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| NPRR Number | [1234](https://www.ercot.com/mktrules/issues/NPRR1234) | NPRR Title | 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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| Cell Number |  |
| 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 June 26, 2024 for Nodal Protocol Revision Request (NPRR) 1234.

First, the Steel Mills propose to add the following to the list of information that is identified as ERCOT Critical Infrastructure Information (ECEII) in paragraph (1) of Section 1.3.2.1:

“Any information associated with a Load Point or Large Load submitted to ERCOT by a Transmission Service Provider (TSP)[.]”

Without any explanation for this proposal from the Steel Mills, it is difficult to understand why the Steel Mills believe this information qualifies as ECEII. Nevertheless, this proposed addition of a new category of ECEII is overbroad, and to the extent it includes any true ECEII, it is also unnecessary.

As defined in Section 2.1, ECEII is:

“Specific engineering, vulnerability, or detailed design information concerning proposed or existing ERCOT System Infrastructure that:

(a) Relates details about the production, generation, transportation, transmission or distribution of energy;

(b) Could foreseeably be useful to a person planning an attack on ERCOT System Infrastructure;

(c) Is exempt from mandatory disclosure under the Freedom of Information Act, 5 U.S.C. § 552, and has not been disclosed to the public through lawful means; and

(d) Does not simply give the general location of the ERCOT System Infrastructure.”

From this definition, addition of any and all information associated with Load Points or Large Loads to the list of items considered ECEII is not appropriate. Such information does not represent detailed design information related to the production, transmission, or distribution of energy. To the extent some information associated with a Load Point or a Large Load, such as the association of a Load Point to a single end-use customer of significant size, might represent a risk to grid reliability, such information is already classified as ECEII, see *e*.*g*. paragraphs (1)(a), (b), and (g) of Section 1.3.2.1.

Separately, ERCOT notes that some information about Large Loads is already deemed “Proprietary Customer Information,” a category of Protected Information under paragraph (1)(r) of Section 1.3.1.1, and ERCOT already has an obligation to maintain confidentiality of such information. For these reasons, ERCOT does not support the Steel Mills’ proposal to broadly categorize *any* information *associated with* a Load Point or Large Load provided to ERCOT by a TSP as ECEII.

ERCOT also opposes the addition of a defined term for Load Point proposed by the Steel Mills that would confine the term only to connections 25 MW or greater. This is not how the term is currently understood or used throughout the Protocols, Guides, and Other Binding Documents. In Planning Guide Revision Request (PGRR) 115, the term Load Point replaces the older term “Model Load”, which has a longstanding use to represent an end use customer, or group of customers, connected to a transformer that have a 60kV or lower secondary voltage, often termed as a distribution transformer. ERCOT does not currently have a MW threshold or limit on the size of a Load Point and does not believe one would be appropriate. ERCOT also does not support confining a Load Point to a TSP. ERCOT currently also has Load Points defined by Resource Entities.

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| Revised Cover Page Language |

None at this time.

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| Revised Proposed Protocol Language |

None at this time.