

December 9, 2025

Public Utility Commission of Texas
William B. Travis Building
1701 N. Congress Ave. Suite 7-110
Austin, Texas 78701

Dear Chairman Gleeson and Commissioners,

I want to address the ERCOT reliability plan. There are many discrepancies that need to be evaluated starting with the fact that the information used to make conclusions was gathered from 2022 -2023. It is well known that electrical technology changes very rapidly due to the push for sustainability and the massive demand for data, especially AI. This creates the need for ERCOT and their engineers working on the reliability plan to constantly adapt and make changes for new advancements.

This does not seem to be happening since the plan was written on July 25, 2024. No changes have been made to adjust for the behind-the-meter build that has begun as new data centers arrive in the Permian Basin.

The ERCOT plan is for the 2030 and 2038 load forecasts. Let us look at the 8 companies who have committed to building their data centers in Texas with behind-the-meter power making ERCOTs load forecast outdated.

1. Fermi America. Their main source of power will be nuclear with a natural gas power plant coupled with solar, wind and a battery back up system for energy capture. Fermi will NOT be connected to the Texas grid.
2. Landbridge. They are partnering with NRG energy to build and operate a natural gas power plant producing 1,100 MW of energy.
3. New Era Helium. They are having a 250 MW power plant built with the ability to expand to 1 GW.
4. Chevron. They are building a power plant that will produce 2.5 GW or 2500 MW of energy and they will be bypassing the Texas grid for power as well.
5. Poolside/Core Weaver/Occidental. They are specifically placing their data center where Texas is known for having an over abundance of natural gas and will be building a power plant to meet their needs.
6. Pacifico Energy. They will build a 5 GW natural gas powerplant AND be off the grid as well. Their completion is set for 2028.
7. Google. While Google will not be building a power plant, they have a PPA to secure their power from Intersect and TPG Rise Climate using solar and battery backup.
8. Sharon AI. They are building their own power plant starting at 250 MW with the ability to expand to 1 GW.

ERCOT writes in their reliability plan that the need for transmission lines is due to the addition of large industrial and data facilities, paragraph 3, the study did not consider that each data center would be providing their own power. In 2023 data centers did not understand that the Texas grid or the whole of the US grid, could not supply enough energy for their data centers. Realizing this, data centers are now providing their own energy. And not just in Texas. xA1 and The Mountain Data Center in TN is moving to provide their own power, Georgia is working on a way to let data centers use their own clean energy, and Google across the US is committed to using clean energy to power all their data centers in the US. It is the future of how data centers will get enough energy needed.

Furthermore, the ERCOT reliability plan says, in paragraph 3, that to meet the forecasted load they will need to import power. What was not considered is that since the plan was written 3 power plants are being build. Each plant provides energy to the gas and oil industry in the Permian Basin. Vistra will be providing 2 new and advanced natural gas power plants providing 1185 MW, CRV will build a power plant providing 1350 MW and New Power LLC will provide 300 MW.

I would like to challenge that ERCOT comments, in paragraph 3, that transmission is relatively sparse in the Delaware Basin subregion of the Permian, where oil and gas demand is shifting. I find this hard to believe due to the massive undertaking of the CREZ project. Looking at the CREZ maps the Delaware Basin received 345kv transmission lines just like all the Permian Basin did. If ERCOT is saying that they need more 345 lines, that should be considered a whole separate project based solely in the Permian Basin.

One of my biggest concerns about the ERCOT reliability plan and study is that the data was provided by the TDSPs (Transmission and Distribution Service Providers). As a Texan I have no way, and I am assuming the PUCT does not as well, have a way to evaluate this data for accuracy. Considering our TSPs are private companies how does Texas trust that the data and projections are accurate versus making suggestion look larger or in this case, completely unnecessary, due to the backend payment over 40 years. What a great incentive to inflate your numbers.

And how is building antiquated transmission lines across the State of Texas tie into the vision of Governor Abbott with nuclear advances and power plants? A single 765kv line can only transport 2100 MW every 200 miles while a power plant can provide 3000 MW. Considering we have an overabundance of natural gas why are we not adding additional 3 GW power plants into the Permian Basin to give the oil and gas industry the power that they need. Why are you destroying the Texas landscape with what can be supplied within the Basin itself?

I am asking the PUCT to give thought to the fact that the above information shows the ERCOT reliability plan has become outdated. Pulling transmission lines across the state of Texas at the cost of the environment, the land, and private property rights, seems to be extremely destructive versus following the Governors plan and using advance technologies. Power Plants, nuclear power along with solar, wind and battery backup systems give the Permian Basin what it needs for future growth in the oil and gas industry. The data centers are relying on their own power plants for energy.

Here is a quick AI search on google as to whether the US grid can support the coming data centers.

These are results for can the US energy grid supply enough power to all the coming data centers

AI Overview

No, the current U.S. energy grid is not adequately prepared for the massive influx of data centers, facing significant challenges in generation, transmission, and infrastructure to meet skyrocketing demand, especially for AI, leading to potential blackouts, delays, and the need for massive grid modernization, new power sources (like nuclear, renewables), and better coordination between utilities, states, and the federal government.

Key Problems & Challenges:

Rapid Demand Growth: Data centers, fueled by AI, could consume up to 12% of U.S. electricity by 2028, up from 4.4% in 2023, with projections showing immense spikes in regional demand.

Infrastructure Gaps: The grid lacks sufficient generating capacity and transmission lines to deliver power where needed, with long backlogs for components like transformers and switchgear.

Aging Generation: Existing power plants are retiring, while new firm capacity (like gas turbines, nuclear) takes years to build, creating a supply gap.

Grid Fragmentation: The U.S. grid's fractured local/state control hinders large-scale modernization efforts needed to overhaul the system.

Grid Operator Strain: Major operators like PJM are struggling to manage connections, with some proposals to curtail data center power during emergencies.

Potential Solutions & Strategies:

Grid Modernization: Significant investments in smart grid technology, and battery storage are crucial.

Renewables & New Sources: Building more solar, wind, and potentially nuclear power is essential

"Behind-the-Meter" Generation: Large tech companies are exploring on-site energy generation (solar, batteries, microgrids) to reduce grid reliance.

Improved Planning: Better coordination between data center developers, utilities, and regulators for more accurate load forecasting and investment.

Demand Management: Grid operators are looking at strategies to manage data center load during peak times, potentially reducing their guaranteed supply.

In essence, while the potential for growth is there, the infrastructure is not ready, requiring a massive, coordinated overhaul to prevent severe strain and ensure power for the AI era.

As you can see the US grid is NOT ready for all these data centers, but Abbott's vision of using nuclear and natural gas power plants, especially "behind the meter" makes Texas one step ahead. Why would you still consider the antiquated way of large transmission lines destroying the Texas landscape?

Sincerely,

Marylynne Norman

II segment of the Bell County East – Big Hill 765kv transmission line proposed project.

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Potential Solutions & Strategies:

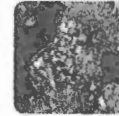
- **Grid Modernization:** Significant investments in transmission, smart grid technology, and battery storage are crucial.
- **Renewables & New Sources:** Building more solar, wind, and potentially nuclear power is essential, though permitting and transmission remain hurdles.
- **"Behind-the-Meter" Generation:** Large tech companies are exploring on-site energy generation (solar, batteries, microgrids) to reduce grid reliance.
- **Improved Planning:** Better coordination between data center developers, utilities, and regulators for more accurate load forecasting and investment.
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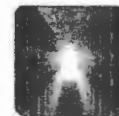
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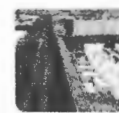
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Renewable Energy World

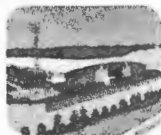


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AI Overview

Georgia is facing significant pushback on data centers from residents and local governments, leading to **moratoriums, stricter ordinances (noise, water, energy), and legal challenges**, especially as projects move from metro Atlanta to rural areas; key concerns involve massive **water/power usage**, environmental impact, and lack of local control, despite economic arguments for AI growth.



Reasons for Pushback

- **Water & Energy Consumption:** Data centers use vast amounts of water for cooling and draw massive electricity, straining local resources, particularly in rural areas.
- **Environmental Concerns:** Residents worry about the impact on local ecosystems, noise pollution, and the overall footprint in their communities.
- **Lack of Transparency & Planning:** Communities feel they lack sufficient information and that state agencies (like the DCA) and developers aren't adequately addressing impacts before approval.
- **Subsidization Fears:** Some fear that residential customers will end up subsidizing the high energy demands of these tech giants.
- **Rural Incursions:** As metro areas become saturated, developers target rural Georgia, upsetting communities unfamiliar with such large-scale industrial projects.

Responses & Actions

- **Moratoriums:** Numerous counties (Coweta, DeKalb, Douglas, Athens-Clarke) have enacted temporary bans or pauses on data center development.
- **New Ordinances:** Cities and counties are passing local rules with restrictions on noise, water use, buffer zones, and cooling systems (e.g., banning open-loop cooling).
- **Legal Challenges:** Residents have sued counties (e.g., Twiggs) for approving projects without proper state review (Development of Regional Impact - DRI).
- **State-Level Action:** The Department of Community Affairs (DCA) paused its review process for data center proposals to examine its evaluation system.

Key Locations & Examples

- **Coweta, DeKalb, Troup Counties:** Extended moratoriums, debating new rules.
- **Twiggs County:** Faced resident lawsuits over a rezoning decision.
- **Union City:** Community activists organized against a proposed facility.
- **Metro Atlanta:** Areas like the Beltline have banned new data centers, pushing development outward.

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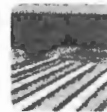
 Macon Telegraph



The costs of crypto mining in Georgia. Will it be...

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Why Big Tech sees Georgia farmland as ripe...

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AI Overview

Virginia is seeing significant pushback on data centers, with residents and environmental groups opposing rapid growth due to concerns over massive energy demand straining the grid, increased air pollution from backup generators, threats to water resources, industrialization of communities, traffic, noise, and insufficient local control over development, leading to lawsuits, calls for stricter regulations, and debates over balancing economic benefits with community quality of life and environmental goals.

Key Concerns Driving Pushback:

- Energy & Grid Strain:** Data centers consume immense electricity, straining Virginia's grid and leading to reliance on polluting diesel generators, requiring costly public investment in new infrastructure.
- Environmental Impact:** Concerns exist over water usage, carbon emissions, impact on local air quality, and the visual blight of massive facilities and associated transmission lines.
- Community Character:** Residents fear the industrialization of rural and suburban areas, increased traffic congestion, and noise pollution, which diminishes quality of life and property values.
- Lack of Transparency:** Non-disclosure agreements and secrecy surrounding the industry make it hard to assess true environmental and economic impacts.
- Local Control:** Localities struggle with state-level mandates, while residents demand more local authority to say "no" to projects.

Actions & Responses:

- Activism & Lawsuits:** Groups like the [Piedmont Environmental Council](#), [Sierra Club](#), and local coalitions have filed lawsuits and advocated for comprehensive studies on cumulative impacts.
- Local Ordinances:** Counties like Fairfax and Campbell are re-examining zoning and considering special permits for data centers.
- Legislative Efforts:** Bills (like SB 1449/HB 1601) to give state government more oversight were vetoed by Governor Youngkin, who favored local control, though legislative debate continues.
- Community Opposition:** Residents in areas like Prince William County (near "Data Center Alley") are actively protesting new developments, calling them "science fiction" landscapes.

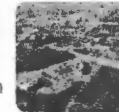
The Economic vs. Environmental Trade-off:

- While data centers bring significant tax revenue and jobs, particularly during construction, critics argue these benefits don't outweigh the environmental costs and the strain on public resources, especially since the industry's true local footprint isn't fully transparent.

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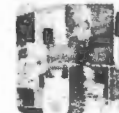
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New coalition calls for changes to Virginia's dat...

Jan 15, 2024 — The coalition also filed a lawsuit against th...

Bay Journal



Data Centers & Energy Demand

Nov 24, 2025 — Virginia's current approach is...

The Piedmont Environm...



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These are results for did **virginia** elect new officials after the old ones would not listen to the concerns about data **centers** being built

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◆ AI Overview

Yes, concerns about data centers have significantly impacted recent Virginia elections, leading to the election of new officials at the local level and contributing to a shift in state politics. 🗳️

Key outcomes include:

- **Local Level Upsets:** In local elections, residents have successfully voted out incumbent officials who supported data center projects and replaced them with opponents of the industry.
 - In **Warrenton**, all town council members who supported a specific Amazon data center proposal were voted out in the November 2024 election and replaced by a council composed entirely of project opponents.
 - In a special election in **Prince William County's Gainesville District** in November 2025, a Democrat who vowed to block the spread of the industry won a seat previously held by a Republican for decades.
 - In primary elections, a political newcomer campaigning against a "Digital Gateway" project defeated the county's top elected official in Prince William County.
- **State Level Impact:** The issue has also influenced state-level races.
 - A Democrat, John McAuliff, flipped a state legislature seat by making the high energy costs associated with data centers a central part of his campaign.
 - The issue was a factor in other races during the November 2025 elections, which resulted in a strong Democratic majority in the General Assembly.
 - Governor-elect Abigail Spanberger has signaled support for statewide policies to ensure data centers do not strain resources and pay their fair share of costs, a departure from the previous governor who vetoed some data center reform bills. 🗳️

In essence, community backlash has translated into political change, with newly elected officials promising stricter scrutiny and regulation of data center development. 🗳️

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