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| NPRR Number | [1202](https://www.ercot.com/mktrules/issues/NPRR1202) | NPRR Title | Refundable Deposits for Large Load Interconnection Studies |
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| Date | October 15, 2024 |
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| Submitter’s Information |
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| Cell Number |  |
| Market Segment | Not applicable |

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| Comments |

ERCOT submits these comments to Nodal Protocol Revision Request (NPRR) 1202 to express its concerns with this NPRR and the comments filed by Longhorn Power on October 1, 2024.

After NPRR1202 was filed in September of 2023, ERCOT filed NPRR1234, Interconnection Requirements for Large Loads and Modeling Standards for Loads 25 MW or Greater, and Planning Guide Revision Request (PGRR) 115, Related to NPRR1234, Interconnection Requirements for Large Loads and Modeling Standards for Loads 25 MW or Greater, to address issues related to the interconnection of Large Loads.[[1]](#footnote-1) Together, NPRR1234 and PGRR115 establish a more comprehensive structure for the interconnection of Large Loads which includes the following components:

* Creates a new process for studying the reliability impacts of all Large Loads seeking to interconnect to the ERCOT System. A Large Load Interconnection Study (LLIS) will be required for each new Large Load project that seeks to interconnect to the ERCOT System. Like the Full Interconnection Study (FIS), the LLIS will consist of a similar suite of studies conducted by one or more affected Transmission Service Providers (TSPs).
* Requires all Large Loads evaluated via the LLIS to be included in the existing quarterly stability assessment prior to Initial Energization.
* Creates requirements that must be met before a Large Load may be included in the ERCOT Network Operations Model and requires additional reliability performance criteria for the inclusion and evaluation of Large Loads in planning studies.
* Establishes timelines for the review of the LLIS and the completion of other steps in the interconnection process.
* Provides for cancellation of a Large Load project if certain interconnection deadlines are not met.
* Adds a requirement that any Resource Entity that adds 20 MW or more of Load at any site with an existing Generation Resource shall submit a new Reactive Power study. The study must demonstrate the continued compliance of the Generation Resource with Voltage Support Service (VSS) requirements.
* Creates specific Subsynchronous Oscillation (SSO) requirements for Large Loads.
* Establishes new standards for the identification and classification of a site with an aggregate peak Demand of 25 MW or more at a common substation in ERCOT Network Operations Model. Such information will provide ERCOT visibility of the locations of these Loads for operational and planning purposes.
* Requires the installation of disconnect devices for Large Loads capable of interrupting fault current to isolate the Large Load from the ERCOT System.
* Adds a fee for LLIS requests to the ERCOT Fee Schedule in the amount of $14,000.00.

ERCOT is concerned that the amount of the LLIS fee proposed in NPRR1202 ($50,000) and Longhorn Power’s comments ($25,000) may not be closely correlated to ERCOT’s costs for the performance of interconnection-study work. ERCOT is closely reviewing the cost-causation data upon which the LLIS fee proposed in NPRR1234 ($14,000) was originally based and will submit comments to NPRR1234 if more recent data supports a change to the proposed LLIS fee amount.

ERCOT recognizes that its previous comments to NPRR1202 (filed approximately a year ago) mentioned the concept of assessing a recurring “maintenance fee” for work performed to sustain projects in the interconnection queue as a potential alternative to charging to a refundable deposit. Similarly, Longhorn Power’s recent comments propose charging a “recurring fee” for Large Load and Generation projects in the amount of $5,000 per quarter until energization. However, after further consideration, ERCOT believes that charging a recurring fee for Large Load and Generation projects would involve substantial administrative burden and the possibility of cancellation (as proposed in PGRR115) is a sufficient mechanism to remove stale projects from the interconnection queue. As a result, ERCOT does not endorse the creation of a recurring fee at this time.

ERCOT recommends that NPRR1234 and PGRR115 be adopted instead of the more limited rules proposed in NPRR1202 and the comments submitted by Longhorn Power.

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| Revised Cover Page Language |

None

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| Revised Proposed Protocol Language |

None

1. NPRR1234 and PGRR115 were filed on May 28, 2024. [↑](#footnote-ref-1)