

OGRR Comments

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| OGRR Number | 208 | OGRR Title | Voltage Ride-Through (VRT) Requirements |
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| Date | November 7, 2008 |
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| Submitter's Information | |
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| Market Segment | Independent Generator |

| Comments |
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| Overall Market Benefit | |
| Overall Market Impact | |
| Consumer Impact | |

Eurus fully supports prospective application of a new ERCOT Voltage Ride-Through (VRT) standard which is stronger and more demanding than any other in the country. Our support is made with the understanding that the proposed standard will be applied prospectively so that system reliability is improved, which is necessary for the grid to operate smoothly for all participants. Going-forward, turbine manufacturers, windfarm design engineers, and development decision makers all will have an opportunity to make cost effective adjustments to comply with the new standard. The ability to adjust is particularly important for the new ERCOT VRT standard since it sets such high requirements. Conversely, our considered judgment is that it will be prohibitively expensive and inefficient to retrofit a windfarm where the design, procurement and construction decisions have already been made. Any requirement to retrofit an existing market participant's facility can be done only when there are compelling, documented reasons and when other alternatives are deemed to be impractical. At this point, no such compelling, documented reason has been identified and no alternatives investigated so that there is no basis for requiring retrofit of existing wind generators in order to comply with the new VRT standard.

Eurus believes that there is an immediate need to perform studies to evaluate any current or potential difficulties in the ERCOT System. These studies must include the actual capability of the existing facilities. While there is legitimate concern that some

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wind generators may not perform as desired under low voltage situations, there has been no comprehensive approach to perform the needed studies to in fact identify and investigate the issues. Actual study of the potential problems and evaluation of alternatives could well determine that less costly and more effective options are available. Eurus believes that ERCOT, in conjunction with the Transmission Service Providers (TSPs), and wind generators should immediately start the process of insuring that wind generation facilities models are accurate and up to date and then proceed to expeditiously perform the needed studies.

Eurus pledges to work with ERCOT to insure that the needed data correctly represents the actual capabilities of our windfarm; and we will work with equipment suppliers to facilitate access to required technical information. Eurus looks forward to working with ERCOT and the TSPs to help insure that the study scope is as comprehensive and complete as needed. Eurus will assist ERCOT and the TSPs as needed to evaluate cost effective alternatives to any deficiencies that are identified.

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| Revised Proposed Guide Language |
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None