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| NOGRR Number | [256](https://www.ercot.com/mktrules/issues/NOGRR256) | NOGRR Title | Related to NPRR1191, Registration, Interconnection, and Operation of Customers with Large Loads; Information Required of Customers with Loads 25 MW or Greater |
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| **Date** | | October 21, 2023 | |
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| **Submitter’s Information** | | | |
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| Market Segment | | Investor-Owned Utility (IOU) | |

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| Comments |

AEP supports Golden Spread Electric Cooperative’s (GSEC’s) proposed changes to exclude Controllable Load Resources (CLRs) and non-Controllable Load Resources (“NCLRs”) from the Transmission Operator’s (TO’s) Load shed obligation calculation.

It is not equitable for these Resources to be included in the TO’s Load shed obligation when they are at the control of ERCOT and thus would prevent the TO from allocating any Load shed to these Entities in an emergency, even if the TO wanted to do so.

As GSEC mentions, it could be possible for a CLR or NCLR to be on during the ERCOT summer or winter peak and create a Load shed obligation for the TO for this Load the following year. While the obligation would be on the TO to shed for what was allocated for this Load, the TO cannot count ERCOT-ordered reductions by these Load Resources since it did not happen at the TO’s direction and thus the inequity of the Load shed obligation allocation.

While the ERCOT System gets the reliability benefit of using these CLR and NCLRs in emergencies, the current Load shed obligation calculation that includes CLR and NCLR Loads inequitably apportions the obligation. Removing these from the Load shed obligation calculation places all the TOs on a more equitable and fairer basis.

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| **Revised Cover Page Language** |

None

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| Revised Proposed Guide Language |

None