



NRG Texas Power LLC
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February 16, 2016

From: NRG Texas Power LLC (NRG)

To: Electric Reliability Council of Texas (ERCOT),
ERCOT Board of Directors,
ERCOT Technical Advisory Committee (TAC)

Subject: Application for Permanent Site-Specific Exemption from Compliance With ERCOT Nodal Protocols, Section 10.3.2.3 (6)

Pursuant to Nodal Protocols Section 10.14, Exemptions from Compliance to Metering Protocols, NRG submits the following application to ERCOT and requests that TAC and the ERCOT Board approve a permanent exemption for the W. A. Parish Generating Station from the metering requirements found in Nodal Protocols, Section 10.3.2.3(6), which allows the use of net metering for a facility with multiple Points of Interconnection (POI), provided that the POIs are physically within 400 yards.

ERCOT Nodal Protocols, Section 10.14, establishes the process and information required to seek an exemption from compliance with ERCOT metering requirements. NRG provides the required information below.

10.14.3.1 Information to be Included in the Application

The application for exemption to ERCOT shall include:

- (a) A detailed description of the exemption sought, including specific reference to the relevant Section(s) of these Protocols or the SMOG authorizing ERCOT to grant the exemption, and the Metering Facilities to which the exemption will apply;

NRG seeks approval by TAC and the ERCOT Board for a permanent exemption from the requirements in the Nodal Protocols, Section 10.3.2.3 (6), for the W. A. Parish Generating Station including all 14 EPS meters at the site (TDSP Project Numbers 100-WAP138 and 100-WAP345).

- (b) A detailed statement of the reason for seeking the exemption, including any supporting documentation;

The W.A. Parish Generating Station is wholly-owned by NRG Texas Power LLC, and is situated in Fort Bend County. With a combined name plate capacity of approximately 4,000 MW, consisting of 4 coal-fired generating units, 4 gas-fired units, and a single simple-cycle gas turbine utilized as a blackstart resource, W. A. Parish is one of the largest and most complex generating stations in the state. Since Unit 1 went into commercial operation in 1958, the facility has been serving the people of Texas continuously for over 55 years. With the newest unit at the site (WAP-8) being 34 years old, the station predates not only the ERCOT Nodal Market, but also the de-regulation of the wholesale electricity market in Texas.



Interconnecting with 20 different 138kV and 345kV transmission lines, the initial design of the station sought to maximize reliability by integrating operations across the entire site, including the capability for one unit to provide startup power to another in the event of a total, or partial, blackout of the ERCOT grid. The station has always been registered as a single facility, and is settled under a single settlements statement, but has two different Meter Design Proposals. One for the 138kV portion of the site, comprising 11 EPS meters, and the other for the 345kV portion, comprising 3 EPS meters.

Nodal Protocols, Section 10.3.2.3(6), allows the use of net metering for a facility with multiple Points of Interconnection (POI), provided that the POIs are physically within 400 yards. On November 17, 2015, ERCOT held a conference call with NRG to discuss W. A. Parish registration under a single RARF with two approved EPS Metering Design Proposals. Subsequent conversations between ERCOT, NRG, and CenterPoint Energy determined that the POIs for the 138kV system and the 345kV system at the site were in excess of the 400 yard limit (the furthestmost POI's are approximately 950 yards apart). Additionally, there are electrical connections in the station's electrical distribution system that can provide a path to supply certain loads from either the 138kV system, or the 345kV system, effectively cross-connecting them. The fully integrated nature of the plant design and the cross-connection capability within the distribution system at the plant (all of which predates any ERCOT Protocol requirement) clearly meets the intent of the net metering requirements.



(c) Details of the Entity(s) to which the exemption will apply;

The exemption will apply to NRG Texas Power LLC, as the registered Resource Entity and Qualified Scheduling Entity for the W.A. Parish Generating Station.

(d) Details of the location to which the exemption will apply;

The location to which the exemption will apply is the W. A. Parish Generating Station located at 2500 Y. U. Jones Road, Thompsons, TX, 77481 and includes all 14 EPS meters at the site (TDSP Project Numbers 100-WAP138 and 100-WAP345).

(e) Details of the period of time for which the exemption will apply, including the proposed start and finish dates of that period; and

The permanent exemption will start upon the date of approval by the ERCOT Board of Directors. There is no end date to this exemption.

(f) Any other information requested by ERCOT.

Besides satisfying the requirements in ERCOT Protocols, Section 10.14, this application also addresses questions posed in "ERCOT's General Guidelines for Considering ERCOT Polled Settlement (EPS) Metering Facility Exemptions" which is posted on the MIS.

The proposed exemption does not introduce any known metering inaccuracies, as it merely consolidates the two existing, approved Meter Design Proposals. There are also no changes or impacts to the ERCOT settlements processes expected from the proposed exemption.

NRG has worked closely with CenterPoint Energy on both the temporary and the permanent metering exemption request, and CenterPoint supports the proposed exemption.

Submitted by:
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NRG Texas Power LLC