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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 | | October 6, 2023 | |
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| Submitter’s Information | | | |
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| Market Segment | | Consumers | |

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| Comments |

The Data Center Coalition (DCC) appreciates the opportunity to submit these Comments[[1]](#footnote-1) on the Electric Reliability Council of Texas (ERCOT)'s proposed Nodal Protocol Revision Request (NPRR) 1191, specifically the interconnection process issue topic. DCC’s brief comments and suggestions are outlined below.

1. ***Introduction***

DCC is the national membership organization for the data center industry, representing leading data center owners and operators who maintain data center infrastructure across the country and globe. DCC empowers and champions the data center community through public policy advocacy, thought leadership, stakeholder outreach, and community engagement. DCC has 28 member companies, most of which have operations in Texas.

1. ***Interconnection Process Issue Proposal***

With operations throughout Texas, DCC members are well versed in siting new large loads within ERCOT. DCC understands ERCOT’s interest in gaining additional visibility into the load interconnection process given recent and projected load additions. However, DCC does have concerns about some aspects of the Large Load Interconnection Study (LLIS) process as proposed by ERCOT in Planning Guide Revision Request (PGRR) 111 and NPRR1191, specifically related to confidentiality and the overall efficiency and feasibility of the proposed LLIS process.

The LLIS process proposed in PGRR111 would require, among many other things, new, interconnecting Large Loads to provide ERCOT with information needed to model and study the load as well as a Load Commissioning Plan. While the PGRR does not identify the specific information interconnecting Large Loads would need to provide, it is typical for large power users to provide interconnecting utilities with similar information, including the size of the proposed load and location. This is competitive, trade-secret information and often subject to non-disclosure agreements between the utility and the entity looking to interconnect. Large Loads providing similar information directly to ERCOT (e.g., the Interconnecting Entity, the proposed load size, and location of the load) raises concerns about how such information would remain confidential and how ERCOT would ensure that such information is protected and not disclosed to other entities who do not need it.

In addition to confidentiality issues, PGRR111 places requirements on Large Loads that are difficult to meet. For example, in Section 9.6, the proposed rule states that Large Loads must validate that loads have been properly modeled. Since the interconnecting Transmission Service Provider (TSP) will be responsible for modeling Large Loads, end users are not able to ensure that this requirement has been met. This requirement underscores a larger point in that the LLIS process will require Large Loads to directly interact with ERCOT, which will be a new process for large end users in ERCOT. Large end users may not be able to provide ERCOT with the information they are looking to collect or may not be able to do so easily within the normal course of business. Additionally, aspects of the LLIS may be redundant to study processes conducted by the interconnecting utility, which often reviews similar information. To this end, DCC respectfully requests that ERCOT make the LLIS process as efficient as possible for Large Loads.

1. ***Conclusion***

DCC thanks ERCOT for its significant work on this important topic and greatly appreciates the opportunity to provide comments on the load interconnection process as it relates to NPRR1191. We respectfully request that ERCOT consider DCC’s comments and recommendations above.

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| Revised Cover Page Language |

None

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| Revised Proposed Protocol Language |

None

1. The Data Center Coalition ([www.datacentercoalition.org](http://www.datacentercoalition.org)) is a membership organization of leading data center owners and operators. Public testimony and written comments submitted by DCC do not necessarily reflect the views of each individual DCC member. [↑](#footnote-ref-1)