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| NPRR Number | [1238](https://www.ercot.com/mktrules/issues/NPRR1238) | NPRR Title | **Registration of Loads with Curtailable Load Capabilities** |
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| Date | | June 10, 2025 | |
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| Submitter’s Information | | | |
| Name | | Joe Dan Wilson | |
| E-mail Address | | [jwilson@gsec.coop](mailto:jwilson@gsec.coop) | |
| Company | | Golden Spread Electric Cooperative (GSEC) | |
| Phone Number | | 806-349-5210 | |
| Cell Number | | 806-340-1214 | |
| Market Segment | | Cooperative | |

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| Comments |

Golden Spread Electric Cooperative (GSEC) appreciates the opportunity to comment on Nodal Protocol Revision Request (NPRR) 1238, Registration of Loads with Curtailable Load Capabilities.

GSEC strongly supports NPRR1238 and, in particular, wishes to express support for the comments submitted by Texas Industrial Energy Consumers (TIEC) on June 5, 2025.

GSEC supports TIEC’s central position:

* The option for Loads to register as Voluntary Early Curtailment Loads (VECLs) must remain voluntary — not mandatory.
* This approach upholds the language of the Public Utility Regulatory Act (PURA) § 37.151, which provides customers with the right to continuous and adequate firm service unless the customer affirmatively agrees otherwise.
* GSEC further concurs that registration as a VECL should never be imposed as a condition of interconnection or ongoing service by ERCOT.

GSEC supports TIEC’s requested revisions to retain “Voluntary” in all references to Early Curtailment Loads and to remove any ambiguity in the Protocol language regarding the voluntariness of such registration. We agree that this is consistent with legislative intent and recent policy direction under Senate Bill 6.

Additionally, GSEC supports the operational and technical framework that remains in NPRR1238, including clear procedures for registration, deployment, recall, and telemetry requirements.

By supporting TIEC’s comments on NPRR1238, GSEC affirms its commitment to:

* Promoting fairness in Load shed obligation calculations leading to realistic compliance requirements; and
* Ensuring that only those Loads who voluntarily elect to register as a VECL are included in these programs.

GSEC urges prompt approval of NPRR1238, incorporating TIEC’s clarifying language to ensure that the option to register as a VECL remains voluntary.

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| Revised Cover Page Language |

None

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| Revised Proposed Protocol Language |

None