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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 | December 9, 2024 |
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| Submitter’s Information |
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| Market Segment | Independent Generator  |

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| Comments |

Engie 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.

In general, Engie agrees with Longhorn Power’s comments that ERCOT’s Large Load and Generation Interconnection Queue (“queue”) would benefit from changes that provide more clarity on the queue and shorten the interconnection timeline, including moving through the part 1, 2, and 3 interconnection processes in a more efficient manner.

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. Engie also agrees with others that a larger upfront fee be assessed and the effort to eliminate the on-going fee be vetted through the stakeholder process.

Further, Engie envisions funds from the fee being used to hire additional personnel. ERCOT’s interconnection team has been doing a great job of moving projects through the process with the resources they have in-house. However, the team is overloaded and with ever increasing large loads and the Texas Energy Fund generation on the horizon, there is no relief envisioned in the foreseeable future. ERCOT has expressed concern over using fees to fund additional full-time employees (FTEs). Engie would suggest that rather than just funding FTEs these fees could be used to contract with an engineering firm capable of completing the reviews and studies on an as-needed basis. Using this method more interconnection requests yields more fees and the greater ability to contract needed resources. As the queue and workload reduces, there would be less fee revenue and less need to outsource.

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| Revised Cover Page Language |

None

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| Revised Proposed Protocol Language |

None