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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 11, 2024 | |
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| Submitter’s Information | | | |
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| Market Segment | | Industrial Consumer | |

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| Comments |

Cholla appreciates the opportunity to comment on Nodal Protocol Revision Request (NPRR) 1191 and appreciates the increasingly difficult job ERCOT has of managing a system that is changing in very dramatic ways on both the generation and Load side of the equation.

NPRR1191 proposes significant changes to the way loads are required to register and are allowed to operate in the ERCOT system. While some of the changes recommended represent problems that have not been observed on the system or problems that shouldn’t be observed for some time, in an effort to come to a holistic solution, Cholla is willing to accept some changes to the Protocols that are reasonable and seem to hit a middle ground between stakeholders and ERCOT.

Specifically, Cholla supports the changes that have been recommended by Bob Wittmeyer and broadly discussed at the December 11th Large Flexible Load Task Force (LFLTF) meeting. The changes are as follows:

**Concept Paper for Large Loads**

All **Large Loads get a 5ish-min Nodal Price** the Next time we change Load Zones.

In exchange for talking a Nodal Price Large Loads get **Transitional Congestion Revenue Rights** from their Load Zone to their Node for a fixed period of time (Until 12/31/2029?). These TCRRs could be very similar to PCRR’s in they are not free, but at a heavy discounted price. Unlike PCRRs; TCRRs have an end date.

This also solves the Averaging consumption/price problem and lets LL avoid problems with 15-minute pricing and 5-minute consumption.

**Registered Curtailable Loads (RCLs) – This is a superset of loads under ERCOT Control – CLR / NCLR / Interruptible are a subset of RCL’s.**

RCL’s Ramp rates are dictated by the service they provide to ERCOT. (CLR/NCLR). **AS Ramp Rates trump all other ramp rates.**

Loads can move between CLR / NCLR / Interruptible load resources, daily but are always subject to curtailment by ERCOT (part of Registration Process).

I**nterruptible Load Resources** have a ramp rate limitation of **10% Down and 5% up** per minute.

**RCLs are in the QSE load Shed Table not in the TDSP load Shed Table,** RCLs are deployed before Firm Load Shed.

RCLs can be a portion of a Load, but the RCL is registered with ERCOT as an RCL its ability to move between RCL and Firm Load is restricted and limited in frequency. (ownership change, annual - some longer duration change but possible under specific circumstances).

Only RCL’s can offer AS to ERCOT.

(as part of the RCL definition we need to define NCLRs, we currently have no definition in protocols.)

**RCL are excluded from some of the costs for AS**, IE ECRS, Non-Spin and Reg UP, as they use very little of those services because they are volunteering to be shed first and should not cause a material need for those AS. Large Loads still trip hence they do need RRS and Reg Down and should continue to pay for services they need.

**ERS is not an Ancillary Service** and can be provided by Firm Loads, as such ERS resources stay with the TO for Load Shed.

Cholla acknowledges that these are only in concept form at this point, and much more discussion is needed to come to finalized language that can be introduced into the Protocols. However, it is an excellent starting point for discussion.

Cholla would also point out that there are aspects of this Concept Paper with which we do not agree such as the allocation of congestion rights. We are, however,

willing to accept this as necessary if such a compromise is needed allow the approval of the concepts included in the paper as a whole.

We look forward to providing additional input in the upcoming LFLTF meetings.

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| Revised Cover Page Language |

None at this time.

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| Revised Proposed Protocol Language |

None at this time.