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| **Determination:** No ERCOT Protocol or Other Binding Document (OBD) Revision Requests concerning Primary Frequency Response (PFR) are necessary in order to specifically accommodate the new Southern Cross Transmission, LLC (“SCT”) Direct Current Tie (DC Tie). |
| **Background/History:** The Public Utility Commission of Texas (PUC) issued an Order in Project No. 46304 that directed ERCOT to complete certain tasks—set forth in 14 different Directives—that the PUC deemed were necessary to accommodate the SCT DC Tie. This determination relates to the PFR portion of Directive 8, which requires that ERCOT:    “(a) study and determine whether Southern Cross Transmission or any other entity scheduling flows across the Southern Cross DC tie should be required to provide or procure voltage support service or primary frequency response, or their technical equivalents, (b) implement any necessary revisions to its standards, guides, systems, and protocols, as appropriate, and (c) certify to the Commission when it has completed these actions.”  Discussions with stakeholders occurred at the following meetings regarding the PFR portion of Directive 8: Performance Disturbance Compliance Working Group (PDCWG) 10/11/2017, 11/08/2017, 12/13/2017, 01/12/2018, 02/14/2018; Reliability Operations Subcommittee (ROS) 03/01/2018, 04/05/2018. ERCOT staff prepared a whitepaper setting forth its determination and considerations relevant to that resolution, which was presented for discussion at these meetings ([link to whitepaper](http://www.ercot.com/content/wcm/key_documents_lists/139261/12._SCT_Directive8_PFR_Recommendation_PDWCG_Consensus_02142018.docx)).  ERCOT staff, after consultation with stakeholders, determined that there is no need, at this time, for the SCT DC Tie, or Entities scheduling across the DC Tie, to provide Governor-like frequency response, because, among other reasons: (1) the ERCOT System currently exceeds minimum PFR requirements under NERC Reliability Standards; (2) coordinating with other Balancing Authorities in providing PFR would introduce significant operational complexities; and (3) current ERCOT Protocols and OBDs do not require existing DC Ties to provide PFR.  PDCWG action: On 02/14/2018, PDCWG voted to endorse the Directive 8, PFR determination.  ROS action: On 04/05/2018, ROS voted to endorse the Directive 8, PFR determination.  Note: This determination concerns only the PFR portion of Directive 8. Directive 8 discussions regarding Voltage Support Service (VSS) are ongoing with ERCOT staff and stakeholders. |