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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 13, 2021 |

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| **Submitter’s Information** |
| **Name** | Andy Nguyen |
| **E-mail Address** | Andy.Nguyen@lcra.org |
| **Company** | Lower Colorado River Authority |
| **Phone Number** |  |
| **Cell Number** | 512-705-8618 |
| **Market Segment** | Cooperative (CO-OP) |

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| **Comments** |

LCRA submits these comments to Planning Guide Revision Request (PGRR) 095, Establish Minimum Deliverability Criteria, in response to the 12/7/21 ERCOT comments.

Hydro Generation Resources should be included among the Resources listed in paragraph (3) of Section 4.1.1.7, Minimum Deliverability Criteria. Like the other types of listed Resources, Hydro Generation Resources are located within the ERCOT System and their output is primarily within ERCOT’s control, through Dispatch Instructions, over the entire real power capability range of each Resource.

The goal of this PGRR is to identify the minimum deliverability to serve peak system Load. When ERCOT has experienced emergency conditions in the past, Hydro Generation Resources have been dispatched by ERCOT to assist in meeting system demand. Because these types of resources can be dispatched to a specific level of output and controlled by ERCOT, they should be included as part of this PGRR.

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| **Revised Cover Page Language** |

None

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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, hydro, 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.