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Industrial Ultra-Low
Carbon Fuels

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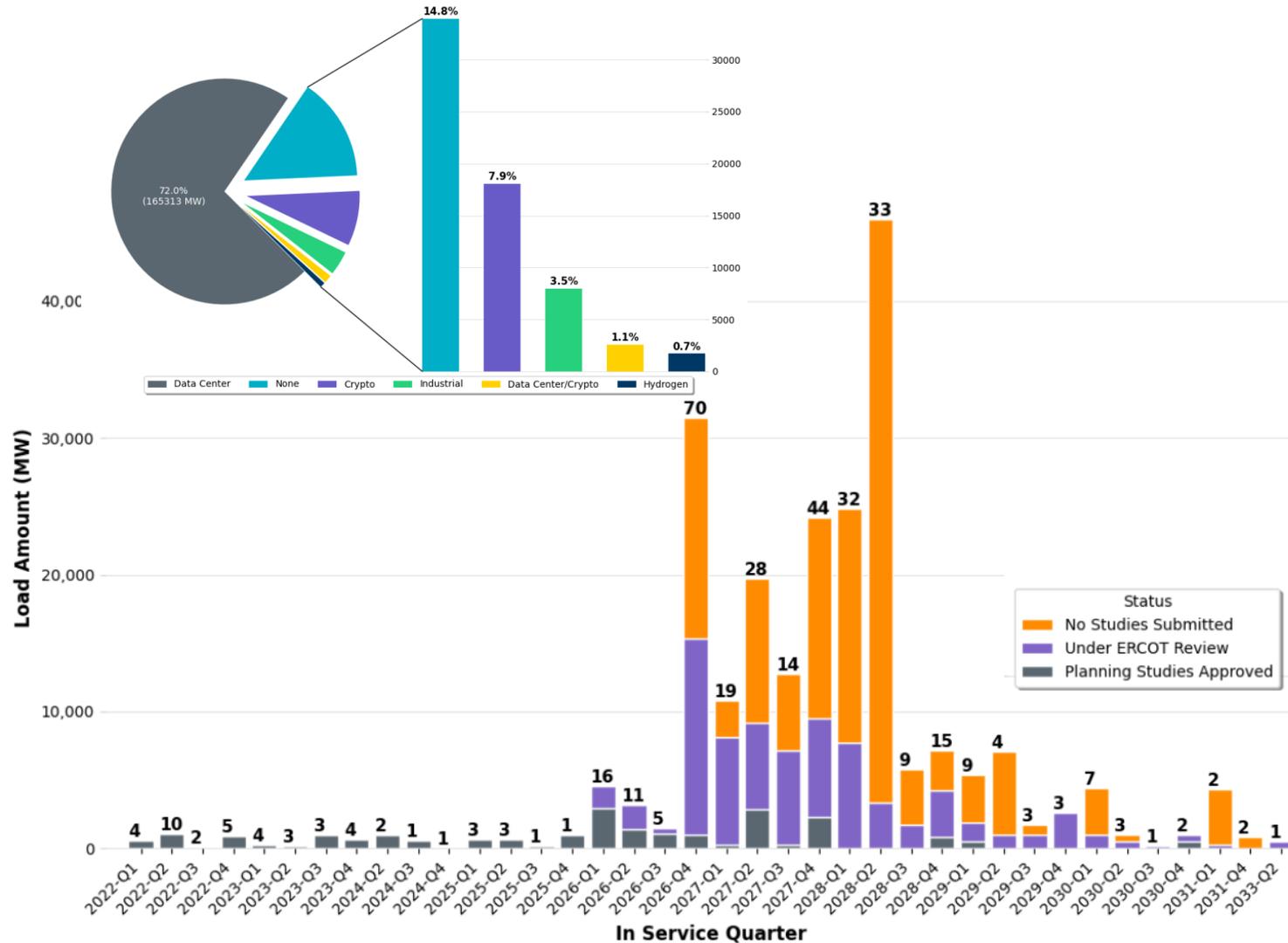
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SHEER AMOUNT OF LOAD REQUESTS REQUIRES EXPANDING THE TOOLKIT



- Unprecedented large load requests need new approaches
- Transmission build required to service the level of load requested will take time – particularly concentrated regions of demand
- NPPR 1188-compliant (nodal priced) CLR benefits system and loads
 - Development can be enabled while transmission upgrades are complete
- Nodal priced CLR loads still contribute to transmission improvement long term

NODAL PRICED CLR ENABLES LARGE FLEXIBLE LOADS TO SUPPORT RELIABILITY

PGRR 134 (Or other approach)

Impact

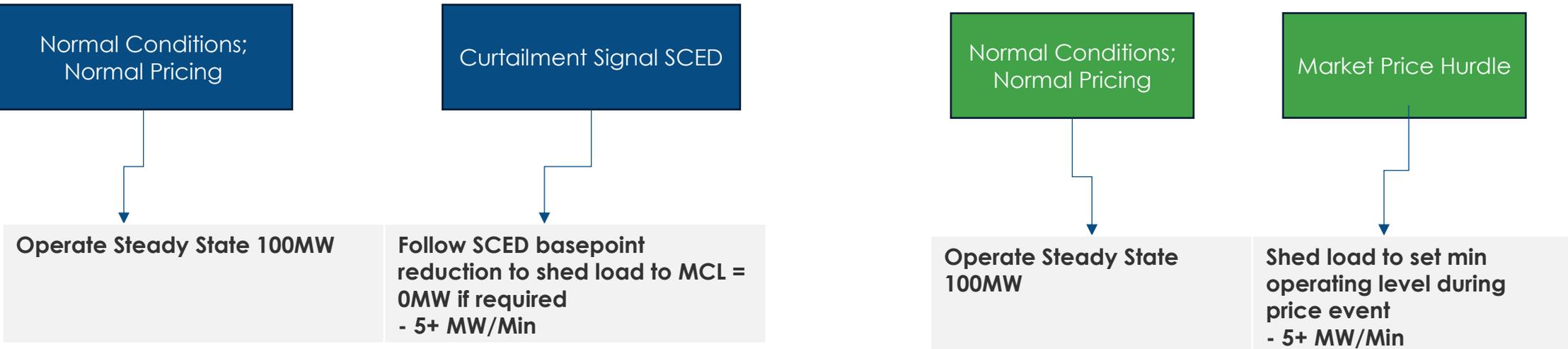
- PGRR 134 enables ERCOT to operationalize nodal priced CLR framework quickly, transparently, and with minimal structural change
 - Changes to planning guide defining how large loads operate as dispatchable resources in ERCOT
 - If connecting before firm availability – **sets the framework for requiring large loads to be CLR until upgrades are made**
 - Elect to be studied as a CLR
 - May authorize earlier energization while constraints can be mitigated by dispatch
- Large Flexible Loads create a new tool to manage congestion, emergency curtailment, overall grid resilience
 - Establishing CLR loads now will benefit industrial (and other) large loads – where waiting may push these loads out of market due to timelines
 - CLR Converts load into a reliability asset
 - Participate directly in SCED
 - Respond to nodal price signals
 - Reduce demand during congestions
 - Provide necessary response during system stress
 - **Deliverability risk is voluntary – assumed by the load sponsor**

LARGE INDUSTRIAL LOADS DESIGNED TO MANGE CURTAILMENT – PRICE INCENTIVIZED

Not all large loads are price insensitive, but many are timeline sensitive. CLR approach provides long term value for ERCOT.

- Nodal priced CLR supports price incentivized large loads long term (ex. Hydrogen)
- Scenario: 100 MW Load requesting interconnection in 2027; Transmission upgrades cannot server firm load under N-1 until 2028, but study shows load can be served reliably under normal conditions

2027; pre-upgrades	2028+; post upgrades
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ILLUSTRATIVE ONLY

ERCOT FEEDBACK ON CLR

ERCOT FEEDBACK:

- **For CLRs**, ERCOT intends to file Revision Requests to:
 - Allow a Large Load to declare its intent to register as a CLR and be treated accordingly in the Batch process
 - Create a binding framework that would require the Large Load to register as a CLR once operational and remain a CLR until defined exit conditions are met
 - Include updated SCED methodology to ensure the CLR is dispatched to resolve constraints in real-time operations
 - Define how CLRs are reflected in other planning assessments to ensure transmission is ultimately built to serve these Large Loads

APPROACH TO ERCOT FEEDBACK

Framework proposed established all obligations of the CLR on contract – you lose status if you don't comply and have to wait for your upgrades

PROPOSED APPROACH

3.14.6 CLR Planning and Operations Agreements

(1) An ILLE may register as a CLR in order to energize in advance of a completed transmission plan to serve the requested Large Load, if it signs an agreement with ERCOT that:

- (a) creates a duty to submit Energy Bid Curves at a low enough level to not trigger shadow price cap constraints on congestion management for more than 15 minutes at a time, and to monitor active constraints;
- (b) sets the CLR's MCL at 0 MW unless a higher amount is approved by ERCOT; and
- (c) authorizes ERCOT to de-energize the facility for repeated non-compliance with the agreement.

(2) The ILLE must coordinate with the TSP and ERCOT to identify a time to test its telemetry and response capabilities in advance of receiving an approval to energize.

(3) A ILLE cannot register for this program unless the CLR is eligible for nodal pricing.

(4) The agreement expires 60 days after both ERCOT and the TSP conclude that the necessary transmission Facilities have been energized to serve the Load so that the CLR operations are no longer necessary. Within that window, the CLR has a one-time option to withdraw its CLR registration and no longer have obligations to ERCOT under this Section.



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THANK YOU

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