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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** | October 13, 2021 |

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| **Market Segment** | Independent Power Marketer (IPM) |

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| **Comments** |

Rainbow Energy Marketing Corporation (REMC) appreciates this opportunity to comment on this important Planning Guide Revision Request (PGRR). The business case states that “This PGRR is intended to ensure that dispatchable Resources are not “bottled” from a reliability perspective. Establishing minimum deliverability criteria for dispatchable 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).” In the list of “dispatchable” Resources, the PGRR intentionally omits Intermittent Renewable Resources (IRRs) even though IRRs are much more dispatchable than say nuclear Resources – IRRs are always dispatchable down when generating and can be dispatchable up if self or ERCOT curtailed. Using the term “dispatchable” and excluding IRRs is a contradiction and misuse of the term. What is really important to ERCOT’s goal is that Resources that are not intermittent in nature not be bottled up when needed to serve Load. Thus, rather than inappropriately using the term “dispatchable,” a better term to use to describe the reliability goal this PGRR is trying to ensure is “non-intermittent.” The comments below substitute “non-intermittent” for “dispatchable” in the PGRR.

During Winter Storm Uri, one of the resources that played an important role in reducing the amount of Load that needed to be shed was Direct Current Tie (DC Tie) imports. DC Ties were importing power into ERCOT at near their capacity throughout most of the winter storm. It’s our understanding that Mexico stopped exporting power at some point during the storm only due to natural gas export from Texas to Mexico being curtailed. In order to ensure that such an important resource is not “bottled” when needed most for reliability, our comments add DC Tie imports to the list of non-intermittent resources that should not be “bottled” from a reliability perspective.

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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 non-intermittent resources. |
| Business Case | This PGRR is intended to ensure that non-intermittent resources are not “bottled” from a reliability perspective. Establishing minimum deliverability criteria for dispatchable 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 non-intermittent resources 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 amount of non-intermittent resource capacity can be delivered to serve peak system Load while meeting the following reliability criteria:

(a) Operating conditions in categories P0, P1, and P7 of 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) For the requirements of this section, non-intermittent resources include:

(a) Generation Resources utilizing nuclear, coal and lignite, combined cycle, gas/oil steam, or combustion turbine technologies;

(b) DC Tie Imports; and

(c) Energy Storage Resources (ESRs) meeting an ERCOT-defined minimum duration threshold.

(3) Resources other than non-intermittent resources as defined in paragraph (2) above may be curtailed as necessary to meet the requirements of this section.

(4) ERCOT-proposed revisions to the minimum amount of non-intermittent resource 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.