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| NOGRR Number | [249](https://www.ercot.com/mktrules/issues/NOGRR249) | NOGRR Title | Communication of System Operating Limit Exceedances |
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| Date  | June 22, 2023 |

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| Submitter’s Information |
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| Phone Number | 214-743-6835 |
| Cell Number |  |
| Market Segment | Investor Owned Utility |

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| **Comments** |

These comments are submitted to clarify Oncor understanding of the intent of Nodal Operating Guide Revision Request (NOGRR) 249.

Oncor recognizes ERCOT’s need to update the Nodal Operating Guide to incorporate the requirements of the North American Electric Reliability Corporation (NERC) Reliability Standards FAC-011-4, System Operating Limits Methodology for the Operations Horizon, and IRO-008-3, Reliability Coordinator Operational Analyses and Real-time Assessments, which become effective on April 1, 2024 for ERCOT as the Reliability Coordinator to notify impacted Transmission Operators (TOs) of system operating limit exceedances in accordance with its system operating limit methodology. It is Oncor understanding that once this NOGRR is approved and implemented, ERCOT will begin posting pre- and post-contingency system operating limit exceedences to the MIS Secure Area as an additional method to notify TOs of thermal and voltage limit exceedences.

Oncor understands that system operating limit exceedences for which ERCOT requires action by a TO will continue to be communicated by ERCOT via a phone call and the issuance of an operating instruction as necessary, consistent with ERCOT practice. TOs are not required by these new requirements, nor does ERCOT expect TOs, to take independent action in response to these new MIS Secure Area and existing GridGeo system operating limit exceedance postings, other than to notify ERCOT of any failure of these exceedances to post in either location, as soon as practicable. Any existing obligations of TOs to respond to system operating limit exceedences, such as base case system operating limit exceedences, can continue to be managed according to the TO’s existing practices and tools in accordance with other requirements identified in the NERC Reliability Standards, ERCOT Protocols, and Operating Guides.

In these comments, Oncor offers clarifying edits to NOGRR249.

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| **Revised Cover Page Language** |

None

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| Revised Proposed Guide Language  |

3.7 Transmission Operators

(1) Transmission Operators (TOs) shall follow ERCOT instructions:

(a) Performing the physical operation of the ERCOT Transmission Grid, including circuit breakers, switches, voltage control equipment, protective relays, metering and Load shedding equipment;

(b) Directing changes in the operation of transmission voltage control equipment per Section 2.7.3, Real-Time Operational Voltage Control;

(c) Managing Voltage Profiles established by ERCOT and Voltage Set Points per Section 2.7.3; and

(d) Taking those additional actions required to prevent an imminent Emergency Condition or to restore the ERCOT Transmission Grid to a secure state in the event of a system emergency.

(e) In response to a System Operating Limit (SOL) exceedance communicated by ERCOT.

(2) TOs must meet all requirements identified in the Protocols for TOs in addition to those requirements stated below for all Transmission Facilities represented:

(a) Monitor system conditions and notify ERCOT when Transmission Facility elements reach maximum safe operating limits as soon as practicable;

(b) Notify ERCOT of any changes in its Transmission Facility status within ten seconds of the change of status as specified in Protocol Section 3.10.7.5, Telemetry Requirements;

(c) Operate and manage Transmission Facilities between energy sources and the point of delivery;

(d) Coordinate emergency communications between a represented Transmission Service Provider (TSP) system and ERCOT;

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| ***[NOGRR177: Replace paragraph (d) above with the following upon system implementation of NPRR857:]***(d) Coordinate emergency communications between a represented Transmission Service Provider (TSP) or Direct Current Tie Operator (DCTO) system and ERCOT; |

(e) Monitor the loading of the transmission system(s);

(f) Notify ERCOT of all changes to the status of all Transmission Elements and Transmission Facilities;

(g) Act as Single Point of Contact for transmission Outages;

(h) Maintain continuous communication (24x7) with ERCOT;

(i) Ensure Dispatch Instructions, received for their system or on behalf of represented TSPs or Distribution Service Providers (DSPs), are carried out as issued;

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| ***[NOGRR177: Replace paragraph (i) above with the following upon system implementation of NPRR857:]*** (i) Ensure Dispatch Instructions, received for their system or on behalf of represented TSPs, DCTOs, or Distribution Service Providers (DSPs), are carried out as issued;  |

(j) Maintain operational metering;

(k) Implement Black Start;

(l) Ensure the ability to receive pre- and post-contingency system operating limit exceedences communicated by ERCOT through at least one of the following methods at all times, unless both systems are unavailable:

1. Postings on the MIS Secure Area, and
2. The GridGeo application.

Upon observation of a failure of either method, the TO will notify ERCOT as soon as practicable.

(m) Ensure the ability to monitor Generic Transmission Limits (GTLs) and the associated flows that affect their system via the Inter-Control Center Communications Protocol (ICCP); and

(n) Monitor GTLs and the associated flows that affect their system.

(3) TOs shall submit to ERCOT, by March 15 of each year, a written back-up control plan to continue operation in the event the TOs control center becomes inoperable. Back-up control plans shall be submitted to ERCOT via secured webmail or encrypted data transfer. TOs shall request that a secure email account be created with ERCOT by sending an email to shiftsupervisors@ercot.com.

(4) Each back-up control plan shall be reviewed and updated annually and shall meet the following minimum requirements:

(a) Include descriptions of actions to be taken by TO personnel to avoid placing a prolonged burden on ERCOT and other Market Participants;

(b) Include descriptions of specific functions and responsibilities to be performed to continue operations from an alternate location;

(c) Include procedures and responsibilities for maintaining basic voice communications capabilities with ERCOT; and

(d) Include procedures for back-up control function testing and the training of personnel.

(5) As an option, the back-up control plan may include arrangements made with another Entity to provide the minimum back-up control functions in the event the TO’s primary functions are interrupted.

(6) By February 15 of each year, each TO shall submit to ERCOT its emergency operations plan to mitigate operating emergencies, as required by the applicable North American Electric Reliability Corporation (NERC) Reliability Standards, and in accordance with Section 8, Attachment L, Emergency Operations Plan. The emergency operations plan shall be submitted to ERCOT via secured webmail or encrypted data transfer. A TO may request a secure email account by sending an email to ERCOT at transrep@ercot.com. If no changes have been made from the previous submission, the TO shall resubmit the emergency operations plan with a new revision date indicating that it has been reviewed and no changes were made. If a TO revises its emergency operations plan, the TO shall submit the revised emergency operations plan to ERCOT within 45 calendar days of the effective date of the revised plan and must include a summary of revisions.

(7) ERCOT shall review each TO’s emergency operations plan to ensure it addresses all relevant reliability risks and will notify the TO of its conclusions within 30 calendar days of receipt of a TO’s new or revised emergency operations plan. ERCOT shall coordinate with the TO on a mutually agreeable time frame for the resubmittal of the emergency operations plan if ERCOT determines that reliability concerns require revision to the emergency operations plan. Plans submitted for the annual review before February 15 will be deemed to have been received on February 15 for ERCOT to initiate the review described in this section.