Satoshi Energy’s informal comments related to the requests and guides for ERCOT large loads for inclusion in the conversation at the next task force meeting.

**General comments**

Satoshi Energy is asking to clarify language around Large Loads providing solutions to reliability scenarios. This comment concerns several projects with capped offtake from P6 n-1-1 planning issues that cause voltage instability. The protocols should accommodate treating flexible loads differently than firm loads when they can address contingency scenarios rather than contribute to them.  Language should be added to allow loads to be constraints that create a SCED re-dispatch after the n-1 event or other acceptable solution to ensure resilience in n-1-1 scenarios. This will provide better reliability than installing significant reactive systems that are rarely, if ever, required.

**NPRR1191**

Satoshi Energy is not supportive of ramp rate constraints.  We do not believe that ramp constraints should be placed on a load and, if they are, should be placed on all loads.  To constrain a load because they cannot ramp is problematic. Also, large loads have the potential to change applications over time, which may cause drastic changes in behavior. The grid should continue to focus on serving loads.

Regarding Load Interconnection fees, Satoshi Energy proposes that ERCOT implement refundable deposits.  The load queue is full of requests that cannot be managed efficiently and transparently.  Having deposits will give the queue a greater percentage of viable loads.  The deposit should be refundable upon energization of the load to reward good actors.  Regarding speed and transparency, Satoshi Energy also supports the RIOO system for load interconnection requests and study processes.

**NOGRR256**

Satoshi Energy is confident that loads will not be able to comply with voltage ride-through as proposed in NOGRR256 operationally.  Data centers we are involved with cannot offer ride-through.  It is unlikely that hydrogen or most other technologies will also be able to provide this ride-through.  ERCOT should not put standards in place that cannot be met.  These standards would significantly stifle economic development due to the inability of many load types to comply.  Pricing should reflect the outcomes that ERCOT desires.

**PGRR and RRGRR**

Satoshi Energy desires to understand what ERCOT considers to be “dynamic data,” when ERCOT is suggesting submitting dynamic data.  What is the data?

Satoshi Energy is against identifying the primary and secondary uses of a load.  It is burdensome to keep the information updated over time.  Much of the load infrastructure we develop can interchange types of load or run a mixture of load types.  If required to identify uses, it should be general enough to mitigate frequent updates.

We appreciate you incorporating these comments into your materials for the LFLTF.  We would like to discuss these issues and resolve them in the stakeholder process.