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| NPRR Number | [1180](http://www.ercot.com/mktrules/issues/NPRR1180) | NPRR Title | Inclusion of Forecasted Load in Planning Analyses |
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| Date | | August 28, 2024 | |
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| Submitter’s Information | | | |
| Name | | Ping Yan, Robert Golen | |
| E-mail Address | | [Ping.Yan@ercot.com](mailto:Ping.Yan@ercot.com), [Robert.Golen@ercot.com](mailto:Robert.Golen@ercot.com) | |
| Company | | Electric Reliability Council of Texas (ERCOT) | |
| Phone Number | | 512-248-4153, 512-248-6702 | |
| Cell Number | |  | |
| Market Segment | | Not Applicable | |

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| Comments |

ERCOT submits these comments to replace various instances of the term “Load” with the uncapitalized term “load” in the definition of “Substantiated Load” and in the revision description and business case of this Nodal Protocol Revision Request (NPRR). The capitalized term “Load” is defined in Section 2.1 of the ERCOT Protocols as “[t]he amount of energy in MWh delivered at any specified point or points on a system.” That definition does not align with the intended meaning of several instances of the term in this NPRR and the associated Planning Guide Revision Request (PGRR) 107, which use other senses of the term “load,” including a MW quantity of power or the general concept of Customer power consumption. Because ERCOT is not intending to refer to a MWh quantity of energy in these instances, the uncapitalized term should be used in such cases.

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| Revised Cover Page Language |

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| Nodal Protocol Sections Requiring Revision | 2.1, Definitions  3.11.4.1, Project Submission  3.11.4.1.1, Project Submissions Based on Unsubstantiated Load (new) 3.11.4.6, Processing of Tier 2 Projects  3.11.4.7, Processing of Tier 1 Projects 3.11.4.9, Regional Planning Group Acceptance and ERCOT Endorsement |
| Revision Description | This Nodal Protocol Revision Request (NPRR) revises the Protocols to address recent amendments to P.U.C. Subst. R. 25.101, Certification Criteria, which became effective on December 20, 2022.  Specifically, NPRR1180 incorporates the requirement in P.U.C. Subst. R. 25.101(b)(3)(A)(ii)(II) for any reliability-driven transmission project review conducted by ERCOT to incorporate the historical load, forecasted load growth, and additional load seeking interconnection, in the ERCOT independent review. |
| Business Case | The inclusion of historical load, forecasted load growth, and additional load seeking interconnection in transmission project reviews conducted by ERCOT is required by Public Utility Commission of Texas (PUCT) Rule for Certificates of Convenience and Necessity (CCNs). Including that information in ERCOT’s independent reviews of RPG projects will help ensure ERCOT’s transmission project recommendations support long-term system and Customer needs. |

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| **Market Rules Notes** |

Please note that the following NPRR(s) also propose revisions to the following section(s):

* NPRR956, Designation of Providers of Transmission Additions
  + Section 3.11.4.1
  + Section 3.11.4.9

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| Revised Proposed Protocol Language |

**2.1 DEFINITIONS**

**Substantiated Load**

Load submitted by a TDSP for planning purposes that is substantiated by any of the following:

(a) An executed interconnection or other agreement;

(b) An independent third-party load forecast that has been deemed credible by ERCOT and that may include load for which a TDSP has yet to sign an interconnection agreement; or

(c) A letter from a TDSP officer attesting to such load, which may include load for which a TDSP has yet to sign an interconnection agreement.

**Unsubstantiated Load**

Load submitted by a TDSP for planning purposes that is not Substantiated Load.

***3.11.4 Regional Planning Group Project Review Process***

3.11.4.1 Project Submission

(1) Any stakeholder may initiate an RPG Project Review through the submission of a document describing the scope of the proposed transmission project to ERCOT. Projects should be submitted with sufficient lead-time to allow the RPG Project Review to be completed prior to the date on which the project must be initiated by the designated TSP.

(2) Stakeholders may submit projects for RPG Project Review within any project Tier. All transmission projects in Tiers 1, 2 and 3 shall be submitted. TSPs are not required to submit Tier 4 projects for RPG Project Review, but shall include any Tier 4 projects in the cases used for development of the Regional Transmission Plan.

(3) All system improvements that are necessary for the project to achieve the system performance improvement, or to correct the system performance deficiency, for which the project is intended should be included into a single project submission.

(4) Facility ratings updates are not considered a project and are not subject to RPG Project Review.

**3.11.4.1.1 Project Submissions Based on Unsubstantiated Load**

(1) Following the submission of a project by a TSP, if ERCOT determines that the asserted need for a Tier 1, Tier 2, or Tier 3 project is based in part or in whole on Unsubstantiated Load, ERCOT shall notify the submitting TSP and the RPG, and neither ERCOT nor the RPG will conduct any further review of the project.

3.11.4.6 Processing of Tier 2 Projects

(1) ERCOT shall conduct an independent review of a submitted Tier 2 project as follows:

(a) ERCOT’s independent review shall consist of studies and analyses necessary for ERCOT to make its assessment of whether the proposed project is needed and whether the proposed project is the preferred solution to the identified system performance deficiency that the project is intended to resolve;

(b) ERCOT shall consider all comments received during the project comment process and factor reasonable comments into its independent review of the project;

(c) ERCOT will attempt to complete its independent review for a project in 120 days or less. If ERCOT is unable to complete its independent review based on RPG input within 120 days, ERCOT shall notify the RPG of the expected completion time;

(d) ERCOT may, at its discretion, discuss submitted transmission projects at meetings of the RPG in order to obtain additional input into its independent review; and

(e) ERCOT shall prepare a written report documenting the results of its independent review and recommendation on the project and shall distribute this report to the RPG.

3.11.4.7 Processing of Tier 1 Projects

(1) ERCOT shall conduct an independent review of a submitted Tier 1 project as follows:

(a) ERCOT’s independent review will consist of studies and analyses necessary for ERCOT to make its assessment of whether the proposed project is needed and whether the proposed project is the preferred solution to the identified system performance deficiency that the project is intended to resolve;

(b) ERCOT will consider all comments received during the project comment process and factor reasonable comments into its independent review of the project;

(c) ERCOT will attempt to complete its independent review for a project in 150 days or less. If ERCOT is unable to complete its independent review based on RPG input within 150 days, ERCOT shall notify the RPG of the expected completion time;

(d) ERCOT may, at its discretion, discuss submitted transmission projects at meetings of the RPG in order to obtain additional input into its independent review; and

(e) ERCOT shall prepare a written report documenting the results of its independent review and recommendation on the project and shall distribute this report to the RPG.

(2) Tier 1 projects require ERCOT Board endorsement.

3.11.4.9 Regional Planning Group Acceptance and ERCOT Endorsement

(1) For Tier 3 projects, successful resolution of all comments received from ERCOT and stakeholders during the project comment process will result in RPG acceptance of the proposed project. An RPG acceptance letter shall be sent to the TSP(s) for the project, the project submitter (if different from the TSP(s)), and posted on the MIS Secure Area. For Tier 2 projects, ERCOT’s recommendation as a result of its independent review of the proposed project will constitute ERCOT endorsement of the need for a project except as noted in paragraph (4) below. For Tier 1 projects, ERCOT’s endorsement is obtained upon affirmative vote of the ERCOT Board except as noted in paragraph (4) below. An ERCOT endorsement letter shall be sent to the TSP(s) for the project, the project submitter (if different from the TSP(s)), and the PUCT, and posted on the MIS Secure Area upon receipt of ERCOT’s endorsement for Tier 1 and Tier 2 projects except as noted in paragraph (4) below.

(2) Following the completion of its independent review, ERCOT shall present all Tier 1 projects for which it finds a need to the ERCOT Board and shall provide a report to the ERCOT Board explaining the basis for its determination of need. Prior to presenting the project to the ERCOT Board, ERCOT shall present the project to the Technical Advisory Committee (TAC) for review and comment. Comments from TAC shall be included in the presentation to the ERCOT Board. ERCOT will make a reasonable effort to make these presentations to TAC and the ERCOT Board at the next regularly scheduled meetings following completion of its independent review of the project.

(3) If a TSP asserts a need for a proposed Tier 1 or Tier 2 project based in part or in whole on its own planning criteria, then ERCOT’s independent review shall also consider whether a reliability need exists under the TSP’s criteria.  If ERCOT identifies a reliability need under the TSP’s criteria, then ERCOT shall recommend a project that would address that need as well as any reliability need identified under NERC or ERCOT criteria, but shall explicitly state in the independent review report that ERCOT has assumed the TSP’s criteria are valid and that an assessment of the validity of the TSP’s criteria is beyond the scope of ERCOT’s responsibility.  ERCOT or the ERCOT Board may provide a qualified endorsement of such a project if ERCOT determines that it is justified in part under ERCOT or NERC criteria, as described in paragraph (1) above.  However, neither ERCOT nor the ERCOT Board shall endorse a project that is determined to be needed solely to meet a TSP’s criteria.