|  |  |  |  |
| --- | --- | --- | --- |
| **NOGRR Number** | [**265**](https://www.ercot.com/mktrules/issues/NOGRR265) | **NOGRR Title** | **Related to NPRR1238, Registration of Loads with Curtailable Load Capabilities** |
|  | |  | |
| **Date Posted** | | June 11, 2025 | |
|  | |  | |
| **Submitter’s Information** | | | |
| **Name** | | Nathan Bigbee | |
| **E-mail Address** | | [nathan.bigbee@ercot.com](mailto:nathan.bigbee@ercot.com) | |
| **Company** | | ERCOT | |
| **Phone Number** | | 512-225-7093 | |
| **Market Segment** | | Not applicable | |

|  |
| --- |
| **Comments** |

ERCOT has determined that it can support Nodal Operating Guide Revision Request (NOGRR) 265 because it has identified anticipated use cases that would not appear to raise a risk of conflict with the requirements of Senate Bill (SB) 6.

ERCOT had previously expressed the concern that requiring large loads that are registered as Early Curtailment Loads (ECLs) to curtail when Physical Responsive Capability (PRC) reaches 3,100 MW might be found to conflict with an inferred legislative intent to allow curtailment of large loads in advance of an Energy Emergency Alert (EEA) only when that load is enrolled in the “demand management service” created by Section 4 of the bill (to be codified in Public Utility Regulatory Act [PURA] § 39.170(b)). However, ERCOT has since learned that some large-load customers are interested in voluntarily participating in a program that requires such early curtailment. ERCOT expects that this interest may be driven in part by a desire to avoid high prices in scarcity and near-scarcity conditions or by a desire to avoid creating a potential compliance concern for the Transmission and/or Distribution Service Provider (TDSP) to which the customer is interconnecting, which outcomes are consistent with public policy. In such cases, voluntary ECL registration would not appear to raise a legal concern because a customer choosing such registration has affirmatively accepted its curtailment obligation. Based on this anticipated use case, ERCOT is no longer concerned that the NOGRR raises an unavoidable risk of legal conflict, and ERCOT therefore supports approval of this NOGRR. Based on the 6/10/25 comments submitted by the sponsor of this NOGRR, Golden Spread Electric Cooperative (GSEC), ERCOT understands that voluntary ECL registration is consistent with the sponsor’s anticipated application of the NOGRR.

ERCOT does not oppose TIEC’s reinsertion of the word “Voluntary” in the term “Voluntary Early Curtailment Load (VECL).” ERCOT emphasizes that, while registration as an ECL (or VECL) may be voluntary, the performance requirements under the Protocols for customers that do elect such registration would not be.

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

None.

|  |
| --- |
| Revised Proposed Protocol Language |

None.