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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** | July 31, 2023 |

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| **Submitter’s Information** |
| **Name** | Matthew Boms |
| **E-mail Address** | mboms@texasadvancedenergy.org |
| **Company** | Texas Advanced Energy Business Alliance (TAEBA) |
| **Phone Number** | (202) 380-1950 x3055 |
| **Cell Number** | (512) 987-6187 |
| **Market Segment** | Independent Generators |

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| **Comments** |

The Texas Advanced Energy Business Alliance (TAEBA) opposes NOGRR 245, Inverter-Based Resource (IBR) Ride-Through Requirements, and recommends that it remains tabled, pending further stakeholder engagement and a study to assess the reliability and cost impacts of NOGRR245 on market participants and the ERCOT System. Our concern is that there will be significant adverse industry impacts if NOGRR245 is approved, beyond those listed in the ERCOT impact analysis, such as a significant number of retirements of low-cost energy assets that may undermine ERCOT’s stated goal of enhancing reliability while also driving up costs for Texas consumers.

At minimum, we recommend that ERCOT revise NOGRR245 by:

* Developing deadlines with stakeholders to ensure the timeline to comply with the 2800 -2022 – IEEE Standard for Interconnection and Interoperability of Inverter-Based Resources (IBRs) Interconnecting with Associated Transmission Electric Power Systems (“IEEE 2800-2022 standard”) is practically achievable;
* Allowing good cause exemptions for facilities that cannot comply with the new requirements;
* Exchanging the retroactive application of NOGRR245 for a tiered approach where facilities that can convert first are required to comply first; and
* Considering alternative methods to enhance grid reliability such as deploying grid forming technologies to enhance voltage stability, and other commercially available options.

We share ERCOT’s goal of improving the reliability of Inverter-Based Resources (IBRs) and believe that further discussion and tailoring of NOGRR245 would improve reliability and minimize the risks that NOGRR245 currently presents, specifically:

* deenergizing a significant portion of ERCOT generation;
* causing facilities to violate contracts by requiring compliance with upgraded equipment standards that are not possible to meet in the time allowed;
* diminishing developer confidence and reducing investment in the ERCOT region; and
* increasing costs for consumers by deenergizing low-cost Resources.

Generally, we support and echo the concerns and potential solutions outlined in the comments of other stakeholders like the Advanced Power Alliance (APA).

To summarize, TAEBA recommends that NOGRR245 remains tabled while ERCOT gathers more stakeholder feedback. TAEBA welcomes the opportunity to collaborate with ERCOT on reliability solutions, and we believe that further discussion on the implementation of NOGRR245 will yield superior outcomes.

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| **Revised Cover Page Language** |

None

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| **Revised Proposed Guide Language** |

None