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| PGRR Number | [122](https://www.ercot.com/mktrules/issues/PGRR122) | PGRR Title | Reliability Performance Criteria for Loss of Load |

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| Date | February 4, 2025 |

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| Comments |

Google appreciates the opportunity to participate in the discussions involving Loss of Load Reliability Performance Criteria. Google generally takes the position that this Planning Guide Revision Request (PGRR) is unnecessary. ERCOT already has the ability to cap or limit the amount of load interconnected at a single Point of Interconnection (POI) through the interim large load interconnection process, and will have the ability to do so if it identifies a reliability issue in the updated Nodal Protocol Revision Request (NPRR) 1234, Interconnection Requirements for Large Loads and Modeling Standards for Loads 25 MW or Greater. In fact, the point of ERCOT’s review of large loads is to emphasize and identify potential reliability issues which must either be addressed or load interconnection restricted. The implementation of an arbitrary cap based on a historical precedent fails to recognize the history of electrification and the growth of loads over time. Moreover, the cap does not adequately recognize the configuration of large loads behind a single POI. While true the loss of a full large load could pose a consequential incident to the grid, so too could the loss of a generator. However, much like a generator, a large load does not typically consist of a single asset behind the POI, but multiple assets designed to operate independently should one of them fail.

Google requests ROS continue to table this PGRR while we engage with ERCOT to better address their concerns.

Though not made to these comments, Google would also recommend consolidating the 1 GW cap proposed in PGRR115, Related to NPRR1234, Interconnection Requirements for Large Loads and Modeling Standards for Loads 25 MW or Greater, and PGRR122 as they appear to share similar concerns.

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| Revised Cover Page Language |

None

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| Revised Proposed Guide Language |

None