|  |  |  |  |
| --- | --- | --- | --- |
| PGRR Number | [103](https://www.ercot.com/mktrules/issues/PGRR103) | PGRR Title | Establish Time Limit for Generator Commissioning Following Approval to Synchronize |

|  |  |
| --- | --- |
| Date | February 28, 2023 |

|  |  |
| --- | --- |
| Submitter’s Information | |
| Name | Tonya Miller, Caitlin Smith, Jeffrey Clark |
| E-mail Address | [tonya@txsolarpower.org](mailto:tonya@txsolarpower.org), [Caitlin.Smith@jupiterpower.io](mailto:Caitlin.Smith@jupiterpower.io), Jeff.Clark@PowerAlliance.org |
| Company | Texas Solar Power Association, Jupiter Power, Advance Power Alliance |
| Phone Number |  |
| Cell Number | 512-560-9735, 832-326-1238, 512-651-0291 |
| Market Segment | Independent Generator |

|  |
| --- |
| Comments |

Based on discussion with stakeholders at the recent Planning Working Group (PLWG) and Operations Working Group (OWG) meetings, Joint Commenters offer the following revisions to the February 13, 2023 Joint Commenters Comments.

|  |
| --- |
| Revised Cover Page Language |

|  |  |
| --- | --- |
| 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 270 days of receiving approval for Initial Synchronization above 20 MVA from ERCOT. |
| 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, this PGRR limits 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 270 days of receiving ERCOT’s approval for Initial Synchronization. This period is more than a reasonable amount of time to complete the necessary requirements. |

|  |
| --- |
| Revised Proposed Guide Language |

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 270 days of receiving ERCOT’s approval for Initial Synchronization above 20 MVA 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, unless good cause exception to this deadline has been granted. ERCOT must respond to updates to the commissioning plan and checklist submissions within seven days, and test submittals within 30 Business Days. ERCOT may consider the following factors when deciding whether to grant a good cause exception:

(a) The Resource Entity has updated all relevant dates in the online Resource Integration and Ongoing Operations (RIOO) system;

(b) The Resource Entity has updated the commissioning plan with sufficient detail to explain why the plan has changed and any corrective actions necessary to complete commissioning including, but not limited to, ordering additional equipment; and/or

(c) ERCOT needs additional time to review and is satisfied with the communication from the Resource Entity.

|  |
| --- |
| ***[PGRR103: Replace paragraph (2) above with the following on January 1, 2025:]***  (2) Within 270 days of receiving ERCOT’s approval for Initial Synchronization above 20 MVA 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, unless good cause exception to this deadline has been granted. ERCOT must respond to updates to the commissioning plan, checklist submissions, and the AVR and voltage test submittals within seven Business Days of whichever test is submitted latter. ERCOT may consider the following factors when deciding whether to grant a good cause exception:  (a) The Resource Entity has updated all relevant dates in the online Resource Integration and Ongoing Operations (RIOO) system;  (b) The Resource Entity has updated the commissioning plan with sufficient detail to explain why the plan has changed and any corrective actions necessary to complete commissioning including, but not limited to, ordering additional equipment;  (c) The Resource Entity has taken reasonable efforts to complete the commissioning requirements; and/or  (d) ERCOT needs additional time to review and is satisfied with the communication from the Resource Entity. |

(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.