



***Application for Permanent Site-Specific
Exemption from Compliance with ERCOT
Nodal Protocols Concerning Generation
Netting for ERCOT-Polled Settlement Meters***

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Principal

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REQUEST FOR APPROVAL



- **CPS Energy seeks approval by ERCOT TAC and the ERCOT Board for a permanent exemption from the requirements in the Nodal Protocols, Section 10.3.2.3 (6), for the Calaveras Facility including all 9 EPS meter points at the site**
- **ERCOT Protocols, section 10.14, allows entities to seek a permanent metering exemption and requires TAC and ERCOT board approval**

BACKGROUND



- The Calaveras Facility was audited by ERCOT on November 8, 2018. The audit found that JK Spruce 2 generator (JKS2) POI to the ERCOT grid was out of compliance with Protocol 10.3.2.3(6). Protocol 10.3.2.3(6) allows the POI to be within 400 yards. The POIs at the Calaveras site are approximately 570 yards.



The planning and engineering design for the addition of the Spruce Generation Plant to the Calaveras Facility began prior to the deregulation of the wholesale market in the early 1990's, and when the ERCOT Retail Market was opened to competition in 2002. The 1980's Spruce Plant initial design layout of JKS1 and JKS2 generators included the reserve auxiliary transformers to support both generators.

CALAVERAS FACILITY



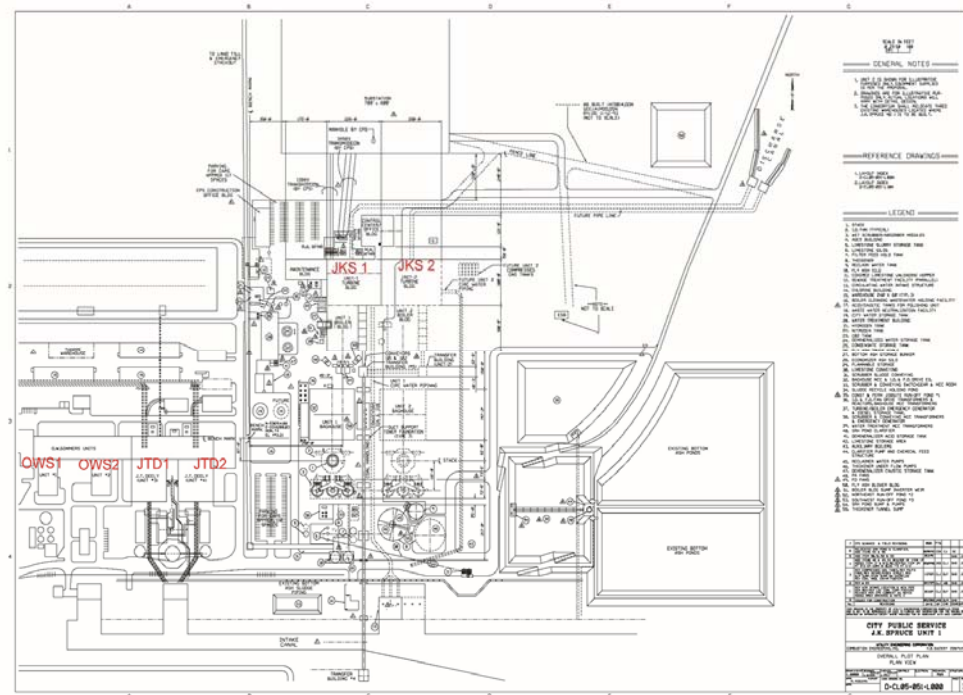
- Calaveras Lake was constructed in 1967 to provide cooling water for future generation units
- OWS1 added in 1972
- OWS2 added in 1974
- JTD1 added 1977
- JTD2 added 1978
- JKS1 added 1992
- JKS2 added 2010
- ERCOT Metering Design Proposal was approved on February 8, 2002 netting the eight EPS metering points for Calaveras Facility plant load and generation, in accordance with Protocol 10.3.2.3



JK SPRUCE PLANT



- The 1980's Spruce Plant initial design layout of JKS1 and JKS2 generators included the reserve auxiliary transformers to support both generators
- In 2009, the ERCOT Metering Design Proposal was amended to include the JKS2 metering point
- Construction of the JKS2 started in 2007 and was completed in 2010
- One 138 kV line from the Sommers - Deely Switchyard feeds the Spruce reserve auxiliary transformers



PROTOCOL 10.3.2.3 (6)



- ...a common switchyard is defined as an electric substation Facility where the POI for Load and Generation Resources are located at the same Facility but where the interconnection points are physically not greater than 400 yards apart
- The addition of the JKS2 metering point at the Calaveras Facility resulted in the interconnection points being 570 yards apart



CPS Energy has already submitted and ERCOT has granted a temporary exemption to 10.3.2.3 (6) for the Calaveras Facility

PERMANENT EXEMPTION APPLICATION



- CPS Energy filed a Permanent Exemption Application for the Calaveras Facility
- The exemption will apply to CPS Energy, as the registered Resource Entity and Qualified Scheduling Entity (QSE) for the Calaveras Facility
- The permanent exemption will start upon the date of approval by the ERCOT Board of Directors and there is no end date to this exemption

CPS Energy seeks a motion from TAC for approval of the Application for Permanent Site-Specific Exemption from Compliance with ERCOT Nodal Protocols, Section 10.3.2.3 (6) for the Calaveras Facility



Thank You





Appendix

