

6.5.7.12 Large Load Ramp Rate Limitations:

1. What is the rationale for the proposed ramp rate limitations of 20% per minute of registered peak demand for Controllable Load Resources (CLRs)?
2. If a CLR can ramp up or down at a rate exceeding 20% per minute of its registered peak demand while still following base points, what is the purpose of limiting the CLR ramp rate to 20% per minute?
3. The proposed ramp rate limitation for non-CLR Large Loads is objectively restrictive, arguably punitive, and creates a long list of unintended consequences to both Large Loads operating within the ERCOT market and those seeking to develop projects within the ERCOT market.

The imposition of these ramp rate limitations on non-CLR Bitcoin mining loads would force the business to consume undesirably priced power for a longer duration than is technically required and introduces a fundamental economic risk to the business given the combination of the following:

- a) Ex-post price signal received by non-CLR Large Loads
- b) Proposed ramp rate limitations (lesser of 5% of peak demand or 20 MW per minute ramp down, lesser of 2% of peak demand or 8 MW per minute ramp up)
- c) And the mechanics of energy settlements within the ERCOT market

Timestamp	System Wide LMP	CLR - 20% ramp down/min				Non-CLR LFL - 5% or 20 MW ramp down/min		
		MW	MWh	Cost (5 Min)	Cost (15 Min)	MW	MWh	Cost (15 Min)
0:00	\$ 70.69	500	20.83	\$ 1,472.71	\$ 5,053.68	500	37.50	\$ 21,225.46
0:05	\$ 253.89	0	0.00	\$ -		400	29.17	
0:10	\$ 403.15	0	0.00	\$ -		300	20.83	
0:15	\$ 123.23	0	0.00	\$ -	\$ -	200	12.50	\$ 12,498.67
0:20	\$ 1,168.16	0	0.00	\$ -		100	4.17	
0:25	\$ 958.37	0	0.00	\$ -		0	0.00	
0:30	\$ 185.19	0	0.00	\$ -	\$ -	0	0.00	\$ -
0:35	\$ 200.00	0	0.00	\$ -		0	0.00	
0:40	\$ 2,568.08	0	0.00	\$ -		0	0.00	
			20.83	\$ 1,472.71	\$ 5,053.68		104.17	\$ 33,724.13

For these reasons, ramp rate limitations placed on Large Load entities—who are not registered as market participants—should be as nonrestrictive as possible, while maintaining defined reliability standards established by the PUC, NERC, and ERCOT to facilitate a risk-managed approach to industrial load growth within the state of Texas.

Additionally, the methodology used to determine any proposed ramp rate limitations should be clearly defined as part of the NPRR stakeholder process to ensure that such methodology is intellectually defensible, technically feasible, and ultimately addresses system reliability as well

as the effects of proposed policies on all stakeholders, not just a particular group, operating within the ERCOT market today and in the future.

4. What is the contemplated noncompliance penalty for a Large Load not following ramp rate limitations due to an unplanned outage of at facility? (e.g. fiber internet backbone serving the facility stops functioning and the loss of connectivity causes an instantaneous load drop of compute load)