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| NOGRR  Number | [243](https://www.ercot.com/mktrules/issues/NOGRR243) | NOGRR Title | Implementation of Seasonal Load Shed Tables | |
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| Date | | November 2, 2022 | |
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| Submitter’s Information | | | | |
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| Market Segment | | Cooperative | | |

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| Comments |

Golden Spread Electric Cooperative, Inc. (“Golden Spread”) appreciates the work that has been done on this NOGRR by the Joint Transmission Operators (TOs). Golden Spread agrees that two or more Load shed tables are needed for varying Seasons. The changes to paragraph (3) of Section 4.5.3.4, Load Shed Obligation, represent an improvement to today’s Load shed table and we support in part.

Golden Spread agrees ERCOT should not be tied to a certain date/time to determine which Load shed table should be used, and it should be determined based on weather conditions. Golden Spread understands ERCOT and other TOs do not currently support a Real-Time Load shed allocation, but still believes this should be the ultimate goal and something ERCOT should work towards in the coming years. Absent a Real-Time Load shed allocation, having more than one Load shed obligation table seems to be appropriate. However, Golden Spread does have several concerns with the way the NOGRR is currently drafted.

Our specific comments are made with the assumption that there will be a Large, Flexible Load (LFL) registration in the coming months that would exclude appropriately registered data centers from the TO Load shed obligation. Specifically, Golden Spread is concerned that Joint TOs are:

* Excluding transmission connected Load from the Load shed allocation (paragraph (2) of Section 4.5.3.4)
  + Transmission Load would be free to increase or decrease Load during Energy Emergency Alert (EEA) Level 3 event.
* Including transmission connected Load to determine the peak (paragraphs (2)(a)-(b) of Section 4.5.3.4), but excluding it from being included in the allocated Load shed table.
  + Should transmission Load be included in determining the coincident peak, but excluded when calculating Load shed obligation based upon that peak?
* A clear definition of transmission connected Load is needed:
  + Does this include a customer-owned substation?
  + Does this include auxiliary Load for wind farms, solar farms, and Energy Storage Resources (ESR)?
  + What does it exclude?

Other areas that need further attention from stakeholders include:

* The proposal for calculating Load shed tables based on a 1-Coincident Peak (CP) winter and 1-CP summer, eliminating the 4-CP for Load shed obligation purposes (paragraphs (2)(a)-(b) of Section 4.5.3.4).
* Paragraph (3) of Section 4.5.3.4 has no set timeframe on when the shift takes place from a winter Load shed table to a summer Load shed table. This appears to be under ERCOT’s discretion.
* Does ERCOT have draft Load shed tables, based upon the Joint TOs proposal, that would be indicative of new TO Load shed obligations?

Golden Spread would be in support of two separate Load shed tables, but not excluding transmission Load from the calculation or Load shed obligation. We look forward to working with the stakeholders on these changes and further discussion of this NOGRR at the November 7th ROS meeting.

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| Revised Cover Page Language |

None

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| Revised Proposed Guide Language |

None