* NOGR 256.
  + The VRT standards proposed by ERCOT are likely too strict for much of the load in ERCOT, much of which has been operating in ERCOT for decades.
  + ERCOT should work with stakeholders to better understand the VRT capabilities of existing load and then propose VRT goals/standards for OEMs to deliver for future load.
* NPRR 1191
  + Connecting the dots between these ramp rate limitations and NPRR 1188 - NCLRs are allowed to net their load ramp with a BTM generator to avoid violating the ramp constraint. CLRs, however, are treated as front of the meter by definition. This inconsistency favors NCLRs over CLRs.
  + Who is ultimately responsible for the execution of the SSO Mitigation Plan? TSP or Load? (3.22.1.3) Who pays for what?
  + How are RCL “deployed MWs” calculated? Telemetry or nameplate capacity? What if RCL has already been turned down voluntarily for high prices?  (6.5.7.3.1)
  + CLRs should be able to take full advantage of their ability to ramp to avoid high prices and enhance reliability, so that the ramp rate registered can be fully utilized. For example, if they can reduce load to avoid a high price, requiring them to consume at that high price on a slower ramp costs money and disincents CLR registration. Instead, ERCOT should calculate updated desired base points based on the registered ramp rate. Why shouldn’t CLRs be able to follow a one minute UDBP ramp to LPC?
  + At the very minimum, does it make sense to try and resolve the discrepancy between the 20% ramp rate constraint and the four-minute UDBP trajectory? Whether this is done for wind is completely irrelevant.
  + Should this NPRR include allowances for CLRs to resolve or avoid activating N-1 contingencies?
  + In addition to the proposed fee to cover ERCOT’s costs, an additional large fee should be required that is refundable when the Large Load energizes. The goal is to rationalize the interconnection request queue.
* RGRR 036
  + How is “dynamic data” defined as it relates to the Resource Registration Guide? It’s not clear the extent to which all kinds of large loads will have the ability to produce and provide “dynamic data to ERCOT.”
  + We’re willing to provide whatever information we can about primary/secondary end use activities initially, but these activities are likely to change over time, and such changes should not require complicated compliance requirements beyond providing updated information.
  + When is information about necessary transmission upgrades required by ERCOT? This information is provided to the load by the TSP at some point during the planning and interconnection process.
* PGRR 111
  + How will modeling of large loads as described in 6.6.1 interfere with TSP forecasted load in base case? (see: PGRR 107)
  + Note that the question related to dynamic data in the RGRR 036 also applies to PGRR 111
  + What are the criteria for inclusion or exclusion of other Large Load interconnection requests in the LLIS associated with a Large Load request?
  + How CLR/NCLR/RCL will be treated and how much connection will be allowed if LLIS shows incremental loads under P0 condition for selected scenarios.
  + How CLR/NCLR/RCL will be treated and how much connection will be allowed if LLIS shows incremental loads under N-1-1 (including ERCOT PG4) conditions ?
  + How CLR/NCLR/RCL will be treated and how much connection will be allowed if LLIS shows the CLR will result in incremental stability issues?
  + How CLR/NCLR/RCL will be treated and how much connection will be allowed if LLIS shows the CLR will result in incremental load flow issues under P4 or P5 contingency conditions?
  + Why LLIS study reports are marked as “Certified” and are only accessible to TSPs, whereas Generator FIS reports have been marked as “Secure” and have been even available to other types of market participants? Given the scrutiny around the Large Load Interconnection process, the application cost and LLIS prolonged timeline, we strongly believe that it is important for other Market Participants to have access to the LLIS reports to be able to monitor the market outlook and also conduct their due diligence before submitting new applications for Large Loads.