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| NOGRR Number | [190](http://www.ercot.com/mktrules/issues/NOGRR190) | NOGRR Title | Related to NPRR937, Distribution Voltage Level Block Load Transfer (BLT) Deployment |
| Date of Decision | July 11, 2019 |
| Action | Tabled |
| Timeline | Normal |
| Proposed Effective Date | To be determined |
| Priority and Rank Assigned | To be determined |
| Nodal Operating Guide Sections Requiring Revision | 4.5.3.4, Load Shed Obligation |
| Related Documents Requiring Revision/Related Revision Requests | NPRR937, Distribution Voltage Level Block Load Transfer (BLT) Deployment |
| Revision Description | This Nodal Operating Guide Revision Request (NOGRR) would allow distribution voltage level Block Load Transfer (BLT) firm Load deployed in Energy Emergency Alert (EEA) Level 2 to count toward the appropriate Transmission Service Provider’s (TSP’s) or Distribution Service Provider’s (DSP’s) firm Level 3 Load shed obligations under EEA Level 3. |
| Reason for Revision |  Addresses current operational issues. Meets Strategic goals (tied to the [ERCOT Strategic Plan](http://www.ercot.com/content/news/presentations/2013/ERCOT%20Strat%20Plan%20FINAL%20112213.pdf) or directed by the ERCOT Board). Market efficiencies or enhancements Administrative Regulatory requirements Other: (explain)*(please select all that apply)* |
| Business Case | This NOGRR recognizes the contribution of distribution voltage level BLT’s deployment as firm Load shed. Some of these distribution BLTs account for nearly 20% of a distribution cooperative’s Load. These Loads were registered as BLTs so that ERCOT would have the ability to be aware of them, but not be treated as interruptible. This Load is firm Load and should be counted toward the Level 3 Load shed obligations of the distribution cooperative.  |
| ROS Decision | On 7/11/19, ROS unanimously voted to table NOGRR190 and refer the issue to the Operations Working Group (OWG). All Market Segments were present for the vote. |
| Summary of ROS Discussion | On 7/11/19, participants suggested exploration of solutions that would accommodate BLT deployments while also ensuring the necessary amount of Load is shed during an EEA event, possibly via development of a second Load shed table and/or other operational changes. |

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| **Comments Received** |
| Comment Author | **Comment Summary** |
| None |  |

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| Market Rules Notes |

Please note the baseline language in the following sections has been updated to reflect the incorporation of the following NOGRRs into the Nodal Operating Guide:

* NOGRR192, Administrative Changes for June 1, 2019 Nodal Operating Guide – Load Shed Table (Incorporated 6/1/19)
	+ Section 4.5.3.4
* NOGRR193, Administrative Changes for July 1, 2019 Nodal Operating Guide – Load Shed Table (Incorporated 7/1/19)
	+ Section 4.5.3.4

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| Proposed Guide Language Revision |

**4.5.3.4 Load Shed Obligation**

(1) Obligation for Load shed is by DSP. Load shedding obligations need to be represented by an Entity with 24x7 operations and Hotline communications with ERCOT and control over breakers. Percentages for Level 3 Load shedding will be based on the previous year’s TSP peak Loads, as reported to ERCOT, and will be reviewed by ERCOT and modified annually. Distribution voltage level BLTs, if called upon before Level 3 Load shedding, shall count towards the appropriate TSP’s or DSP’s obligation. (Use TOs as list of Entities)

ERCOT Load Shed Table

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| --- | --- |
| **Transmission Operator** | **2018 Total Transmission Operator Load (%MW)** |
| AEP Texas Central Company | 8.52 |
| Brazos Electric Power Cooperative Inc. | 5.24 |
| Brownsville Public Utilities Board | 0.36 |
| Bryan Texas Utilities | 0.49 |
| CenterPoint Energy Houston Electric LLC | 24.27 |
| City of Austin DBA Austin Energy | 3.6 |
| City of Brady | 0.02 |
| City of College Station | 0.28 |
| City of Garland | 0.9 |
| CPS Energy (San Antonio) | 6.53 |
| Denton Municipal Electric | 0.50 |
| GEUS (Greenville) | 0.16 |
| LCRA Transmission Services Corporation | 5.74 |
| Oncor Electric Delivery Company LLC | 37.43 |
| Rayburn Country Electric Cooperative Inc. DBA Rayburn Electric | 1.19 |
| South Texas Electric Cooperative Inc.  | 2.21 |
| Texas-New Mexico Power Company | 2.56 |
| **ERCOT Total** | **100.00** |