

PGRR 109: ERCOT Responses to TAEBA's Comment

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- ERCOT appreciates the comments from Texas Advanced Energy Business Alliance (TAEBA)
- ERCOT has the following responses to TAEBA's suggestions based on the reasons outlined in the <u>ERCOT comments</u> posted on Oct 10



Summary of ERCOT Responses

Regarding TAEBA's Suggestion: Reduce ERCOT's Response Time to 5 Business Days

ERCOT Response:

- ERCOT needs the 10 Business Day timeframe for thorough review
- ERCOT Staff needs sufficient time as we may need to review models in more details, additional communications and/or discussions internally and/or externally
- Regarding TAEBA's Feedback: Unclear Triggers for 20 Business Day Extension

ERCOT Response:

- The extension acts as a buffer period
- Unusual situations (e.g., high volume of review requests or urgent tasks) may arise



Summary of ERCOT Responses (continued)

Regarding TAEBA's Concern: Defining IBR Changes Needing Dynamic Model Updates

ERCOT Response:

- ERCOT does not have discretion and is not in the position to make the determinations
- ERCOT recommends IBR owners to closely work with OEMs as they have comprehensive insight of the equipment and complex dynamic models
- Regarding TAEBA's suggestion: Reduce TSP Dynamic Stability Study Timeline to 30 Days

ERCOT Response:

 The 30-day timeline was discussed, and the DWG TSPs reached an agreement on the 90 days since TSPs often manage various workloads and study requests



Next Steps

- Based on the reasons mentioned, ERCOT encourages stakeholders to recommend approval of PGRR109 in its original form as submitted by ERCOT
- □ Next Steps and Timelines
 - ROS in November
 - TAC in December
 - Board of Directors in December







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