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| NOGRR Number | [249](https://www.ercot.com/mktrules/issues/NOGRR249) | NOGRR Title | Communication of System Operating Limit Exceedances |
| Date of Decision | | August 31, 2023 | |
| Action | | Recommended Approval | |
| Timeline | | Normal | |
| Proposed Effective Date | | April 1, 2024 | |
| Priority and Rank Assigned | | Not applicable | |
| Nodal Operating Guide Sections Requiring Revision | | 3.7, Transmission Operators | |
| Related Documents Requiring Revision/Related Revision Requests | | None | |
| Revision Description | | This Nodal Operating Guide Revision Request (NOGRR) specifies the methods for Transmission Operators (TOs) to receive electronic communication of system operating limit exceedances from ERCOT. | |
| Reason for Revision | | Addresses current operational issues.  Meets Strategic goals (tied to the [ERCOT Strategic Plan](https://www.ercot.com/files/docs/2018/12/13/ERCOT_Strategic_Plan_2019-2023.pdf) or directed by the ERCOT Board).  Market efficiencies or enhancements  Administrative  Regulatory requirements  Other: (explain)  *(please select all that apply)* | |
| Business Case | | 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, become effective on April 1, 2024. These Reliability Standards specify that ERCOT, as the Reliability Coordinator, is to develop and implement a methodology that communicates system operating limit exceedances to impacted TOs.  In order to meet the new requirements by April 1, 2024, ERCOT will utilize two existing electronic methods of communication to notify impacted TOs of all system operating limit exceedances. ERCOT will post active pre- and post-contingency exceedances on the MIS Secure Area. Pre- and post-contingency exceedances will also be communicated to TOs via the GridGeo application. These electronic communication methods are the minimum forms of notification and do not prevent the use of other means of communication as needed (i.e., verbal notification).  All TOs will be required to have the ability to monitor both the MIS Secure Area and the GridGeo application, but are only required to monitor either the MIS Secure Area or the GridGeo application for system operating limit exceedance communications. This is to ensure TOs will continue to receive notifications should one form of communication become inoperable.  ERCOT currently provides any Generic Transmission Limits (GTLs) and their respective flows via the Inter-Control Center Communications Protocol (ICCP). As a long-term solution, ERCOT is evaluating the provision of additional functionality to the application that will be delivered as part of SCR 820, Operator Real-Time Messaging During Emergency. The electronic system operating limit exceedance communication within the Operator Real-Time Messaging During Emergency application will be considered as an improvement of the application, in addition to the required scope of SCR 820 being delivered. | |
| ROS Decision | | On 4/6/23, ROS voted to table NOGRR249 and refer the issue to the Operations Working Group (OWG). There was one abstention from the Independent Power Marketer (IPM) (SENA) Market Segment. All Market Segments participated in the vote.  On 7/6/23, ROS voted unanimously to recommend approval of NOGRR249 as amended by the 6/27/23 OWG comments. All Market Segments participated in the vote.  On 8/3/23, ROS voted unanimously to endorse and forward to TAC the 7/6/23 ROS Report and 3/17/23 Impact Analysis for NOGRR249. All Market Segments participated in the vote. | |
| Summary of ROS Discussion | | On 4/6/23, participants reviewed NOGRR249. Certain stakeholders noted that not all TOs were in agreement with ERCOT’s approach, and expressed concern that they may not be able to achieve three-part communication.  On 7/6/23, participants reviewed the 6/27/23 OWG comments.  On 8/3/23, participants reviewed the 3/17/23 Impact Analysis. | |
| TAC Decision | | On 8/22/23, TAC voted unanimously to recommend approval of NOGRR249 as recommended by ROS in the 8/3/23 ROS Report. All Market Segments participated in the vote. | |
| Summary of TAC Discussion | | On 8/22/23, TAC reviewed the ERCOT Opinion, ERCOT Market Impact Statement, and Independent Market Monitor (IMM) Opinion for NOGRR249. | |
| ERCOT Board Decision | | On 8/31/23, the ERCOT Board voted unanimously to recommend approval of NOGRR249 as recommended by TAC in the 8/22/23 TAC Report with a recommended effective date of 4/1/24. | |

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| Opinions | |
| Credit Review | Not applicable |
| Independent Market Monitor Opinion | IMM has no opinion on NOGRR249. |
| ERCOT Opinion | ERCOT supports approval of NOGRR249. |
| ERCOT Market Impact Statement | ERCOT Staff has reviewed NOGRR249 and believes the market impact for NOGRR249 is the establishment of an effective method for communicating system operating limit exceedances to impacted TOs in accordance with 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. |

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| Market Segment | Not applicable |

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| **Comments Received** | |
| **Comment Author** | **Comment Summary** |
| Oncor 062223 | Proposed clarifying edits to reflect Oncor’s understanding the proposal does not require TOs to take independent action in response to the 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 |
| OWG 062723 | Indicated its support of the 6/22/23 Oncor comments and proposed additional clarifying edits |
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| **Market Rules Notes** | |

Administrative changes to the language were made and authored as “ERCOT Market Rules.”

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| Proposed Guide Language Revision |

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; or
2. The GridGeo application.

Upon observation of a failure of the method that is being utilized, 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](mailto: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](mailto: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.