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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 | August 11, 2023 |

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| Submitter’s Information | |
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| E-mail Address | Judd.Messer@poweralliance.org |
| Company | Advanced Power Alliance |
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| Cell Number |  |
| Market Segment | Independent Generators |

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| Comments |

During the discussion of ERCOT Nodal Operating Guide Revision Request (NOGRR) 245 at the August 3, 2023 Reliability and Operations Subcommittee (ROS) meeting, ERCOT Staff comments garnered significant interest from impacted market participants, especially with respect to ERCOT’s comments regarding the readiness of original equipment manufacturers (“OEMs”) in developing and implementing the necessary components for compliance.

During the meeting, ERCOT Staff indicated that they had spoken with OEMs and, by and large, solutions exist for all Inverter-Based Resource (IBR) facilities to meet the proposed NOGRR245 compliance requirements and timelines. However, ERCOT Staff then stated that ERCOT recognizes that in order to meet the initially proposed timeline in NOGRR245, ERCOT would have to allow for “specific carveouts” for certain units, good-cause exceptions or more relaxed standards in some cases, and the need to adjust the compliance timeline for certain sets of requirements such as phase angle jump and multi-fault ride-through capability.

Given that ERCOT’s statements to ROS differ from the current version of NOGRR245, and in order to provide clarity to OEMs and impacted market participants, the Advanced Power Alliance (APA) requests that ERCOT update its NOGRR245 comments, redline language and Impact Analysis as quickly as possible to more accurately reflect ERCOT Staff comments from the August 3, 2023 ROS Meeting.

APA members request ERCOT file comments in advance of the next ROS Meeting, scheduled for September 7, 2023, particularly as it relates to each OEM’s vintage/model ability to comply with ERCOT’s June 22, 2023 comments on NOGRR245, or to a similar performance standard that would be acceptable to ERCOT. Alternatively, ERCOT could collaborate with OEMs to create a compliance table for all models.

APA members believe it is essential that ERCOT’s response include as much detail as possible with regard to the OEM products that need no exceptions or modifications to comply with NOGRR245, the specific carve outs and exceptions to performance curves that ERCOT stated they would be willing to provide for any OEM models that requires such carve outs, and examples of the commercially available retrofit packages that ERCOT indicated are available to bring all IBRs, both existing and future, into compliance within the compliance timeline in NOGRR245.

Market participants plan to file comments by August 31st, seven days prior to the ROS meeting, and would very much appreciate ERCOT filing its updated comments by August 23rd. It is imperative that market participants base their comments on the latest version of ERCOT’s proposed requirements and timeline. During the August 11th Inverter-Based Resource Working Group meeting, ERCOT indicated that it would be filing updated comments either on August 11th or the following week. APA member companies look forward to reviewing ERCOT’s revised language and appreciate ERCOT’s focus on this important matter.

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| Revised Cover Page Language |

None

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| Revised Proposed Guide Language |

None