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Filed Date - 2025-07-14 03:34:32 PM

Control Number - 58317

Item Number - 3

Public Utility Commission of Texas

Memorandum

TO: Interested Persons

FROM: Jessie Horn, Sr. Counsel, Rules and Projects Division

DATE: July 14, 2025

RE: Project No. 58317, *SB 6 Implementation*
Workshop Agenda

Commission Staff will hold a public workshop on July 21, 2025, starting at 9:00 am CST. The workshop will be held in the Commissioner's Hearing Room on the 7th floor of the William B. Travis Building, 1701 Congress Avenue, Austin, Texas 78701. The workshop will also be broadcast live and archived for later viewing on Admin Monitor, which can be accessed at: <https://www.adminmonitor.com/tx/puct/>.

The purpose of the workshop is to receive public input on topics related to implementation of Senate Bill (SB) 6, enacted by the Texas 89th Legislature, Regular Session. The workshop will be structured in an open discussion format, guided by Commission Staff's questions outlined in the attached agenda.

Workshop Agenda

Project No. 58317, *SB 6 Implementation*

July 21, 2025

9am to 4pm CST

William B. Travis Building

Commissioner's Hearing Room, 7th floor

1701 Congress Avenue, Austin, Texas 78701

Large load interconnection (Public Utility Regulatory Act (PURA) § 37.0561)

1. PURA § 37.0561(b) requires the commission to establish standards for interconnecting large load customers in the ERCOT power region in a manner designed to support business development in this state while minimizing the potential for stranded infrastructure costs and maintaining system reliability. What additional standards not described in PURA § 37.0561 would help minimize the potential for stranded infrastructure costs while supporting business development in the state and maintaining system reliability?
2. PURA § 37.0561(c) states that the standards established by the commission apply to customers requesting a new or expanded interconnection where the total load at a single site would exceed a demand threshold established by the commission based on the size of loads that significantly impact transmission needs in the ERCOT power region. PURA § 37.0561(c) also requires the commission to establish a demand threshold of 75 megawatts (MW) unless the commission determines that a lower threshold is necessary to accomplish the purposes described by PURA § 37.0561(b). How often and by what methodology should the commission evaluate whether a demand threshold less than 75 megawatts (MW) is appropriate?

Large load forecasting (PURA § 37.0561(m))

3. What criteria should ERCOT use to include forecasted large load of any peak demand in the organization's:
 - a. transmission planning, and
 - b. resource adequacy models and reports?
4. Should the criteria for 3a and 3b be the same? If not, how and why should the criteria be different?
5. On June 5, 2025, the commission granted ERCOT's request for a Good Cause Exception (GCE) to Planning Guide § 3.1.7(1)(c) in Project No. 55999, authorizing ERCOT to (1) adjust load forecasts provided in officer letter attestations submitted by Transmission and/or Distribution Service Providers (TDSPs), and (2) use the adjusted load forecasts in ERCOT's base cases for the 2025 Regional Transmission Plan (RTP). What are the pros and cons of the forecast methodology as it relates to large loads that ERCOT employed under the GCE for the 2025 RTP?
 - a. In its May 1, 2025 request for a GCE in Project No. 55999, ERCOT identified a discrepancy between data centers' requested MWs, reflected in officer letter

attestations, and data centers' final installed MWs. How can the commission best address the discrepancy between data centers' requested MWs and data centers' final installed MWs?

6. To make the criteria for forecasted large loads uniform among all TDSPs, what criteria, not described in PURA 37.0561(d), (f), (g), and (h)(3), could the commission require large loads to meet for inclusion in ERCOT's forecasting?
 - a. What information or data should the commission collect during this rulemaking to determine and refine the criteria that large loads must meet for inclusion in ERCOT's forecasting?

Net metering arrangements (PURA § 39.169)

7. What action or circumstance that occurs before implementation triggers the requirement to provide notice to ERCOT under PURA § 39.169?
8. PURA §39.169(d) requires the commission to approve, deny, or impose reasonable conditions on a proposed net metering arrangement to maintain system reliability and sets forth a non-exhaustive list of conditions that may be imposed.
 - a. How should a proposed net metering arrangement's impact to system reliability be evaluated?
 - b. What additional conditions not described in PURA § 39.169(d) should be considered when evaluating a proposed net metering arrangement's impact to system reliability?
9. PURA § 39.169(d)(3) states that the commission may impose a condition requiring customers to be held harmless for stranded or underutilized transmission assets resulting from the behind-the-meter operation.
 - a. Does the reference to transmission assets in PURA § 39.169(d)(3) include transmission assets required to connect the large load, transmission assets required to connect the generation resource, or transmission assets associated with network upgrades that were necessary to serve either the load or the generation resource, or some combination of these?
 - b. What standards should apply in determining whether any transmission assets are stranded or underutilized, and in quantifying the amount of stranded or underutilized assets?
 - c. What entity or entities should be responsible for identifying and quantifying stranded or underutilized transmission assets?
 - d. What mechanisms should be implemented to hold customers harmless for stranded or underutilized transmission assets?

Transmission cost recovery (PURA § 35.004(c-1))

10. PURA § 35.004(c-1) requires the commission by rule to ensure that a large load customer who is subject to the standards adopted under PURA § 37.0561 contributes to the recovery of the interconnecting electric utility's costs to interconnect the large load to the utility's system.
 - a. How should the commission ensure that a large load customer contributes to the recovery of the interconnecting electric utility's costs to interconnect the large load to the utility's system?
 - b. What types of costs to interconnect the large load to the utility's system should be paid by the large load?

Large load demand management service (PURA § 39.170)

11. PURA § 39.170(a) imposes a duty on the commission to require ERCOT to ensure that each electric cooperative, transmission and distribution utility, and municipally owned utility serving a transmission-voltage customer develops a protocol to allow the load to be curtailed during firm load shed. What policy determinations, if any, should be made by the commission rather than the ERCOT stakeholder process to implement PURA § 39.170(a)?
12. PURA § 39.170(b) imposes a duty on the commission to require ERCOT to develop a reliability service to competitively procure demand reductions from large load customers with a demand of at least 75 megawatts to be deployed in the event of an anticipated emergency condition. What policy determinations, if any, should be made by the commission rather than the ERCOT stakeholder process to implement PURA § 39.170(b)?

Additional considerations

13. Is there anything else that the commission should consider in its implementation of SB 6?