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| PGRR Number | [103](https://www.ercot.com/mktrules/issues/PGRR103) | PGRR Title | Establish Time Limit for Generator Commissioning Following Approval to Synchronize  |
| Date of Decision | January 5, 2023 |
| Action | Tabled |
| Timeline | Normal |
| Proposed Effective Date | To be determined |
| Priority and Rank Assigned | To be determined |
| Planning Guide Sections Requiring Revision  | 5.5, Generator Commissioning and Continuing Operations |
| Related Documents Requiring Revision/Related Revision Requests | None |
| Revision Description | This Planning Guide Revision Request (PGRR) requires an Interconnecting Entity to complete all conditions for commercial operation of a Generation Resource or Energy Storage Resource (ESR) within 180 days of receiving approval for Initial Synchronization from ERCOT.  |
| Reason for Revision |  Addresses current operational issues. Meets Strategic goals (tied to the [ERCOT Strategic Plan](http://www.ercot.com/content/wcm/lists/144926/ERCOT_Strategic_Plan_2019-2023.pdf) or directed by the ERCOT Board). Market efficiencies or enhancements Administrative Regulatory requirements Other: (explain)*(please select all that apply)* |
| Business Case | As of December 20, 2022, 53 projects representing more than 11,180 MW of capacity in Generator Interconnection or Modification (GIM) received approval for Initial Synchronization under Part 2 (or Part 2b, where applicable) of the ERCOT New Generator Commissioning Checklist more than 180 days ago, and still have not received their Part 3 approval required for full commercial operation. Of these, 36 projects representing 8,151 MW received approval for Initial Synchronization under Part 2 (or 2b) more than one year ago, and 18 projects representing 3,137 MW received approval for Initial Synchronization more than two years ago.Delays in completing the Resource commissioning process create a reliability risk because, in aggregate, there could be a significant amount of generation on the ERCOT System that is not providing system support services. Specifically, any Generation Resource or ESR whose Qualified Scheduling Entity (QSE) has not requested approval of Part 3 of the ERCOT New Generator Commissioning Checklist for the Resource may not have an operational Automatic Voltage Regulator (AVR), Power System Stabilizer (PSS), or turbine speed governor, and may not have demonstrated the Resource’s Reactive Power capability through testing. To alleviate this reliability risk, ERCOT proposes to limit the time between Initial Synchronization and commercial operation by requiring Generation Resources and ESRs to complete all conditions required for commissioning and to require submittal of Part 3 of the ERCOT New Generator Commissioning Checklist within 180 days of receiving ERCOT’s approval for Initial Synchronization. ERCOT believes this period is more than a reasonable amount of time to complete the necessary requirements.  |
| ROS Decision | On 1/5/23, ROS voted unanimously to table PGRR103 and refer the issue to the Operations Working Group (OWG) and Planning Working Group (PLWG). All Market Segments participated in the vote. |
| Summary of ROS Discussion | On 1/5/23, ERCOT Staff presented PGRR103. Participants discussed potential options to mitigate Generation Resources and ESRs delays in achieving full commercial operation within 180 days of receiving ERCOT’s approval for Initial Synchronization, and whether the 180 day time limit was appropriate under certain circumstances. There was general agreement that additional discussion is warranted, including comments suggesting that potential commercial solutions be explored at the Wholesale Market Subcommittee (WMS).  |
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| Opinions |
| Credit Work Group Review | Not applicable |
| Independent Market Monitor Opinion | To be determined |
| ERCOT Opinion | To be determined |
| ERCOT Market Impact Statement | To be determined |
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| Market Segment | Not Applicable |

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| **Comments Received** |
| **Comment Author** | **Comment Summary** |
| None |  |

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| Proposed Guide Language Revision |

5.5 Generator Commissioning and Continuing Operations

(1) For each interconnecting Generation Resource or Energy Storage Resource (ESR), each Interconnecting Entity (IE) shall meet the conditions established by ERCOT before proceeding to Initial Energization, Initial Synchronization, and commercial operations. These conditions may require proof of meeting applicable ERCOT requirements, which may include, but are not limited to, reactive capability, Voltage Ride-Through (VRT) standards, dynamic model template submission, Automatic Voltage Regulator (AVR), Primary Frequency Response (PFR), Power System Stabilizer (PSS), Subsynchronous Resonance (SSR) models, and telemetry.

(2) Within 180 days of receiving ERCOT’s approval for Initial Synchronization of a new or repowered Generation Resource or ESR, a Resource Entity shall ensure the Resource meets the conditions established by ERCOT for commercial operations and shall submit a request to ERCOT to commission the Resource. Nothing in this section affects ERCOT’s authority to require the disconnection of a Resource from the ERCOT System if ERCOT determines that the Resource creates a risk to the reliability of the ERCOT System.

(3) No later than 30 days following the Resource Commissioning Date, the Resource Entity shall submit updates to the resource dynamic planning models based on “as-built” or “as-tested” data and provide a plant verification report as required by paragraph (5)(b) of Section 6.2, Dynamics Model Development. Pursuant to paragraph (5)(c) of Section 6.2, any necessary model updates shall be accompanied with model quality tests.

(4) During continuing operations:

(a) Pursuant to paragraph (5)(c) of Section 6.2, any necessary model updates shall be accompanied by model quality tests.

(b) The Resource Entity shall provide ERCOT with a plant verification report as required by paragraph (5)(b) of Section 6.2 at the following times:

(i) No later than 30 days after implementing a settings change as required by paragraph (7) of Section 6.2;

(ii) No earlier than 12 months and no later than 24 months following the later of the Resource Commissioning Date or March 1, 2021; and

(iii) A minimum of every ten years.