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| PGRR Number | [105](https://www.ercot.com/mktrules/issues/PGRR105) | PGRR Title | Deliverability Criteria for DC Tie Imports |

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| Date | September 22, 2023 |

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| Submitter’s Information | |
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| Cell Number |  |
| Market Segment | Not Applicable |

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| Comments |

ERCOT submits these comments to request that the Technical Advisory Committee (TAC) table Planning Guide Revision Request (PGRR) 105 to give the Public Utility Commission of Texas (PUCT) an opportunity to provide guidance on the policy issues underlying this proposal.

As ERCOT noted in its August 29, 2023 comments, PGRR105’s proposal to extend the minimum deliverablity criteria used for dispatchable Generation Resources to DC Tie imports is at odds with ERCOT’s determination regarding Directive 6 from PUCT Project No. 46304.[[1]](#footnote-1) In resolving that directive, ERCOT found that no transmission upgrades were needed to accommodate flows over the DC Tie facility proposed by Southern Spirit Transmission LLC because PGRR077, DC Tie Planning Assumptions, revised the Planning Guide to require ERCOT to curtail DC Tie flows to resolve any planning criteria violations in ERCOT’s reliability planning studies.[[2]](#footnote-2) The PUCT explicitly approved ERCOT’s determination in its September 30, 2022 order closing Project 46304.[[3]](#footnote-3)

In their comments to PGRR105, Rainbow Energy Marketing Corporation and Southern Spirit argue that the PUCT’s resolution of the Project No. 46304 directives is irrelevant to the consideration of this PGRR because every Revision Request is a change in existing law. But PGRR105 is different from other Revision Requests because it raises potentially significant cost, market design, and reliability issues that have historically been decided by the PUCT and because it proposes a policy that departs from the conclusion reached by the PUCT just last year in its order approving ERCOT’s resolution of Directive 6. Under these circumstances, ERCOT believes the PUCT should have an opportunity to opine on these questions before this PGRR is placed before the ERCOT Board of Directors for consideration.

As authorized by 16 Texas Administrative Code § 25.361(d)(3), ERCOT has today submitted a formal request to the PUCT seeking its input on the policy issues underlying PGRR105.[[4]](#footnote-4) As that request explains, the prospect of a federally mandated minimum interregional transfer requirement elevates the significance of the full-deliverability mandate contemplated in this PGRR. Given the significant cost, market design, and reliability considerations associated with this PGRR, ERCOT believes the PUCT should provide direction on these policy issues first.

In light of ERCOT’s formal request for Commission input on the policy issues underlying this PGRR, ERCOT respectfully requests that TAC table this PGRR.

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| Revised Cover Page Language |

None

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| Revised Proposed Guide Language |

None

1. *See* PUCT Project 46304, Revised Order Creating and Scoping Project (May 23, 2017), available at <https://interchange.puc.texas.gov/Documents/46304_4_941374.PDF>. [↑](#footnote-ref-1)
2. *See* PUCT Project 46304, ERCOT’s Tenth Status Update (June 22, 2022), available at <https://interchange.puc.texas.gov/Documents/46304_25_1217031.PDF>. [↑](#footnote-ref-2)
3. *See* PUCT Project 46304, Order Closing Project (Sep. 30, 2022), available at <https://interchange.puc.texas.gov/Documents/46304_27_1242916.PDF>. [↑](#footnote-ref-3)
4. *See* PUCT Project 41155, ERCOT’s Request for Commission Input Concerning Proposed Revisions to ERCOT Planning Requirements (Sep. 22, 2023), available at <https://interchange.puc.texas.gov/Documents/41155_40_1332206.PDF>. [↑](#footnote-ref-4)