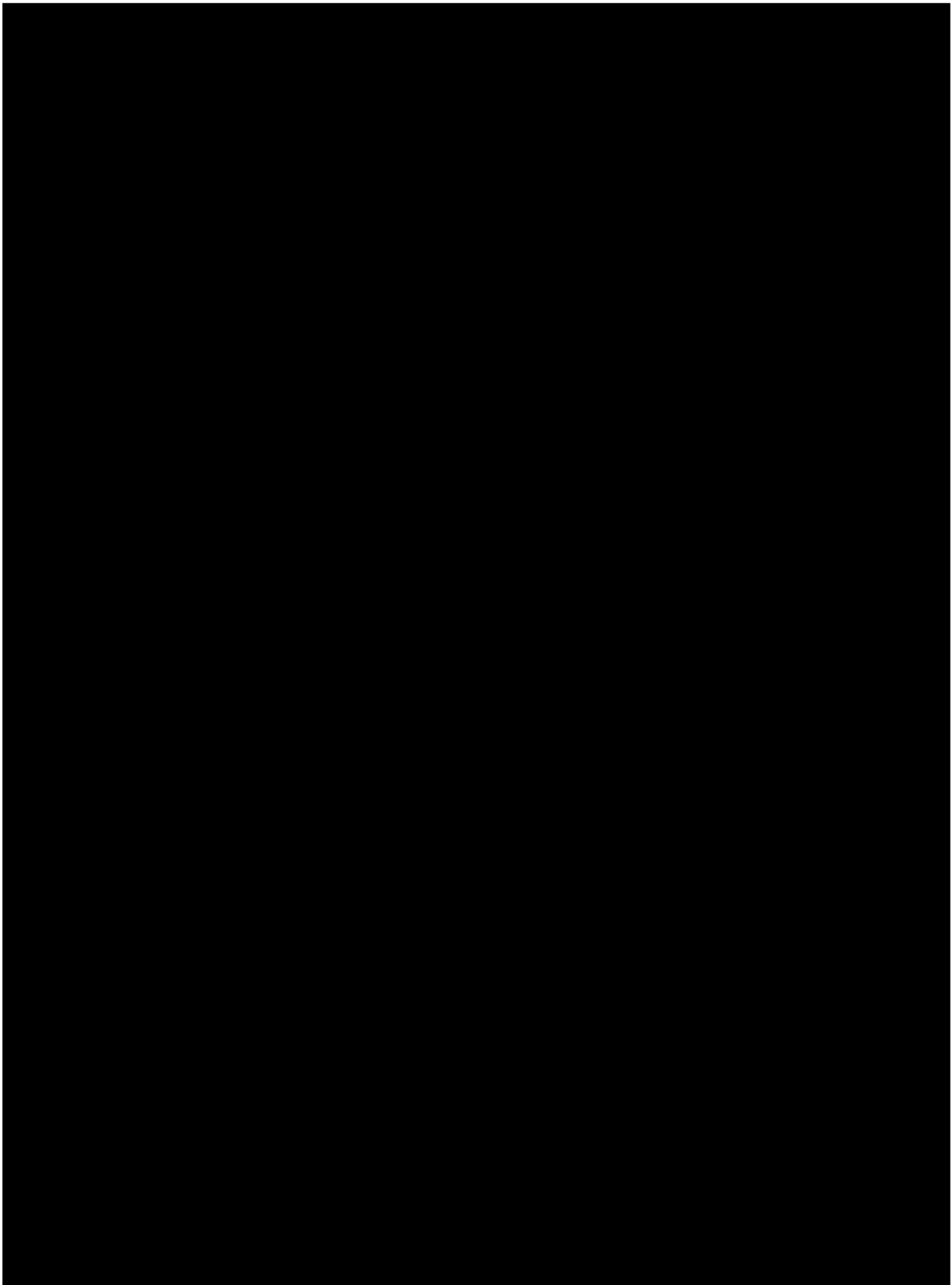


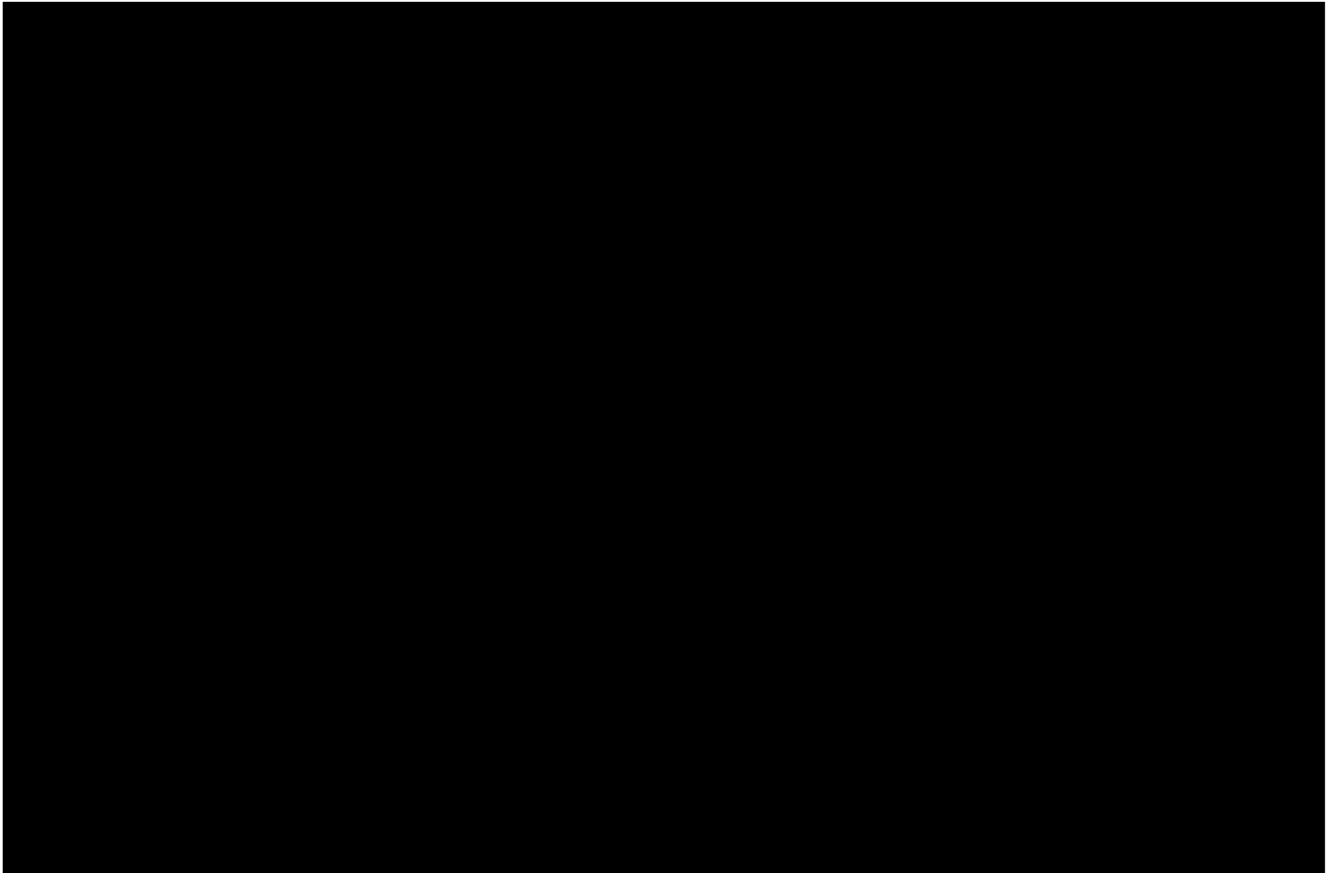


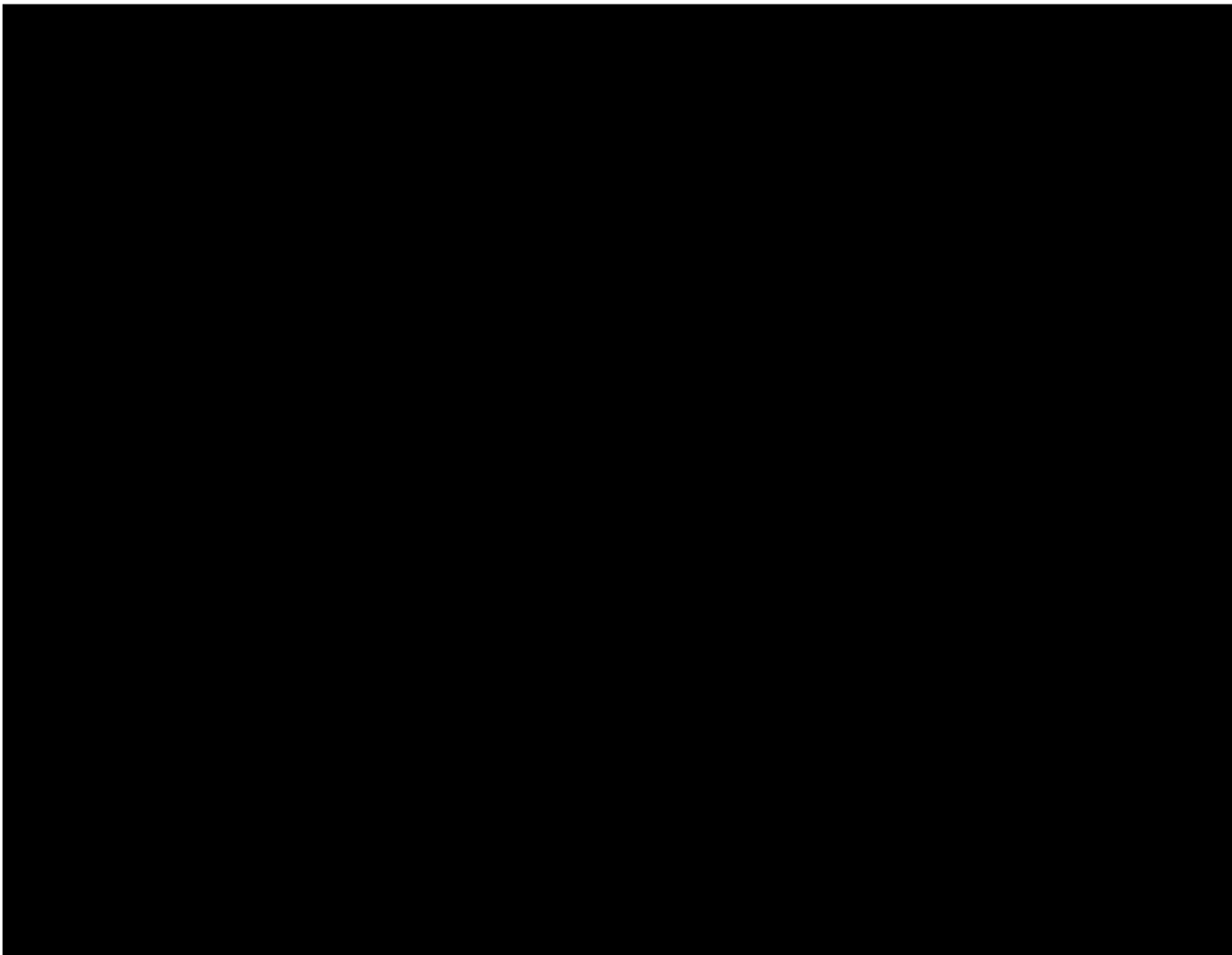


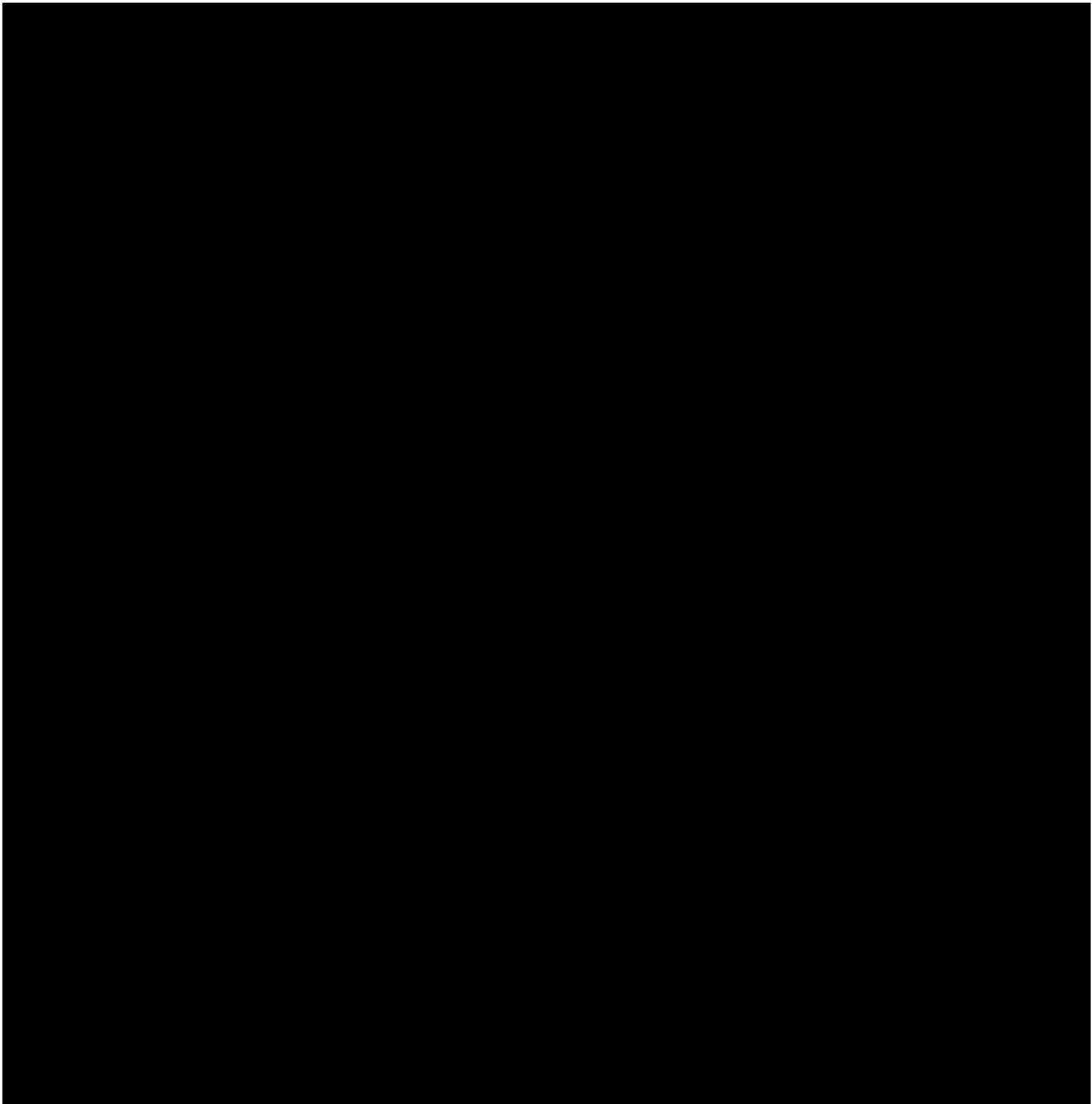


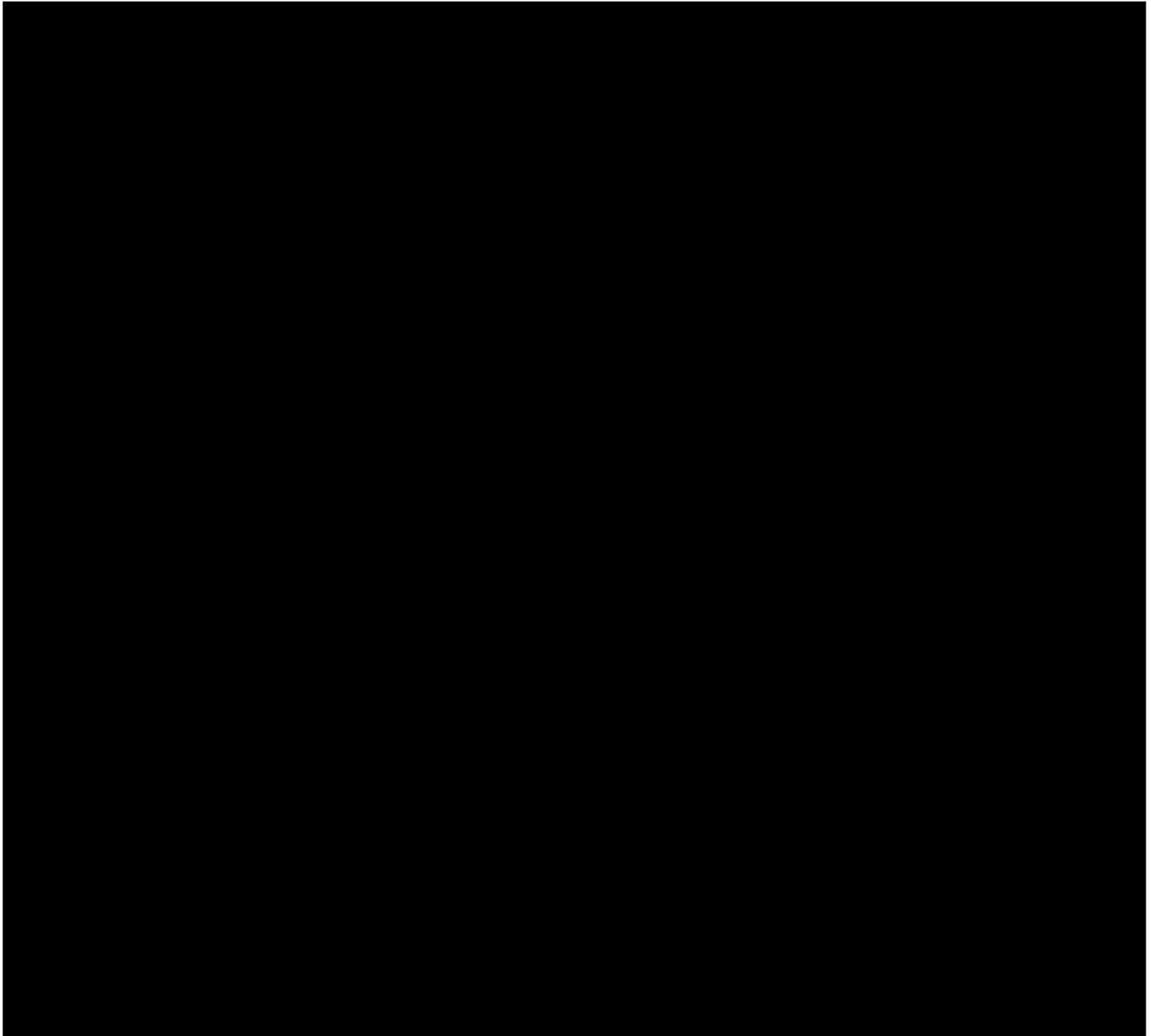


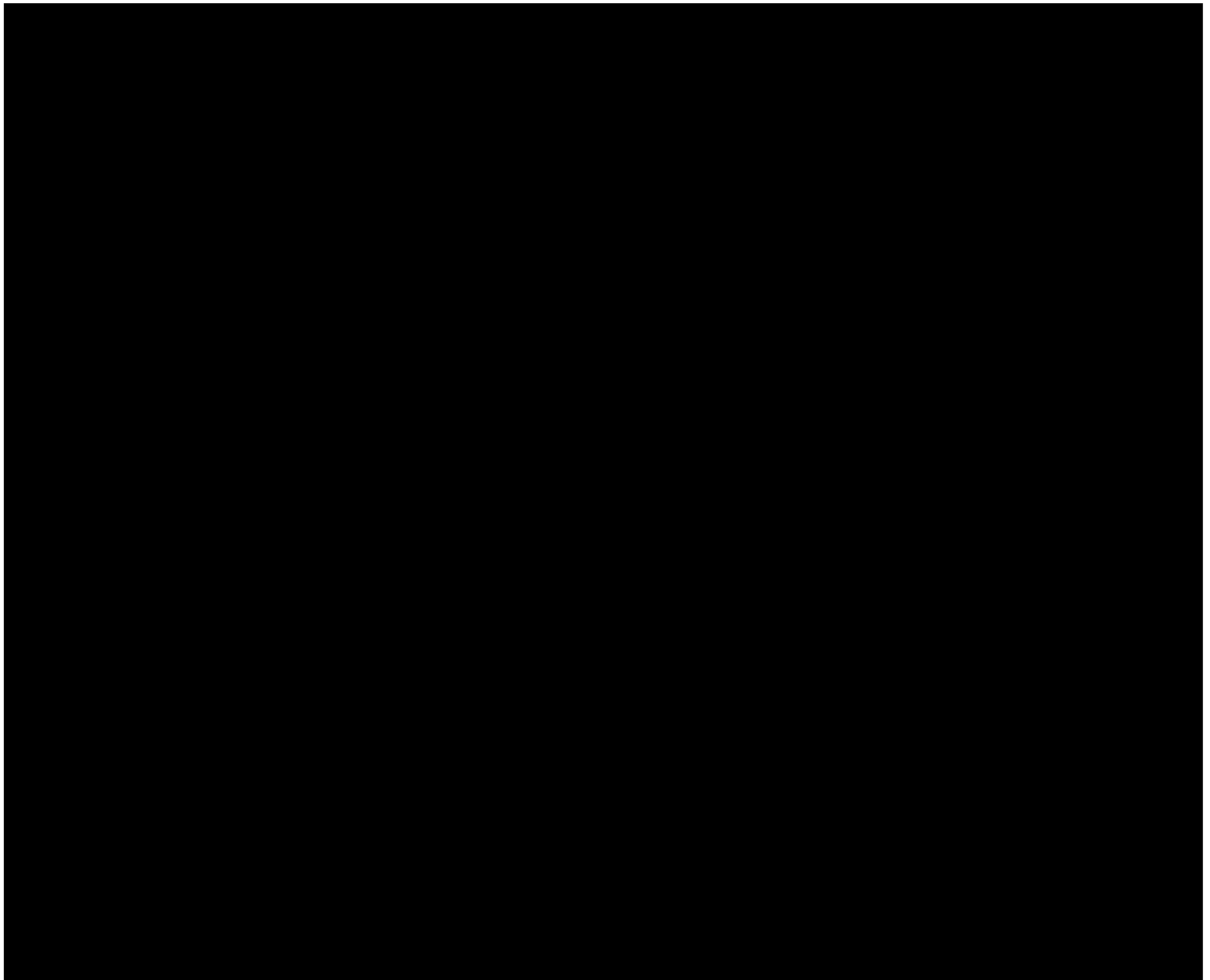


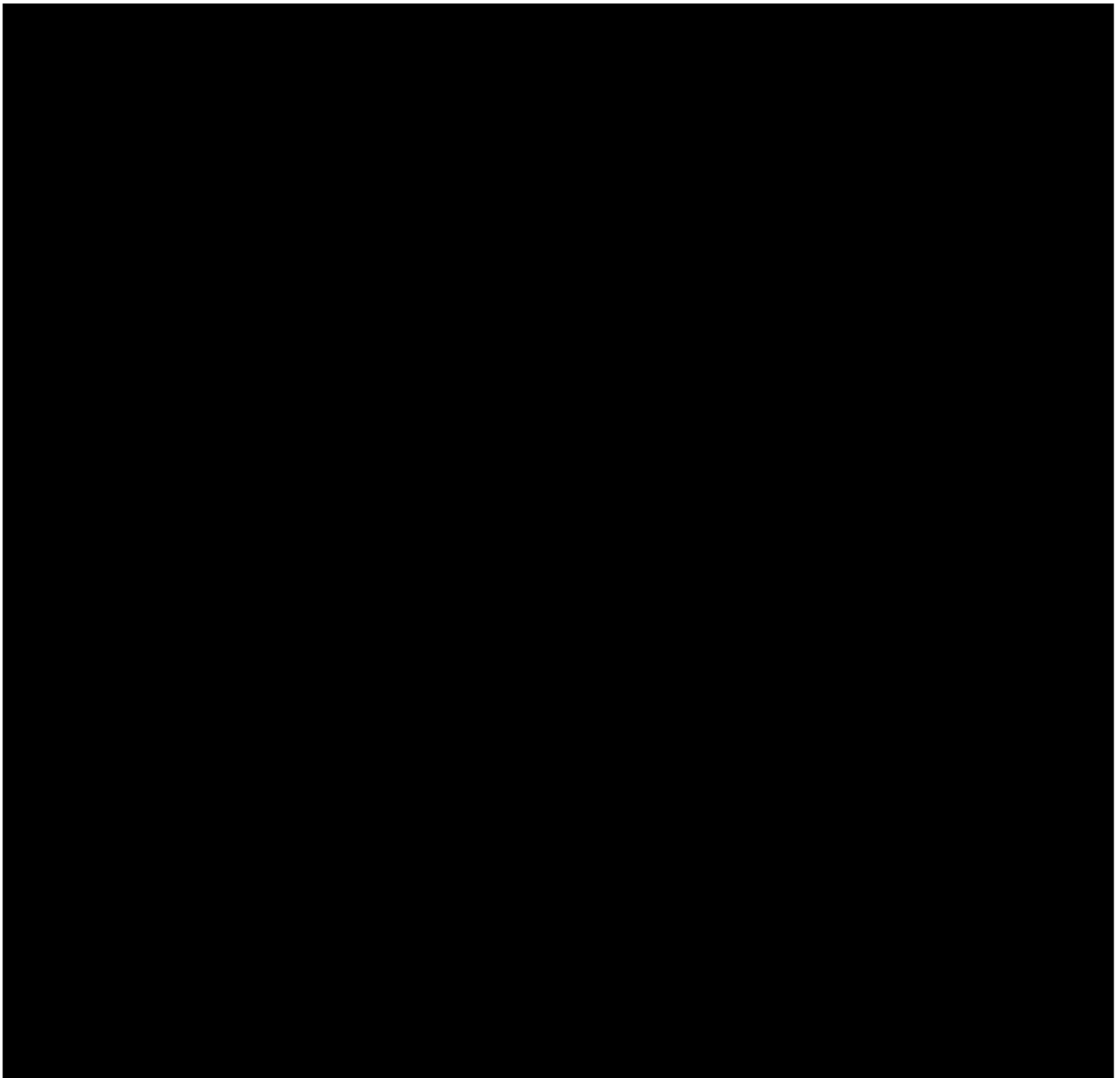






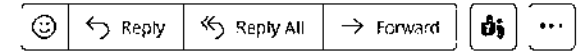




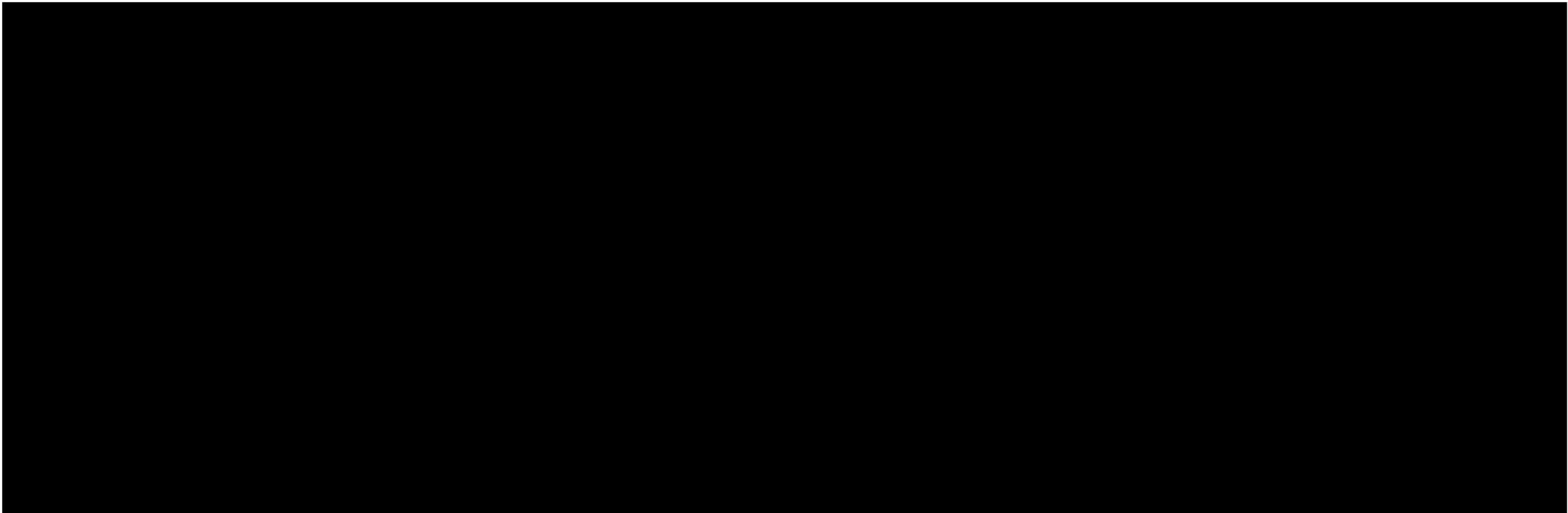


ATTACHMENT I

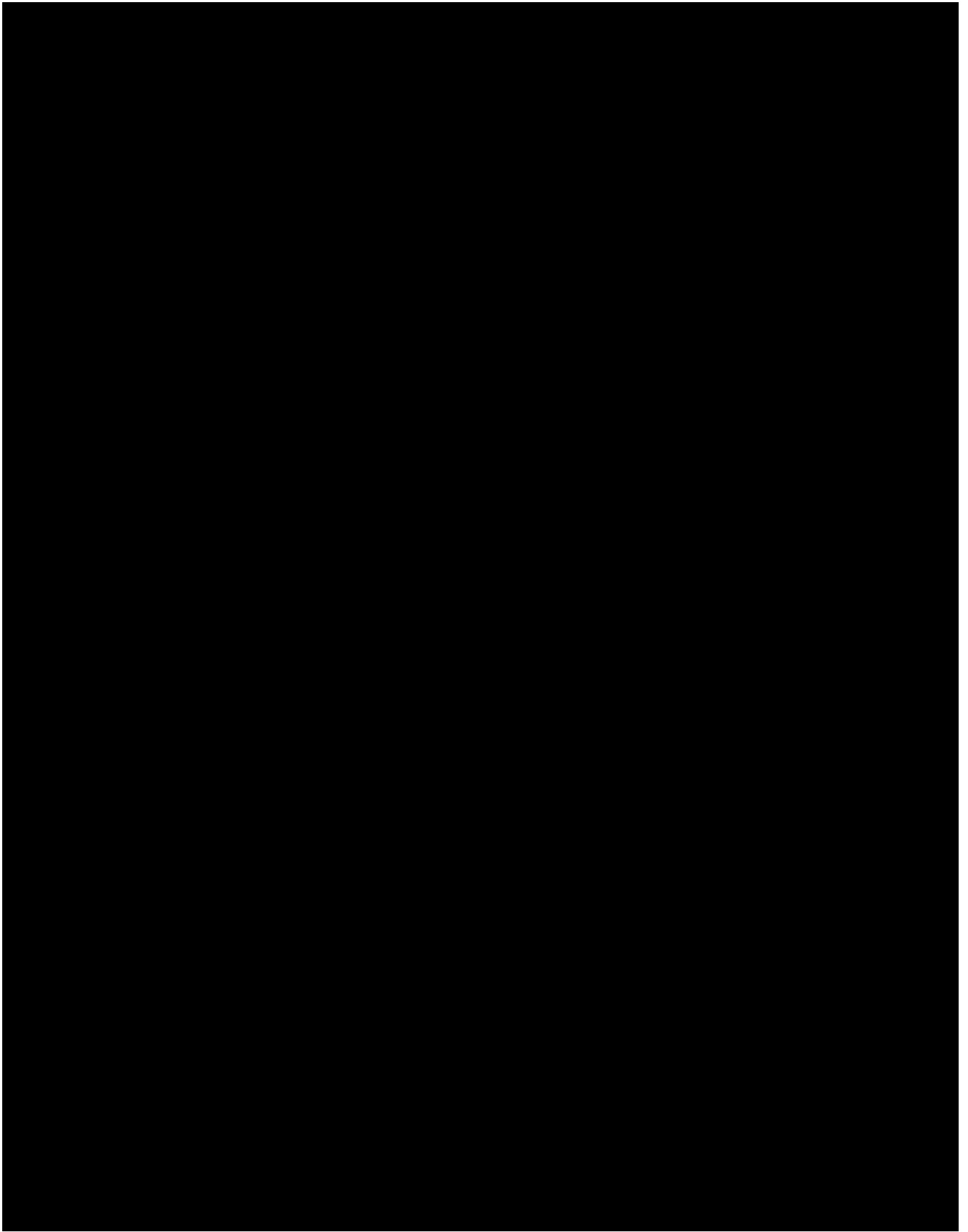
Mesquite (BZ-17) Notice to Proceed

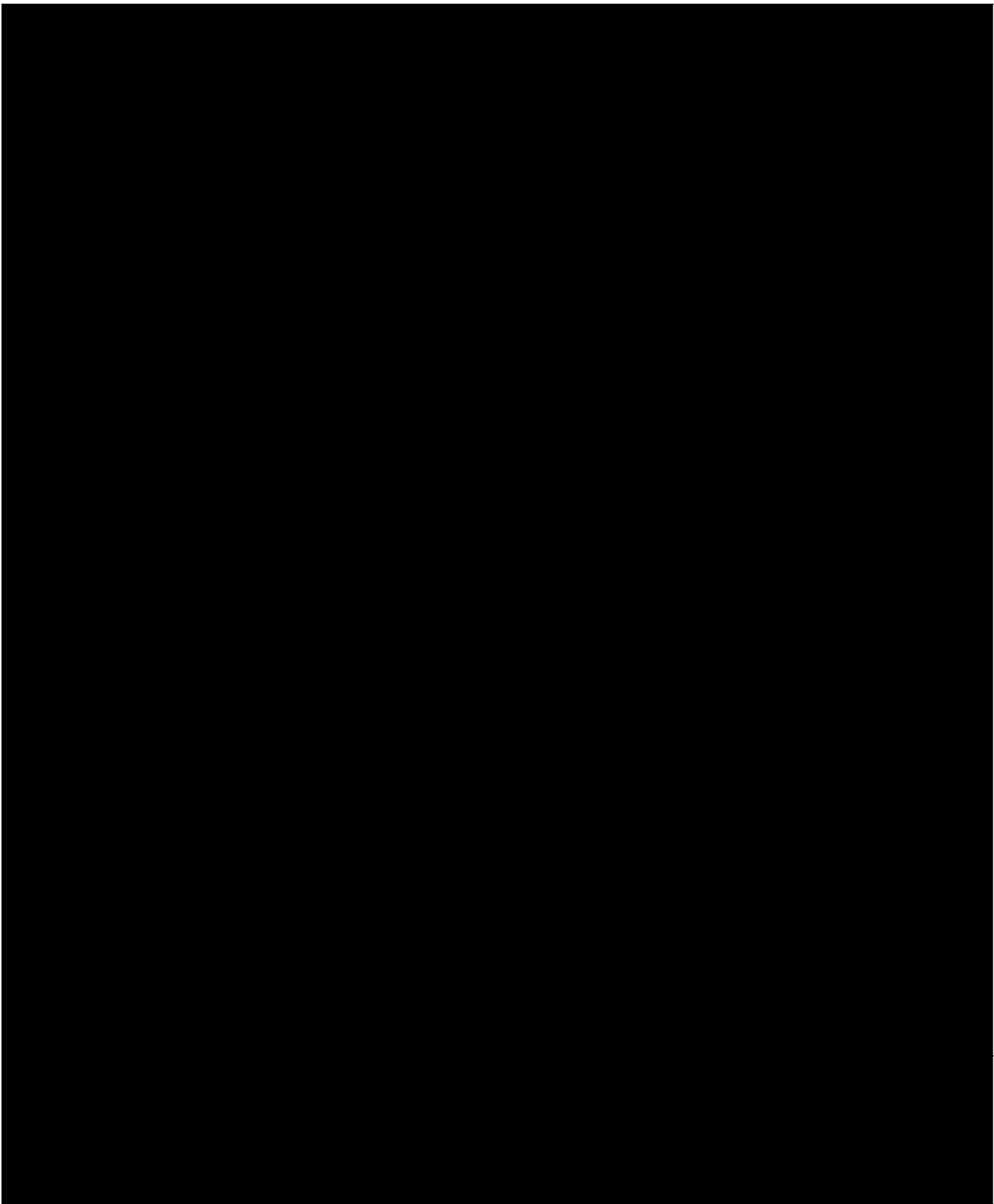


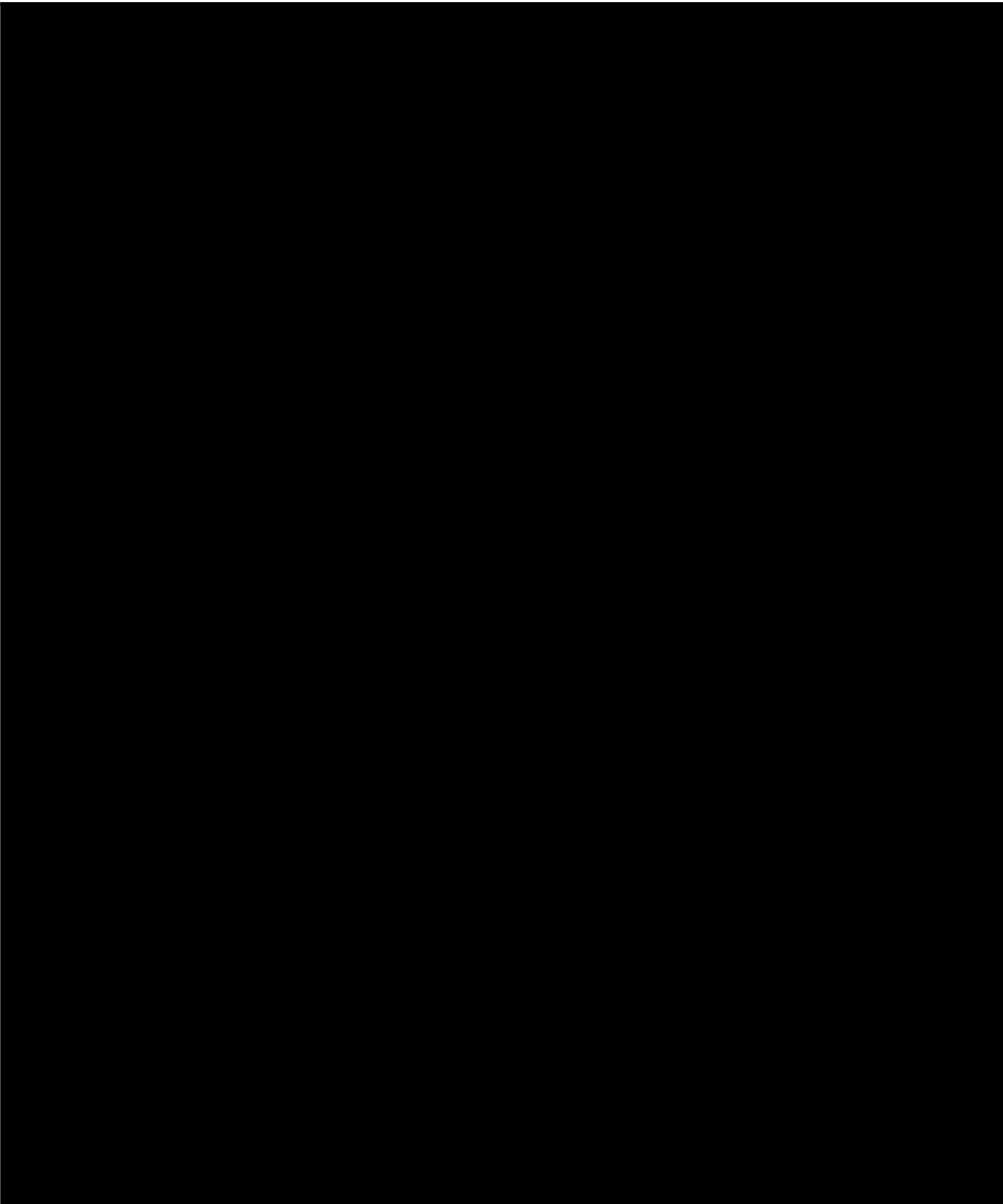
Fri 7/10/2026 10:41 PM

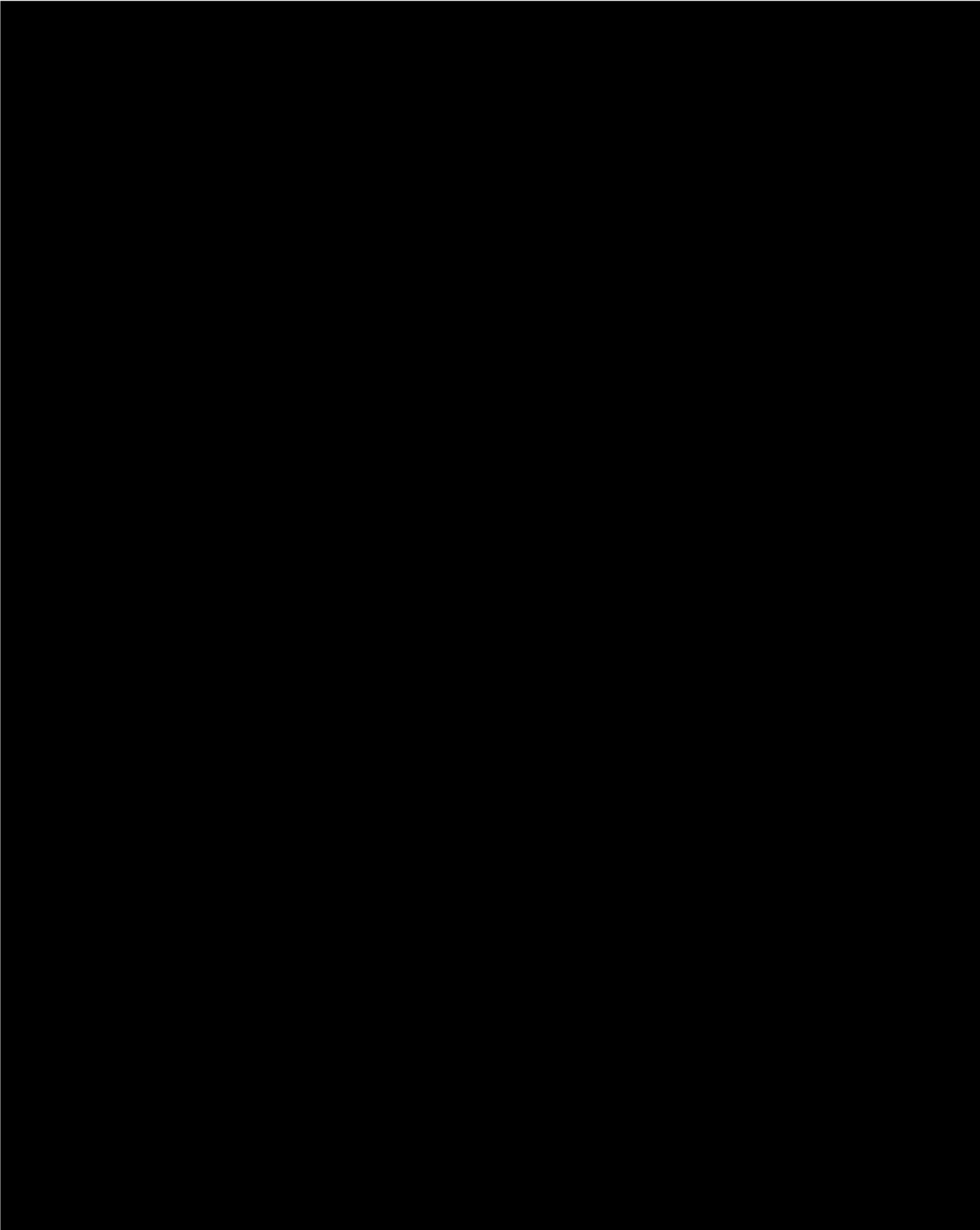


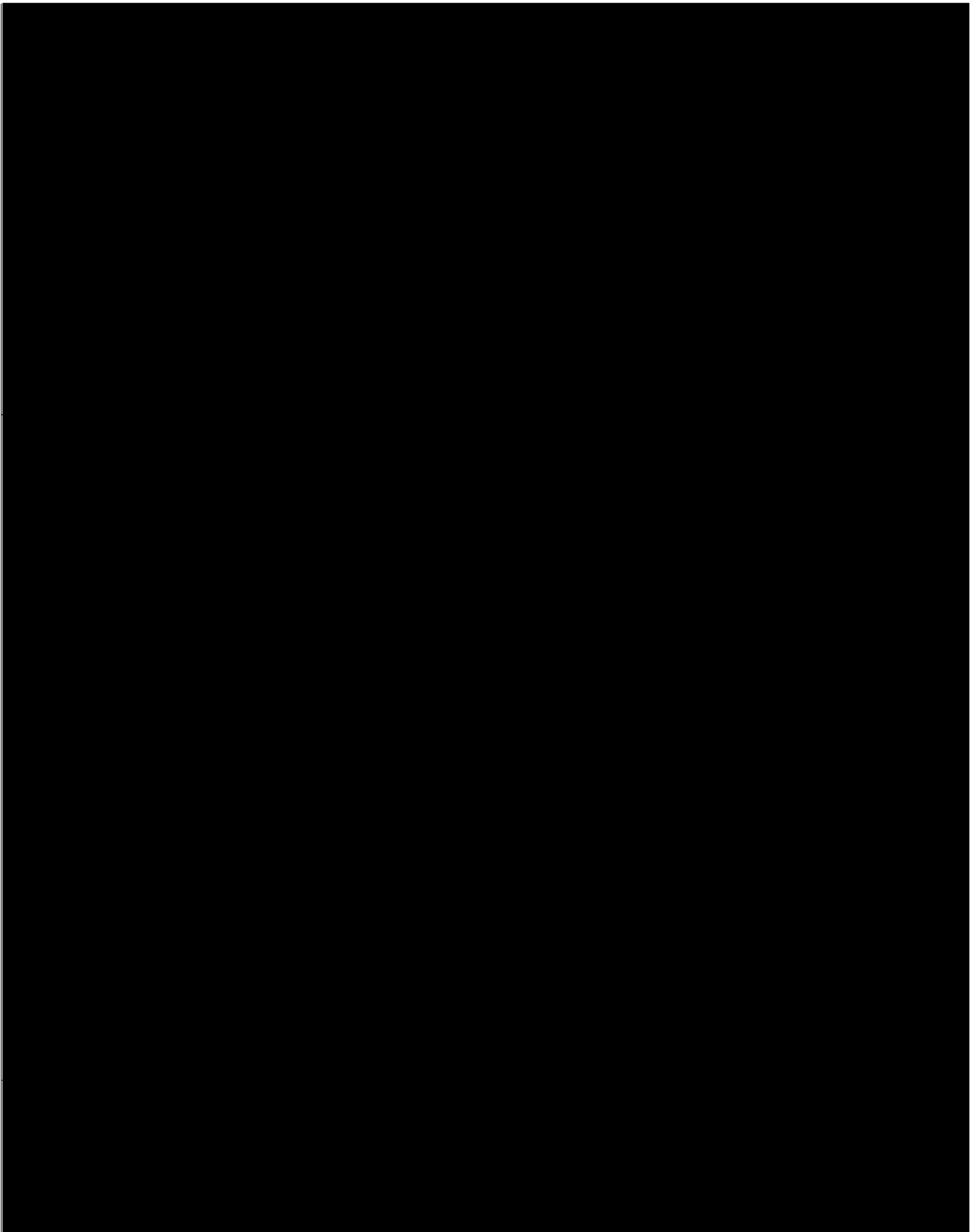
ATTACHMENT J

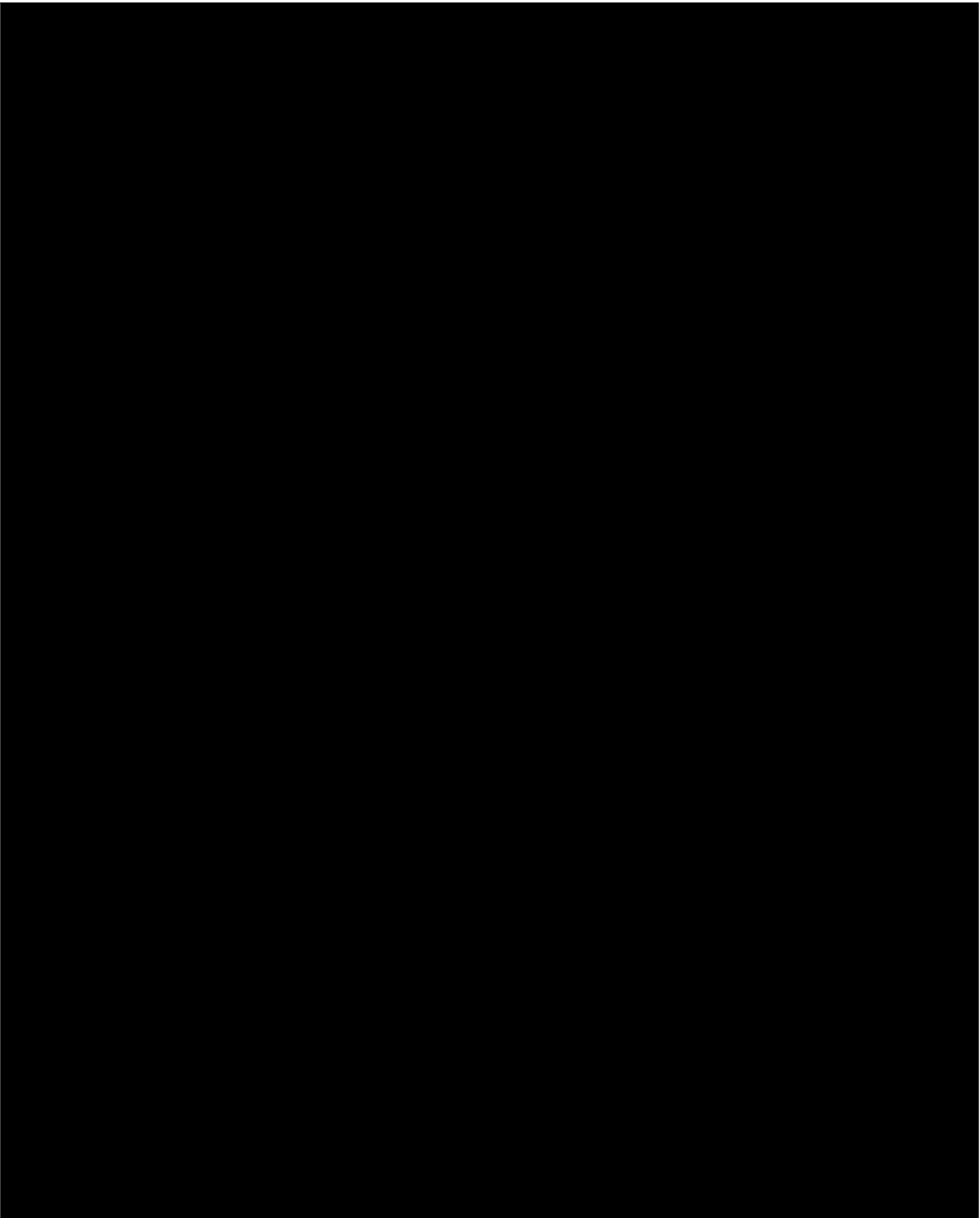












7/10/26, 4:05 PM

UPS CampusShip | UPS - Canada

UPS CampusShip: View/Print Label

1. **Ensure there are no other shipping or tracking labels attached to your package.** Select the Print button on the print dialogue box that appears. Note: If your browser does not support this function, select Print from the File menu to print the label.
2. **Fold the printed label at the solid line below.** Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.

3. GETTING YOUR SHIPMENT TO UPS

Customers without a Daily Pickup

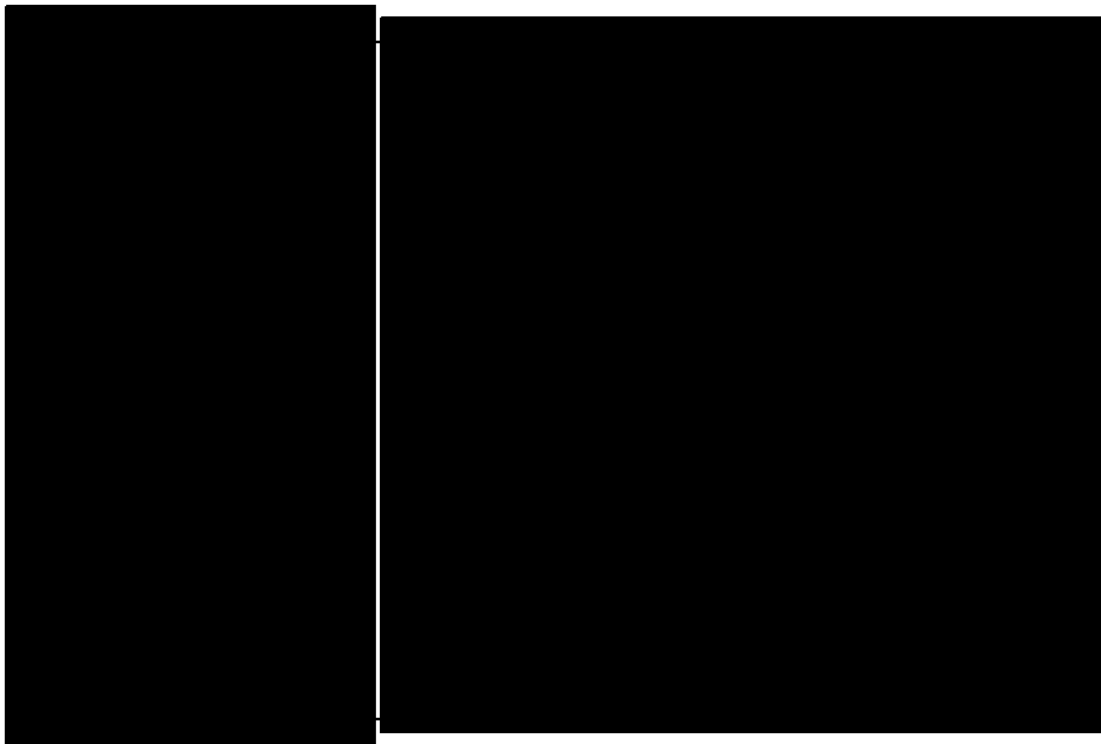
Ground, 3 Day Select, and Standard to Canada shipments must be dropped off at an authorized UPS location, or handed to a UPS driver. Pickup service is not available for these services. To find the nearest UPS location, select the Drop-off icon from the UPS tool bar.

To schedule a pickup, or to find a UPS location, click on Shipping from the main toolbar and select the Schedule a Pickup or Find Drop-off Locations.

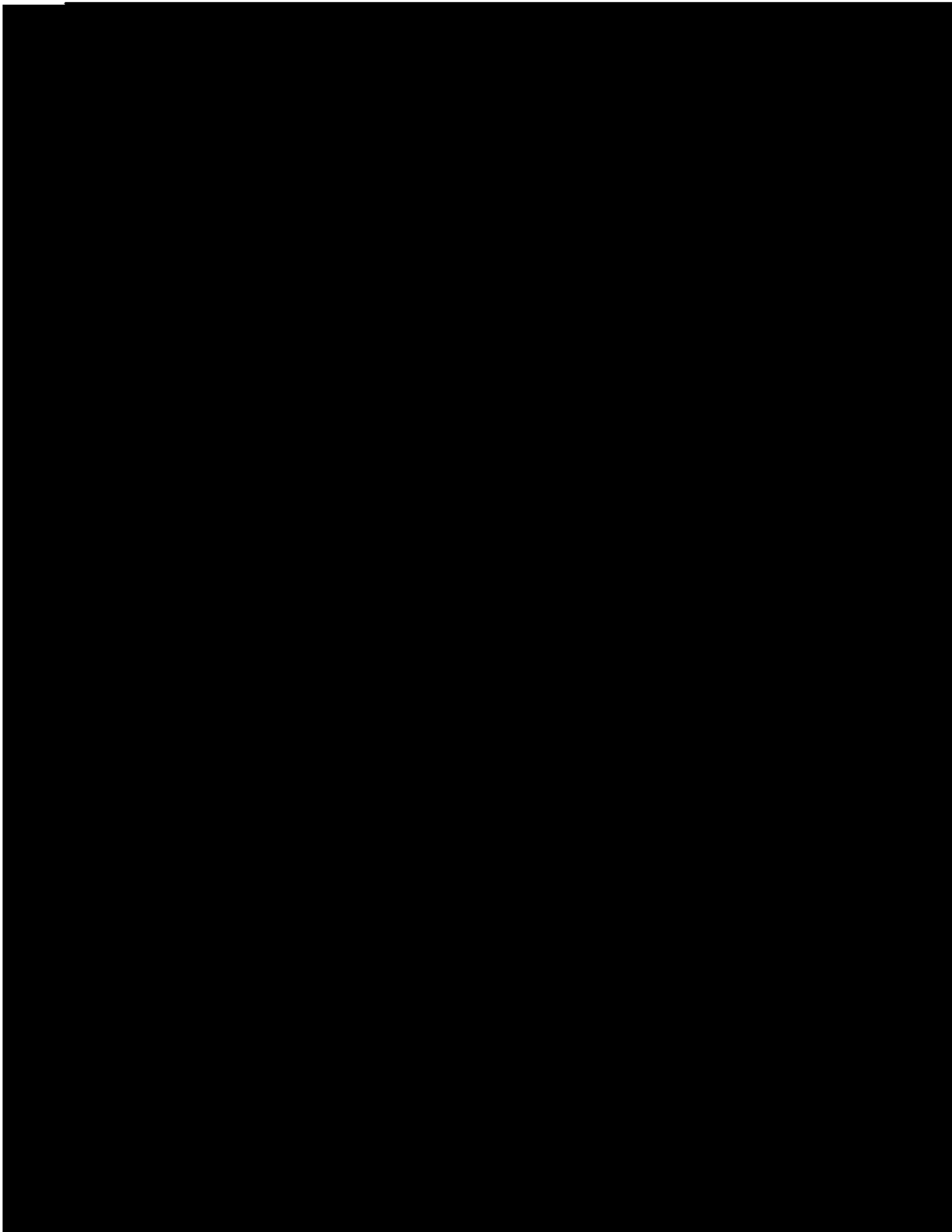
Customers with a Daily Pickup:

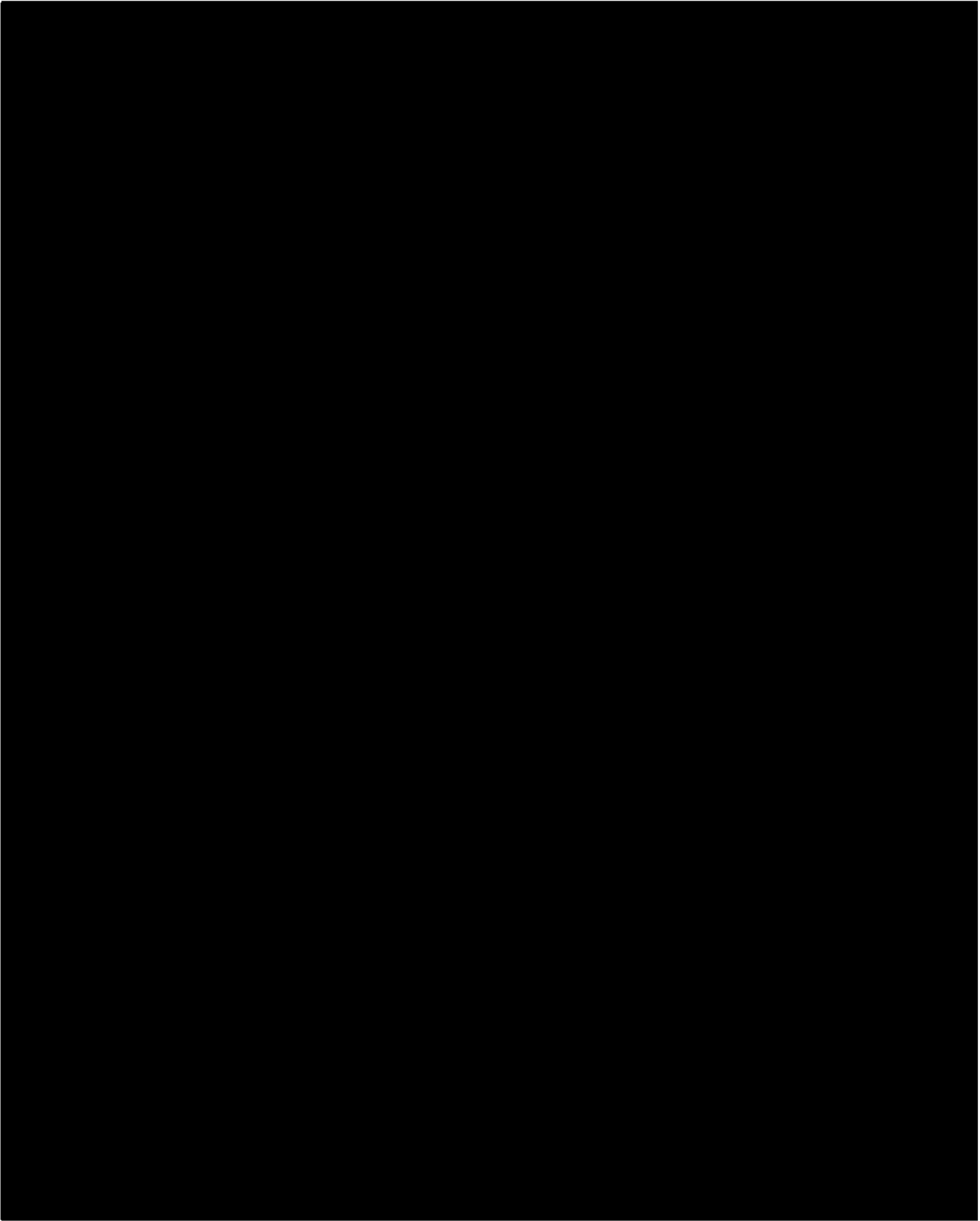
Your driver will pickup your shipment(s) as usual.

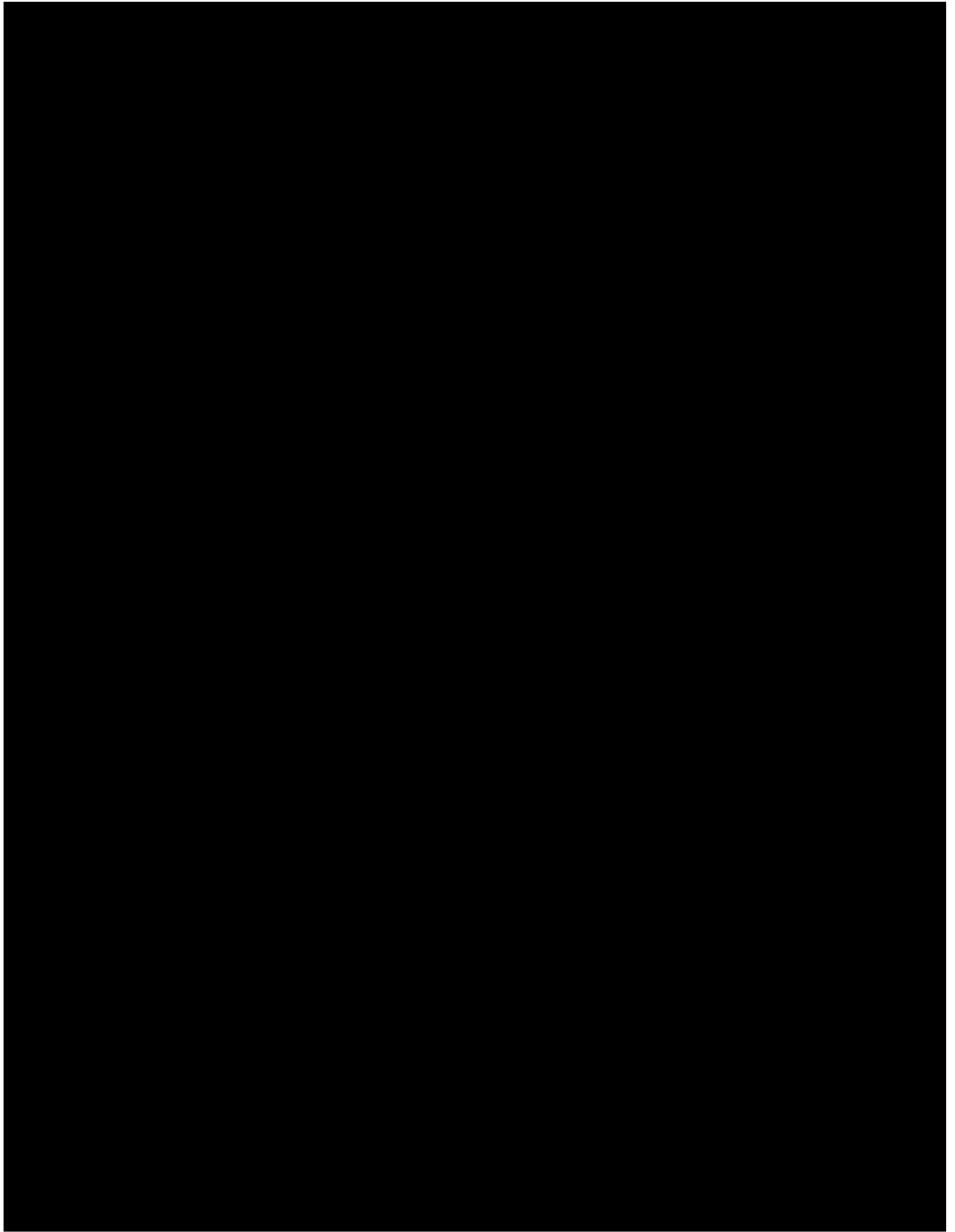
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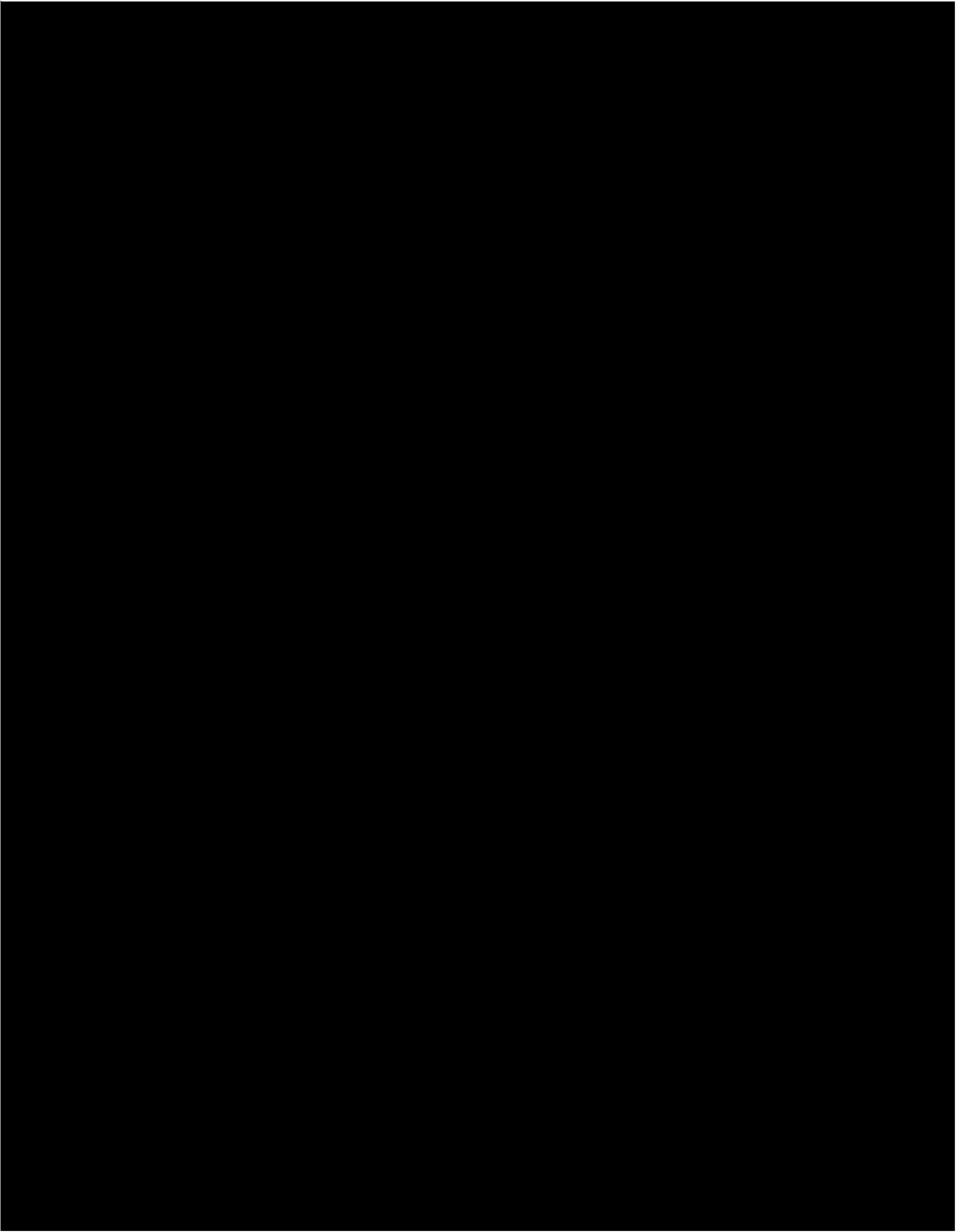


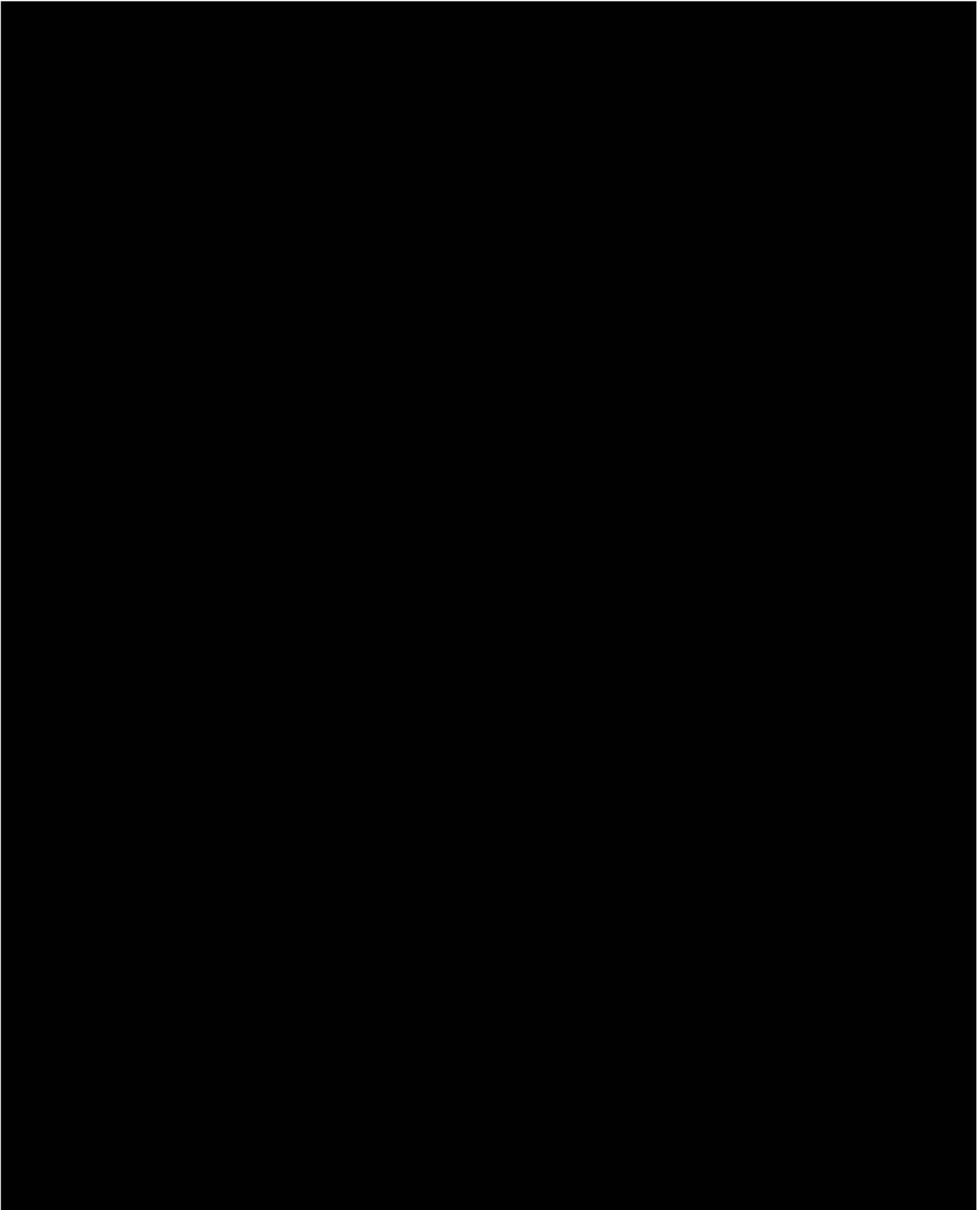
ATTACHMENT K

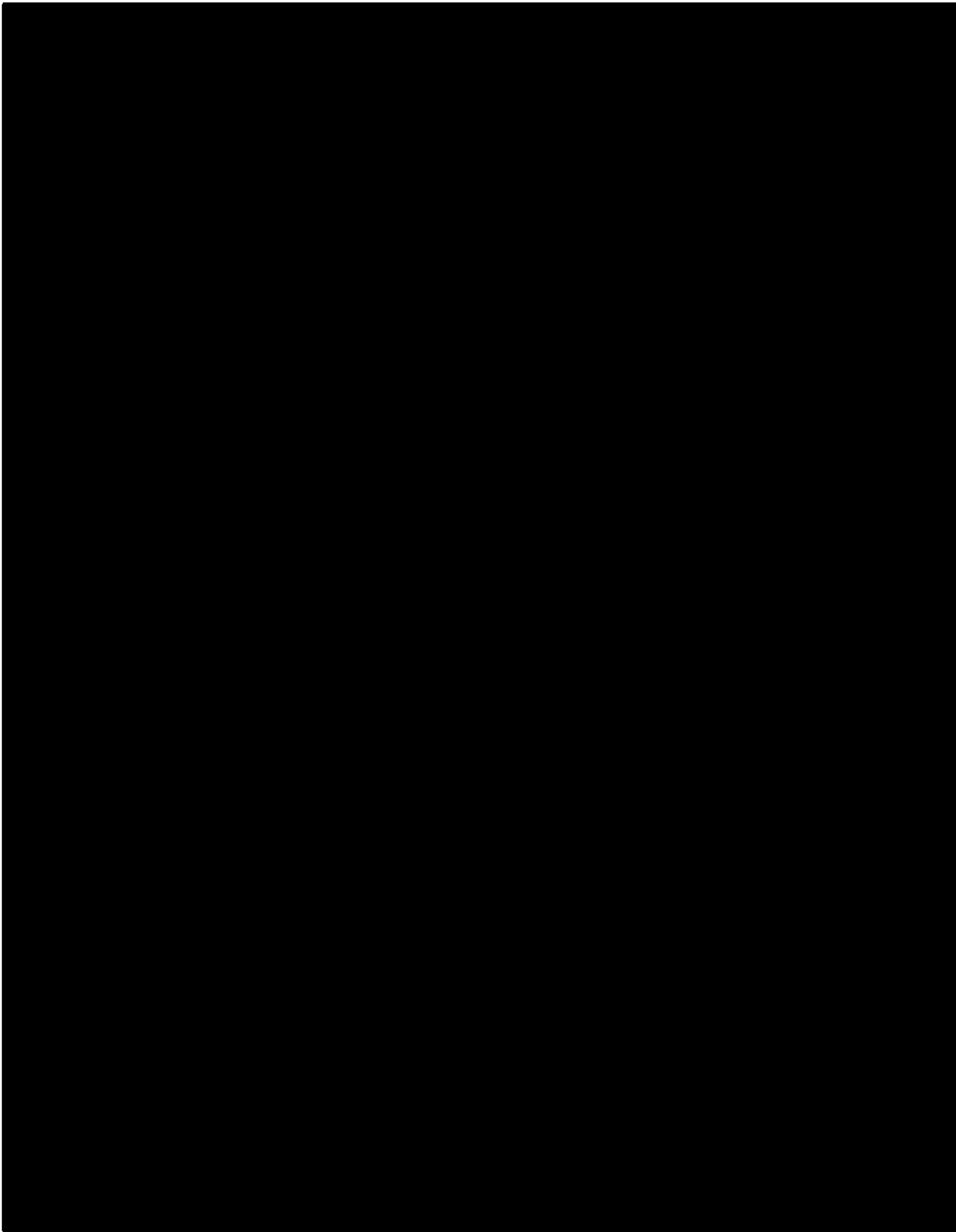












UPS CampusShip: View/Print Label

1. **Ensure there are no other shipping or tracking labels attached to your package.** Select the Print button on the print dialogue box that appears. Note: If your browser does not support this function, select Print from the File menu to print the label.
2. **Fold the printed label at the solid line below.** Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.

3. GETTING YOUR SHIPMENT TO UPS**Customers without a Daily Pickup**

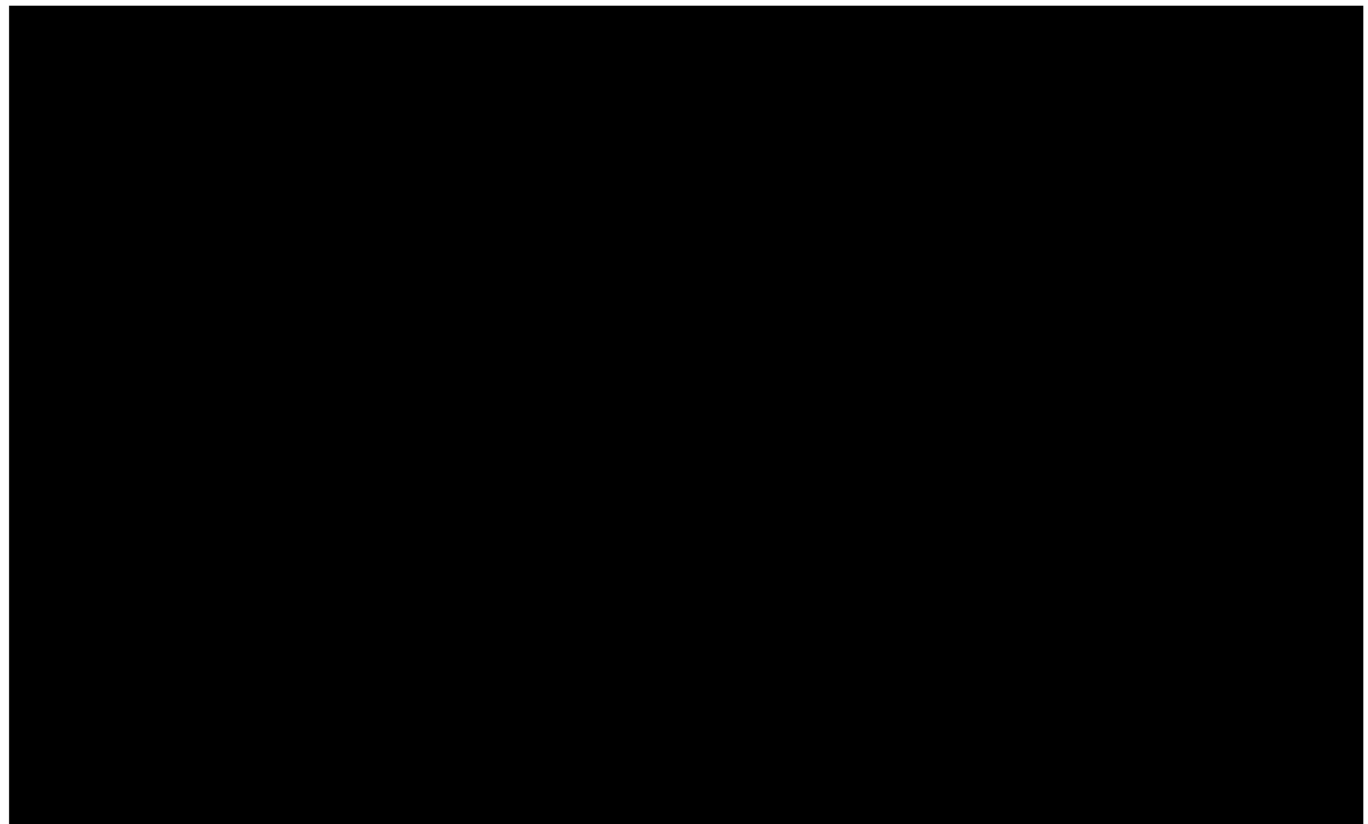
Ground, 3 Day Select, and Standard to Canada shipments must be dropped off at an authorized UPS location, or handed to a UPS driver. Pickup service is not available for these services. To find the nearest UPS location, select the Drop-off icon from the UPS tool bar.

To schedule a pickup, or to find a UPS location, click on Shipping from the main toolbar and select the Schedule a Pickup or Find Drop-off Locations.

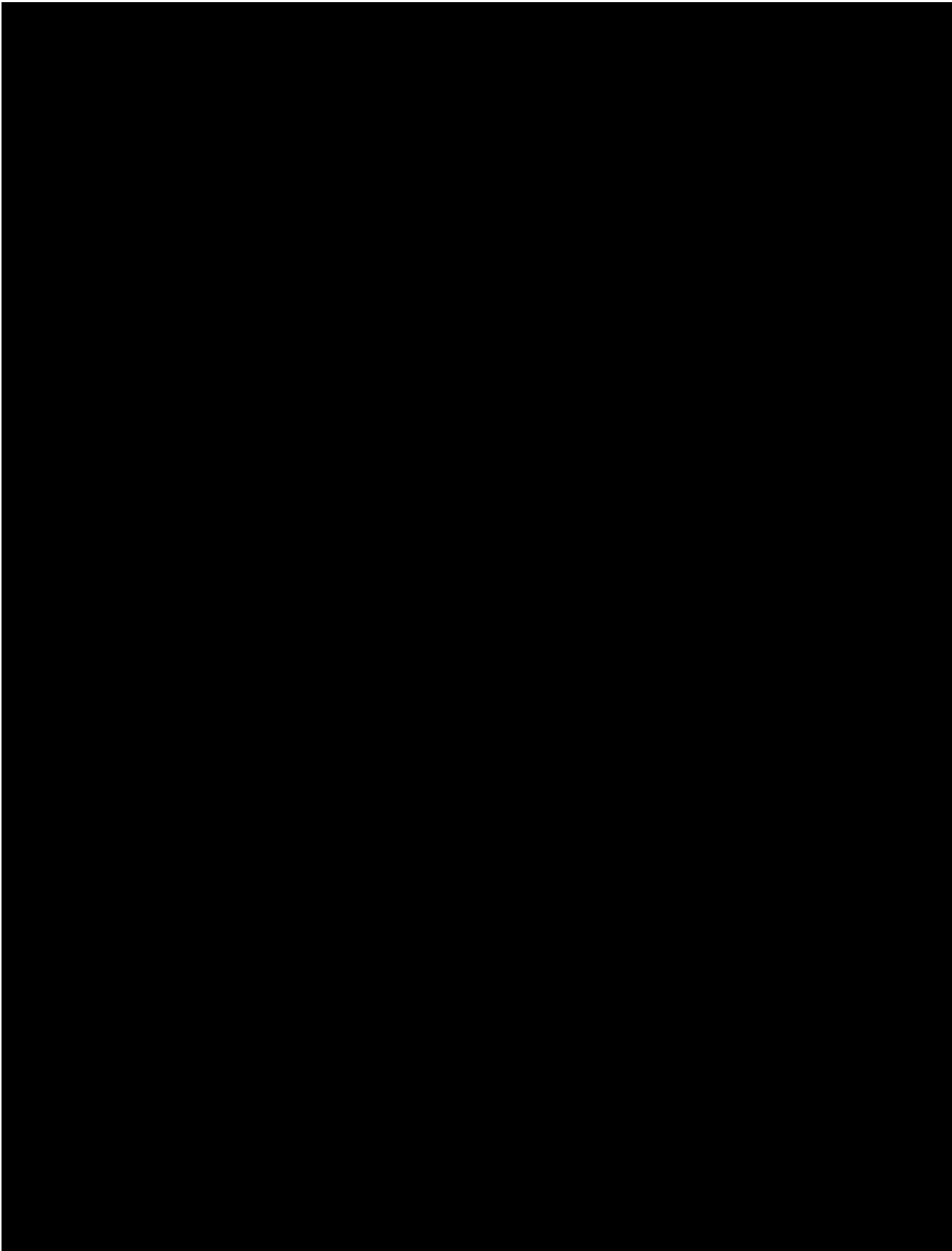
Customers with a Daily Pickup:

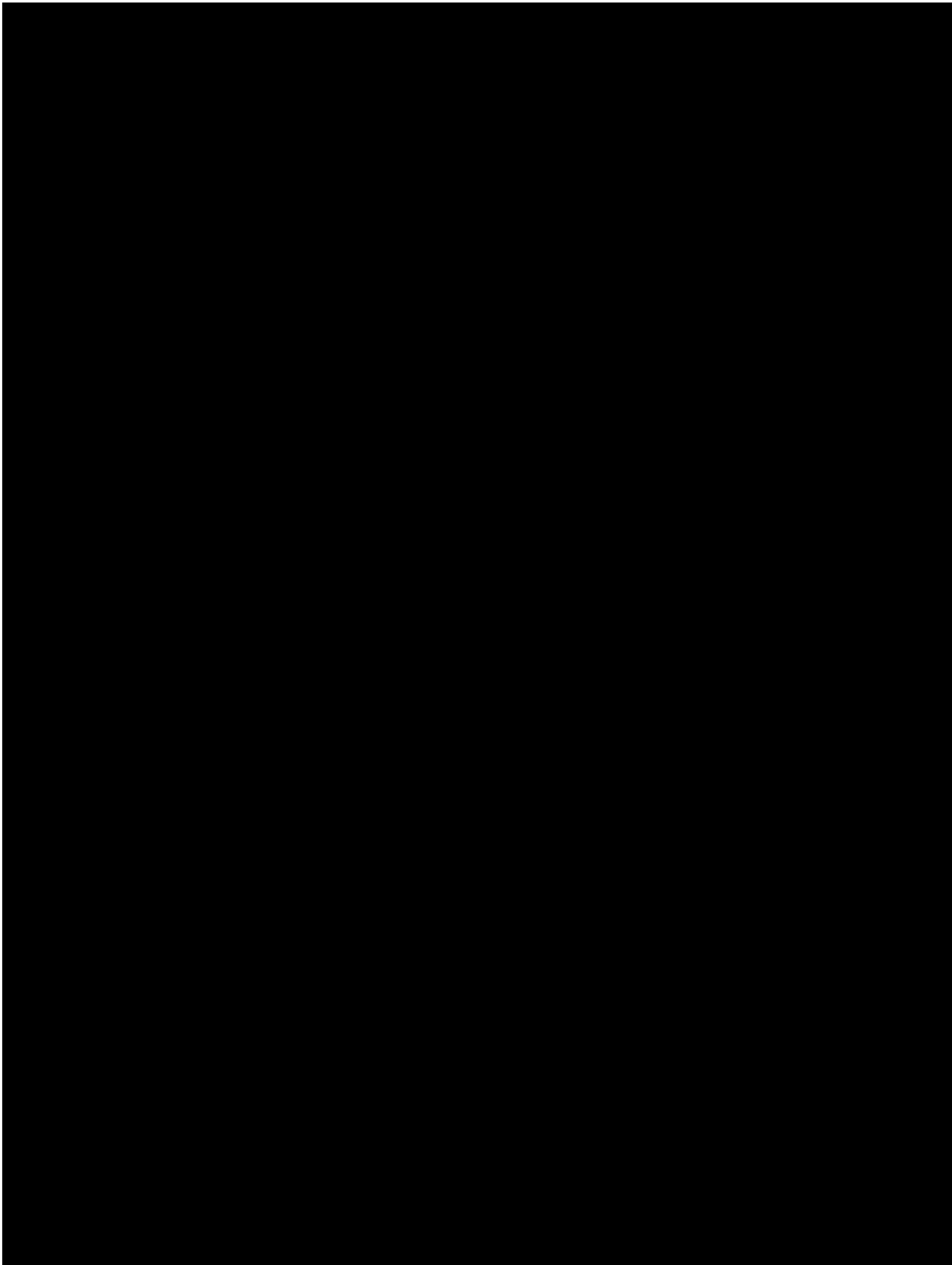
Your driver will pickup your shipment(s) as usual.

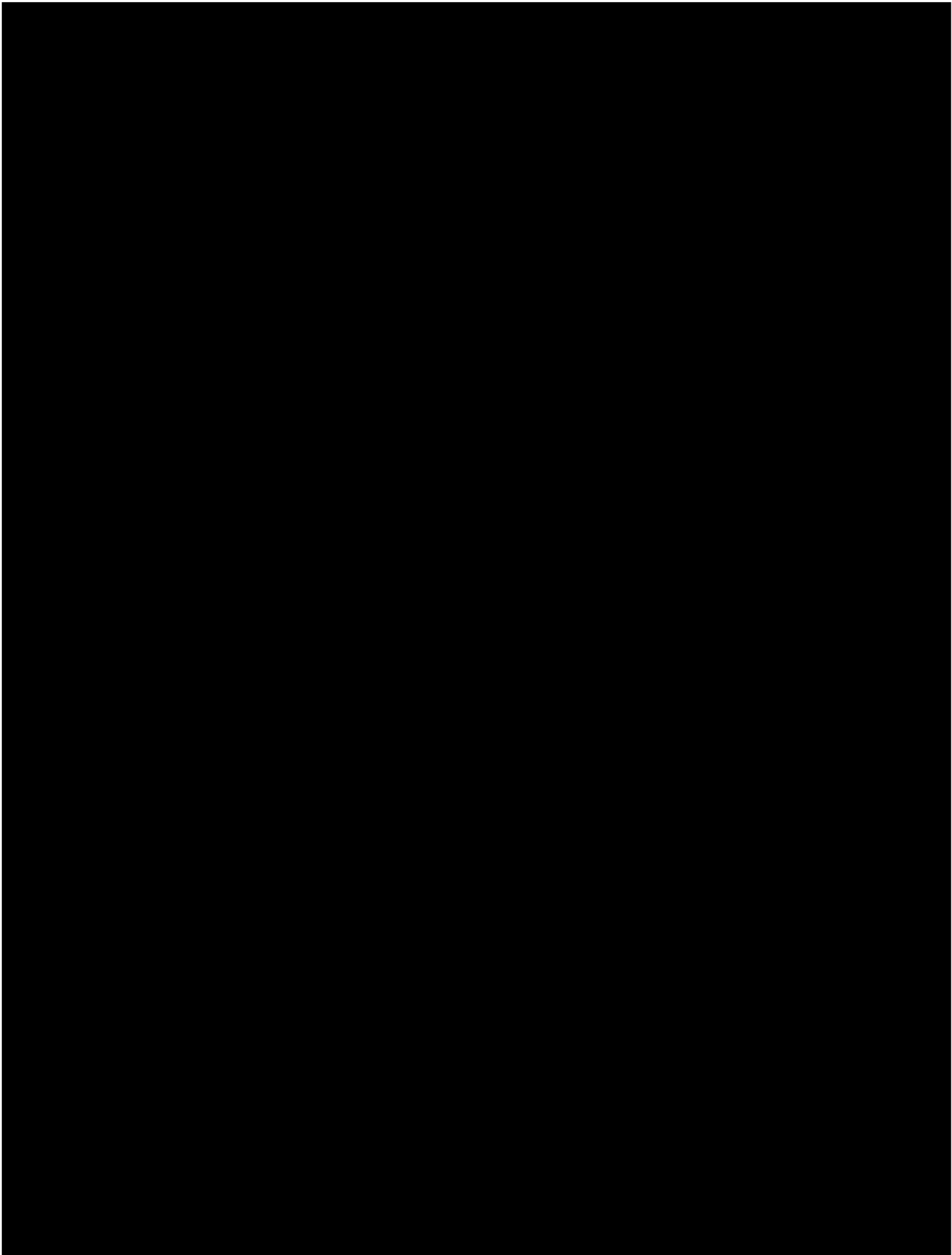
FOLD HERE

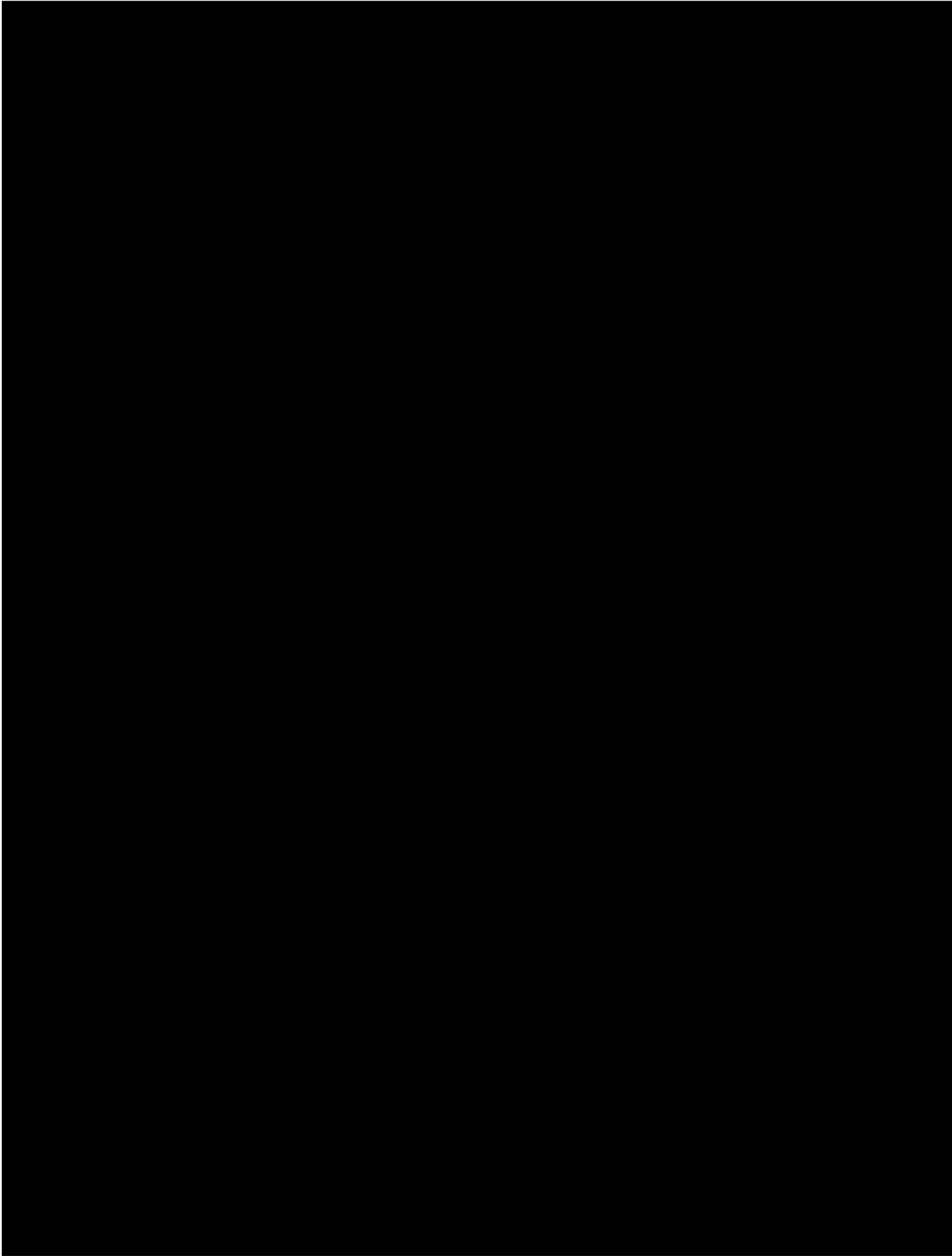


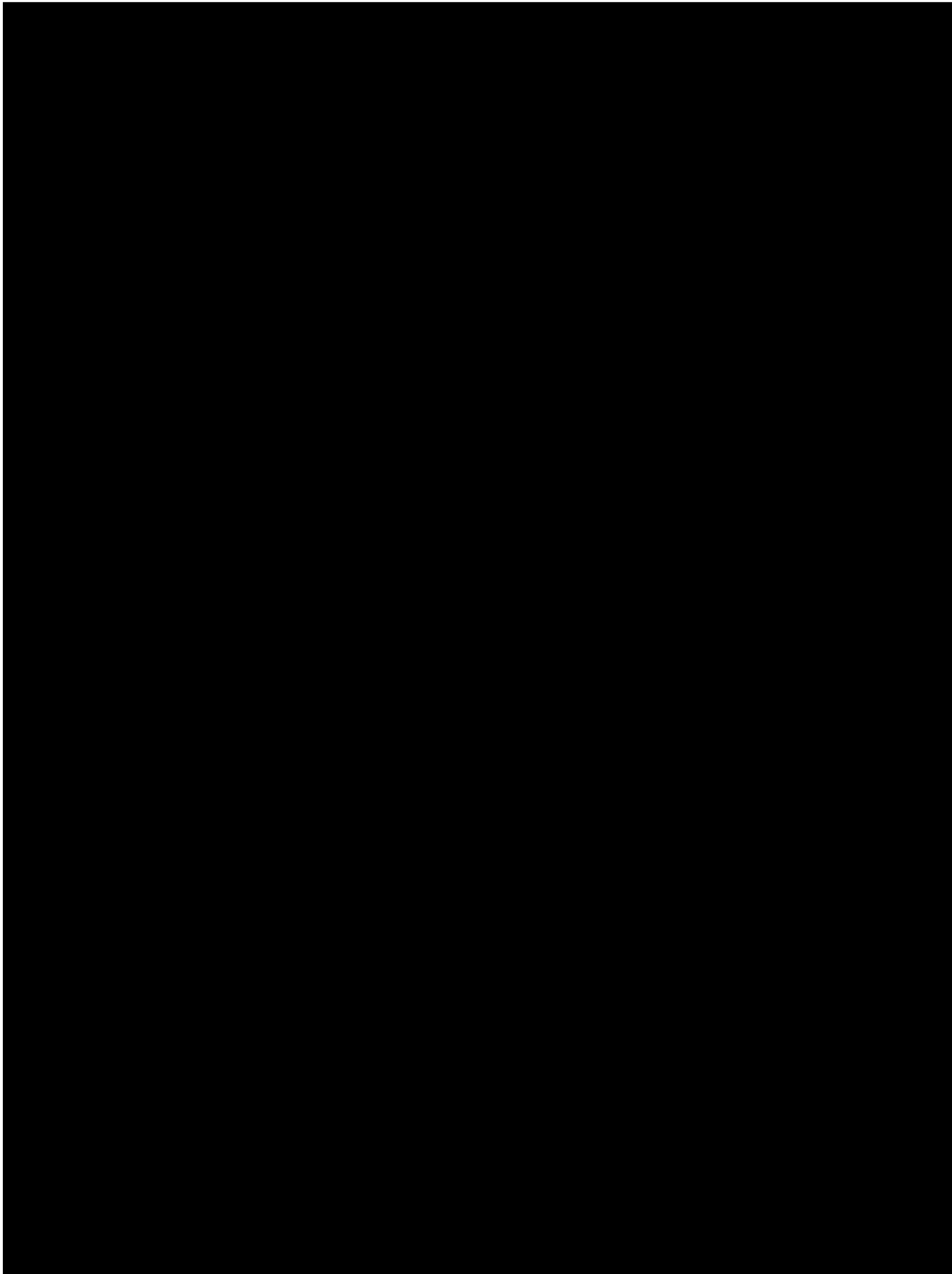
ATTACHMENT L

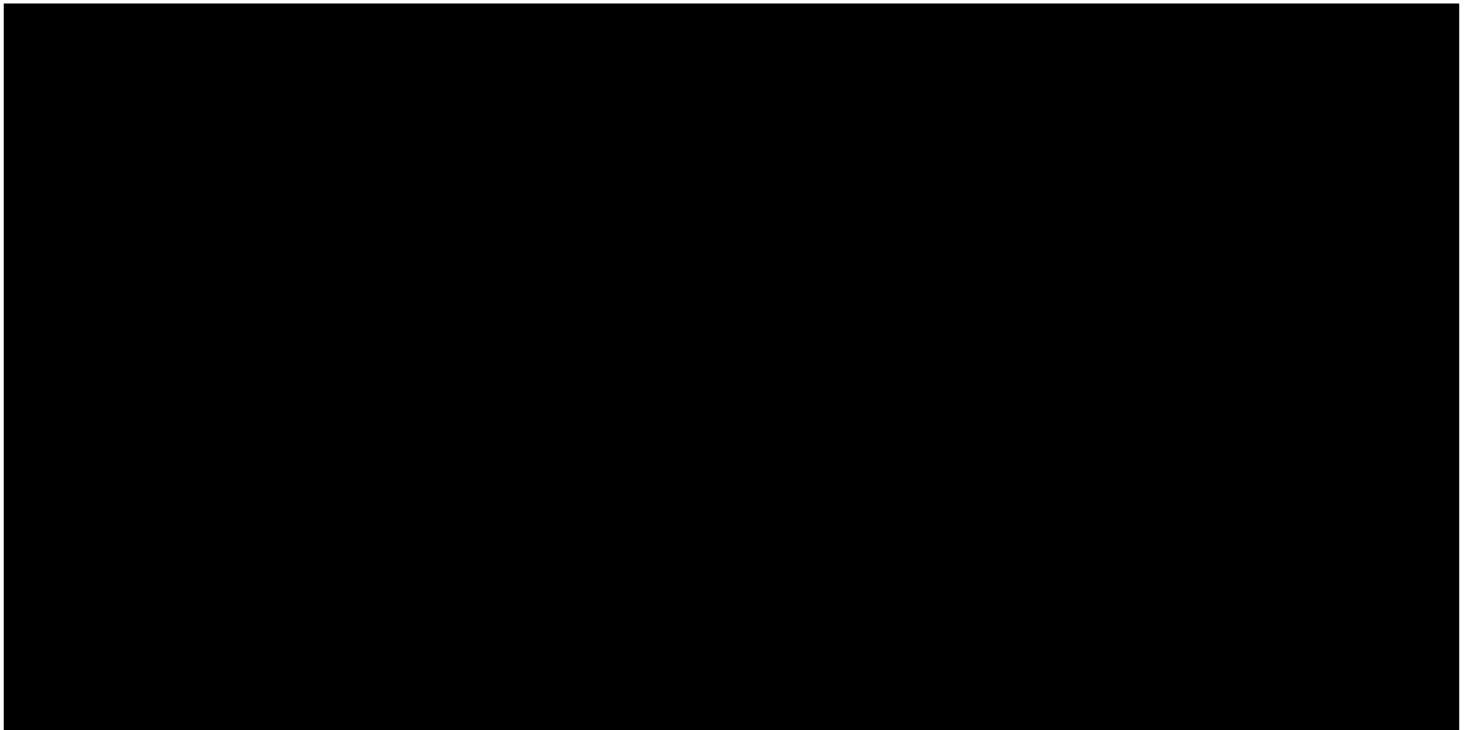


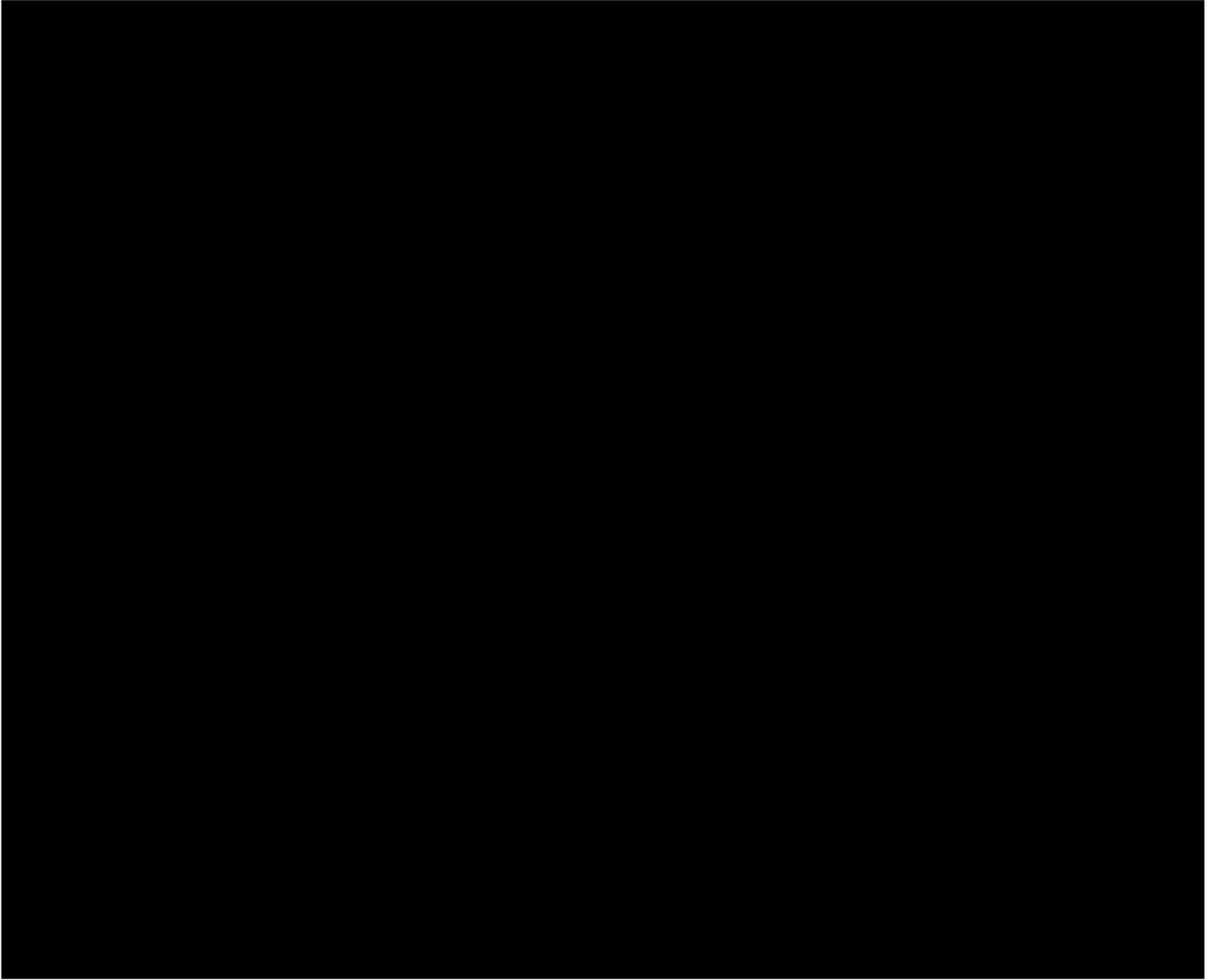












ATTACHMENT M

From: [REDACTED]
Sent: Friday, July 24, 2026 2:34 PM
To: [REDACTED]

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

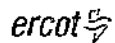
STEC has uploaded the Batch Zero Submission for BZ-17 to the provided shared folder.



CAUTION: THIS MESSAGE ORIGINATED FROM OUTSIDE OF STEC.

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Please follow these [instructions](#) to setup your access to ERCOT External Share for the first time.



This email is generated through ERCOT's use of Microsoft 365 and may contain content that is controlled by ERCOT.

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ATTACHMENT N

Batch Zero Load Information Form

This form is a draft template provided for stakeholder review and process development purposes only and remains subject to change, revision, or withdrawal pending further ERCOT review and stakeholder feedback. Final versions of this form will not be issued or implemented unless and until PGRR145 is approved by both the ERCOT Board of Directors and the Public Utility Commission of Texas ("PUCT").

Purpose of this Workbook

This workbook supports the coordination, collection, validation, and tracking of submission materials required for the ERCOT Batch Zero Process for Large Load Interconnections. The workbook is intended to function as the primary coordination and readiness tracking tool used by ILLEs, Interconnecting TSPs/DSPs, and ERCOT throughout the Batch Zero submission and review process. The workbook is used to:

- Identify the applicable Batch Zero eligibility pathway;
- Determine applicable submission requirements;
- Assign review and validation responsibilities;
- Track submission completeness and outstanding items;
- Document supporting materials and validation status; and
- Confirm readiness for ERCOT submission.

This workbook does not replace official ERCOT forms, attestations, technical submissions, or formal ERCOT eligibility determinations.

How to Use This Workbook

Complete Section 1 – Large Load Demographics

Enter the Large Load project information, including the Interconnecting Large Load Entity (ILLE), Interconnecting TSP, Interconnecting DSP (if applicable), project location, interconnection information, and load characteristics. Information should be consistent with all supporting Batch Zero materials and ERCOT submissions.

Identify Submission Responsibility in Section 10

Identify the party responsible for coordinating collection, validation, and submission readiness prior to ERCOT submission. The TSP and DSP should coordinate responsibility for collection, validation, and submission activities prior to ERCOT submission.

Select the Applicable Eligibility Path and Entry Path in Section 2

Select the Batch Zero eligibility path applicable to the Large Load request. The selected eligibility path determines which eligibility requirements, supporting documentation, attestations, and validations are applicable. For projects qualifying through LUIS, RPG, PBPR, or combinations thereof, also select the applicable Entry Path. The Entry Path determines the methodology used to construct the Load Commissioning Plan (LCP) and the resulting modeled load schedule. Depending on the selected Entry Path, the Interconnecting TSP/DSP may be required to complete the LCP section using LUIS, RPG, PBPR, transmission upgrade, TPIT, and interconnection agreement information. The Eligibility Path and Entry Path serve different purposes and may not be identical. The Eligibility Path determines eligibility requirements, while the Entry Path determines load modeling methodology.

Review Section 3 – Eligibility Requirements

Review all listed requirements and identify which submission items are applicable for the selected eligibility path. Some items may be Required, Conditional, or Not Required depending on the selected pathway. For applicable attestation-based submission items, the workbook also identifies the corresponding attestation template and page reference in the "ILLE attestation location" column.

Assign Responsibility for Collection and Validation

For each applicable submission requirement, the TSP and DSP shall coordinate and assign responsibility for review and validation activities prior to ERCOT submission. The reviewing entity identified in the workbook is responsible for reviewing applicable submission materials, validating completeness and consistency, documenting completion status and identifying deficiencies/follow-up requests (if applicable).

Track Completion Status

The Completion Status field is used to track whether applicable submission items have been received and reviewed for completeness by the responsible reviewing entity. A status of "Complete" indicates that the applicable reviewing entity has completed its review of the submission item for completeness and consistency purposes. Final eligibility determinations remain subject to ERCOT review and approval.

Enter Associated File Names

For each applicable submission item, enter the associated file name or document identifier corresponding to the supporting material received from the ILLE or other responsible party.

Identify Applicable Attestation Template References

For applicable ILLE attestation-based submission items, the "ILLE attestation location" column identifies the corresponding draft attestation template and page reference where the submission requirement is addressed. These references are intended to support coordination between the ILLE, TSP/DSP, and ERCOT during preparation and review of submission materials.

Confirm Package Readiness Prior to Submission

Once all applicable required documents have been received, reviewed, and validated by the responsible TSP and/or DSP, Cell A1 shall display: "LOAD APPLICATION READY TO BE SUBMITTED"

This indicates that:

- all applicable required submission items have been received;
- required reviews and validations have been completed;
- the submission package has been coordinated between the applicable TSP/DSP; and
- the package is considered ready for ERCOT submission.

This readiness confirmation does not constitute ERCOT eligibility approval.

Eligibility Requirements Field Definitions (Section 3 in "Batch Zero LIF" sheet)

Requirement / Submission Item – Identifies each document, form, attestation, evidence item, or technical submission required for the selected Batch Zero eligibility pathway.

Applicability – Indicates whether the item is Required, Conditional, or Not Required for the selected eligibility pathway.

Submission Format – Identifies the required submission format for the applicable submission item (e.g., Evidence, Attestation, Form, Technical documentation, TSP confirmation, or ERCOT determination).

Submitting Party – Identifies the party responsible for preparing and/or providing the submission item into the Batch Zero process, as applicable. This may include the ILLE, Interconnecting TSP/DSP, or ERCOT depending on the submission requirement.

ILLE Attestation Location – Identifies the applicable ERCOT draft attestation template. This field is intended to support navigation, preparation, and review of ILLE attestation materials.

Reviewing Entity – Identifies the TSP or DSP responsible for reviewing and validating the applicable submission item.

Completion Status – Indicates the review status of the submission item in the LIF.

Supporting File Name(s) – Records the name(s) of the file(s), attachment(s), or document identifier(s) associated with the submission item.

ERCOT Validation – Used to record ERCOT's validation outcome for the submission item, including confirmation, follow-up requests, deficiency identification, or final validation status, as applicable.

Notes / Comments – Optional field for comments, clarifications, deficiency notes, follow-up items, attestation references, or other coordination observations related to the submission item.

Submission Coordination

The TSP and DSP are responsible for coordinating submission responsibilities between themselves prior to ERCOT submission.

For pathways requiring an LCP, the Interconnecting TSP/DSP is responsible for selecting the applicable Entry Path and completing the LCP using the instructions associated with that Entry Path.

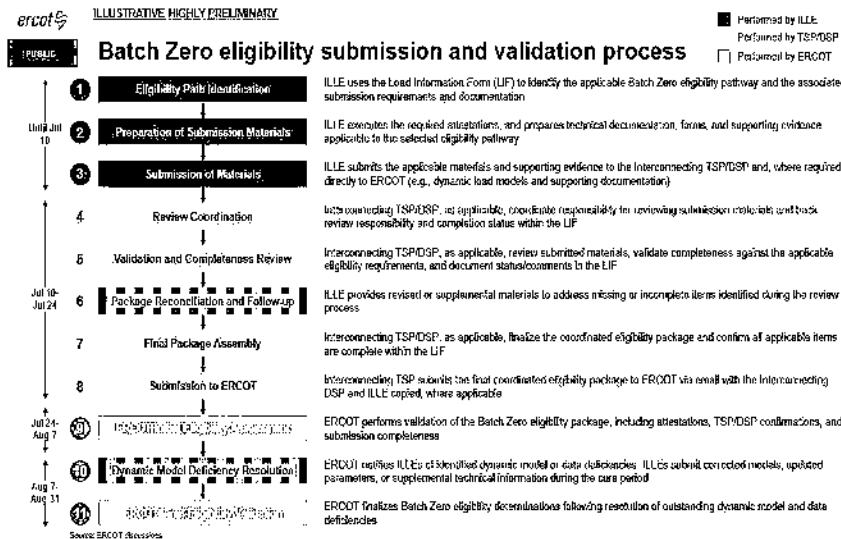
The submitting entity identified in Section 10 is responsible for transmitting the final Batch Zero submission package to ERCOT. ERCOT generally expects the Interconnecting TSP to transmit the final submission package to ERCOT and copy the Interconnecting DSP, if applicable.

The final submission package may include:

- the completed LIF;
- supporting documentation and evidence;
- required ERCOT forms and attestations; and
- any required TSP/DSP confirmations or notifications under the Planning Guide.

The workbook may also reference applicable ERCOT draft attestation templates and associated page references for coordination and review purposes.

Dynamic load models and supporting dynamic model documentation may require direct submission by the ILLE to ERCOT in accordance with ERCOT instructions and applicable Batch Zero requirements.



Classification: Internal Purpose

This form is a draft template provided for information review and process development purposes only and remains subject to change, revision, or withdrawal pending further ERCOT review and stakeholder feedback. Any changes to this form will only be issued on a formal change control process. Approval is required for use by the ERCOT Board of Directors and the Public Utility Commission of Texas (PUCT).

Batch Zero Load Information Form (LIF)

Section 1 - Load Load Description

Section 1A - Project Identification

[Redacted content for Section 1A - Project Identification]

Section 2 - Batch Zero Eligibility and Entry Path

[Redacted content for Section 2 - Batch Zero Eligibility and Entry Path]

Section 3 - Eligibility Requirements

[Redacted content for Section 3 - Eligibility Requirements]

ERCOT validation - Notes / Comments

[Redacted content for ERCOT validation - Notes / Comments]

[Redacted content for ERCOT validation - Notes / Comments]

Classification: Internal Purpose



*Note: Due dates shown in this workbook are indicative only and are intended as a summary of key PG&R146 milestones. Users should refer to the approved PG&R146 language and applicable ERCOT governing documents for detailed requirements, exceptions, and implementation guidance.

Section 4: Milestones for future use			
Field	Format	Instructions	Notes
		For use only at direction of ERCOT	
		For use only at direction of ERCOT	
		For use only at direction of ERCOT	

Classification: Internal Purpose

This form is a draft template provided for stakeholder review and process development purposes only and remains subject to change, revision, or withdrawal pending further ERCOT review and stakeholder feedback.
Prior versions of this form will not be issued or implemented in ERCOT and will not be approved by the ERCOT Board of Directors and the Public Utility Commission of Texas (PUCT).

Load Commissioning Plan (LCP)

Entry Path: LUIS Only

NOTE: This section must be completed by the interconnecting TSP/SEP. The interconnecting TSP/SEP is responsible for preparing the LCP, applying the applicable Batch Zero study path logic, and entering all required data in this tool.

IA or Equivalent Agreement This section is required for all Large Loads		LLIS Load Commissioning Plan (LCP) as modified by TPIT This section is required if a LLIS is being used to qualify for Batch Zero as either base load or studied load							RPG as modified by TPIT This section is required if a RPG study is being used to qualify for Batch Zero as base load		Permian Basin Reliability Plan This section is required if the Permian Basin Reliability Plan (PSRP) study is being used to qualify for Batch Zero as base load		DO NOT MODIFY THIS SECTION					
Date	Interconnection Agreement Peak MW	MVAR	2025 RTP RTI Peak Demand (if available)	LCP Peak MW	MVAR	LLIS Required controlling upgrade, if any	LLIS TPIT ISO Project Number	LLIS TPIT Project Name	LLIS TPIT Project Case#	255 SWG_01 Cases?	RPG Stop effective date	LLIS Stop effective date	RPG TPIT- Adjusted Peak MW	LLIS TPIT- Adjusted Peak MW	Combined TPIT Adjusted Peak MW	Output Peak MW	Load Treatment	

Instructions and explanation for completing this section

Populate Interconnection Agreement Peak MW and MVAR using the executed Interconnection Agreement (IA) or equivalent agreement.

Populate LCP Peak MW and MVAR using the approved LLIS Load Commissioning Plan (LCP).

For each load increase that depends on a transmission upgrade, enter the controlling transmission upgrade in LLIS Required controlling upgrade. If the upgrade is included in the latest TPIT report, enter the latest TPIT in-service date in LLIS TPIT ISO. If the upgrade is not included in the latest TPIT report, leave LLIS TPIT ISO blank.

Leave all RPG study inputs blank.

Leave all Permian Basin Reliability Plan (PSRP) inputs blank.

Do not modify RPG Stop effective date, LLIS Stop effective date, RPG TPIT-Adjusted Peak MW, LLIS TPIT-Adjusted Peak MW, Combined TPIT-Adjusted Peak MW, Output Peak MW, or Load Treatment. These fields are calculated automatically.

For load increases that depend on a transmission upgrade, the LLIS TPIT-Adjusted Peak MW schedule will be modified automatically to reflect the latest TPIT in-service date. If the TPIT in-service date is later than the date reflected in the approved LLIS LCP, the corresponding load increase will not be reflected until the TPIT in-service year.

Output Peak MW is determined automatically as the lower of the Interconnection Agreement Peak MW schedule and the Combined TPIT-Adjusted Peak MW schedule for each year.

The resulting Output Peak MW schedule is modeled as Base Load in all years.

ATTACHMENT O



RE: Nearby Loads for LLI-2720 [REDACTED]

[REDACTED]

CAUTION: THIS MESSAGE ORIGINATED FROM OUTSIDE OF STEC.
Do not open attachments or click links from an unknown or suspicious origin.

[REDACTED]

Subject: Fw: Nearby Loads for LLI-2720 [REDACTED]

***** EXTERNAL Email *****

Please be cautious and evaluate before you click on links, open attachments, or provide credentials. As a reminder, please report phishing emails via the Report Phishing button. If the button is not available, then please forward to 'ReportPhishing@ercot.com'

[REDACTED]

[REDACTED]



RE: Mesquite LLI-2720 Short Circuit Study Result

[REDACTED]

CAUTION: THIS MESSAGE ORIGINATED FROM OUTSIDE OF STEC.
Do not open attachments or click links from an unknown or suspicious origin.

[REDACTED]

[REDACTED]

Subject: Mesquite LLI-2720 Short Circuit Study Result

***** EXTERNAL Email *****

Please be cautious and evaluate before you click on links, open attachments, or provide credentials. As a reminder, please report phishing emails via the Report Phishing button. If the button is not available, then please forward to 'ReportPhishing@ercot.com'

[REDACTED]



RE: [REDACTED] Stability Study Results

[REDACTED]

Confidentiality Notice: The information contained in this email message and any attached documents may be privileged and confidential and is intended for the addressee only. If you received this message in error, please notify the sender immediately.

[REDACTED]

Subject: Re: [REDACTED] and Mesquite (LLI-2720) Stability Study Results

***** **EXTERNAL Email** *****

Please be cautious and evaluate before you click on links, open attachments, or provide credentials. As a reminder, please report phishing emails via the Report Phishing button. If the button is not available, then please forward to 'ReportPhishing@ercot.com'

[REDACTED]

[REDACTED]

Subject: RE: [REDACTED] and Mesquite (LLI-2720) Stability Study Results

CAUTION: THIS MESSAGE ORIGINATED FROM OUTSIDE OF STEC.
Do not open attachments or click links from an unknown or suspicious origin.

[REDACTED]

Confidentiality Notice: The information contained in this email message and any attached documents may be privileged and confidential and is intended for the addressee only. If you received this message in error, please notify the sender immediately.

[REDACTED]

Subject: Re: [REDACTED] and Mesquite (LLI-2720) Stability Study Results

***** **EXTERNAL Email** *****

Please be cautious and evaluate before you click on links, open attachments, or provide credentials. As a reminder, please report phishing emails via the Report Phishing button. If the button is not available, then please forward to 'ReportPhishing@ercot.com'

[REDACTED]

ATTACHMENT P

To:

Notice_Operations@lists.ercot.com,NOTICE_GENERAL@LISTS.ERCOT.COM,TACANDOTHERS@lists.ercot.com,ROS@lists.ercot.com

Sent: 7/23/26, 5:32 PM**Subject:** M-B062326-06 Batch Zero Eligibility Submissions and Good Cause Exception Process for PGRR145**NOTICE DATE:** July 23, 2026**NOTICE TYPE:** M-B062326-06 General**SHORT DESCRIPTION:** Batch Zero Eligibility Submissions and Good Cause Exception Process for PGRR145**INTENDED AUDIENCE:** Interconnecting Large Load Customers, Transmission/Distribution Service Providers, and other interested stakeholders**DAYS AFFECTED:** July 24, 2026

LONG DESCRIPTION: Under Planning Guide Section 9.2.2, Interconnecting Distribution Service Providers (DSPs) and Transmission Service Providers (TSPs) must submit to ERCOT all information required for a Large Load to be included in Batch Zero as base load under Section 9.2.1.1 or Section 9.2.1.2 no later than the end of day July 24, 2026. ERCOT has provided standard submission materials on the ERCOT [Large Load Integration webpage](#). Other than an opportunity to reconcile financial security and resolve deficiencies in dynamic models, there are no exceptions to the requirements.

ERCOT recognizes that, given the short implementation period for Planning Guide Revision Request 145 (PGRR 145), there are Interconnecting Large Load Entities (ILLEs) that can demonstrate that they substantially meet an eligibility criterion but cannot satisfy a specific element of it. An ILLE in this position may submit with its eligibility materials a letter requesting a good cause exception to ERCOT's application of a PGRR 145 eligibility requirement, along with any supporting documentation. The ILLE must explain in detail the basis for an exception, which must include information demonstrating that the exception will not compromise PGRR 145 objectives. For purposes of this Market Notice, eligibility criteria that may be excepted do not include the requirement in Section 9.2.1.1(e)(i) and (f)(i) that the Large Load have a complete and valid set of interconnection studies as described in Section 9.2.1.4 or that the Large Load satisfy one of the requirements in Section 9.2.1.2(a)(i)-(iii).

Under existing procedures, ERCOT may seek a good cause exception from the Public Utility Commission of Texas (PUCT) to waive application of one or more eligibility requirements in Planning Guide Section 9. ERCOT will review requests for an exception and, in its sole discretion, decide whether to request that the PUCT authorize ERCOT to waive an eligibility requirement applicable to the ILLE under 16 Tex. Admin. Code 25.3(b) and 25.361(b)(16).

While the exception is pending, ERCOT will provisionally consider the specific criterion as met. ERCOT will continue to process and classify the Large Load according to the timelines in Planning Guide Section 9.3.1. If ERCOT declines to seek the exception, or the PUCT denies it, ERCOT will treat the criterion as unmet and reclassify the Large Load accordingly.

An ILLE seeking to qualify a Large Load as studied load must submit its eligibility materials to its Interconnecting DSP or TSP by the July 24, 2026 deadline. In addition, ILLEs that did not submit a Large Load as base load by the July 10 deadline because they could not satisfy one or more criteria may submit eligibility materials to the Interconnecting DSP or TSP by July 24, 2026, and the Interconnecting DSP or TSP must submit the materials to ERCOT by end of day July 24, 2026. The Interconnecting DSP or TSP should (1) select "Incomplete" in the dropdown menu in Column J of Section 3 of the Batch Zero Load Information Form and (2) list the supporting letter in Column K and include it with the package.

ACTION REQUIRED: An Interconnecting Large Load Entity that can demonstrate that they substantially meet an eligibility criterion but cannot satisfy a specific element of it may submit to the Interconnecting Distribution Service Provider or Transmission Service Provider with its eligibility materials a letter requesting a good cause exception to ERCOT's application of a PGRR 145 eligibility requirement, along with any supporting documentation.

CONTACT: If you have any questions, please email the LLWG_Feedback@ercot.com. You may also call the general ERCOT Client Services phone number at (512) 248-3900 or contact ERCOT Client Services via email at ClientServices@ercot.com.

If you are receiving email from a public ERCOT distribution list that you no longer wish to receive, please follow this link in order to unsubscribe from this list: <http://lists.ercot.com>.

dg