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| NOGRR Number | [245](https://www.ercot.com/mktrules/issues/NOGRR245) | NOGRR Title | Inverter-Based Resource (IBR) Ride-Through Requirements |

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| Date | May 3, 2023 |

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| Submitter’s Information |
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| Market Segment | Independent Generators |

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| Comments |

Clearway Renew LLC submits these comments in its capacity as an ERCOT member and on behalf of affiliates which are subsidiaries of Clearway Energy Group LLC (“Clearway”). Clearway develops, owns, and operates solar, wind, storage, and natural gas generation, with over 9 GW in operation across the U.S. In ERCOT, Clearway operates a combined 1.8 GW wind and solar fleet and has over 3 GW of new wind, solar, and storage under development.

We flag significant concern that the proposed requirements in NOGRR245 are not in line with reasonable expectations for the technological evolution of inverter capabilities, and that retroactive application of these requirements to our existing fleet could cause unanticipated early retirements that would take needed generation off the ERCOT System.

Moreover, we do not believe the application of the proposed requirements to all existing assets is necessary in order to ensure reliable operation of the ERCOT System. To our knowledge, our wind fleet has not been identified by ERCOT as experiencing any ride-through challenges.

Clearway’s fleet includes inverter technology from a number of different Original Equipment Manufacturers (OEMs), the majority of which have indicated that the inverters currently in the field are not capable of meeting NOGRR245 requirements. In some cases, it appears hardware retrofits may be available that would enable compliance with the proposed requirements, but cost and the timeline to procure and install are unknown. In today’s supply chain environment, it could be challenging to impossible to complete retrofits by the proposed 2024 compliance deadline. In other cases, it is unclear whether retrofitting is even possible. We are working with our OEMs to assess retrofit availability and feasibility for each of our plants.

Rather than rush retroactive requirements without fully understanding the feasibility or consequences, ERCOT should 1) take additional time to work with OEMs and generation owners to understand whether inverter retrofits are feasible, 2) explore the feasibility of transmission system solutions such as synchronous condensers to provide voltage support, and 3) identify units with a history of ride-through challenges and target efforts with the owners of those units to identify solutions to increase reliability. This multi-pronged approach will help ERCOT and stakeholders arrive at a more informed and prudent path forward. We are confident there are cost-effective, reasonable solutions to ensure reliability that are not overly punitive and will not threaten the viability of existing generation.

On a go-forward basis, we support ERCOT’s efforts to update ride-through standards and support the adoption of the requirements in NOGRR245 for new generating facilities. We are working with our OEMs to ensure that the equipment we procure for our plants entering construction in ERCOT can comply with the NOGRR245 requirements. We urge ERCOT to work with OEMs to understand the inverter technology roadmaps and establish viable phase-in timelines for new requirements.

We recommend ERCOT separate NOGRR245 into two revision requests – one set of requirements for new resources with Standard Generator Interconnection Agreements (SGIAs) signed after the issuance of this operating guide revision, and a separate set of requirements for existing resources. This will send the proper signals to the market regarding investments in new resources while allowing adequate time to develop a realistic, comprehensive solution for existing resources.

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| Revised Cover Page Language |

None

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| Revised Proposed Guide Language |

None