

BAL-001-TRE-2 Primary Frequency Response (PFR)

Responsibility Exclusion Process

Parts 9.3 and 10.3 in the BAL-001-TRE-2 NERC Reliability Standard allow the Generation Owner (GO) to request an exclusion for a generating unit’s initial and sustained PFR scores computed for a Frequency Measurable Event (FME) using the methodology specified in this Standard. The below process details the steps that need to be taken by the GO when submitting an exclusion request and ERCOT’s evaluation process.

Exemption request receipt

* The Market Participant must submit to their Client Services Representative or ERCOT Compliance at compliance@ercot.com, a request for their unit to be excluded **within 30 days** from the day the [“Initial and Sustained Frequency Response Unit Performance” report](https://mis.ercot.com/secure/data-products/group-reports/pdcwg?id=NP12-262-M) is posted on the MIS.

Note: The Initial and Sustained Frequency Response Unit Performance report is a certified report and a QSE digital certificate with an appropriate role is needed to access it.

* The Market Participant must submit adequate supporting evidence on the merits of such a conclusion.

Evaluation Process

* If the request is simple and evidence is clear, direct, and compelling, ERCOT may approve the exclusion.
* ERCOT may request additional documentation if deemed necessary.
* At ERCOT’s determination a request may be submitted for review by PDCWG, which may make a recommendation. However, final determination will be made by ERCOT.
* ERCOT Operations Planning will notify the Market Participant when the request is approved or there is a refusal to authorize a request for exclusion.

Examples of reasonable operating conditions

The table below provides a list of ordinarily experienced operating conditions that may constrain a generating unit from responding within its capabilities during Frequency Measurable Events (FMEs). For such conditions ERCOT may re-evaluate or grant exclusions based on evidence provided. Note that this is not an exhaustive list of operating conditions that may impact the generating unit performance.

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| Operating Conditions | Response Limitation |
| Operation at or near auxiliary equipment operating limits | Boiler feed pumps transitions, condensate pumps, pulverizer operating limits or transition points, and forced draft fans limiting steam flow  |
| Data telemetry failure | Due to telemetry failure, actual generator response data was not communicated to ERCOT |
| External system conditions impacting generator performance | Ambient Conditions* This should not include unit limitations due to seasonal ambient conditions as an alternative to updating the telemetered HSL sent to ERCOT
* Temperature control overrides to protect against mechanical damage
* Environmental constraints
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| Combined Cycle Configuration Transitions | * Transition to or from different combined cycle configurations such as 1x1 to 2x1 or vice-versa as well as other combined cycle configurations if there are more units.
* Combined Cycle configuration changes does not change the Resource Status
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| Unit ramping transition points affecting Ramp Magnitude Calculations | * Unit did not continue to ramp in the gradient level of the pre-perturbation period after the event
* Reached base load or lower ramping transition output levels prior to or during the event.
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| Other operating conditions | * Governor off/out of service (with evidence ERCOT was notified)
* System stability limits
* Control logic issues
* Specific design conditions limiting responses
* Weather related issues
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