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| PGRR Number | [077](http://www.ercot.com/mktrules/issues/PGRR077) | PGRR Title | DC Tie Planning Assumptions |

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| Date | January 30, 2020 |

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| Market Segment | Investor Owned Utility (IOU) |

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| Comments |

Sharyland Utilities (SU) submits these comments to Planning Guide Revision Request (PGRR) 077, DC Tie Planning Assumptions, to ensure utility owned Direct Current Ties (DC Ties) can, to the greatest extent possible, fully support reliability in the ERCOT Transmission Grid. Utility owned DC Ties play a crucial role in the reliability of the ERCOT Transmission Grid and SU is concerned that if utility owned DC Ties are not adequately planned for in transmission planning analyses, their benefit cannot be fully realized by the transmission system. When the ERCOT power reserves drop below specified levels, ERCOT is required to declare an Energy Emergency Alert (EEA). During EEA Level 1, the first of several steps in an emergency, ERCOT can call on all available power supplies, including power from other grids. Many times, this power from other grids is obtained through the use of Emergency Energy across DC Ties as was the case in the August 15, 2019 EEA Level 1 declaration, when ERCOT requested Emergency Energy across the SU Railroad DC Tie for an hour and forty-five minutes. If transmission planning analyses do not provide for the ability of the transmission system to receive imports across a utility owned DC Tie, up to the DC Tie name plate capacity, without causing other reliability issues on the system, ERCOT may not be achieving the maximum reliability benefits provided by utility owned DC Ties. SU recommends that transmission planning analyses should provide for the full import of utility owned DC Ties without causing additional reliability issues on the transmission system.

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| Revised Cover Page Language |

None

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| Revised Proposed Guide Language |

None