

NPRR 1191 and Related Revision Requests

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1. The current language of NOGRR 256 explicitly exempts RCLs from maintaining a load shedding obligation. We suggest that loads that register as a large load and qualify for either RCL, NCLR, or CLR be excluded from load shedding obligation tables. Our opinion is that it feels unfair to have resource obligations like SCED and/or ancillary services while also being treated as a load for load shedding obligation purposes.
2. It is our opinion that ERCOT should separate the VRT portion of NOGRR 256 from NPRR 1191 so that progress can be made in the LFL interconnection queue.
3. With regard to VRT, the IEEE 1668 standard defines criteria to limit voltage sags that customers may expect from utilities and to provide a way to test equipment to see if it will ride through those sags. In our opinion, it was not meant to be a must ride through simply a may ride through. It was written to provide limits as to what a load would need in order to ride through a voltage sag if that was required for acceptable reliability of the customer's facilities. Section 4 of the standard makes it clear that the intended purpose is defining the parameters under which a customer would have continuity of operation.

While we can test our equipment using the procedures outlined in the standard, we would expect them to fail.

4. To our knowledge, there are no bitcoin mining power supplies that are designed to ride through voltage to the boundaries proposed. Even if there were, the cost burden to retrofit them to existing facilities would place an extremely expensive and undue cost on a burgeoning industry.
5. If ERCOT decided to push forward with the VRT requirements as currently proposed, we would expect a lot of market participants, likely including ourselves, would instead simply leverage an under voltage load shedding scheme in existing relays to protect equipment. This would prevent load from automatically repowering after a voltage sag event ends, and lets the customer decide to repower machines after the threat of a follow-on frequency event has subsided.
6. To what extent does ERCOT believe that the VRT problem would still persist if the TSPs strengthened the ERCOT grid to compensate for the increased percentage of intermittent generation? If so, what upgrades would be required, how long would it take, and what would it cost to build that transmission system? For example, what about the prospect of having TSPs or intermittent gen operators install statcom cap banks that are controllable at the subcycle level which would allow voltage to regulate more freely during disturbance conditions?