NPRR1191

AEP generally agrees with Oncor’s 8/25/2023 comments on NPRR1191. That said, we have some questions about the definitions of Large Load and Registered Curtailable Load and the practical application of those terms in PGRR111, NOGRR256 and RRGRR036 that we believe will be addressed in upcoming work sessions.

Relative to RCLs, we do not believe that an RCL should be allowed to change their registration status without the express approval of ERCOT and the interconnecting TSP.

NOGRR256

AEP wrestled with Oncor’s proposed change from TSP to TO as the TDSP has the agreement with the customer and it is the TO that would receive ERCOT instructions. Otherwise, we agree with Oncor’s proposed changes. We strongly agree with Oncor’s recommendation that LFLTF discuss whether Controllable Load Resources should also be removed from the TO Load shed obligation allocations in paragraph (2) of Section 4.5.3.5, Transmission Operator Load Shed Obligation.

PGRR111

AEP offers the following highlights of PGRR111 topics for discussion:

* 3 business days is too quick to respond to many of the steps of the LLIS. We would like to extend those to 10 business days or have the LLIS timeline match the response times of the generation interconnection process.
* We would like more details on how ERCOT and the TSP will implement the ‘outage of a Large Load’ addition to the events in table 1 on page 5 of the PGRR. Will SSWG create a new ERCOT5 contingency type in their database? Is this Large Load criteria going to use the 25 or 75 MW threshold?
* If RCL are not in the CDR as firm load, will they be in-service in future peak load planning models?
* Will Large Loads that do not intend to be CLR, NCLR, or RCL that are designated with a Load ID of X in the SSWG cases be allowed to change the Load ID once all the transmission improvements are complete?
* Is ‘Load Facility’ a defined ERCOT term in protocol section 2?
* In section 9.2.1 (1) (b) (iii) and (iiii) does this imply if a load is 70 today and wants to add 5 MW, then they will have to go through the LLIS process?
* In section 9.4.3.1 (6) (b) should this also include voltage violations?
* In section 9.6 (3) will this approval and MW level be documented through RIOO?

RRGRR036

We have not done a thorough review of RRGRR036 and appreciate that ERCOT Staff intends to explore potential gaps or inconsistencies between the package of revision requests.