

OGRR Number	208	OGRR Title	Voltage Ride-Through (VRT) Requirement
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Date	November 7, 2008
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Submitter's Information	
Name	Joint Comments from E.ON, Invenergy and Horizon (John Moore, Kris Zadlo, and Brian Hayes)
E-mail Address	mailto: john.moore@eon.com , kzadlo@invenergyllc.com , and brian.hayes@horizonwind.com
Company	E.ON, Invenergy and Horizon
Market Segment	

Comments

E.ON Climate & Renewables North America Inc. (“E.ON”), Invenergy, LLC (“Invenergy”) and Horizon Wind Energy, LLC (“Horizon”), along with another wind developer, appealed TAC’s adoption of OGRR 208 relating to VRT. The appeals are set on the Board’s November agenda.

E.ON, Invenergy and Horizon are pleased to report that they have worked successfully with ERCOT Staff and TAC to reach a proposed resolution of their appeals. Our central concern has been the retrospective application of the new VRT standards to existing wind generators. OGRR 208 as written would broadly require costly retrofits of existing wind generators without any study showing a reliability need. The proposed resolution of the appeals addresses this concern by revising OGRR 208 to provide for a study. ERCOT Staff has committed to complete the study by no later than June 2010. This approach will enable ERCOT and the stakeholders to implement solutions to any demonstrated reliability need well in advance of the compliance schedule in the current OGRR 208. It also leaves intact the prospective application of the new VRT standards to all wind generators with interconnect agreements signed on or after November 1, 2008.

TAC endorsed this approach at its recent meeting November 6, 2008 as stated in the TAC Comments approved from the November 6th meeting. This approach is also fully consistent with TRE’s stated position. TRE strongly supports applying the new VRT requirements prospectively but opposes the retrofit requirements that lack study and foundation.

We believe that the proposed resolution of these appeals represents a genuine “win-win” outcome. Attached are the recommended revisions to OGRR 208 and related materials for the Board’s consideration. We look forward to presenting them at the Board Meeting on November 17th.

OGRR Comments

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Submitter's Information	
Name	Mark Dreyfus on behalf of the Technical Advisory Committee (TAC)
E-mail Address	mark.dreyfus@austin.energy.com
Company	Austin Energy
Phone	512-322-6544
Market Segment	Municipal

Comments

On November 5, 2008, ERCOT Staff, E.ON, Invenergy, and Horizon, presented a set of draft comments to the TAC which incorporated revisions, limited to the retrospective provisions of OGRR208, which are scheduled for appeal at the November 17, 2008 ERCOT Board of Directors meeting. On November 6, 2008, TAC considered the draft comments and voted to file comments with the Board that TAC recommend that the Board adopt this language as a resolution of the appeal of OGRR208 with the TAC amendment that there be a date certain for the proposed study. The motion passed with four opposing votes from the Municipal (2) and Investor Owned Utility (IOU) (2) Market Segments and nine abstentions from the IOU, Independent Generator (2), Consumer, Independent Retail Electric Provider (4) and Independent Power Marketer Market Segments.

OGRR Comments

Revised Proposed Guide Language
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3.1.4.1 PGC Data Reporting

The PGC's reporting QSE shall provide the following information to ERCOT Control Area Authority at the times specified:

TIME	INFORMATION
Every 10 seconds	<ul style="list-style-type: none"> ➤ Generation net MW output ➤ Generation net MVAR ➤ Status of switching devices in switchyard ➤ Generating unit breaker status ➤ Generating unit High Operating Limit ➤ Generating unit Low Operating Limit
Daily	<ul style="list-style-type: none"> ➤ Planned unit status, ➤ Planned unit capability (both hourly and daily), ➤ Fuel limitations. <p>The reporting Entity will promptly report this condition to ERCOT Control Area Authority</p>
Annually	<ul style="list-style-type: none"> ➤ Seasonal capability where applicable, ➤ Planned maintenance schedules. <p>This information shall be updated when it changes.</p>
Upon request	<ul style="list-style-type: none"> ➤ Fuel capability as described in Section 6.2.7, Unit Alternative Fuel Capability Operating Guide Form, in conjunction with an Operating Condition Notice, Alert, Advisory, or Emergency Notice,

Each generator at a generation facility shall have its turbine's automatic speed governor in service when the generator is in normal operation. Testing and regulation performance of the speed governor shall be in accordance with Section 2.2.5, Turbine Speed Governors, of these Operating Guides. The generator operator is required to notify the ERCOT Control Area Authority, through its QSE, if the operation of speed governors is impaired.

Each generation facility providing an Ancillary Service shall provide output consistent with the requirements of that Ancillary Service and ERCOT instructions.

In the event of an ERCOT declared Emergency, ERCOT may require the QSE to notify the generation facility through the reporting Entity and require it to increase or decrease generation or change voltage and reactive requirements in accordance with the Protocols. The generation facility shall use its best efforts in meeting these required output levels in order that the ERCOT System can maintain safe and reliable operation.

It is the responsibility of all generators to carry an operational share of reactive support to insure adequate and safe Voltage Profiles are maintained in all areas of ERCOT. To accomplish this, the following requirements shall apply to each generation facility.

OGRR Comments

- Each generation facility shall have Automatic Voltage Regulators and power system stabilizers in service as defined in Section 3.1.4.5, Automatic Voltage Regulators and Power System Stabilizers, below.
- The generation facility shall be designed and operated consistent with its obligations to supply Voltage Support Service as required in the ERCOT Protocols and ERCOT Control Area Authority Procedures.
- ERCOT has the right and obligation to Dispatch the reactive output (Vars) of each generation facility within its design capability to maintain adequate transmission voltage in ERCOT.
- ERCOT and the TSP shall be notified of any equipment changes that affect the reactive capability of an operating generating unit no less than 60 days prior to implementation. Changes that decrease the reactive capability of the generating unit below the required level and changes that decrease the Voltage Ride-Through (VRT) capability of the plant must be approved by ERCOT prior to implementation. "Voltage Ride-Through" is defined as the ability of a generation plant to remain connected to the transmission system for specified high voltage and low voltage conditions.
- High reactive loading or reactive oscillations on generation units should be communicated to the QSE, the transmission operator, and ERCOT as soon as practicable.
- The tripping off line of a generating unit due to voltage or reactive problems should be reported to ERCOT, the transmission operator, and the QSE as soon as practicable.

REFERENCE: PROTOCOL SECTION 6.10.2, GENERAL CAPACITY TESTING REQUIREMENTS (IN PART)

QSEs shall provide ERCOT a list identifying each Generation Resource unit that is expected to operate more than one hundred sixty eight (168) hours in a Season as a provider of energy and/or Ancillary Services. ERCOT shall evaluate, during each Season of expected operation, the Net Dependable Capability of each unit expected to operate more than one hundred sixty eight (168) hours during that Season, except for any Generation Resources used solely for energy services and whose capacity is less than ten (10) MW. Prior to the beginning of each Season, QSEs shall identify the Generation Resources to be tested during the Season and the specific week of the test if known. This schedule may be modified by the QSE (including retests) during the Season. QSEs not identifying a specific week for a Generation Resource unit test must test the unit within the first one hundred sixty eight (168) hours of run time during the Season or operate with a Net Dependable Capability equal to the highest integrated hourly MWh output demonstrated during the first one hundred sixty eight (168) hours of run time. QSEs do not have to bring units On-line or shut down solely for the purpose of the seasonal verification. Any unit for which the QSE desires qualification to provide Ancillary Services shall have its Net Dependable Capability verified prior to providing services using the Generation Resource unit even if it fits the less than one hundred sixty eight (168) hour or small capacity exception. The capability of hydro units operating in the synchronous condenser fast response mode to provide hydro Responsive Reserve shall be evaluated by Season. Load acting as a Resource to provide Ancillary Services shall have its telemetry attributes verified by ERCOT annually. In addition, once every two (2) years, any LaaR providing Responsive Reserve Service shall test the under frequency relay or the output from the solid-state switch, whichever applies, for correct operation. However, if the Load's performance has been verified through

OGRR Comments

response to an actual event, the data from the event can be used to meet the annual telemetry verification requirement for that year and/or the biennial relay testing requirement...

3.1.4.6 Protective Relaying and Voltage Ride-Through (VRT) Requirement

The Facility's generation machine characteristics and plant design shall incorporate the under-frequency firm Load shedding philosophy and criteria defined in Operating Guide 2.9, Requirements for Under-Frequency Relaying. Inherent in this philosophy is the idea that all generators remain on line until all three steps of firm Load shedding have been executed. In addition, Generation Resources must set generator voltage relays to remain connected to the transmission system during the following operating conditions:

- Generator terminal voltages are within five percent (5%) of the rated design voltage and volts per hertz are less than one hundred five percent (105%) of generator rated design voltage and frequency;
- Generator terminal voltage deviations exceed five percent (5%) but are within ten percent (10%) of the rated design voltage and persist for less than 10.0 seconds;
- Generator volts per hertz conditions are less than one hundred sixteen percent (116%) of generator rated design voltage and frequency and last for less than 1.5 seconds;
- A transmission system fault (three-phase, single-phase or phase-to-phase), but not a generator bus fault, is cleared by the protection scheme coordinated between the Generation Entity and the TDSP on any line connected to the generator's transmission interconnect bus, provided such lines are not connected to induction generators described in Protocol subsection 6.5.7.1, Generation Resources Required to Provide Voltage Support Service Installed Reactive Capability, paragraph (7). However, in the case of a generator bus fault or a primary transmission system relay failure, the generator protective relaying may clear the generator independent of the operation of any transmission protective relaying.

The generation Facility shall have protective relaying necessary to protect its equipment from abnormal conditions as well as to be consistent with protective relaying criteria as described in Section 7.2, System Protective Relaying.

Within thirty (30) days of ERCOT's request, Generation Resources shall provide ERCOT with the operating characteristics of any generating unit's equipment protective relay system or controls that may respond to temporary excursions in voltage with actions that could lead to tripping of the generating unit.

Generating Resources required to provide VSS shall have and maintain the following capability:

- (1) Over-excitation limiters shall be provided and coordinated with the thermal capability of the generator field winding and protective relays in order to permit short-term reactive capability that allows at least eighty percent (80%) of the unit design standard (ANSI C50.13-1989), as follows:

Time (seconds)	10	30	60	120
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OGRR Comments

Field Voltage % 208 146 125 112

After allowing temporary field current overload, the limiter shall operate through the automatic AC voltage regulator to reduce field current to the continuous rating. Return to normal AC voltage regulation after current reduction shall be automatic. The over-excitation limiter shall be coordinated with the over-excitation protection so that over-excitation protection only operates for failure of the voltage regulator/limiter.

- (2) Under-excitation limiters shall be provided and coordinated with loss-of-field protection to eliminate unnecessary generating unit disconnection as a result of operator error or equipment misoperation.

3.1.4.6.1 Protective Relaying Requirement and Voltage Ride-Through Requirement for Wind-powered Generation Resources

- Wind-powered Generation Resources (WGRs) specified below are required to set generator voltage relays to remain in-service during all transmission faults (no more than nine (9) cycles) in accordance with Figure 1, Voltage Ride-Through Boundaries For ~~Generating Units~~, Wind-powered Generation Resources, below. Faults on individual phases with delayed clearing (zone 2) may result in phase voltages outside this boundary but if the phase voltages remain inside this boundary then generator voltage relays are required to be set to remain connected and recover within the voltage recovery boundary of Figure 1.
- -WGR voltage relays shall be set to remain interconnected during three-phase faults on the transmission system for a voltage level as low as zero volts with a duration no more than nine (9) cycles as measured at the point of interconnection as shown in Figure 1. The clearing time requirement for a three-phase fault will be specific to the generating plant point of interconnection, as determined by and documented by the transmission provider in conjunction with the interconnection agreement. This requirement does not apply to faults that would occur between the generator terminals and the transmission voltage side of the generation step-up transformer or when clearing the fault effectively disconnects the generator from the system.
- WGRs may be tripped after the fault period if this action is intended as part of a special protection system.
- WGRs may meet the VRT requirements of Figure 1 by the performance of the generators or by installing additional equipment (e.g., Static VAR Compensator) within the generating plant or by a combination of generator performance and additional equipment.
- WGRs that have had over 50 seconds cumulative operation over the life of the WGR below 10% of nominal voltage at the point of interconnection shall be allowed, with ERCOT's approval, to set generator voltage relays to provide sufficient protection to the WGR to comply with warranty requirements and to retain the expected life of the resource.

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- Existing individual WGRs that are replaced are required to meet the requirements of Figure 1.
- ~~Existing individual WGRs that are part of a Generation Interconnect Agreement signed prior to January 1, 2003 are exempt from the requirements of Section 3.1.4.6.1, Protective Relaying Requirement and Voltage Ride-Through Requirement for Wind-powered Generation Resources.~~
- ~~WGRs that are part of a Generation Interconnect Agreement signed after January 1, 2003 and before November 1, 2008 shall meet the requirements of Section 3.1.4.6.1 by January 1, 2015.~~
- WGRs that are part of a Generation Interconnect Agreement signed after November 1, 2008 shall meet the requirements of Section 3.1.4.6.1, Protective Relaying Requirement and Voltage Ride-Through Requirement for Wind-powered Generation Resources. All such WGRs shall provide a status of compliance to ERCOT System Planning by July 1, 2009.
- WGRs that are part of a Generation Interconnect Agreement signed prior to November 1, 2008 shall provide information requested by ERCOT, including existing WGR VRT capabilities, for a study to evaluate the need for additional protective relaying and VRT requirements applicable to some or all such WGRs. If the results of the study demonstrate the need, this Operating Guide shall be revised to establish those requirements, including a schedule for compliance. ERCOT shall publish study results and provide recommendations to ROS by the scheduled ROS meeting of June 2010
- ~~All WGRs shall provide a status of compliance with the requirements of Section 3.1.4.6.1 to ERCOT System Planning by July 1, 2009.~~
- ~~All non-exempt WGRs shall provide an implementation plan for compliance with the requirements of Section 3.1.4.6.1 to ERCOT System Planning by July 1, 2009.~~
- Notwithstanding any allowed exemptions of the foregoing provisions, existing individual WGRs that meet the requirements of Figure 1 on November 1, 2008 shall continue to meet the requirements of Figure 1.
- If, due to a system disturbance, a WGR come off-line within the boundaries of the VRT requirement of Figure 1, then the WGR owner and the TSP shall be required to investigate and report to ERCOT on the cause of the WGR trip identifying a reasonable mitigation plan and timeline.

ERCOT and the TSP shall be notified of any equipment changes that affect the reactive capability of an operating WGR no less than sixty (60) days prior to implementation. of the changes, and any such changes that decrease the reactive capability of the WGR below the required level and changes that decrease the Voltage Ride-Through (VRT) capability of the plant must be approved by ERCOT prior to implementation.

OGRR Comments

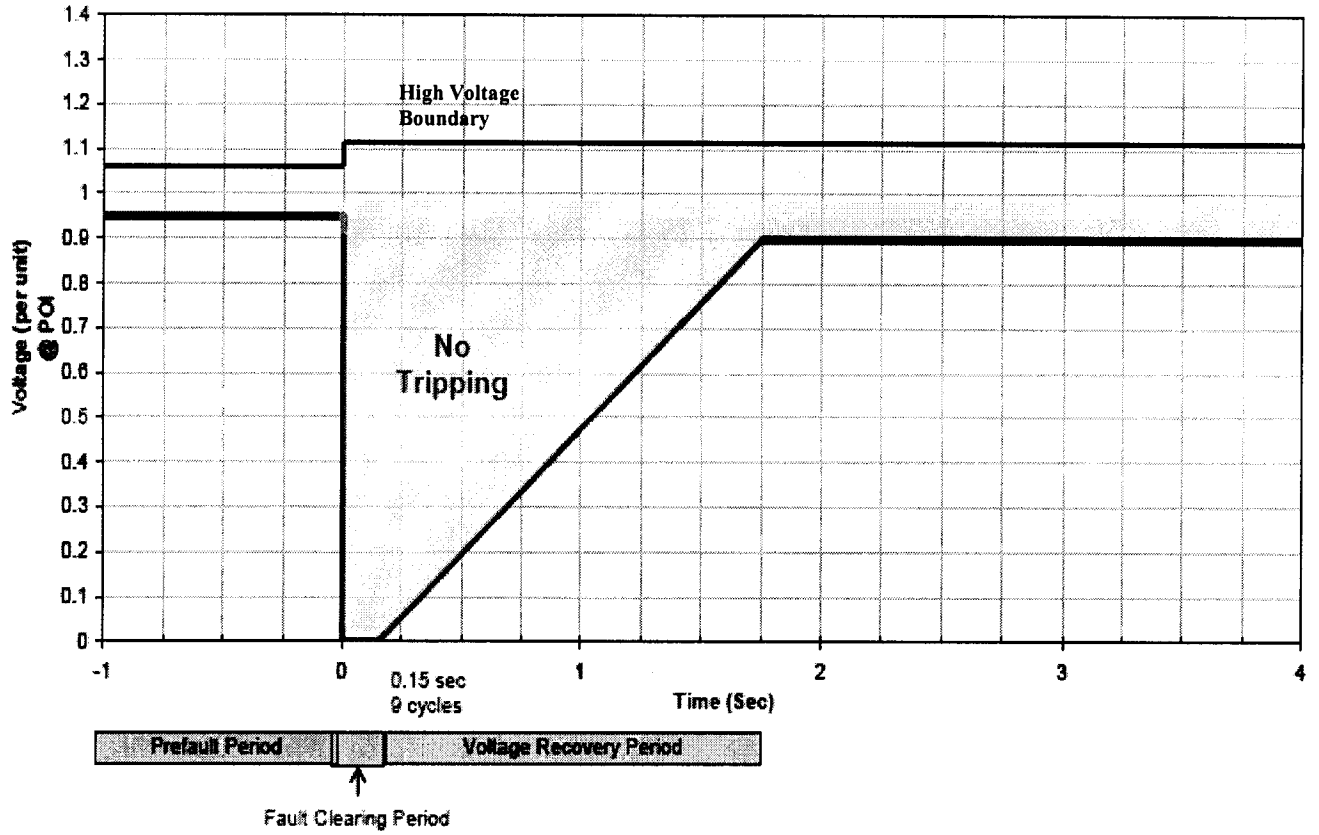


Figure 1: Voltage Ride-Through Boundaries For Wind-powered Generation Resources

OGRR 208 VRT

**APPEAL PRESENTATION
TO ERCOT BOARD**

**by E.ON Climate & Renewables,
Horizon Wind Energy, LLC, and
Invenenergy LLC**

November 17, 2008

OGRR 208

- Stakeholder resolution reached:
 - Resolution with ERCOT Staff
 - TAC refined and endorsed resolution at November 6th TAC Meeting
 - Consistent with TRE position
- The TAC Comments resolve important stakeholder issues:
 - Requires reliability study
 - Accelerates needed improvements
 - Reduces regulatory risk
 - OGRR 208 VRT requirements continue to apply prospectively.

Requested Board Action

Adopt the TAC recommendation to the Board in the TAC
Comments to OGRR 208.

Technical Advisory Committee

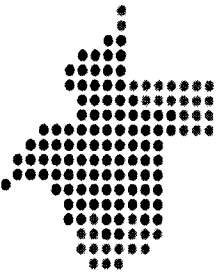
Presentation to the

ERCOT Board of Directors

October 21, 2008

Discussion of Study Horsepower

- Stakeholders have expressed concern that certain decisions are made with insufficient background analysis.
 - ERCOT Staff resource constraints.
 - Stakeholder resources are also insufficient.
- Recent Examples:
 - Study of LaaR capability for AS capacity: long delayed due to scarce stakeholder resources to update the dynamic model.
 - Ancillary Services Methodology: Changes based on GE Study without extensive analysis for application to ERCOT-specific facts.
 - OGRR 208: Issue before the Board next month, in which the need for a study has also been raised.



**TEXAS
REGIONAL
ENTITY™**

An Independent Division of ERCOT

Texas Regional Entity

TAC Presentation

November 6, 2008

OGRR208 Position

- **Texas RE strongly supports the need for WGRs that are part of a Generation Interconnect Agreement signed after November 1, 2008 to be installed with LVRT technology. This provision of OGRR208 must be retained and implemented.**
- **Texas RE supports the need for additional studies to define the actual risk to the BPS**
- **Texas RE does not support retrofit requirements without adequate foundation**
- **Texas RE believes the 2015 implementation period is excessive if true risk exists**

OGRR Comments

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Date	November 5, 2008
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Submitter's Information	
Name	Joint Comments from ERCOT, E.ON, Invenergy and Horizon (Mike Grable, John Moore, Kris Zaldo, and Brian Hayes)
E-mail Address	mgrable@ercot.com , john.moore@eon.com , kzaldo@invenergyllc.com , and brian.hayes@horizonwind.com
Company	ERCOT, E.ON, Invenergy and Horizon
Market Segment	N/A

Comments

Below are proposed revisions from ERCOT Staff, E.ON, Invenergy, and Horizon to the October 2, 2008 TAC approved version of OGRR208. The revisions are limited to the retrospective provisions of OGRR208. All other revisions in OGRR208 were accepted as blackline language for ease of reviewing and only the proposed revisions are redlined below.

OGRR Comments

Revised Proposed Guide Language
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REFERENCE: PROTOCOL SECTION 6.10.2, GENERAL CAPACITY TESTING REQUIREMENTS (IN PART)

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- ~~Existing individual WGRs that are part of a Generation Interconnect Agreement signed prior to January 1, 2003 are exempt from the requirements of Section 3.1.4.6.1, Protective Relaying Requirement and Voltage Ride-Through Requirement for Wind-powered Generation Resources.~~
- ~~WGRs that are part of a Generation Interconnect Agreement signed after January 1, 2003 and before November 1, 2008 shall meet the requirements of Section 3.1.4.6.1 by January 1, 2015.~~
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- ~~All WGRs shall provide a status of compliance with the requirements of Section 3.1.4.6.1 to ERCOT System Planning by July 1, 2009.~~
- ~~All non-exempt WGRs shall provide an implementation plan for compliance with the requirements of Section 3.1.4.6.1 to ERCOT System Planning by July 1, 2009.~~
- Notwithstanding any allowed exemptions of the foregoing provisions, existing individual WGRs that meet the requirements of Figure 1 on November 1, 2008 shall continue to meet the requirements of Figure 1.
- If, due to a system disturbance, a WGR come off-line within the boundaries of the VRT requirement of Figure 1, then the WGR owner and the TSP shall be required to investigate and report to ERCOT on the cause of the WGR trip identifying a reasonable mitigation plan and timeline.

ERCOT and the TSP shall be notified of any equipment changes that affect the reactive capability of an operating WGR no less than sixty (60) days prior to implementation. of the changes, and any such changes that decrease the reactive capability of the WGR below the required level and changes that decrease the Voltage Ride-Through (VRT) capability of the plant must be approved by ERCOT prior to implementation.

OGRR Comments

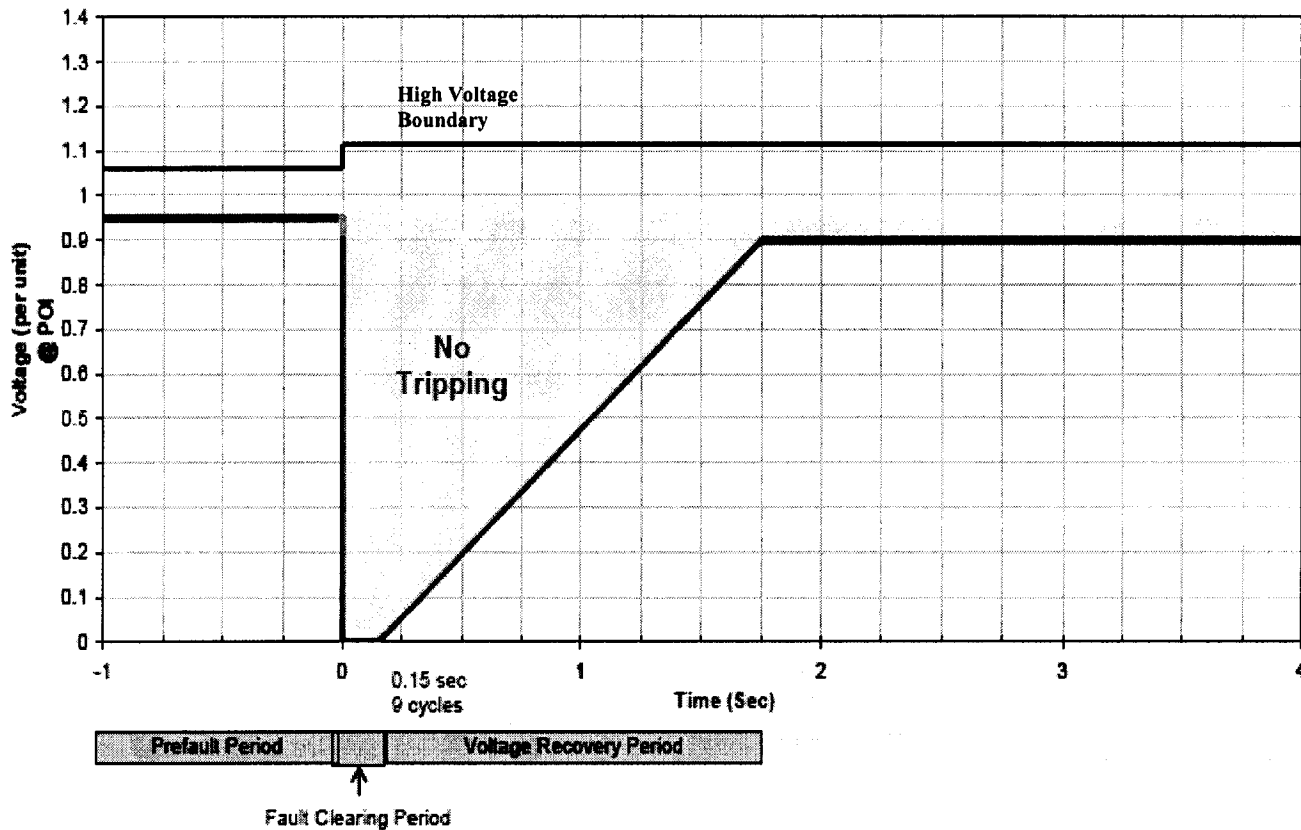


Figure 1: Voltage Ride-Through Boundaries For Wind-powered Generation Resources