|  |  |  |  |
| --- | --- | --- | --- |
| **NPRR Number** | [**1308**](https://www.ercot.com/mktrules/issues/NPRR1308) | **NPRR Title** | **Board Priority - Related to NOGRR282, Large Electronic Load Ride-Through Requirements** |
|  | |  | |
| **Date** | | February 9, 2026 | |
|  | |  | |
| **Submitter’s Information** | | | |
| **Name** | | Cameron Poursoltan | |
| **E-mail Address** | | [cameron@datacentercoalition.org](mailto:cameron@datacentercoalition.org) | |
| **Company** | | Data Center Coalition (DCC) | |
| **Phone Number** | | (713) 894-9933 | |
| **Cell Number** | | (713) 894-9933 | |
| **Market Segment** | | Industrial Consumer | |

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

The Data Center Coalition (DCC) is the national membership association[[1]](#footnote-1) for the data center industry, representing leading data center owners and operators who maintain data center infrastructure across the country and globe, as well as companies that lease large amounts of data center capacity. DCC empowers and champions the data center community through public policy advocacy, thought leadership, stakeholder outreach, and community engagement. A vast majority of DCC member companies have teams, operations and infrastructure in the Lone Star State, and ten companies are proudly headquartered within its borders. As such, Nodal Protocol Revision Request (NPRR) 1308, which defines “Large Electronic Load,” has a direct impact on DCC’s member companies. While DCC recognizes ERCOT’s mission of ensuring Texans have reliable, affordable energy, we believe that NPRR1308 narrowly singles out data centers and cryptocurrency mining facilities for responsibilities and requirements that should belong to all ERCOT stakeholders.

NPRR1308 establishes a “Large Electronic Load” definition that serves as the foundation to establish obligations that uniquely impact data centers and cryptocurrency mining facilities, rather than being structured as a broad, industry‑wide standard. NPRR1308 defines a Large Electronic Load (LEL) as “a Large Load in which 50% or greater of the Demand at the site consists of power electronic base load, specifically computational load, such as data centers and cryptocurrency mining facilities.”

These industries are not the only Large Load customers that utilize the ERCOT grid, nor are they only large customers that could experience voltage-ride through challenges. Proposed requirements should focus on the size of a customer’s load, not its specific industry or end-use of electricity. As currently structured, ERCOT requirements will disproportionately impact both industries. However, through its evaluations, ERCOT has not demonstrated that these two industries uniquely impact grid reliability, nor has ERCOT provided any reasonable justification to single out these industries. Further, as structured, the LEL definition treats the two industries as if their operations and ability to respond to voltage ride-through requirements are the same, which they are not.

The data center industry is not a monolithic one. It is composed of different companies, company sizes, facilities, business models, computing operations, and energy configurations. Some data centers are built to support advanced large language models while others are multi-tenant facilities that host servers for several other business clients. Therefore, their operational, and legal responsibilities to their clients vary by the type of data center and they also have different designs which offer varying capabilities to ride through events as established in related ERCOT items like Nodal Operating Guide Revision Request (NOGRR) 282, Board Priority - Large Electronic Load Ride-Through Requirements. While ERCOT’s language singles out these two specific industries, data centers also traditionally do not perform any differently than other industries as highlighted in ERCOT’s recent presentation on Large Load reduction events.[[2]](#footnote-2)

Ultimately, data centers are customers who require energy to run their operations. While DCC members recognize the importance of supporting efforts to grid reliability, it should not be the data centers industry's responsibility alone. This mission should be shared with utilities and Transmission and/or Distribution Service Providers (TDSPs) whose mission is to offer affordable and reliable energy. It should also include all other Large Loads. For these reasons, we recommend removing the definition of “Large Electronic Loads” and applying any associated requirements uniformly to all Large Loads.

Our members remain committed to working with all stakeholders and ERCOT to support grid reliability. While DCC appreciates the intent of ERCOT to enhance the grid, our members believe there are more effective ways to ensure affordable, reliable energy for all Texans that do not single out two specific industries for baseless, disparate treatment. As ERCOT continues its work on NPRR1308 and related efforts like NOGRR282, DCC remains a resource to help achieve this objective.

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

None

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

None

1. The Data Center Coalition is a membership organization of leading data center owners and operators. Public testimony and written comments submitted by DCC do not necessarily reflect the views of each individual DCC member. A list of current DCC Members is accessible at <https://www.datacentercoalition.org/members>. [↑](#footnote-ref-1)
2. ERCOT, *ERCOT Recent Large Load Events*., 10.24.25. <https://www.ercot.com/files/docs/2025/10/22/ERCOT-Recent-Large-Load-Events_LLWG_24Oct2025.pptx>. [↑](#footnote-ref-2)