



NRG Texas Power LLC
910 Louisiana St
Houston, TX 77002

July 19, 2021

From: NRG Texas Power LLC (NRG)

To: Electric Reliability Council of Texas (ERCOT),
ERCOT Board of Directors,
ERCOT Technical Advisory Committee (TAC)

Subject: Application for Permanent Site-Specific Exemption from Compliance With ERCOT Nodal Protocols, Section 10.3.2.3 (6)

Pursuant to Nodal Protocols Section 10.14, Exemptions from Compliance to Metering Protocols, NRG submits the following application to ERCOT and requests that TAC and the ERCOT Board approve a permanent exemption for the Limestone Generating Station from the metering requirements found in Nodal Protocols, Section 10.3.2.3(6), which allows the use of net metering for a facility with multiple Points of Interconnection (POI), provided that the POIs are physically within 400 yards.

ERCOT Nodal Protocols, Section 10.14, establishes the process and information required to seek an exemption from compliance with ERCOT metering requirements. NRG provides the required information below.

10.14.3.1 Information to be Included in the Application

The application for exemption to ERCOT shall include:

- (a) A detailed description of the exemption sought, including specific reference to the relevant Section(s) of these Protocols or the SMOG authorizing ERCOT to grant the exemption, and the Metering Facilities to which the exemption will apply;

NRG seeks approval by TAC and the ERCOT Board for a permanent exemption from the requirements in the Nodal Protocols, Section 10.3.2.3 (6), for the Limestone Generating Station including all 6 EPS meter points at the site (TDSP Project # 100-LEG).

- LEG Gen 1
- LEG Gen 2
- LEG Standby 1
- LEG Standby 2
- LEG 35Kv Trf 1
- LEG 35Kv Trf 2

- (b) A detailed statement of the reason for seeking the exemption, including any supporting documentation;

The Limestone Generating Station is wholly owned by NRG Texas Power LLC and is situated in Limestone County. With a combined name plate capacity of approximately 1,660 MW, consisting of 2 coal-fired generating units, Limestone went into commercial operation in 1985. With the generation resource being 36 years old, the station predates not only the ERCOT Nodal Market, but also the de-regulation of the wholesale electricity market in Texas.



The station has always been registered as a single facility, is settled under a single settlement statement, has 6 points of interconnection (POIs), and one metering facility Design Proposal. The Design Proposal pertaining to the EPS metering facility (TDSP Project # 100-LEG) has been conditionally approved by ERCOT.

Nodal Protocols, Section 10.3.2.3(6), allows the use of net metering for a facility with multiple Points of Interconnection (POI), provided that the POIs are physically within 400 yards (i.e. common switchyard). Following a review of the metering facilities at Limestone by the ERCOT metering department and CenterPoint, it was determined that the distance between the two farthest POIs at the site was approximately 1,370 feet, or 457 yards. Therefore, NRG requests the exemption to comply with the 400-yard rule in Nodal Protocols, Section 10.3.2.3(6).



(c) Details of the Entity(s) to which the exemption will apply;

The exemption will apply to NRG Texas Power LLC, as the registered Resource Entity and Qualified Scheduling Entity for the Limestone Generating Station.

(d) Details of the location to which the exemption will apply;

The location to which the exemption will apply is the Limestone Generating Station located at 3964 FM 39, Jewett, TX, 75846 and includes all 6 EPS meter points at the site (reference TDSP Project # 100-LEG).

(e) Details of the period of time for which the exemption will apply, including the proposed start and finish dates of that period; and

The permanent exemption will start upon the date of approval by the ERCOT Board of Directors. There is no end date to this exemption.

(f) Any other information requested by ERCOT.

Besides satisfying the requirements in ERCOT Protocols, Section 10.14, this exemption request also addresses questions posed in “ERCOT’s General Guidelines for Considering ERCOT Polled Settlement (EPS) Metering Facility Exemptions” which is posted on the MIS.

The proposed exemption does not introduce any known metering inaccuracies, as it merely continues the existing practice of netting generation and auxiliary loads at the site. There are also no changes or impacts to the ERCOT settlements processes expected from the proposed exemption.

NRG has worked with ERCOT and CenterPoint Energy on this permanent metering exemption request, and they both provided information to support the proposed exemption. ERCOT has conditionally approved the Design Proposal pertaining to this EPS metering facility (reference TDSP Project # 100-LEG).

Submitted by:
Bill Barnes
NRG Texas Power LLC