DATA CENTER CAMPUS DEVELOPMENT

Texas Large-Load Owner Readiness Pack

PUCT Project 58481, Filing 206

SYNOPSIS	EXECUTIVE SUMMARY	OWNER PLAYBOOK	AUDIT PACK

A premium owner operating pack for standard CIAC delivery and agreed customer-built or build-transfer facilities, including capital controls, release gates, and audit-ready evidence checklists.

Prepared by Sitebraid
Owner-side capital, infrastructure and acceptance decisions
sitebraid.dev I insights@sitebraid.dev

View the live resource I Share: LinkedIn X

1. One-page synopsis

Texas large-load development now requires the owner to prove that land, megawatts, schedule, money, equipment, and operating readiness describe the same project. A credible request is no longer just a location and a target load.

The owner must control three separate cash exposures:

1. Financial security: a performance backstop whose amount, draw rights, replenishment, reduction, release, and expiry must be modeled.
2. CIAC and study/procurement payments: cash paid for eligible utility work, subject to credits, revised estimates, and final accounting.
3. Customer-built capital: owner-funded design, equipment, construction, land rights, testing, and transfer costs when the TSP agrees that the customer may build facilities.

These exposures may overlap in time. A future refund or credit does not fund today's peak cash requirement.

The owner decision

Choose the delivery model only after comparing schedule control, peak unrecovered cash, design and acceptance risk, land and title obligations, retained liabilities, and the downside if requested MW, energization, or load ramp changes.

Non-negotiable control

Release no security, CIAC payment, equipment deposit, or customer-build notice to proceed until the executed documents and the owner's capital ledger agree on scope, amount, timing, ownership, acceptance, credits, refunds, and failure consequences.

2. Executive summary

2.1 Regulatory status

Texas Senate Bill 6 directs the PUCT to establish uniform standards for large loads in ERCOT. The enacted statute generally uses 75 MW as the threshold unless the commission sets a lower value, requires a transmission screening fee of at least $100,000, and calls for site-control and financial-commitment standards.

Filing 206 supplies proposed implementation and agreement mechanics within PUCT Project 58481. Treat its provisions as proposed or implementation-dependent unless incorporated into an effective rule, tariff, order, or executed agreement.

2.2 What finance must model

The governing metric is peak unrecovered owner cash, not headline CIAC. The model should show security issuance and release; study and screening payments; CIAC versions, allowances, taxes, and true-up; equipment deposits and cancellation costs; customer-build EPC and land rights; supported reimbursements or displaced scope; and delay, reduced-MW, slow-ramp, rejection, and withdrawal cases.

2.3 What changes when the customer builds

Customer build can provide schedule control and a second procurement route for high-voltage breakers, switchgear, transformers, protection, controls, telecom, and civil works. It does not create an automatic right to energize or an automatic obligation for the TSP to accept the assets.

The TSP may require a switchyard fee parcel, exclusive easement, permanent access, utility and communications easements, operating control, inspection rights, warranty assignment, and transfer of completed facilities. Fee title, easement rights, licensed access, and operating control are different rights and must be documented separately.

2.4 How to compare cost without double counting

Net incremental customer-build cash = customer-build EPC + land/right delivery + TSP review/testing + procurement carrying cost + temporary or duplicate equipment + transfer closeout + retained obligations - documented displaced CIAC/TSP scope - supported reimbursement, refund, or salvage.

Equipment deposits and progress payments are timing components of EPC, not separate cost. Displaced CIAC is a deduction only when an executed agreement or utility ledger proves the owner will not pay both scopes.

2.5 Audit standard

Every material obligation and dollar should trace through this chain:

Authority -> executed clause -> approved scope -> invoice or security event -> payment -> asset or milestone -> acceptance evidence -> ledger closeout.

3. Applicability and interpretation map

Label	Meaning	Owner treatment
Statutory	Enacted Texas law	Confirm applicability and retain legal interpretation
Proposed	Pending PUCT rule, form, or filed language	Scenario-plan; do not book as executed obligation
Tariff	Effective utility charge or service condition	Store effective version and applicability evidence
Contractual	Executed agreement or amendment	Load into obligation register and capital model
Project-specific	TSP, site, voltage, design, or schedule condition	Confirm in writing; do not generalize
Sitebraid control	Recommended evidence or governance practice	Adopt where it reduces execution or audit risk

Applicability screen

- [ ] Legal applicant and affiliated entities are identified.
- [ ] Requested demand, delivery voltage, point of interconnection, and geographic site are fixed.
- [ ] Applicable threshold and large-load classification are confirmed in writing.
- [ ] Current statute, PUCT rule, tariff, ERCOT requirements, and executed agreements are indexed.
- [ ] Duplicate or substantially similar requests at the same site are disclosed.
- [ ] Confidential and commercially sensitive records are access-controlled.

Control fields: Owner: ________ Evidence ID: ________ Status: ________ Due/expiry: ________ Reviewer/date: ________ Exception: ________

4. Delivery model A: TSP-delivered CIAC

4.1 Decision workflow

1. Establish site control and the legal applicant.
2. Freeze the requested MW, voltage, service point, and load ramp used across utility, tenant, design, and finance records.
3. Obtain the effective tariff and all study, procurement, CIAC, delivery, and interconnection agreements.
4. Reconcile the facilities exhibit to the CIAC estimate and owner capital model.
5. Post security only after draw, replenishment, step-down, release, refund, and expiry mechanics are approved.
6. Pay CIAC only against an approved scope and version-controlled estimate.
7. Reconcile monthly invoices, draws, credits, commitments, and milestones.
8. Close out with accepted as-builts, energization evidence, final accounting, and security release tracking.

4.2 TSP-delivered readiness checklist

Project identity and site control

[ ] Applicant legal name, ownership, tax status, and signatory authority verified.

[ ] Deed, lease, option, or other qualifying site-control instrument remains valid through required milestones.

[ ] Parcel schedule and legal descriptions reconcile to the service-point location.

[ ] Requested MW and ramp reconcile across utility application, tenant commitments, design basis, and finance model.

[ ] Duplicate or alternative service requests are disclosed and dispositioned.

Scope and cost responsibility

[ ] Facilities exhibit separates direct-interconnection, upstream/network, metering, protection, telecom, land, customer, and temporary works.

[ ] Ownership, operation, maintenance, replacement, and access responsibility is assigned for every asset class.

[ ] CIAC estimate has version, assumptions, contingency, tax treatment, exclusions, and validity date.

[ ] Change-order authority and estimate-update process are executed.

[ ] Screening or study credits are confirmed in the utility ledger.

Security and liquidity

[ ] Security amount and permitted instrument are approved.

[ ] Beneficiary, draw triggers, notice, cure, replenishment, step-down, release, and expiry are documented.

[ ] Security and CIAC are modeled as separate exposures.

[ ] Base, delay, reduced-MW, slow-ramp, and withdrawal cases stay within approved liquidity.

[ ] No refund or release is recognized before entitlement, amount, and timing are supportable.

Delivery and closeout

[ ] TSP schedule identifies procurement, outage, construction, test, and energization dependencies.

[ ] Owner prerequisites and due dates are in the obligation register.

[ ] Invoice and security-draw evidence reconciles to approved scope and incurred cost.

[ ] Protection, metering, SCADA, telecom, and operating protocols are accepted.

[ ] Final utility accounting reconciles CIAC, security, credits, refunds, and remaining obligations.

[ ] Load-ramp and sustained-operation milestones are calendared through final security release.

Completion record: Workstream owner: ________ Repository folder: ________ Last certified: ________ Open exceptions: ________

5. Delivery model B: customer-built or build-transfer facilities

5.1 The eight release gates

Gate	Required decision evidence	Stop condition
Scope	Executed asset-by-asset scope and demarcation exhibit	Overlap or gap with CIAC/TSP scope
Design	Approved electrical, civil, controls, telecom, metering, cybersecurity, and hold points	Approval conditional or design basis changing
Procurement	Accepted manufacturers/specifications; title, warranty, spares, cancellation, storage, and reassignment terms	Vendor or rating not accepted in writing
Land	Accepted fee parcel/easements/access legal descriptions, survey, title, environmental, drainage, and road delivery	Rights cannot be recorded or maintained
Construction	Inspection, safety, outage, quality, change, nonconformance, and rework procedures	TSP witness or hold-point process unresolved
Acceptance	Test plans, witness criteria, punch-list threshold, energization authority, and failure remedies	Acceptance standard not objective
Transfer	Bill of sale/deed/easement, liens, warranty, tax, insurance, O&M;, indemnity, and surviving duties	Consideration or liability unresolved
Fallback	Rejection, delay, removal, modification, storage, salvage, and alternate-use plan	Stranded-asset exposure not approved

5.2 Customer-built readiness checklist

Commercial and technical authority

[ ] Executed agreement expressly permits customer design, procurement, or construction.

[ ] Asset list distinguishes customer-built/TSP-owned, customer-built/customer-owned, and TSP-built facilities.

[ ] CIAC reduction or displaced TSP scope is documented, not assumed.

[ ] TSP standards, approved-equipment list, review fees, inspection charges, and resubmittal process are current.

[ ] Energization remains subject to TSP acceptance and operating authority.

Land, access, and conveyance

[ ] Fee parcel, easement, access, utility, communications, drainage, and temporary construction rights are separately identified.

[ ] Survey and title products use TSP-approved legal descriptions.

[ ] Environmental, wetlands, cultural, geotechnical, grading, drainage, and access conditions are cleared.

[ ] Lost developable acreage and permanent access burden are valued.

[ ] Recording, tax, maintenance, restoration, and future-expansion rights are assigned.

Procurement and asset controls

[ ] Equipment ratings and manufacturers are accepted before noncancelable release.

[ ] Purchase orders identify title passage, warranty start, warranty assignment, spares, software, storage, preservation, freight, taxes, and insurance.

[ ] Long-lead deposits and progress payments are included once in EPC cash flow.

[ ] Temporary or bridge equipment has an accepted removal/replacement plan and outage window.

[ ] Asset register tracks serial number, buyer, payer, title holder, location, warranty, transfer date, and disposition.

Quality, testing, and transfer

[ ] Quality plan includes submittals, inspection/test plans, hold points, RFIs, nonconformances, and corrective action.

[ ] Factory and site acceptance tests identify TSP witness and pass/fail criteria.

[ ] Protection, control, SCADA, telecom, metering, grounding, and cybersecurity configurations are baselined.

[ ] Punch-list closure threshold and energization authority are explicit.

[ ] As-builts, manuals, training, spares, warranties, software, liens, and final accounting are delivery conditions.

[ ] Transfer documents identify accepted assets, consideration, effective time, risk of loss, taxes, insurance, indemnities, and surviving owner obligations.

[ ] Rejection and delay consequences are funded and approved.

Completion record: Delivery executive: ________ TSP acceptance lead: ________ Evidence index version: ________ Open exceptions: ________

6. Owner cost ledger

Cost category	What belongs in the owner model	Evidence required
Security	Issuance fees, collateral, draws, replenishment, expiry, and release	Instrument, acknowledgment, draw/release notices, roll-forward
CIAC and studies	Estimate versions, invoices, taxes, allowances, credits, and true-up	Tariff, agreement, facility exhibit, utility ledger, final statement
Customer-build EPC	Engineering, equipment, civil, installation, controls, and commissioning	Executed scope, bids, POs, changes, invoices, payment evidence
Land and rights	Land value, surveys, title, conveyance, easements, access works, lost acreage	Appraisal, survey, deed/easements, title policy, site plan
TSP oversight	Review, inspection, outage coordination, resubmittal, and testing fees	Tariff/agreement clause, invoices, approval log
Carrying cost	Deposits, financing, freight, taxes, insurance, storage, and preservation	Vendor contracts, financing schedule, logistics and insurance records
Temporary equipment	Bridge gear, replacement outage, removal, return, and salvage	Approved design, title/warranty, outage and disposition plan
Transfer closeout	Legal instruments, liens, warranty assignment, tax, and final accounting	Closing checklist, recorded instruments, acceptance certificate
Retained obligations	Customer-side O&M;, access/drainage upkeep, spares, indemnities, and insurance	Responsibility matrix, O&M; terms, insurance evidence

Cost category	What belongs in the owner model	Evidence required
Delay/opportunity	Tied-up capital, delayed revenue, lost expansion area, and remobilization	Approved model, baseline schedule, variance and decision log

Cost-model controls

[ ] EPC deposits and progress payments are not counted twice.

[ ] Displaced CIAC is deducted only with executed evidence.

[ ] Shared land/access costs are separated from customer-build incremental rights.

[ ] Refunds, credits, reimbursements, and salvage use supportable amounts and dates.

[ ] Retained O&M;, warranty, indemnity, and land-maintenance duties survive where applicable.

[ ] Model reports both net present value and peak unrecovered cash.

7. Audit-ready evidence checklist

Mark Complete only when the approved or executed version is stored and linked in the evidence index.

Status: Missing / Draft / Under review / Complete / Superseded / Not applicable

7.1 Governance

[ ] Board or investment approval and delegated authority matrix

[ ] Entity formation, ownership, good standing, tax forms, and signatories

[ ] Parent guaranty, letter of credit, surety, or other security authorization

[ ] Conflicts, related-party approvals, and reliance memoranda

7.2 Property

[ ] Deeds, leases, options, amendments, extensions, and assignment rights

[ ] Parcel schedule, title, exceptions, cure log, and surveys

[ ] Fee parcel, easement, access, utility, communications, drainage, and temporary rights

[ ] Environmental, wetlands, cultural, geotechnical, drainage, and access evidence

[ ] Appraisal and encumbered/lost developable-acreage calculation

7.3 Regulatory and utility record

[ ] Original and revised requests with MW, voltage, location, and ramp

[ ] Duplicate-request disclosures and dispositions

[ ] Screening/study application, invoice, payment, and credit record

[ ] Utility/TSP studies, models, assumptions, comments, and final reports

[ ] PUCT/ERCOT submissions, acknowledgments, confidentiality controls, and correspondence

[ ] Backup-generation disclosure, capability, non-export basis, fuel, permits, and operating limits

7.4 Agreements and money

[ ] Effective tariff versions and applicability record

[ ] Study, procurement, CIAC, delivery, interconnection, customer-build, transfer, O&M;, access, switching, and outage agreements

[ ] Security instrument, renewals, draws, replenishments, releases, refunds, and closing balance

[ ] CIAC versions, invoices, payment proof, credits, taxes, allowances, and final true-up

[ ] Monthly clause-to-cash reconciliation approved by finance and project controls

7.5 Design through energization

[ ] Design basis, approved drawings, calculations, specifications, and revision log

[ ] TSP comments, dispositions, deviations, hold-point releases, and approvals

[ ] Vendor approvals, bids, POs, changes, tests, shipping, preservation, insurance, warranties, and spares

[ ] Quality, safety, inspection, RFI, submittal, nonconformance, and corrective-action records

[ ] Commissioning plan and protection/control, SCADA, telecom, metering, grounding, and equipment test results

[ ] Witness, punch-list, acceptance, energization, and commercial-service evidence

[ ] As-builts, data, software, training, manuals, liens, warranties, transfer, and final acceptance

7.6 Operations and retention

[ ] Load-ramp and sustained-operation evidence

[ ] Metering, dispatch/curtailment, backup operation, fuel, maintenance, and emissions records

[ ] Access, switching, outage, and emergency logs

[ ] Capacity withdrawal/reallocation notices and security treatment

[ ] Annual retained-responsibility review

[ ] Retention schedule mapped to tariff, contract, tax, environmental, corporate, and litigation-hold requirements

Evidence index fields

For every checklist item record evidence owner; repository/document ID; document title; version/effective date; execution, submission, or acceptance date; reviewer and review date; status; and exception, expiry, or renewal.

8. Required owner registers

1. Evidence index: document ID, version, effective date, source, owner, confidentiality, approval, and repository link.
2. Obligation register: clause, party, deliverable, due date, prerequisite, evidence, status, cure, and remedy.
3. Capital ledger: security, CIAC, studies, procurement, EPC, land, testing, operating cost, credits, refunds, and true-ups by phase.
4. Milestone matrix: site control, study, procurement, land, construction, acceptance, energization, ramp, and release.
5. Change log: baseline, requested change, MW/cost/schedule impact, approvals, and executed amendment.
6. Asset/title register: equipment ID, buyer, payer, title holder, location, warranty, transfer, O&M; party, and disposition.
7. Compliance calendar: filings, security renewals, permits, tests, reports, ramp dates, certifications, and retention triggers.
8. Exception register: requirement, gap, risk, interim control, accountable executive, target date, and closure evidence.

Monthly owner certification

[ ] Forecast uses the latest executed scope and approved schedule.

[ ] Security, CIAC, procurement, and EPC balances reconcile to third-party evidence.

[ ] No credit or refund is recognized early.

[ ] Land rights cover current design, permanent access, drainage, and expansion interfaces.

[ ] Customer-built assets remain within approved standards and hold points.

[ ] Acceptance risks, nonconformances, retained liabilities, and expiring rights are disclosed.

[ ] Backup-generation statements remain consistent with capability, permits, fuel, and operating limits.

9. Capital-release certificate

Do not authorize the next irreversible commitment unless every applicable answer is Yes or an executive-approved exception is attached.

[ ] Governing statute, rule, tariff, and agreement versions are identified and status is clear.

[ ] Site control and property rights remain valid through the next milestone.

[ ] Requested MW and ramp reconcile across utility, tenant, design, and finance records.

[ ] Security draw, replenishment, step-down, release, refund, and expiry are modeled.

[ ] CIAC is separated from security and tied to an approved facility scope.

[ ] Study/screening credits are confirmed in writing.

[ ] Customer-build design, procurement, land, acceptance, title, O&M;, and fallback terms are executed.

[ ] Temporary and permanent equipment are separately funded, scheduled, and dispositioned.

[ ] Peak unrecovered cash fits approved liquidity in downside cases.

[ ] An independent reviewer can trace every material claim and payment to evidence.

Release requested: ________ Amount: ________ Purpose: ________ Required date: ________

Prepared by/date: ________ Finance: ________ Legal: ________ Engineering: ________ Executive approval: ________

Exception reference: ________ Next review: ________

10. Primary sources and use notes

- PUCT Project 58481, Filing 206
- Texas Senate Bill 6, enacted text
- ERCOT Large Load Integration
- PUCT Interchange, Project 58481

PUCT Interchange availability can be intermittent. Preserve the filing identifier and local evidence copy used for the owner record. Revalidate the adopted rule, tariff, and agreement package at every capital gate.

Prepared by Sitebraid for owner-side data center campus capital, infrastructure, and acceptance decisions.