

Legal Notice Comments

Legal Notice Number	M-B011419-01	Legal Notice Short Description	Notice of ERCOT's intent to execute coordination plans with Southwest Power Pool, Inc. ("SPP") and Midcontinent Independent System Operator, Inc. ("MISO").
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Submitter's Information	
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Market Segment	Cooperative

Comments

GSEC appreciates the effort that ERCOT and the SPP have put into developing the ERCOT-SPP Coordination Plan ("Coordination Plan") and appreciates ERCOT's willingness to consider comments from stakeholders. GSEC understands that the intent of the Coordination Plan is to address reliability coordination between ERCOT and the SPP and GSEC's comments are not intended to disregard this in any way. As such, GSEC has sought clarification from ERCOT to resolve two potential concerns with the Coordination Plan.

The first concern is that Exhibit B is ambiguous regarding the Primary Party designation in the ERCOT Switchable Generation Resource table of Exhibit B. GSEC's ANTELOPE ANT3/AEEC_ANTLP_3 ("Antelope 3") is listed as "0" for SPP in 2019, which is accurate. However, it is not listed in the ERCOT table. Per section 16.5.4(2) of the ERCOT Nodal Protocols, GSEC did not submit Antelope 3 as NOT available to ERCOT for the months of June through August of 2019. Previous ERCOT Seasonal Assessment of Resource Adequacy ("SARA") and Capacity Demand and Reserves ("CDR") reports have included Antelope 3 for capacity planning purposes in ERCOT, and as such, GSEC would have expected Antelope 3 to be included in the ERCOT table for 2019. GSEC understands that it is ERCOT's intent to be the Primary Party for Antelope 3 in 2019 and that ERCOT will work with the SPP to clarify this designation in Exhibit B.

The second concern is that Section 2.3 Block Load Transfers, in combination with Exhibit B, appears to be in conflict with Section 6.5.9.5.2(1) of the ERCOT Nodal

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Protocols. Section 6.5.9.5.2(1) states “For BLTs that are deployed in an emergency and are not modeled in the Network Operations Model, the responsible TSP shall notify ERCOT as soon as practicable after deployment,” whereas, the Coordination Plan states, “The Party transferring load will confirm the BLT availability with the Party accepting the load before any BLT implementation.” Many of the BLT loads listed in the Block Load Transfers table of Exhibit B of the Coordination Plan, would qualify for notification as soon as practicable after deployment under the ERCOT Nodal Protocols.

GSEC therefore requests either Exhibit B or Section 2.3 Block Load Transfers of the Coordination Plan be modified to be consistent with current ERCOT Nodal Protocols prior to the execution of this agreement by the SPP and ERCOT. GSEC’s Members do not switch BLT load between SPP and ERCOT often, and primarily do so when customers are without power due to weather events and expected to otherwise endure long power outages. The current protocol Section 6.5.9.5.2(1) has worked sensibly for GSEC’s Members to ensure prompt restoration of customer outages when a source to a delivery point is lost in one of the grids. Prior to the implementation of Section 6.5.9.5.2(1) of the ERCOT Nodal Protocols, GSEC’s Members experienced communication and timing issues associated with the switching of these small non-modeled loads, significantly delaying restoration to customers without power. These BLT loads are all served on 12.5 kV distribution systems where GSEC members have a distribution delivery point on each side of the ERCOT/SPP seam and come together through distribution at the seam with normally open isolating switches. The BLT loads are less than 5 MW in size (seasonally < 1MW) and have a negligible affect on the Bulk Electric System. The rationale for the creation of Section 6.5.9.5.2(1) is still relevant today and as such this protocol should not be changed nor be superseded by the Coordination Plan.

GSEC’s discussions with ERCOT indicated ERCOT’s willingness to resolve the concern. GSEC’s requested changes are not intended to undermine ERCOT’s nor the SPP’s ability to operate the grid in a reliable manner; to the contrary, GSEC is seeking changes for increased transparency and to reduce the potential impact of extended customer outages. GSEC appreciates any assistance to accomplish these objectives.