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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 |

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| Date | February 13, 2023 |

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

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| Comments |

Texas Solar Power Association, Jupiter Power, and the Advanced Power Alliance (together, “Joint Commenters”) support the efforts that ERCOT proposes to close out the interconnection process. However, despite diligent efforts by both companies and ERCOT staff to meet Part 3 of the ERCOT New Generator Commissioning Checklist requirements, many projects take longer than 180 days to complete the process. Part 3 may require 20 or more tests, and projects may run into unexpected delays during the testing process. Our comments propose a solution intended to address the root cause issues of longer than expected generator commissioning timelines. We suggest:

1. Extend the proposed 180-day deadline to 270 days.
2. Allow for requests for extension of the 270-day deadline for good cause. Good cause issues can vary on a case-by-case basis, but to be granted an extension, an interconnecting entity must update the relevant dates in the online Resource Integration and Ongoing Operations (RIOO) system, update their commissioning plan, and clearly communicate the issue at hand to ERCOT. Entities requesting a good cause exemption could be required to pay additional fees upon submittal of the good cause exemption request to recognize the additional time required from ERCOT Staff.
3. ERCOT must respond to interconnecting entities’ ERCOT New Generator Commissioning Checklist submissions, test submittals, or commissioning process questions within seven Business Days to facilitate robust communication and acknowledge of any issues that could lead to commissioning delays.

In addition, we suggest ERCOT assign each entity a single point of contact across the various ERCOT divisions. When a party has multiple requests with multiple engineers for projects on a variety of timelines, communication can be unnecessarily complex, further delaying interconnection. We believe that having one ERCOT Staff who is ultimately responsible for all projects in a portfolio can be helpful with identifying any relevant trends or communication issues. We also recognize that our recommendation for a seven Business Day deadline in the revised proposed language below, may also create a need for additional ERCOT Staff. Therefore, we encourage ERCOT to consider raising fees to hire additional staff.

Finally, we suggest deleting ERCOT’s restatement of their authority for disconnections. If ERCOT would prefer to keep language related to disconnection in Section 5.5, Generator Commissioning and Continuing Operations, we suggest a cite to the relevant Protocol section.

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| Revised Cover Page Language |

None

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| 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, checklist submissions, and test submittals within seven 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.

(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.