DATA CENTER CAMPUS DEVELOPMENT

ERCOT PGRR145: Batch Zero Large-Load Owner Readiness Pack

Adopted June 18, 2026 I Most provisions effective July 11, 2026

SYNOPSIS	EXECUTIVE SUMMARY	OWNER MODEL	AUDIT CHECKLIST

A shareable owner-side guide for Batch Zero eligibility, attestations, provider handoffs, model governance, energization, and audit readiness.

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1. Synopsis

PGRR145 replaces a collection of individual large-load studies with a transitional system-wide process for eligible and committed projects. Batch Zero sorts projects into base load, studied load, or future-batch load, evaluates system impacts, allocates megawatts over Years 1 through 6, and advances qualifying projects into refinement, transmission planning, energization, and continuing-operation controls.

The central owner problem is evidence consistency. A project can have land, equipment orders, a customer contract, financial security, studies, and an energization plan, yet still fail if those records describe different entities, megawatts, points of interconnection, dates, technologies, or ramp assumptions.

PGRR145 is approved, but not every feature is fully implemented. ERCOT lists most provisions as effective July 11, 2026. Planning Guide Section 9.6.1(2) and (3), concerning additional Provisional Controllable Load Resource provisions, remain tied to system implementation.

Owner action: maintain one project evidence index that reconciles every attestation, model, contract, equipment commitment, financial-security record, Load Commissioning Plan, and provider communication to the same approved project baseline.

2. Executive summary

What PGRR145 does

PGRR145 creates the one-time Batch Zero transition for new or modified Large Loads subject to ERCOT's interconnection process. The Planning Guide applies to a new Large Load, an existing facility modification increasing aggregate peak demand by at least 75 MW, or a change adding or moving a point of interconnection or service delivery point to a different bus on a different circuit.

Batch Zero includes two study phases:

1. Interconnection Study: system-wide steady-state analysis and stability screening, followed by Years 1 through 6 megawatt allocations.
2. Refinement Study: refinement of the allocated portfolio and delivery of a recommended transmission plan for Regional Planning Group review.

PGRR145 does not turn a classification, allocation, attestation, or equipment order into permission to energize. Large Loads that did not meet Batch Zero eligibility cannot receive Initial Energization approval until evaluated through a future process. Projects in Batch Zero must still satisfy applicable agreements, studies, equipment, operating, and energization requirements.

Current owner consequence

The original July 2026 Batch Zero submission dates have passed. Current owner work therefore centers on:

- proving the accuracy of prior submissions and attestations;
- closing conditional-classification and verification requests;
- reconciling allocated MW to commercial and campus phasing;
- maintaining model and Load Commissioning Plan consistency;
- executing required interconnection and financial commitments;
- controlling changes before energization; and

- retaining a complete audit trail through verification, commissioning, and operation.

Between July 10, 2026 and April 9, 2027, ERCOT may request supporting material for attestations and perform site-readiness verification. A materially false attestation or failure to respond within ERCOT's specified time can remove the project from Batch Zero after the process described in Planning Guide Section 9.

Owner operating principle

Treat every sworn statement as a controlled data product. The person signing must have binding authority, the evidence must exist when the statement is made, and the TSP/DSP submission must match the owner's source record. A later spreadsheet, tenant change, equipment substitution, or design revision cannot silently change the attested baseline.

3. Owner readiness model

A. Establish the controlling project identity

- Legal name of the ILLE and every relied-upon affiliate
- End-use customer or developer status
- Site address, geographic coordinates, parcels, and site-control instrument
- Interconnecting TSP, DSP if applicable, and other affected providers
- Point of interconnection and service delivery point
- Requested peak demand, annual ramp, technology, and operating profile
- Co-located generation, storage, private-use-network, or controllable-load status
- ERCOT large-load identifier and provider project identifiers

B. Reconcile the eligibility path

Document whether the project was treated as:

- base load not subject to additional Batch Zero study;
- load included for study and allocation;
- a Provisional Controllable Load Resource;
- a Withdrawal-Limited Private Use Network; or
- a project deferred to a future interconnection process.

Store the exact Planning Guide subsection, evidence relied upon, attestation, provider validation, ERCOT classification, conditions, and any dispute or correction record.

C. Control maturity and commitment evidence

For the applicable eligibility route, reconcile evidence supporting:

- complete and valid interconnection studies;
- required disclosures;
- orders for equipment with lead times of at least 18 months;
- notice to proceed for all required interconnection facilities;
- end-use status or a qualifying binding end-use contract;
- financial security for necessary system upgrades;

- site control and project-specific rights;
- dynamic stability study status;
- private-use-network or controllable-load commitments; and
- all TSP/DSP confirmations submitted to ERCOT.

Do not infer satisfaction from a project schedule. Store executed purchase orders, payment evidence, construction authorizations, signed contracts, security instruments, studies, and sworn attestations.

D. Align allocation, agreements, and capital

After ERCOT communicates Batch Zero results, reconcile the Years 1 through 6 MW allocation to:

- the Load Commissioning Plan;
- the interconnection or service-extension agreement;
- system-upgrade security and CIAC obligations;
- tenant or end-use contracts;
- equipment and construction schedules;
- temporary and permanent service configurations;
- phase-level capital approvals; and
- campus representations to investors, tenants, lenders, and public authorities.

An allocation is a planning and interconnection input, not a substitute for executed service rights, completed facilities, or energization approval.

4. ILLE, TSP, DSP, and ERCOT handoff matrix

Workstream	ILLE / owner control	TSP or DSP handoff	Completion evidence
Project identity	Maintain legal entity, site, MW, POI, technology, affiliate, and contact baseline	Validate provider records and identifiers	Approved project data sheet and reconciliation signoff
Eligibility	Select and evidence the applicable PGRR145 path	Review evidence and submit required validation	Eligibility memorandum, attestations, provider transmittal, ERCOT classification
Study information	Supply accurate load, model, equipment, generation, and ramp data	Validate, study, and transmit in ERCOT format	Load Information Form, study package, comment log, final submission
Financial commitment	Post required security and fund applicable obligations	Calculate, accept, administer, and report required security	Executed instrument, receipt, ledger, renewal and release controls
Agreements	Execute the required project, service, and interconnection instruments	Execute provider instruments and coordinate affected providers	Complete agreement set with exhibits and amendments
Commissioning	Maintain a current Load Commissioning Plan and readiness evidence	Coordinate facility completion and energization request	Approved LCP, commissioning plan, test record, energization authorization
Change control	Disclose material project changes before they invalidate studies or representations	Assess impact and coordinate ERCOT updates or restudy	Change notice, technical disposition, updated model and approvals

Workstream	ILLE / owner control	TSP or DSP handoff	Completion evidence
Continuing operations	Operate within approved demand and configuration	Maintain provider operating interface and required reporting	Metering, operating, curtailment, maintenance, and compliance records

5. Audit and compliance documentation checklist

Use one row per document set. Mark complete only when the current approved, executed, or submitted version is stored in the controlled repository.

Status key: [ ] Missing [ ] In progress [ ] Complete [ ] Not applicable

5.1 Governance and authority

[ ] Board or investment-committee authorization for Batch Zero commitments

[ ] ILLE formation, ownership, good standing, and authorized-signatory record

[ ] Affiliate authority and reliance documents

[ ] Signing-authority evidence for every sworn or notarized attestation

[ ] Legal, engineering, finance, tax, and regulatory reliance memoranda

5.2 Project identity and site control

[ ] Master project data sheet with legal names and all provider/ERCOT identifiers

[ ] Deeds, leases, options, amendments, assignment rights, and expiration calendar

[ ] Parcel schedule, title evidence, survey, coordinates, and point-of-interconnection map

[ ] Easements, access, utility corridors, construction rights, and recorded instruments

[ ] Site-readiness photos, permits, grading, access, and construction evidence

5.3 Eligibility and attestation record

[ ] Eligibility-path memorandum citing the applicable Planning Guide subsection

[ ] Every ILLE, affiliate, TSP, and DSP attestation in final executed form

[ ] Notary, execution date, signatory name/title, and binding-authority evidence

[ ] Complete supporting-evidence package for each factual statement

[ ] TSP/DSP transmittal and ERCOT receipt or acknowledgment

[ ] Conditional-classification notice, open conditions, response deadlines, and closure evidence

[ ] Verification RFI, exhibit list, response package, and follow-up correspondence

5.4 Commercial commitment

[ ] End-use-customer status evidence or qualifying binding customer contract

[ ] Contract term, service location, MW, ramp, technology, and commencement reconciliation

[ ] Affiliate agreements and responsibility allocation

[ ] Interconnection, service-extension, procurement, CIAC, and operating agreements

[ ] Notices to proceed for all required interconnection facilities

[ ] Amendments, waivers, consents, formal interpretations, and dispute records

5.5 Equipment and construction readiness

[ ] Long-lead equipment register showing items with lead time of at least 18 months

[ ] Executed purchase orders, deposits, vendor acknowledgments, and delivery dates

[ ] Evidence that delivery supports the requested Initial Energization date

[ ] Engineering deliverables, approved one-lines, specifications, and revision history

[ ] Construction notice to proceed, contractor scope, schedule, and payment evidence

[ ] Substitution, cancellation, reassignment, storage, warranty, and delay controls

5.6 Financial security and capital

[ ] Required-security calculation with supporting study and cost basis

[ ] Approved security form, issuer ratings, beneficiary, amount, and expiry

[ ] Cash, guaranty, or letter-of-credit execution and acceptance evidence

[ ] Security roll-forward, renewal, draw, replenishment, release, and refund record

[ ] CIAC and other provider payment ledger

[ ] Phase capital model tied to the allocated MW and Load Commissioning Plan

5.7 Study data and technical models

[ ] Batch Zero Load Information Form and all referenced exhibits

[ ] Load composition, power factor, voltage, harmonic, and operating-profile data

[ ] Steady-state, short-circuit, dynamic, transient-stability, and protection records as applicable

[ ] Dynamic model files, validation evidence, version history, and provider comments

[ ] Co-located generation, storage, PCLR, or WLPUN data and executed forms

[ ] Temporary configuration study and operating constraints

5.8 Load Commissioning Plan and energization

[ ] Current Load Commissioning Plan with Years 1 through 6 MW and dates

[ ] Batch Zero allocation reconciliation and owner approval

[ ] Required-interconnection-equipment completion and acceptance evidence

[ ] Commissioning responsibility matrix, test plan, witness record, and deficiencies

[ ] Standalone Large Load energization request and provider/ERCOT responses

[ ] Initial Energization authorization, conditions, metering, and operating limits

5.9 Change control and continuing operations

[ ] Project-change register for MW, ramp, technology, equipment, POI, ownership, and schedule

[ ] Provider and ERCOT notifications, dispositions, model updates, and restudy decisions

[ ] Metering evidence that demand remains within approved limits

[ ] PCLR, WLPUN, curtailment, or other operating-performance records

[ ] Outage, switching, maintenance, incident, and emergency-procedure logs

[ ] Annual reconciliation of commercial load, physical load, LCP, and ERCOT records

Checklist control fields

For every checked item, record:

- Evidence owner: _____
- Repository/document ID: _____
- Version/effective date: _____
- Date submitted or accepted: _____
- Last reviewed: _____
- Reviewer/approver: _____
- Open exception, condition, or expiry: _____

6. Required owner registers

1. Project identity register: legal entities, identifiers, site, POI, MW, technology, providers, and contacts.
2. Eligibility evidence index: each criterion, attestation, supporting document, submitter, recipient, and ERCOT outcome.
3. Obligation register: Planning Guide or agreement clause, owner, deliverable, date, evidence, status, and consequence.
4. Load and model register: model version, assumptions, validation, submission, reviewer comments, and superseded files.
5. Equipment commitment register: item, lead time, vendor, order date, delivery, payment, installation, and substitution controls.
6. Capital ledger: security, CIAC, studies, procurement, construction, credits, draws, refunds, and retained obligations.
7. Allocation and LCP register: allocated MW, annual ramp, tenant allocation, facilities dependency, and energization condition.
8. Change register: baseline, requested change, technical/commercial impact, notification, disposition, and approved revision.
9. Verification calendar: RFI, attestation, security renewal, construction, testing, energization, operating, and retention dates.

7. Monthly owner certification

Development, legal, engineering, finance, and project controls should certify that:

- project identity and MW are consistent across every active record;
- supporting evidence remains valid for each sworn attestation;
- no superseded document is represented as current;
- security and capital obligations reconcile to accepted provider records;
- equipment orders and construction status support the current energization schedule;
- the Load Commissioning Plan matches the current commercial and physical ramp;
- model changes have been disclosed and accepted where required;
- verification requests and conditional-classification items are closed on time;
- external representations do not exceed the approved allocation or energization position; and
- unresolved conditions, exceptions, expirations, and restudy risks are disclosed.

8. Capital-release checklist

Before the next irreversible commitment, answer yes to each question:

- Is the project's Batch Zero classification and eligibility subsection documented?
- Can each attestation be traced to contemporaneous supporting evidence?
- Are the legal ILLE, affiliates, end-use customer, site, POI, and providers consistent?
- Do requested MW, allocated MW, tenant MW, design MW, and the LCP reconcile?
- Are long-lead orders and construction notices supported by executed documents?
- Are financial security, CIAC, and other provider payments separately modeled?
- Are all open ERCOT or provider verification conditions assigned and dated?
- Does the current model reflect every material equipment, technology, or operating change?
- Are agreements and facilities sufficient for the requested energization step?
- Can an independent reviewer reproduce the project's status from the controlled repository?

If any answer is no, resize or hold the release.

9. Primary sources and interpretation notes

- ERCOT PGRR145 issue page
- PUCT-approved PGRR145 report
- ERCOT Planning Guide, Section 9
- ERCOT Large Load Integration
- ERCOT Large Load Interconnection Process Q&A;

Interpretation discipline

- Adopted: approved PGRR145 and effective Planning Guide requirements.
- Implementation-dependent: approved text that ERCOT identifies as effective upon system implementation.
- Project-specific: classification, provider determination, study result, agreement, allocation, or energization condition for one project.
- Recommended control: Sitebraid audit-readiness practice, not a statement that PGRR145 expressly requires that document.

Prepared by Sitebraid for owner-side data center campus development decisions.