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| PGRR Number | [112](https://www.ercot.com/mktrules/issues/PGRR112) | PGRR Title | Dynamic Data Model and Full Interconnection Study (FIS) Deadline for Quarterly Stability Assessment |

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| Date | October 31, 2023 |

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| Comments |

LCRA appreciates the opportunity to comment on PGRR112. LCRA agrees with ERCOT’s approach to allow more review time for the Full Interconnection Studies (FIS) studies and more time for Transmission Service Providers (TSPs) to address any comments on the preliminary FIS studies before they are made final. In these comments, LCRA proposes modifications to Section 5.3.2.5, FIS Report and Follow-up, to require TSPs to submit the preliminary FIS studies at least 45 days prior to the applicable quarterly stability assessment deadline. This will better enable TSPs to communicate when necessary data should be provided by the Interconnecting Entity (IE) in order to meet the preliminary report deadline.

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| Revised Cover Page Language |

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| Planning Guide Sections Requiring Revision  | 5.3.2.5, FIS Report and Follow-up5.3.5, ERCOT Quarterly Stability Assessment |

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| Revised Proposed Guide Language |

5.3.2.5 FIS Report and Follow-up

(1) The TSP(s) will submit to ERCOT and to the other TSP(s) via the online RIOO system a preliminary report of findings and recommendations for each of the FIS elements at least 45 days prior to the applicable quarterly stability assessment deadline as defined in paragraph (2) of Section 5.3.5, ERCOT Quarterly Stability Assessment.

(2) Any questions, comments, proposed revisions, or clarifications by any party shall be made in writing to the TSP(s) within ten Business Days after the issuance of each study report, which may cover one or more study elements. ERCOT can extend this review period by an additional 20 Business Days and an email will be sent to notify the affected TSP(s) and the IE that it needs additional time to review the report.

(3) After considering the information received from ERCOT and other TSPs, the study element(s) report will be deemed complete and a final report shall be provided, via the online RIOO system, to ERCOT and all TSPs. The TSP(s) conducting the FIS shall submit via the online RIOO system, the SSR analysis, if required, as a separate document from the remainder of the report.

(4) Each final study element report will be available via the online RIOO system after the report has been deemed complete and marked “final” and will be posted to the MIS Secure Area within ten Business Days. Coincident with posting of the final FIS study element reports to the MIS Secure Area, ERCOT will notify the TSP and the IE when each study element report is posted. The TSP shall provide a copy of each final report to the IE upon request.

(5) The study element(s) report shall not contain sensitive information including, but not limited to, confidential plant design information including stability study model data and parameters and contingencies causing instability. The TSP(s) shall provide this information to ERCOT and other TSP(s) upon request.

(6) The TSP issuing the final FIS element(s) report shall indicate that the report is the final report required by the FIS. At the end of the ten Business Day review period following the issuance of the final FIS element(s) report, the FIS will be deemed complete and the IE and TSP may execute an SGIA.

(7) Should the IE wish to proceed with any proposed transmission-connected project, the IE must execute a new or amended SGIA with the appropriate TSP within 180 days following the completion of the FIS (includes all major study element(s) reports). Failure to do so may result in a cancellation as described in Section 5.2.6, Project Cancellation Due to Failure to Comply with Requirements.

(8) If during the time after the FIS is completed and before Initial Synchronization, changes occur that substantially differ from the assumptions used for the FIS, ERCOT and the TSP(s) shall determine the impact of the changes on the results of the FIS and, if applicable, SSR studies. If the changes are determined by ERCOT and lead TSP(s) to have the potential to materially alter the conclusions documented in the FIS, the lead TSP(s) will make appropriate modifications to one or more FIS study elements. The updated FIS reports will be submitted via the online RIOO system. Any questions, comments, proposed revisions, or clarifications by any party shall be made in writing to the TSP(s) within ten Business Days after the issuance of an updated study report. Initial Synchronization of the generator may be delayed pending completion of these modifications to the FIS.

5.3.5 ERCOT Quarterly Stability Assessment

(1) ERCOT shall conduct a stability assessment every three months to assess the impact of planned large generators connecting to the ERCOT System. The assessment shall derive the conditions to be studied with consideration given to the results of the FIS stability studies for large generators, with planned Initial Synchronization in the period under study. ERCOT may study conditions other than those identified in the FIS stability studies.

(2) Large generators that are not included in the assessment as described in this Section as result of the IE failing to meet the prerequisites by the deadlines as listed in the table below will not be eligible for Initial Synchronization during that three-month period. The timeline for the quarterly stability assessment shall be in accordance with the following table:

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| **Generator Initial Synchronization Date** | **Last Day for an IE to meet prerequisites as listed in paragraph (4) below** | **Completion of Quarterly Stability Assessment** |
| Upcoming January, February, March | Prior August 1 | End of October |
| Upcoming April, May, June | Prior November 1 | End of January |
| Upcoming July, August, September | Prior February 1 | End of April |
| Upcoming October, November, December | Prior May 1 | End of July |

(3) If the last day for an IE to meet prerequisites or if completion of the quarterly stability assessment as shown in the above table falls on a weekend or holiday, the deadline will extend to the next Business Day.

(4) Prerequisites to be satisfied prior to the large generator being included in the quarterly stability assessment:

(a) The generator has met the requirements of Section 6.9, Addition of Proposed Generation to the Planning Models.

(b) The IE has provided all generator data in accordance with the Resource Registration Glossary, Planning Model column, including but not limited to steady state, system protection and stability models.

(i) The dynamic data model will be reviewed by ERCOT prior to the quarterly stability assessment and shall be submitted by the IE at least 30 Business Days before the quarterly stability assessment deadline. If either the IE does not submit the required dynamic data model at least 30 Business Days before the quarterly stability assessment or if this review cannot be completed prior to the quarterly stability assessment deadline, ERCOT may refuse to allow Initial Synchronization of the Generation Resource or Settlement Only Generator (SOG) in the three-month period associated with the quarterly stability assessment deadline. ERCOT shall include the Generation Resource or SOG in the next quarterly stability assessment period provided that the review of the dynamic data model has been completed prior to the next quarterly stability assessment’s deadline.

(c) The following elements must be complete:

(i) FIS studies;

(ii) Reactive Power Study; and

(iii) System improvements or mitigation plans that were identified in these studies as required to meet the operational standards established in the Protocols, Planning Guide, Nodal Operating Guides, and Other Binding Documents prior to synchronizing the generator.

(d) The data used in the studies identified in paragraph (4)(c) above is consistent with data submitted by the IE as required by Section 6.9.