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| NPRR Number | [1191](https://www.ercot.com/mktrules/issues/NPRR1191) | NPRR Title | Registration, Interconnection, and Operation of Customers with Large Loads; Information Required of Customers with Loads 25 MW or Greater |
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| Date | December 5, 2023 |
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| Submitter’s Information |
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| Phone Number | 512-691-6137 |
| Market Segment | Independent Retail Electric Provider (IREP) |

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| Comments |

Since its formation in April of 2022, the Large Flexible Load Task Force (LFLTF) has primarily focused its analysis and efforts on the risks and system impacts from the rapid growth of Large Flexible Loads in the ERCOT region. These risks are apparent and should be the focus of this NPRR and the accompanying Revision Requests. Before any consideration of the expansion of similar interconnection study processes, ramp rate and voltage ride-through requirements, and registration requirements to large traditional, non-flexible retail Customers, there must be comprehensive reliability studies performed which justify adoption of rules of this significance and analysis conducted to demonstrate why all other, less disruptive alternatives to address the identified risks are not sufficient. Narrowing the scope of this effort is consistent with the actions taken by the Texas Legislature in the 88th Session through Senate Bill 1929, which became effective on September 1, 2023. The Legislature did not apply registration requirements to large traditional retail Customers.

For discussion purposes, Reliant proposes a definition of Large Flexible Loads based on work products from the LFLTF and existing definitions of similar Loads. Reliant expects further refinement in the LFLTF from ERCOT Staff and stakeholders on this definition. Discretion was intentionally included in the definition to allow ERCOT to determine their preference for frequency of controllability.

***Large Flexible Load***

*One or more Facilities at a single site with an aggregate peak Demand greater than or equal to 75 MW behind one or more common Points of Interconnection (POIs) or Service Delivery Points that is capable of controllably reducing or increasing consumption frequently either by SCED control or through a Dispatch Instruction from ERCOT.*

Reliant supports the creation of a new Demand response product for Registered Curtailable Loads (RCLs) but recommends the product include both transmission and distribution voltage Customers to significantly expand the number of Customers that could participate. If ERCOT has concerns with the implementation of distribution voltage RCLs given system limitations, that language can be grey-boxed until implemented rather than requiring another NPRR.

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| Revised Cover Page Language |

None

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| Revised Proposed Protocol Language |

None