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| **PGRR Number** | [**095**](http://www.ercot.org/mktrules/issues/PGRR095) | **PGRR Title** | **Establish Minimum Deliverability Criteria** |

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| **Date** | December 7, 2021 |

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| **Submitter’s Information** | |
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| **Market Segment** | Not Applicable |

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| **Comments** |

ERCOT submits these comments to Planning Guide Revision Request (PGRR) 095, Establish Minimum Deliverability Criteria, in response to the 10/13/21 Rainbow Energy Marketing Corporation (REMC) comments; the 11/5/21 Oncor comments; and feedback received from stakeholders at the Planning Working Group (PLWG). These comments address the following issues raised by REMC, Oncor, and other stakeholders:

* Discussions at PLWG identified potential ambiguity as to how the minimum amount of Resource capacity referenced in paragraph (1) would be applied. These comments propose replacing the word “amount” with “percentage” and inserting a new paragraph (2) to clarify ERCOT’s intent. The subsequent paragraphs have been renumbered and paragraph references updated accordingly.
* Multiple PLWG participants requested that ERCOT identify an alternative term for “dispatchable Resources.” REMC’s comments suggest using the term “non-intermittent resources,” but that term does not precisely match ERCOT’s intent to focus the proposed deliverability criteria on Resources that are located within the ERCOT System and whose output is primarily within ERCOT’s control, through dispatch instructions, over the entire real power capability range of each Resource. These comments propose replacing the term “dispatchable” with references to the defined list of Resources to which the proposed standard is intended to apply.
* ERCOT supports Oncor’s recommended addition of operating conditions in categories P2-1 and P3 of the NERC Reliability Standard addressing Transmission System Planning Performance Requirements. Accordingly, these comments incorporate Oncor’s proposed revisions to paragraph (1)(a), as well as additional edits to that paragraph to make the language more consistent with that used in the NERC Reliability Standards.
* Reciprocating engines were inadvertently omitted from the list of technologies for which the proposed deliverability criteria would apply. That omission has been corrected in paragraph (3)(a).
* There was a request from stakeholders at PLWG that ERCOT publicly post the current minimum amount of dispatchable Resource capacity or minimum duration threshold for ESRs used for the proposed deliverability criteria. A new paragraph (5)(a) has been added to address that request.

ERCOT appreciates REMC’s comments regarding potential reliability benefits of Direct Current Tie (DC Tie) imports. However, ERCOT does not support REMC’s proposed addition of DC Tie imports to the list of resources for which the proposed deliverability criteria set forth in PGRR095 would apply.

PGRR095 is intended to be relatively narrow, applying the proposed deliverability criteria only to Resources that are located within the ERCOT System and whose output is primarily within ERCOT’s control, through dispatch instructions, over the entire real power capability range of each Resource. DC Tie imports cannot be considered to be within the ERCOT System, as the energy being imported is inherently produced outside of the ERCOT System. Nor are DC Tie imports primarly within ERCOT’s control, as requests for emergency energy across DC Ties require the consent of the neighboring region.

While ERCOT does not support REMC’s proposed revisions to PGRR095, it does support continued discussion of the potential reliability benefits associated with DC Ties and appropriate policies to realize those benefits. ERCOT believes that it is appropriate for those discussions to take place separately from consideration of PGRR095 and respectfully requests that ROS approve PGRR095 as modified by these comments.

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| **Revised Cover Page Language** |

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| Revision Description | This Planning Guide Revision Request (PGRR) establishes minimum deliverability criteria for Resources that are located within the ERCOT System and whose output is primarily within ERCOT’s control, through dispatch instructions, over the entire real power capability range of each Resource. |
| Business Case | This PGRR is intended to ensure that Resources that are located within the ERCOT System and whose output is primarily within ERCOT’s control, through dispatch instructions, over the entire real power capability range of each Resource are not “bottled” from a reliability perspective. Establishing minimum deliverability criteria for such Resources will facilitate the identification of transmission needs to maintain reliability under system conditions with the potential for resource shortages (e.g., peak Load conditions).  The purpose of minimum deliverability criteria is not to guarantee that any given Resource will be dispatched under any given system condition, but rather to ensure that Resources to which the criteria apply are simultaneously deliverable to serve Demand when needed. As such, this PGRR is not intended to make or imply any changes to Real-Time operations or the use of market tools to dispatch Resources. |

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| Revised Proposed Guide Language |

4.1.1.7 Minimum Deliverability Criteria

(1) In conducting its planning analyses, ERCOT and each TSP shall ensure that an ERCOT-defined minimum percentage of capacity of each Resource described in paragraph (3) below can be delivered to serve peak system Load while meeting the following reliability criteria:

(a) Category P0, P1, P2-1, P3, and P7 planning events from the NERC Reliability Standard addressing Transmission System Planning Performance Requirements; and

(b) The ERCOT-specific reliability performance criteria included in Section 4.1.1.2, Reliability Performance Criteria.

(2) The minimum percentage of capacity referenced in paragraph (1) above shall be applied to each Resource’s applicable Seasonal Net Max Sustainable Rating submitted through the Resource Registration process.

(3) The minimum deliverability condition described in paragraph (1) applies to the following Resources:

(a) Any Generation Resource utilizing nuclear, coal and lignite, combined cycle, gas/oil steam, combustion turbine, or reciprocating engine technology; or

(b) Any Energy Storage Resource (ESR) meeting an ERCOT-defined minimum duration threshold.

(4) Resources other than those described in paragraph (3) above may be redispatched as necessary to meet the requirements of this section.

(5) ERCOT-proposed revisions to the minimum percentage of capacity or minimum duration threshold for ESRs used to implement the requirements of this section will be recommended by the Technical Advisory Committee (TAC) and approved by the ERCOT Board.

(a) ERCOT will post the current values approved by the ERCOT Board pursuant to paragraph (5) above on the ERCOT website.