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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** | September 24, 2023 |

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| **Submitter’s Information** | |
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| **Market Segment** | Not Applicable |

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| **Comments** |

ERCOT respectfully asks TAC to table Nodal Operating Guide Revision Request (NOGRR) 245 (at its September 26, 2023 meeting) to provide ERCOT sufficient time to update the Impact Analysis for NOGRR245 and gather information from Resource Entities and original equipment manufacturers (“OEMs”). ERCOT believes that TAC should have all available information in front of it before making its recommendation to the ERCOT Board.

**Impact Analysis**

Pursuant to Nodal Operating Guide Section 1.3.3.7, ERCOT Impact Analysis Based on ROS Report, ERCOT proposes an alternative schedule for developing an Impact Analysis for NOGRR245. ERCOT intends to complete the Impact Analysis prior to the October 24, 2023 TAC meeting.

The ROS-recommended version of NOGRR245 does not address the reliability risk. Consequently, ERCOT believes ROS’s version will result in additional ride-through performance failures and is assessing the impact those events will have on various ERCOT departments’ ability to manage and respond to those events.

**Additional Information Gathering**

ERCOT will also send Resource Entities a Request for Information (“RFI”) seeking an assessment of each wind, solar, and Energy Storage Resource (ESR) unit impacted by NOGRR245 and its ability to comply with each performance requirement in the ROS-recommended version of NOGRR245 and the ERCOT proposed version in its August 18, 2023 comments.

Concurrently, ERCOT will ask OEMs to submit comments identifying the performance capabilities of their existing wind, solar or ESR turbines or inverters, similar to the data GE described in oral comments at the September 14, 2023 ROS meeting.

Lastly, ERCOT is drafting additional comments that will include revising the ROS-recommended version. ERCOT expects to submit those comments within the next few weeks to provide stakeholders adequate time to review them before the October 24, 2023 TAC meeting.