

From: [Jesse Gossett](#)
To: [LLWG Feedback](#)
Subject: Stakeholder Feedback on Batch Zero A - Clarification on Interconnection Capacity vs. Firm Service
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To the Large Load Working Group,

We respectfully submit the following feedback regarding the treatment of "Partial Allocations" in Batch Zero A.

The Issue: The draft framework suggests that Large Load requests may receive a Firm Allocation lower than their requested capacity (e.g., requesting 200 MW but receiving 50 MW Firm due to constraints where no upgrades are identified).

Recommendation: We request confirmation that Batch Zero will adhere to ERCOT's established "**Connect & Manage**" philosophy. Specifically, if a project receives a partial Firm Allocation, the **Interconnection Agreement (IA)** should still reflect the full requested capacity (e.g., 200 MW), provided the Load agrees to operate the non-firm portion as **Conditional Capacity** subject to security-constrained dispatch.

We request the final framework clarify that:

1. **Interconnection Rights:** The physical Interconnection Capacity will be determined by the project's design request, not limited to the Firm Service allocation.
2. **Operational Obligation:** The non-firm portion of the load (MWs above the Firm limit) will be permitted to energize by agreeing to be fully responsive to Security Constrained Economic Dispatch (SCED), effectively obligating the facility to curtail consumption in real-time to resolve congestion, consistent with ERCOT's nodal market design.

Rationale: Limiting the physical IA to the Firm Allocation would act as a de facto "Connect & Firm" standard, which contradicts the ERCOT market design. Maintaining "Connect & Manage" for Batch Zero maximizes system utilization and allows sophisticated loads to manage their own reliability risk without stranding investment. Respectfully,

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