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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 16, 2024 |
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| Submitter’s Information |
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| Market Segment | Independent Generator and Independent Power Marketer (IPM)  |

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| Comments |

TCPA respectfully submits these comments to Nodal Protocol Revision Request (NPRR) 1202 to express its support for this NPRR as amended by the comments filed by Longhorn Power on October 1, 2024.

TCPA agrees with the sentiment expressed in Longhorn Power’s comments that ERCOT’s Large Load Interconnection Queue (“queue”) would benefit from changes that provide more clarity on the contents of the queue and shorten the interconnection timeline. The market will be better positioned to properly align supply and demand if stakeholders have a better line of sight to which projects in the queue are likely to proceed to interconnection and when.

The fees proposed by Longhorn Power for Large Loads and Generation projects are reasonable if they are used to refine the queue and expedite the removal of speculative, stale or duplicative projects.

Along those lines, TCPA suggests that consideration be given towards prioritizing the interconnection of those large loads that can demonstrate enhanced intent to energize, whether that be through a signed Power Purchase Agreement, co-locating with a Generation Resource, or another method.

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| Revised Cover Page Language |

None

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| Revised Proposed Protocol Language |

None