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| PGRR Number | [081](http://www.ercot.com/mktrules/issues/PGRR081) | PGRR Title | Related to NPRR1026, BESTF-7 Self-Limiting Facilities and Self-Limiting Resources |

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| Date | September 22, 2020 |

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| Cell Number |  |
| Market Segment | Not applicable |

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| Comments |

ERCOT submits these comments to Planning Guide Revision Request (PGRR) 081 to reflect consensus reached at the Protocol Revision Subcommittee (PRS) meeting on September 10, 2020, and the Battery Energy Storage Task Force (BESTF) meeting on September 11, 2020. These comments also align PGRR081 with revisions proposed in ERCOT comments submitted on September 3, 2020 to related Nodal Protocol Revision Request (NPRR) 1026 which expand the term “Self-Limiting Facility” and remove the term “Self-Limiting Resource.” Additionally, these comments align PGRR081 with language from PGRR082, Revise Section 5 and Establish Small Generation Interconnection Process.

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| Revised Cover Page Language |

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| PGRR Number | [081](http://www.ercot.com/mktrules/issues/PGRR081) | PGRR Title | Related to NPRR1026, BESTF-7 Self-Limiting Facilities |
| Planning Guide Sections Requiring Revision | | 5.2.3, Self-Limiting Facilities (new) | |
| Revision Description | | This Planning Guide Revision Request (PGRR) describes how Self-Limiting Facilities will be evaluated in the Generation Resource Interconnection or Change Request (GINR) process.  This PGRR is written to be consistent with the Battery Energy Storage Task Force (BESTF) Key Topic and Concept #13, which was approved by the Technical Advisory Committee (TAC) by email vote on April 3, 2020. | |
| Business Case | | Developers have expressed interest in adding Energy Storage System (ESS) capacity to existing Resource sites without altering the inverter rating. This PGRR enables these additions by clarifying that the studies and tests conducted as part of the interconnection process for such capacity additions, when designated as components of Self-Limiting Facilities, will consider only the amount of the MW Injection limit, and if appropriate, the MW Withdrawal limit, and not necessarily the gross amount of capacity added. | |

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| Revised Proposed Guide Language |

***5.2.3 Self-Limiting Facilities***

(1) An Interconnecting Entity may elect to designate any proposed new or modified Generation Resource or Energy Storage Resource as a component of a Self-Limiting Facility for the purposes of the Generator Interconnection or Modification (GIM) process. Upon such designation, all studies and tests undertaken pursuant to this Section 5 or that may otherwise be required as a condition for interconnection shall use the Self-Limiting Facility’s proposed MW Injection limit as the maximum potential injection to the ERCOT System, and, if applicable, shall use the Self-Limiting Facility’s MW Withdrawal limit as the maximum potential withdrawal from the ERCOT System, notwithstanding the nameplate capacity values provided.

(2) Any Generation Resource or ESR that has been studied and tested in the GIM process as a component of a Self-Limiting Facility may not, at any time during or after this process, increase the MW Injection limit or MW Withdrawal limit of the Self-Limiting Facility beyond the value or values that were used in these studies and tests without re-initiating the GIM process to evaluate the impacts of the increased value or values.