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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 11, 2023 |
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| Submitter’s Information |
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| Market Segment | Industrial Consumer |

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| Comments |

Thank you for the opportunity to comment on Nodal Protocol Revision Request (NPRR) 1191 and Nodal Operating Guide Revision Request (NOGRR) 256, Related to NPRR1191, Registration, Interconnection, and Operation of Customers with Large Loads; Information Required of Customers with Loads 25 MW or Greater. The Texas Blockchain Council (TBC) is a nonprofit industry association working to make the State of Texas the jurisdiction of choice for bitcoin, blockchain, and digital asset innovation. Our members are an integral part of the Bitcoin mining community and Texas energy market.

As a threshold matter, TBC shares the concerns of other commenters regarding ERCOT’s authority to issue rules that would regulate entities outside of its purview under the Public Utility Regulatory Act (PURA). Prior to taking significant steps forward on these Revision Requests, it is TBC’s belief that this issue should be resolved in the appropriate forum.

We depend on a reliable grid and wish to work collaboratively with ERCOT on solutions. We submit these comments in that spirit. With respect to NPRR1191, we are generally understanding of ERCOT’s desire for greater visibility, controllability, and predictability, given the ostensible size of the interconnect queue. We are eager to work with you on solutions toward that end and would suggest incentives for moving more Large Flexible Loads into categories such as Controllable Load Resources, or other potential categories. Removing the requirement to provide Primary Frequency Response would be a significant step in that direction. As proposed, the ramp rates are far too restrictive and could force Large Flexible Loads to incur undue, practically unknowable costs for no discernable benefit to grid reliability. We strongly encourage more information gathering and sharing before implementing such measures.

With respect to NOGRR256, it is our understanding that none of the recent disruptions relating to low voltage ride through were caused by Bitcoin miners and that other industrial Loads tripped as well. Therefore, we respectfully request more information regarding any ride-through incidents so that we can better understand the cause and effect relationship between incidents and this proposed measure. We would also emphasize our willingness to cooperate with Texas A&M to develop a body of research that could aid ERCOT in its development of potential policies in this issue area.

We continue to work through these proposals and appreciate the opportunity to be a part of the process. Thank you for your attention to these important matters.

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| Revised Cover Page Language |

None

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| Revised Proposed Protocol Language |

None