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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 21, 2025 |
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| **Submitter’s Information** |
| **Name** | Martha Henson |
| **E-mail Address** | Martha.henson@oncor.com |
| **Company** | Oncor Electric Delivery Company LLC |
| **Phone Number** |  |
| **Cell Number** | 214-536-9004 |
| **Market Segment** | Investor-Owned Utility (IOU) |

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| **Comments** |

Oncor submits these comments to NPRR1267, Large Load Interconnection Status Report, for discussion during the March 4, 2025 Large Flexible Load Task force meeting to:

* Support the recommendations provided by Google’s January 22, 2025 comments which strengthen confidentiality protections for customer projects;
* Propose that paragraph (2)(d) of Section 3.2.7 specify the calendar year the project was submitted to ERCOT by the TSP, rather than the date the interconnection study was requested by the customer, which the TSP does not typically provide to ERCOT;
* Propose clarifying paragraph (2)(e) to reflect the customer’s requested energization year; and
* Recommend removal of the proposal for ERCOT to publish the average interconnection study duration by TSP, since this could result in erroneous conclusions about how long the interconnection study process may take for a particular request.

These comments are submitted on top of the February 11, 2025 Lancium comments.

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| Revised Cover Page Language |

None

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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) Calendar year in which the interconnecting TSP submitted the project to ERCOT;

(e) Requested energization year;

(f) Size range;

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

(h) 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.