**From:** shams@crescentpower.net [mailto:shams@crescentpower.net]   
**Sent:** Wednesday, June 12, 2019 10:28 PM  
**To:** Mele, Cheryl <Cheryl.Mele@ercot.com>  
**Cc:** Rickerson, Woody <Woody.Rickerson@ercot.com>; Woodfin, Dan <Dan.Woodfin@ercot.com>; Ogelman, Kenan <Kenan.Ogelman@ercot.com>; Lasher, Warren <Warren.Lasher@ercot.com>; Jones, Dan <Dan.Jones@ercot.com>; Billo, Jeffrey <Jeff.Billo@ercot.com>  
**Subject:** RE: Implementing Protocols requiring Mitigation Plans for DC Tie Load

**\*\*\*\*\* EXTERNAL email. Please be cautious and evaluate before you click on links, open attachments, or provide credentials. \*\*\*\*\***

Hi Cheryl,

Thanks for your response. Obviously, I’m disappointed since the language in 4.4.4(15) was inserted by ERCOT with the understanding that the treatment for DC Tie Load would not be any different whether ERCOT had to declare an Emergency (as NPRR825 originally required) or a DCTCN. It’s my understanding that ERCOT implements Mitigation Plans whenever other Load are in a similar situation and does not curtail Load pre-contingency (please correct me if I’m mistaken). I doubt ERCOT curtails Load pre-contingency even in the absence of an approved Mitigation Plan. That ERCOT’s language in 4.4.4(15) implied that ERCOT would not do the same for DC Tie Load was not obvious and was not made clear to us by ERCOT. Prior to just the very recent set of WMWG and CMWG meetings, we weren’t aware of exactly what constraints were causing export curtailments – it’s after months of asking for this information did we finally get that information. But now you’re asking us to investigate the cause of curtailment, figure out if a CMP is possible and convince the TSP and ERCOT that they should implement such a CMP, and hope that the TSP and ERCOT will work with us to implement the CMP. My experience in wanting to pursue such a course of action for the Riggins Solar Project for another client (even a simple transfer trip) has been very difficult – there is no incentive for the TSP or ERCOT to facilitate such actions.

I’m hoping we can resolve this at CMWG and not have to submit yet another NPRR that clarifies that ERCOT needs to treat DC Tie Load like Load except for all the reasons clearly defined in the Protocols of when ERCOT can curtail DC Tie Load (e.g. Emergencies, Presidential Orders, to avoid FERC jurisdiction, etc.) – we are not asking to limit any of that.

Regards,

Shams

**From:** Mele, Cheryl <[Cheryl.Mele@ercot.com](mailto:Cheryl.Mele@ercot.com)>   
**Sent:** Wednesday, June 12, 2019 4:21 PM  
**To:** Siddiqi, Shams <[shams@crescentpower.net](mailto:shams@crescentpower.net)>  
**Cc:** Rickerson, Woody <[Woody.Rickerson@ercot.com](mailto:Woody.Rickerson@ercot.com)>; Woodfin, Dan <[Dan.Woodfin@ercot.com](mailto:Dan.Woodfin@ercot.com)>; Ogelman, Kenan <[Kenan.Ogelman@ercot.com](mailto:Kenan.Ogelman@ercot.com)>; Lasher, Warren <[Warren.Lasher@ercot.com](mailto:Warren.Lasher@ercot.com)>; Jones, Dan <[Dan.Jones@ercot.com](mailto:Dan.Jones@ercot.com)>; Billo, Jeffrey <[Jeff.Billo@ercot.com](mailto:Jeff.Billo@ercot.com)>  
**Subject:** RE: Implementing Protocols requiring Mitigation Plans for DC Tie Load

Hello Shams,

In response to your May 24, 2019 email please find below my comments on the issues you raised.  Having listened in on part of the WMS meeting last week I think you raised most of these same issues there and they were agreed to be discussed in upcoming CMWG and RPG meetings.

Related to the Operations issues that you raised, Protocols Section 4.4.4(15) states as follows:

(15)      If market-based congestion management techniques embedded in Security-Constrained Economic Dispatch (SCED) as specified in these Protocols will not be adequate to resolve one or more transmission security violations that would be fully or partially resolved by the curtailment of DC Tie Load and, in ERCOT’s judgment, no approved Constraint Management Plan (CMP) is adequate to resolve those violations, ERCOT may instruct Resources to change output and, if still necessary, curtail DC Tie Load to maintain reliability and shall post a DC Tie Curtailment Notice to the MIS Public Area as soon as practicable.  The quantity of DC Tie Load to be curtailed shall be the minimum required to resolve the constraint(s) after the other remediation actions described above have been taken.

Protocol Section 4.4.4(15) requires ERCOT to assess the feasibility of using approved CMPs to resolve transmission security violations that would be fully or partially resolved by the curtailment of a DC Tie Export.  There are currently no approved CMPs.  Protocol Section 4.4.4(15) does not obligate ERCOT to develop a CMP for such transmission security violations.  As discussed at WMS CMPs can be proposed by others and submitted for assessment of feasibility by ERCOT as well.

As you acknowledged at the May 22, 2019 TAC and last week’s WMS meeting, we understand that this and related issues will be on the agenda for discussion at an upcoming CMWG meeting (originally planned for discussion at the June 3, 2019 CMWG meeting, which was canceled).

As for the Planning issues you raised here, and at WMS, related to DC-ties the appropriate forum to discuss these issues is at the Regional Planning Group.  Currently there are no Protocol or Planning Guide requirements for treatment of DC-tie exports in transmission planning studies.  As briefly discussed in the May Regional Planning Group meeting, ERCOT intends to raise this issue at an upcoming Planning Working Group meeting to see if stakeholders agree that a standard criteria for DC-tie exports should be incorporated into the Planning Guides.

We look forward to the upcoming discussions at stakeholder meetings on these important issues.  If you have any additional thoughts that may help us prepare for those discussions please let me know.

Best,

Cheryl

**From:** [shams@crescentpower.net](mailto:shams@crescentpower.net) [<mailto:shams@crescentpower.net>]   
**Sent:** Tuesday, June 11, 2019 1:43 PM  
**To:** Mele, Cheryl <[Cheryl.Mele@ercot.com](mailto:Cheryl.Mele@ercot.com)>  
**Subject:** RE: Implementing Protocols requiring Mitigation Plans for DC Tie Load

**\*\*\*\*\* EXTERNAL email. Please be cautious and evaluate before you click on links, open attachments, or provide credentials. \*\*\*\*\***

Hi Cheryl,

Please provide an update on the request described below.

Regards,

Shams

**From:** Mele, Cheryl <[Cheryl.Mele@ercot.com](mailto:Cheryl.Mele@ercot.com)>   
**Sent:** Tuesday, May 28, 2019 1:15 PM  
**To:** Siddiqi, Shams <[shams@crescentpower.net](mailto:shams@crescentpower.net)>  
**Cc:** Thompson, Chad <[cthompson@ercot.com](mailto:cthompson@ercot.com)>; Jones, Dan <[Dan.Jones@ercot.com](mailto:Dan.Jones@ercot.com)>; Mickey, Joel <[Joel.Mickey@ercot.com](mailto:Joel.Mickey@ercot.com)>; Billo, Jeffrey <[Jeff.Billo@ercot.com](mailto:Jeff.Billo@ercot.com)>; Rickerson, Woody <[Woody.Rickerson@ercot.com](mailto:Woody.Rickerson@ercot.com)>; Ogelman, Kenan <[Kenan.Ogelman@ercot.com](mailto:Kenan.Ogelman@ercot.com)>; Woodfin, Dan <[Dan.Woodfin@ercot.com](mailto:Dan.Woodfin@ercot.com)>; Lasher, Warren <[Warren.Lasher@ercot.com](mailto:Warren.Lasher@ercot.com)>  
**Subject:** RE: Implementing Protocols requiring Mitigation Plans for DC Tie Load

Shams,

I will review the concerns expressed below with my team and be back in touch.

Regards,

Cheryl Mele

Sr VP and COO, ERCOT

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**From:** [shams@crescentpower.net](mailto:shams@crescentpower.net) [<mailto:shams@crescentpower.net>]   
**Sent:** Friday, May 24, 2019 2:07 PM  
**To:** Mele, Cheryl <[Cheryl.Mele@ercot.com](mailto:Cheryl.Mele@ercot.com)>  
**Cc:** Thompson, Chad <[cthompson@ercot.com](mailto:cthompson@ercot.com)>; Jones, Dan <[Dan.Jones@ercot.com](mailto:Dan.Jones@ercot.com)>; Mickey, Joel <[Joel.Mickey@ercot.com](mailto:Joel.Mickey@ercot.com)>; Billo, Jeffrey <[Jeff.Billo@ercot.com](mailto:Jeff.Billo@ercot.com)>; Rickerson, Woody <[Woody.Rickerson@ercot.com](mailto:Woody.Rickerson@ercot.com)>; Ogelman, Kenan <[Kenan.Ogelman@ercot.com](mailto:Kenan.Ogelman@ercot.com)>  
**Subject:** Implementing Protocols requiring Mitigation Plans for DC Tie Load

**\*\*\*\*\* EXTERNAL email. Please be cautious and evaluate before you click on links, open attachments, or provide credentials. \*\*\*\*\***

Dear Cheryl,

As you may be aware, ERCOT Operations is currently shedding DC Tie Load pre-contingency for N-1 constraints instead of implementing a Mitigation Plan as required by Protocols 4.4.4(15) (from NPRR825). As a compromise with ERCOT and with the assurance from ERCOT that ERCOT would treat shedding DC Tie Load the same whether ERCOT had to declare an Emergency or not, NPRR825 was modified to require ERCOT to issue a DC Tie Curtailment Notice instead of Emergency prior to shedding DC Tie Load but only after all possible actions were exhausted – including RUC and Congestion Management Plans (CMP) which include Mitigation Plans – so the level of firmness is not reduced but rather reaffirmed.

I don’t think we need to involve stakeholders once again to have ERCOT implement the current Protocols (we did this several times with NPRR405, NPRR818, NPRR825, etc., and each time stakeholders reaffirmed the treatment of DC Tie Load). So, my request would be that you direct ERCOT staff to implement Mitigation Plans for N-1 constraints that would eliminate pre-contingency curtailments of DC Tie and only shed DC Tie Load as a post-contingent action in real-time for base (N-0) violations after all measures in 4.4.4(15) are exhausted.

For RTP, Post-NPRR405 ERCOT Planning would plan projects for N-1 issues, but would assume they could be curtailed for N-1-1.  Now, Planning is in the process of changing that policy to curtail DC Tie Load even for N-1 issues – which essentially implies that no transmission upgrades will be planned to support DC Tie Load even though a flat DC Tie Load can be charged 1.67 times what other flat Loads pay. Again, NPRR825 reaffirms the treatment of DC Tie Load in NPRR405 and thus this change in Planning policy is not justified (maybe it’s a result of Operations curtailing DC Tie Load pre-contingency). Thus, I would request that ERCOT reaffirm that Planning would plan projects for N-1 issues.

Of course, I think that Planning should treat DC Tie Load as other Load and not curtail for N-1-1 or pay less than other Load for TCOS (this is more a PUCT issue)  or be made whole since DC Tie Load are subject to 1.67xTCOS. We can discuss this issue at CMWG and SCT directive on Planning. My goal for this email is to request ERCOT to follow the current Protocols and implement MPs for DC Tie Load as soon as possible and plan for DC Tie Load for N-1 issues.

Please let me know your thoughts on this request.

Regards,

Shams Siddiqi, PhD

President, Crescent Power, Inc.

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