|  |  |  |  |
| --- | --- | --- | --- |
| PGRR Number | [115](https://www.ercot.com/mktrules/issues/PGRR115) | PGRR Title | Related to NPRR1234, Interconnection Requirements for Large Loads and Modeling Standards for Loads 25 MW or Greater |

|  |  |
| --- | --- |
| Date | January 29, 2025 |

|  |  |
| --- | --- |
| Submitter’s Information | |
| Name | Floyd Trefny / Mark Smith |
| E-mail Address | [ebmystic@gmail.com](mailto:ebmystic@gmail.com) / [mark@marksmithlawllc.com](mailto:mark@marksmithlawllc.com) |
| Company | ERCOT Steel Mills |
| Phone Number |  |
| Cell Number | 713-516-2745 / 512-635-7930 |
| Market Segment | Industrial Consumer |

|  |
| --- |
| Comments |

Following discussions at the Planning Working Group (PLWG) meeting of January 29, 2025, the ERCOT Steel Mills submit that paragraph (7) of Section 4.1.1.1 should contain qualifying language similar to that submitted by ERCOT in their comments of December 24, 2025 when referencing the term “Large Load” to mean only to those new Large Loads going through the Large Load Interconnection Study Process. The term Large Load by itself is defined in Nodal Protocol Revision Request (NPRR) 1234 meaning all loads over 75 MWs. In Planning Guide Revision Request (PGRR) 115 when ERCOT’s language intends only to refer to those loads going through this planning process, ERCOT suggests a qualifier to indicate such.

The following is a summary of ERCOT’s PGRR115 current language where a distinction is needed for only those Large Loads applicable to new Large Loads going through the Large Load Interconnection Study Process. See the following for examples from ERCOT’s latest submittal of the NPRR highlighted in yellow.

The ERCOT Steel Mills suggest this same language qualifier be used in the specification in paragraph (7) of Section 4.1.1.1 for which no consensus could be reached.

**4.1.1.1 Planning Assumptions**

Option A – Existing Language

(7) Each Large Load included in a planning study shall be set to a level of Demand consistent with the current Load Commissioning Plan.

Option B – Proposed Language

(7) Each new Large Load or Load modification subject to the requirements of Section 9.2.1, Applicability of the Large Load Interconnection Study Process included in a planning study shall be set to a level of Demand consistent with the current Load Commissioning Plan.

***5.3.5 ERCOT Quarterly Stability Assessment***

(1) ERCOT shall conduct a stability assessment every three months to assess the impact of planned large generators and Large Loads subject to the requirements of Section 9.2.1, Applicability of the Large Load Interconnection Study Process, connecting to the ERCOT System.

(a) For large generators with planned Initial Synchronization in the period under study, the assessment shall derive the conditions to be studied with consideration given to the results of the FIS stability studies.

(b) For new Large Loads and Load modifications subject to the requirements of Section 9.2.1, with planned Initial Energization in the period under study, the assessment shall derive the conditions to be studied from the most current Load Commissioning Plan and with consideration given to the results of the LLIS stability studies.

(c) ERCOT may study conditions other than those identified in the FIS or LLIS stability studies.

…

(5) The following prerequisites must be satisfied prior to the inclusion of a new Large Load or Load modification subject to the requirements of Section 9.2.1 in the quarterly stability assessment:

***6.6.1 Modeling of Large Loads Not Co-Located with a Generation Resource, Energy Storage Resource (ESR), or Settlement Only Generator (SOG)***

(1) The interconnecting Transmission Service Provider (TSP) shall not add a new Large Load or Load modification subject to the requirements of Section 9.2.1, Applicability of the Large Load Interconnection Study Process, to the Network Operations Model until the following conditions have been met:

(a) The LLIS has been completed and results communicated per paragraph (6) of Section 9.4, LLIS Report and Follow-up;

(b) The TSP has satisfied all conditions of 9.5.1, Interconnection Agreement for Large Loads not Co-Located with a Generation Resource Facility Registered as a Private Use Network.

***6.6.2*** ***Modeling of Large Loads Co-Located with an Existing Generation Resource, Energy Storage Resource (ESR), or Settlement Only Generator (SOG)***

(1) The addition of a new Large Load to an existing Generation Resource, ESR, or SOG, or the modification of an existing Load at the Generation Resource, ESR, or SOG, subject to the requirements of Section 9.2.1, Applicability of the Large Load Interconnection Study Process, is considered a material modification of the Resource Registration as described in paragraph (8) of Section 6.8.2. The Resource Entity (RE) shall update the Resource Registration data to reflect the new or increased Load.

**9.1** **Introduction**

(1) This Section defines the requirements and processes used to facilitate new or modified Large Load interconnections with the ERCOT System. This process will be referred to as the Large Load Interconnection Study (LLIS) process. The requirements are designed to:

(a) Facilitate studies to identify potential system limitations and determine facilities needed to interconnect a new Large Load to or modify an existing Large Load on the ERCOT network;

(b) Facilitate orderly and organized Large Load interconnections, while allowing ERCOT to determine whether the interconnection of the proposed Large Load would comply with North American Electric Reliability Corporation (NERC) Reliability Standards, ERCOT Protocols, ERCOT Planning and Operating Guides, TSP criteria, and any Applicable Legal Authority (ALA);

(c) Specify the communications required between Interconnecting Large Load Entities (ILLEs), Transmission Service Providers (TSPs), Distribution Service Providers (DSPs), Resource Entities (REs), Interconnecting Entities (IEs), and ERCOT;

(d) Provide the best information on future Large Load additions for use in identifying, forecasting, and analyzing short- and long-range ERCOT capabilities, demands, and reserves; and

(e) Provide ERCOT accurate data about new and modified Large Load subject to the provisions detailed in section 9.2.1, Applicability of the Large Load Interconnection Study Process, to ensure that ERCOT and stakeholders have the information necessary for planning purposes.

|  |
| --- |
| Revised Cover Page Language |

None

|  |
| --- |
| Revised Proposed Guide Language |

None