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| **NPRR Number** | [**1308**](https://www.ercot.com/mktrules/issues/NPRR1308) | **NPRR Title** | **Board Priority - Related to NOGRR282, Large Electronic Load Ride-Through Requirements** |
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| **Date** | | December 10, 2025 | |
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| **Submitter’s Information** | | | |
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| **Market Segment** | | Not applicable | |

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| **Comments** |

ERCOT submits these comments regarding Nodal Protocol Revision Request (NPRR) 1308 in response to Google’s December 4, 2025 comments.

Google’s comments expressed concern with statements that ERCOT made at the November 20, 2025 Large Load Working Group (LLWG) meeting regarding the approval of studies for new Large Electronic Loads (LELs) after November 14, 2025 that cannot meet the proposed voltage ride-through (“VRT”) requirements in Nodal Operating Guide Revision Request (NOGRR) 282, Large Electronic Load Ride-Through Requirements. For clarity, ERCOT notes that, until NOGRR282 is approved and implemented, ERCOT will continue to apply the interim ride-through assessment process announced in its June 23, 2025 Market Notice,[[1]](#footnote-1) as further described in its presentations to the LLWG, as a condition for allowing any LEL to energize during this interim period. More specifically, as ERCOT indicated in its September 19, 2025 presentation to LLWG describing the interim process,[[2]](#footnote-2) ERCOT will evaluate each LEL’s capability to ride through certain simulated events, and if ERCOT’s assessment concludes the LEL can ride through those events, the LEL may proceed to energization. If the LEL cannot ride through the simulated events, it will be allowed to proceed to energization once ERCOT procedures are in place to support real-time operations but will be subject to curtailment when necessary to prevent system operating limit (“SOL”) and Interconnection Reliability Operating Limit (IROL) exceedances.

ERCOT underscores that, once the NOGRR establishing VRT and frequency ride-through (“FRT”) standards is approved and implemented, LELs that energized before the NOGRR was implemented and that are not exempt under the NOGRR would be subject to compliance with those new standards. However, ERCOT’s interim process provides a path forward to energization for those developers that are comfortable assuming this potential compliance risk while these critical reliability requirements are still being refined in the stakeholder process.

ERCOT also provides this response to each of Google’s four recommendations:

**Recommendation 1**: ERCOT should notify each Interconnecting Large Load Entity (ILLE) regarding its compliance status under the ride-through standards proposed in NOGRR282.

**ERCOT response**: As noted above, ERCOT will continue applying the interim ride-through assessment process while NOGRR282 is pending approval and implementation and will not require Large Load Interconnection Studies (LLIS) for LELs to evaluate compliance with the proposed requirements in NOGRR 282 while these requirements are being developed. Therefore, no notification of compliance status under NOGRR282 is needed.

**Recommendation 2**: ERCOT should provide a forecast of aggregate LEL compliance based on submitted LLIS studies.

**ERCOT response**: LLIS studies are not intended to provide individual or aggregate VRT or FRT compliance forecasts. They are designed to assess project-specific impacts within a defined study scope and set of assumed system conditions. As such, there is currently no mechanism for TSPs or ERCOT to produce a VRT compliance forecast based on LLIS submittals.

**Recommendation 3**: ERCOT should identify the locations, MW quantities of load, and specific loads that will be subject to SOLs.

**ERCOT response**: ERCOT intends to provide more information on potential VRT-related SOLs and IROLs for LELs at the December 11, 2025 LLWG meeting. While ERCOT agrees that customers with impacted LELs and affected Transmission Service Providers (TSPs) should generally be apprised of the risk of curtailment in a given area, publicly disclosing the identities of those impacted LELs could present confidentiality concerns under existing Protocols.

**Recommendation 4**: ERCOT should reconsider the benefit of using transmission system upgrades to address VRT concerns given the commercial impact that SOL-driven curtailments could have on LELs.

**ERCOT response**: ERCOT stands by its conclusion that only a VRT requirement can fully mitigate the voltage ride-through risks that LELs pose to grid reliability. Nevertheless, ERCOT suggests that this comment may have some relevance to stakeholder discussions regarding Planning Guide Revision Request (PGRR) 122, Reliability Performance Criteria for Loss of Load. ERCOT anticipates that PGRR122 discussions will be informed by the ongoing LEL VRT-related stability studies, which ERCOT plans to complete in the first half of 2026.

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| **Revised Cover Page Language** |

None

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| **Revised Proposed Protocol Language** |

None

1. See Market Notice [M-B062325-01](https://www.ercot.com/services/comm/mkt_notices/M-B062325-01). [↑](#footnote-ref-1)
2. <https://www.ercot.com/files/docs/2025/10/03/Interim-LEL-VRT-assessment-process_LLWG_09192025_revised.pdf>. [↑](#footnote-ref-2)