

August 28, 2023

# PRIORITY POWER MANAGEMENT: COMMENTS & CONCERNS ON ERCOT NPRR1191 / NOGRR256 / PGRR111

Priority Power appreciates the opportunity to provide ERCOT with feedback on the proposed revisions for Large Loads interconnecting to the ERCOT grid. Priority has been active in the LFLTF and remains supportive of timely resolution and implementation of common-sense policies that will allow Large Loads to enhance both the ERCOT markets and reliability. Our concerns and comments are enumerated below.

## NPRR1191

### Regulation

#### Ramp Limitations

- ❖ Large Loads Exhausting Regulation Reserves (Slide 9 of the [ERCOT presentation from 8/16](#)) – ERCOT notes that *since January 2023, 49 SCED intervals have exceeded available Regulation due to rapid changes in Large Load consumption. The loss of available Regulation temporarily limits ERCOT’s ability to control frequency. This was not an issue prior to the connection of the 2700 MW of Large Loads. Ramp rate limits on Large Loads not controlled by SCED will help mitigate depletion of Regulation by Large Loads.*
  - The need for Regulation is caused by many factors, including intermittent resources, generating resources that trip (all types), and load variations, just to name a few.
    - ERCOT should clarify the impacts of the other resources on the utilization of Regulation during the identified SCED intervals (above).
    - How many new intermittent resources were added to the ERCOT grid during the time the 2,700MW of Large Loads were added?
    - ERCOT analyzes the need for Ancillary Services on an annual basis: ERCOT should expect the need for incremental Regulation as the system grows in size and complexity and isn’t a reason to put punitive rules in place for just some loads.
- ❖ CLR (approved after 3/25/2022)
  - 20% of registered peak Demand per minute (6.5.7.12 (1))
    - Concern: is this a hard limitation or is it subject to the availability of ramping resources available to SCED? The status quo is that a CLR can ramp from minimum load to maximum load (or vice-versa) within one SCED interval. We recommend keeping the status quo.

- ❖ Non-CLR (approved after 3/25/2022)
  - Ramp Down: limited to 5% of registered peak Demand per minute or 20MW per minute, whichever is more limiting (6.5.7.12 (2)(a))
  - Ramp Up: limited to 2% of registered peak Demand per minute or 8MW per minute, whichever is more limiting (6.5.7.12 (2)(b))
  - Concerns:
    - We believe that these ramp limitations are overly conservative and unnecessarily restrictive. This will change the bidding & hedging strategy of these loads and potentially result in unintended consequences. It would be better for ERCOT to eliminate the Primary Frequency Response requirement for CLRs, which would allow a lot more of the Large Loads in CLR and available to SCED without any manual operator actions.
    - Economic Impacts
      - Response to high / low clearing price events in real-time
  - Suggestions
    - PFR should not be required for CLR loads that do not participate in Ancillary Services
    - Eliminate the percentages for Non-CLR loads and set explicit ramp limits (preferably symmetrical)

## Exemptions

- ❖ For an approved Compliance Plan (6.5.7.12(4))
  - ERCOT should specify what criteria would warrant a Compliance Plan
- ❖ Large Loads energized prior to 3/25/2022 (6.5.7.12(5))
  - Concern: Definition of “material changes”. ERCOT needs to provide clarity and fully define “material changes”. What other criteria will ERCOT use (in its sole discretion) to determine if an exempt Large Load maintains its exemption?

## NOGRR256

### Business Case

- ❖ Load tripping due to low-voltage events
  - ERCOT describes several events that make the business case for this NOGRR, yet some of the loads that did not ride through were Large Commercial & Industrial as well as Oil & Gas loads. ERCOT should continue to research why these loads tripped.

### Disconnect Devices – Interruption & Restoration

- ❖ Operation of Disconnect Devices (4.5.3.1(2)(e))
  - ERCOT has the ability to request that the QSE or the TSP for a Registered Curtailable Load (RCL) that cannot or will not comply with a deployment instruction disconnect the load.

- Concerns: ERCOT needs to clarify what the criteria and timeline will be for restoration of a disconnection as well as potential penalties or referrals to the PUCT for enforcement action

### Voltage Ride-Through Requirements

- ❖ Priority Power supports the Texas Blockchain Council’s comments on VRT.

## PGRR111

### Required Interconnection Equipment – Remote Disconnect

- ❖ Section 5.2.1.10(1) and 9.2.4(1) requires a remote capable disconnect device that can be used to disconnect the load upon ERCOT’s request.
  - Concerns:
    - Interruption: Please clarify what criteria will be used to determine when remote disconnection is necessary
    - Restoration: ERCOT needs to clarify what the criteria and timeline will be for restoration of a disconnection as well as potential penalties or referrals to the PUCT for enforcement action

### ERCOT Quarterly Stability Assessment

- ❖ Section 5.3.5(1)(c) allows ERCOT to study conditions other than those identified in the FIS or LLIS stability studies.
  - Concern: ERCOT should list all potential studies, timelines, and reasons for deviating from the FIS & LLIS study protocols
- ❖ Section 5.3.5(7) allows ERCOT, in its sole discretion, to determine that a Large Load no longer meets the prerequisites or has made a “material change” that affects the system stability and cannot energize.
  - Suggestion: ERCOT needs to define “material change” and clarify how this will be used

### Clarification: when interruption can support a higher operating / energization level of a Large Load

- ❖ Section 9.3.4 (Slides 28-33)
  - ERCOT should clarify and be more specific on when interruption of the Large Load in a study would allow a higher operating level (Operational Studies, SSWG, etc.)