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| NPRR Number | [994](http://www.ercot.com/mktrules/issues/NPRR994) | NPRR Title | Clarify Generator Interconnection Neutral Project Classification |
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| Date | July 6, 2020 |
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| Submitter’s Information |
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| Market Segment | N/A |

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| Comments |

TCPA & TIEC file these joint comments in support of the 4/15/20 ERCOT comments which were previously endorsed by the Reliability Operations Subcommittee (ROS) on 6/4/20. The ERCOT comments maintain the current practice of categorizing facilities needed to interconnect new Generation Resources, Energy Storage Resources (ESRs), and Settlement Only Generators (SOGs) to the existing ERCOT Transmission Grid as neutral projects. This practice has proved to work well for “new” interconnecting entities of all types. Since 2015, new installed capacity in ERCOT includes 9,078 MW of wind (57% increase), 2,403 MW of solar (834% increase), 2,440 MW of combined cycle gas (7.3% increase), and 117 MW of battery storage (325% increase).

Broadening the “neutral” classification to cover additional transmission upgrades would raise a host of issues unrelated to the stated intent of this NPRR, including subsidization of the costs of development decisions on the backs of ratepayers. TCPA & TIEC support the current classification process as a means to provide equity to both new and existing resources and also to protect ratepayers from uneconomic transmission investments. As such, TCPA & TIEC recommend approving the 4/15/20 ERCOT comments.

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| Revised Cover Page Language |

None

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| Revised Proposed Protocol Language |

None