GCA Public Policy Brief

NPRR1348 Telemetry Offsetting | Texas Benefits • National Policy Relevance • Public Benefits

CORE PROPOSITION – TELEMETRY OFFSETTING IN ERCOT

Today, a large customer can build its own battery or generator to manage curtailment risk, but the grid can curtail that customer's load and dispatch the resource for the same congestion because it doesn't know the two are paired.

Telemetry Offsetting through NPRR1348 would let them be treated as a pair, so the customer is curtailed only for the portion its sponsored resource can't cover. Load and resource stay separately registered, metered, and telemetered. SCED runs as it does today, and post-operating-day data verifies that the offset was equivalent.

What NPRR1348 Does

Keeps the assets visible to ERCOT. Load, generation, and storage remain separately registered, metered, and telemetered. The architecture links their operating relationship without merging them into a single Resource.

Puts the grid first. The offset yields during EEA 1+ and whenever the paired resource is unavailable or derated, returning the unsupported portion of the load to ordinary PCLR curtailment exposure.

Works within ERCOT's existing dispatch. No new pair-specific SCED logic is required. ERCOT verifies the claimed offset after the operating day using telemetry and meter data.

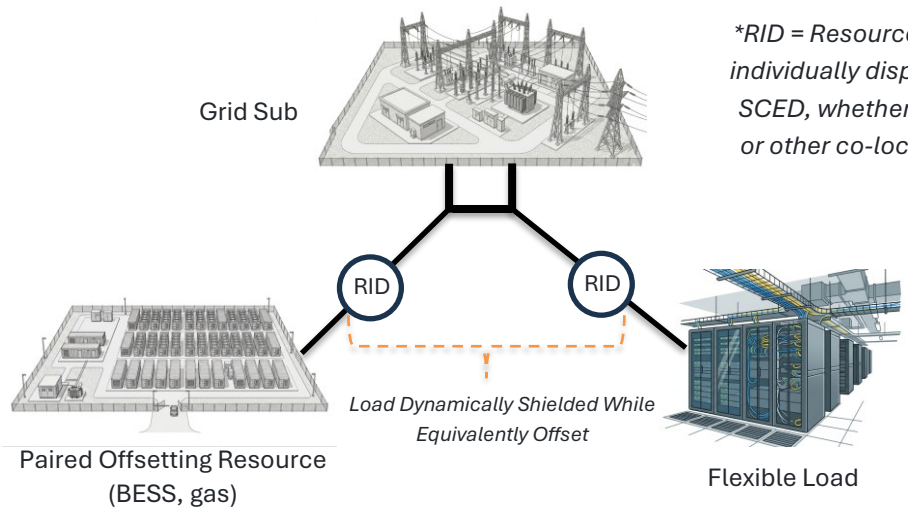
Texas Benefits

Speed to power, with the customer funding its own bridge. PCLR lets large loads energize ahead of full firm-delivery infrastructure by accepting curtailment. Telemetry Offsetting lets those customers privately finance the new resource that makes that interim period workable, so they pay for their own reliability during the transmission buildout.

New capacity, not repurposed capacity. Only new resources qualify: the paired resource must reach commercial operations within 12 months of the PCLR's initial synchronization. The result is privately funded, ERCOT-connected batteries and generation.

More productive use of existing headroom. Load that agrees to be non-firm above its grid-backed floor lets ERCOT use available nodal capability during unconstrained periods while retaining curtailment authority when it's needed.

Figure 1: Paired resource and flexible load at a shared node



**RID = Resource ID, equating to an individually dispatched resource in SCED, whether in FTM, BTM, PUN or other co-located configuration*

National Priorities Fit

A replicable flexible interconnection model. Large-load timelines are colliding with longer transmission timelines nationwide. Telemetry Offsetting shows how conditional access and paired grid-connected resources can become an operational market framework.

A clearer investment proposition. Attribution turns part of an open-ended curtailment exposure into a measurable paired-resource obligation that customers, developers, lenders, and insurers can evaluate.

Flexibility as a verifiable operating capability. Grid 2.0, Brattle, and related work distinguish static firm access from time-, location-, and condition-dependent service. Telemetry Offsetting is an ERCOT implementation of that principle, treating flexibility as telemetry, dispatch, and verification requirements rather than a promise to curtail.

Public Benefits

The public grid remains the platform. The architecture rewards grid-connected solutions instead of pushing large customers and their supporting assets into private islands. When the paired resource isn't supporting its load, its capacity participates in the broader market and adds to system supply.

Flexible interconnection improves utilization. Where a constraint is narrow in time or location, controllable load, storage, and targeted solutions can unlock existing infrastructure while reliability limits stay binding.

Growth becomes additive. The strongest outcome is new economic load arriving with new controllable capacity and transparent operating obligations, leaving the shared grid more capable.

References & Supporting Literature

ERCOT NPRR1348 — Telemetry Offsetting for Provisional Controllable Load Resources

Aurora Energy Research — Curtailment Mitigation for PCLRs: Modeling the Effects of Front-of-Meter Netting

The Brattle Group — Solutions for Timely Interconnection of Large Loads

Grid 2.0 Task Force — An Open Standard for Grid Service Access and Allocation

Arushi Sharma Frank — PCLR Builds the Moat for AI Loads

Global Capacity Alliance / V-Wire — Telemetry Offsetting Technical Architecture — ERCOT White Paper

Utilize Coalition — Beyond Peak: Defining, Measuring, and Optimizing Grid Utilization

About the Global Capacity Alliance

Currently in formation as a 501(c)(6) hybrid consortium, the Global Capacity Alliance scales flexible grid capacity through trusted, replicable regulatory constructs. By developing open frameworks that make coordination between loads, generators, and storage verifiable, the GCA empowers markets to maximize shared infrastructure, unlock transitional deliverability, and safely accelerate growth while waiting for permanent transmission upgrades. Telemetry Offsetting in ERCOT is the GCA's first framework.

Learn more: www.globalcapacityalliance.org | Governance, antitrust, and IP policies | Technical white paper