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| NPRR Number | [1238](https://www.ercot.com/mktrules/issues/NPRR1238) | NPRR Title | Voluntary Registration of Loads with Curtailable Load Capabilities |
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| Date Posted | March 11, 2025 |
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| **Submitter’s Information** |
| Name | Nathan Bigbee |
| E-mail Address | nathan.bigbee@ercot.com  |
| Company | ERCOT |
| Phone Number | 512.225.7093 |
| Cell Number |  |
| Market Segment | Not Applicable |

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| Comments |

ERCOT submits these comments to request that the Protocol Revision Subcommittee (PRS) table Nodal Protocol Revision Request (NPRR) 1238 pending the Texas Legislature’s consideration of Senate Bill (SB) 6. NPRR1238 would authorize ERCOT to direct certain loads registered as Early Curtailment Loads (ECLs) to curtail their demand when Physical Responsive Capability (PRC) decreases to 3,100 MW. By contrast, SB 6 as currently proposed would require ERCOT to establish a competitively procured “demand management service” that would result in payments to large loads in exchange for curtailment in advance of a projected Energy Emergency Alert (EEA). *See* SB 6, 89(R), § 5.

Many steps remain before SB 6 may become law. However, the prospect of a legislative preference for procuring pre-EEA curtailment from large loads only as part of a competitive service raises a risk of conflict with the framework reflected in NPRR1238, given that the reliability value of NPRR1238 appears to implicitly depend on revisions to Transmission Service Provider (TSP) terms of service that would require large load customers to register as ECLs and therefore be subject to pre-EEA curtailment outside of an ERCOT-procured service. ERCOT therefore requests that PRS table NPRR1238 while SB 6 remains pending in the Legislature.

Even if the outcome of the legislative process is a statutory policy determination that is inconsistent with NPRR1238, ERCOT anticipates that it may still be possible to use certain features of NPRR1238 in fashioning a solution to the policy concern NPRR1238 is intended to address. Tabling NPRR1238 will allow ERCOT and stakeholders to evaluate the appropriate path forward once the legislative process has concluded.

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| **Revised Cover Page Language** |

None

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| Revised Proposed Protocol Language |

None