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| NOGRR Number | [265](https://www.ercot.com/mktrules/issues/NOGRR265) | NOGRR Title | Related to NPRR1238, Registration of Loads with Curtailable Load Capabilities |

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| Date | June 10, 2025 |

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| Submitter’s Information |
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| Market Segment | Cooperative |

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| Comments |

Golden Spread Electric Cooperative (GSEC) appreciates the opportunity to comment on Nodal Operating Guide Revision Request (NOGRR) 265, which is companion to Nodal Protocol Revision Request (NPRR) 1238 and establishes Operating Guide changes to implement the voluntary registration of Loads with curtailable Load capabilities.

GSEC strongly supports NOGRR265 and specifically endorses the comments submitted by Texas Industrial Energy Consumers (TIEC) on June 5, 2025.

GSEC supports TIEC’s central position:

* Registration as a Voluntary Early Curtailment Load (VECL) with ERCOT must remain voluntary — not mandatory.
* The Nodal Operating Guide must be clear that loads cannot be required to register as a VECL as a condition of interconnection or ongoing service by ERCOT.
* This approach aligns with the Public Utility Regulatory Act (PURA) § 37.151, which guarantees customers the right to continuous and adequate firm service unless they explicitly agree otherwise, and is consistent with the legislative intent of Senate Bill 6.

GSEC supports the technical and operational framework provided in NOGRR265 for the management, deployment, and recall of VECLs.

By supporting TIEC’s comments on NOGRR265, GSEC affirms its commitment to:

* Fairly allocating Load shed obligations in accordance with operational practices and creating achievable compliance expectations,
* Providing workable tools for transmission and distribution providers while safeguarding voluntary participation for Loads.

GSEC urges approval of NOGRR265 with the clarifying edits proposed by TIEC to reintroduce and reinforce that registration as a VECL is voluntary.

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| Revised Cover Page Language |

None

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| Revised Proposed Guide Language |

None