Appeal of PRR 830

John Houston

Designated TAC Advocate

PRR 830 Procedural History

- Proposed by ERCOT Staff to clarify reactive power requirements applicable to generators and provide a framework for non-compliant wind generators to comply
- At 9/17 meeting, PRS tabled consideration by unanimous vote to allow ROS to review and provide comments or a recommendation
- After consideration of multiple comments and extensive discussion at 10/15 meeting, ROS voted to recommend approval
- After consideration of additional comments and extensive discussion at 10/22 meeting, PRS voted to recommend approval
- After consideration of additional comments and extensive discussion at 11/5 meeting, TAC voted to approve

ERCOT Reactive Power Requirements

- Existing Protocol vetted through the stakeholder process in 2003 and 2004 with multiple opportunities for comment and changes
- Requirements have been in place for several years
- Requirements for generators and loads are fixed; i.e., the requirements do not increase or decrease as needs vary over time
- Incremental needs identified by engineering analysis to ensure remaining voltage stability requirements are provided by transmission owners

Applicability to Existing Generators

- Because PRR 830 was proposed to clarify, not change, the existing requirements, TAC and other stakeholder groups heard and rejected arguments that the clarification in PRR 830 should not apply to certain existing generators because the existing requirements were ambiguous
- PRR 830 does not affect pending ADR or PUC proceedings because it is not applicable to past compliance, but will become effective upon approval
- PRR 830 provides the means and time frame for non-compliant WGRs to fairly and equitably comply without a complete retrofit of certain existing units through installation of reactive resources, paying a contribution-in-aid-of-construction, or submittal of alternative proposals

Need for Studies to Determine Need

- TAC and other stakeholder groups heard and rejected arguments that studies should be performed to determine whether compliance with the requirements is needed for reliability, including consideration of a presentation by Siemens PTI and NextEra to ROS on this subject
- As previously noted, the requirements for generators are fixed they
 do not vary over time as system needs change
- Taking the fixed capability of generators and loads as inputs, transmission planning studies are performed periodically to assess incremental reactive power needs that are then provided by transmission owners
- This approach is fair and workable