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| PGRR Number | [115](https://www.ercot.com/mktrules/issues/PGRR115) | PGRR Title | Related to NPRR1234, Interconnection Requirements for Large Loads and Modeling Standards for Loads 25 MW or Greater |

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| Date | August 12, 2024 |

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| Submitter’s Information |
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| Market Segment | Not applicable |

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| Comments |

 ERCOT offers these comments to address some of the concerns identified by the ERCOT Steel Mills (“the Steel Mills”) in their comments filed on July 3, 2024 for Planning Guide Revision Request (PGRR) 115.

ERCOT does not agree that every reference to the defined term “Large Load” in the Planning Guide should be qualified with the modifier “new.” This PGRR establishes, in the new Section 9, the formal interconnection process for connecting a new Large Load or making defined modifications to an existing Load on the ERCOT System. The limited applicability of this interconnection process is already explicitly articulated in this Section. See *e*.*g*. paragraph (1) of Section 9.1 that provides in part “This Section defines the requirements and processes used to facilitate new or modified Large Load interconnections with the ERCOT System[;]” and in paragraph (1) Section 9.2.1 of this PGRR that states:

“(1) Any request to interconnect or modify a Load Facility that meets one or more of the following criteria shall be subject to the Large Load Interconnection Study (LLIS) process:

(a) A new Large Load;

(b) A modification of any existing Load Facility that increases the aggregate peak Demand of the Facility by 75 MW or more;

(c) A modification of an existing Load Facility that is not a Large Load such that, after modification, the peak Demand of the Load Facility is increased by 20 MW or more and the Load Facility qualifies as a Large Load; or

(d) A modification of an existing Large Load that changes or adds a Point of Interconnection or Service Delivery Point to a different electrical bus on a different electrical circuit.”

Existing Large Loads are not subject to the requirements of this interconnection process unless they make a modification that falls under one of these applicability requirements. To the extent there might be places within PGRR115 where there is ambiguity on whether the requirement applies to a new Large Load only or to all Large Loads, ERCOT recommends clarifying using a specific reference to the applicability requirements in Section 9.2.1 rather than inserting the adjective “new” throughout the Planning Guide.

ERCOT strongly disagrees with the position of the Steel Mills that a modification of an existing Large Load that changes the Point of Interconnection (POI) or Service Delivery Point should be excluded from the applicability requirements of the LLIS, as described in paragraph (1)(d) of Section 9.2.1. ERCOT opposes the removal of this language because a change of POI or Service Delivery Point results in an electrically different configuration on the ERCOT System. Such a change for a Large Load is as impactful to the system as a new Large Load interconnection. ERCOT believes that this scenario should be specifically identified in Section 9.2.1 to ensure a change in Large Load POI or Service Delivery Point is appropriately studied. ERCOT notes that a similar requirement for Generation Resources is in paragraph (1)(c)(iv) of Section 5.2.1 of the Planning Guide.

In their comments, the Steel Mills also oppose the language formalizing the required interconnection equipment for Generation Resources, detailed in Section 5.2.10, and for Large Loads, detailed in Section 9.2.5. ERCOT continues to support the formalized requirements ERCOT proposed for several reasons, including that these sections are adding language to the Planning Guide to codify current practice. In the case of Generation Resources, this practice has been in place since Market Notice W-B061418-01, dated June 14, 2018. A similar requirement has been in place for Large Load interconnections since Market Notice W-A032522-01 issued on March 25, 2022 establishing the interim Large Load interconnection process.

The comments submitted by the Steel Mills also propose to change the requirement to have remotely controlled equipment to instead require manually controlled equipment. If adopted, the Steel Mills proposal would require facilities that limit the speed at which a TO or QSE is able to execute a reliability operating instruction from ERCOT. This is the opposite of what was intended by ERCOT’s proposal which was to empower TOs or QSEs to be able to more quickly act when a threat to system reliability has been identified.

Finally, the Steel Mills propose to require prior notice to a Generation Resource, Energy Storage Resource (ESR), Settlement Only Generator (SOG), or Large Load before a reliability instruction from ERCOT can be executed. Such a requirement conflicts with the existing requirement in Nodal Protocol Section 6.5.7.9, which requires a TSP or QSE to “promptly” comply with “all Dispatch Instructions issued to it.” However, the same section already allows for a TSP or QSE to disregard an instruction when “compliance would create an undue threat to safety, undue risk of bodily harm or undue damage to equipment.” Furthermore, Public Utility Commission of Texas (PUCT) Substantive Rule 25.200(d)(2) requires a TSP to “give ERCOT, affected transmission service customers, and affected suppliers of generation as much advance notice as is practicable in the event of an interruption [in service].” Accordingly, ERCOT believes the proposed requirement to give prior notice is unnecessary.

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| Revised Cover Page Language |

None at this time.

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| Revised Proposed Guide Language |

None at this time.