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| **NPRR Number** | [**1267**](https://www.ercot.com/mktrules/issues/NPRR1267) | **NPRR Title** | **Large Load Interconnection Status Report** |
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| **Date** | February 11, 2025 |
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| **Submitter’s Information** |
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| **Market Segment** | Consumer, Industrial Segment |

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| **Comments** |

Lancium is in support of this Nodal Protocol Revision Request (NPRR) and the initiative to increase stakeholder visibility into the Large Load Interconnection queue. Additionally, Lancium also agrees with Google’s general concerns and recommendations regarding confidentiality and subsequently submits these comments over their January 22nd comments.

In summary, Lancium recommends modifying paragraph (1) to more closely align the criteria for a Large Load with what is currently reported in ERCOT’s ad-hoc Large Load Interconnection queue updates to TAC. To do so, Lancium recommends making the proposed criterion a minimum for inclusion and allow ERCOT to more broadly define Large Load in the Large Load Interconnection Status Report itself. This will allow for loads that have traditionally been reported under the inclusion criteria outlined in the March 25, 2022, market notice (Interim Large Load Interconnection Process) to remain.

Lancium also recommends incorporating aggregation criteria for interconnection status and co-location status in paragraphs (2)(h) and (2)(i). These metrics are already reported by ERCOT on an ad-hoc basis and should be explicitly included due to their value.

While Lancium does not believe an explicit definition is necessary in the Protocols, it encourages ERCOT to collaborate with stakeholders to develop clearer, more granular classifications for interconnection status. Specifically, Lancium suggests splitting the “Planning Studies Approved” category into two: (1) interconnections conditionally approved pending a transmission upgrade and (2) interconnections approved outright. Similarly, Lancium recommends refining definitions related to “Approved to Energize” loads to provide additional clarity.

Finally, Lancium acknowledges that ERCOT currently reports additional metrics not explicitly outlined in paragraph (2), such as observed MW consumption, in ad-hoc queue updates. Lancium encourages ERCOT to avoid treating paragraph (2) as an exhaustive list and to continue reporting additional metrics that provide value to stakeholders in the Large Load Interconnection Status Report.

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| **Revised Proposed Protocol Language** |

***3.2.7 Large Load Interconnection Status Report***

(1) For purposes of this section, a Large Load is inclusive of one or more Facilities at a single site with an aggregate peak Demand greater than or equal to 75 MW behind one or more common Points of Interconnection (POIs) or Service Delivery Points that is seeking interconnection on or after March 25, 2022. ERCOT may expand the criteria for including a Load as a Large Load, provided the defining criteria are clearly stated in the applicable report.

(2) ERCOT must publish a Large Load Interconnection status report each month to the ERCOT website that aggregates Large Load Interconnection requests across multiple dimensions with as much specificity as possible while maintaining the confidentiality of Customer data, including:

(a) Load Zone;

(b) TSP;

(c) Load type (as provided to the TSP, such as refinery, steel mill, data center, etc...);

(d) Interconnection study request date year;

(e) Desired energization date year;

(f) Average interconnection study duration by TSP;

(g) Size range;

(h) Interconnection status (as defined by ERCOT to differentiate between operational, approved, under study, etc.); and

(i) Co-location status.

(3) ERCOT shall take actions such as providing ranges of interconnection MW sizes, aggregate loads, and other similar actions to protect, anonymize, and otherwise safeguard confidential and competitively-sensitive Customer data from public disclosure. When aggregating Customer data, ERCOT should ensure that at least five Customers exist in a particular Load type subcategory prior to aggregation, to protect against accidental disclosure. ERCOT may leave a certain category blank or aggregated with other Load types to avoid disclosure.

(4) ERCOT shall report to TAC or its designated subcommittee its methodology for developing the report defined in paragraph (2) above whenever that methodology changes, but at least every two years.