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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 | January 23, 2024 |
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| Submitter’s Information |
| Name | Mark Smith / Floyd Trefny |
| E-mail Address | mark@marksmithlawllc.com / Ebmystic@gmail.com |
| Company | ERCOT Steel Mills |
| Phone Number |  |
| Cell Number | 512-635-7930 / 713-516-2745 |
| Market Segment | Industrial Consumer |

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| Comments |

The ERCOT Steel Mills appreciate the opportunity to submit additional comments on ERCOT’s proposed Nodal Protocol Revision Request (NPRR) 1191 and associated Revision Requests NOGRR256, PGRR111 and RRGRR036.

The Steel Mills are a group of large steel production Loads within ERCOT, several of which have been operating in the ERCOT region longer than ERCOT has been operational. The ERCOT Steel Mills support Reliant’s December 5, 2023, comments on NPRR 1191 and agree that the direction of the review of this NPRR by the LFLTF should focus on the risks and system impacts from the rapid growth of Large Flexible Loads in the ERCOT region. We also agree with Reliant that “…[b]efore 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.”

The ERCOT Steel Mills also support Reliant’s contention that excluding traditional large retail Customers from the scope of the draft NPRR is fully 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 ERCOT Steel Mills also support, for the same reasons stated by Reliant, replacement of the definition of the term “Large Load” in draft NPRR 1191 with a definition of the term “Large Flexible Load.” Reliant’s proposed definition is similar to that which we proposed in our August 30, 2023 comments and we believe it to be workable. The ERCOT Steel Mills has filed a presentation with the Large Flexible Load Task Force meeting on February 5, 2024 with additional details for consideration.

In regard to Reliant’s support the creation of a new Demand response product for Registered Curtailable Loads (RCLs), the ERCOT Steel Mills, at this time, recommend the product include only transmission level loads with full power telemetry until further study can be made, as application to distribution loads would involve significant amounts of verification of compliance to ERCOT instructions prior to payments for the service.

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| Revised Cover Page Language |

None

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| Revised Proposed Protocol Language |

None