



PGRR109: ERCOT Response to Joint Commenter's Comments

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- ❑ ERCOT appreciates the comments from Southern Power Company, EDF Renewables, Invenergy, and Luminant (“Joint Commenters”) comments
- ❑ ERCOT has the following responses to the Joint Commenter's suggestions based on the reasons outlined in the [ERCOT comments](#) posted in the ERCOT PGRR109 website

Summary of ERCOT Responses

- ❑ Regarding Joint Commenter's Suggestion: Review period impact on Part 3 timeline (i.e., within 300 days in the approved PGRR103)

ERCOT Response:

- ERCOT has updated the PGRR109 to accommodate the Joint Commenter's input, making it as a valid reason for requesting an extension of the Part 3 timeline

Summary of ERCOT Responses

- ❑ Regarding Joint Commenter's Proposal: Removing IBR settings and equipment changes from Planning Guide Section 5.2.1, Applicability

ERCOT Response:

- ERCOT does not support the proposal based on the following reasons
 - Neglecting to address the recommendations from the NERC Odessa event reports (2021 and 2022) and the recent NERC Level 2 Alert (2023)
 - Proposal does not align with FAC-002-4 R6 and its Implementation Guidance
- PGRR109 establishes a screening process for proposed equipment and setting changes before implementing them, ensuring a closer look through the GIM process only when necessary, without mandating GIM requests

Summary of ERCOT Responses (Continued)

❑ Regarding Joint Commenter's Suggestions:

- Limit the proposed review process to equipment changes affecting the dynamic response at the Point of Interconnection (POI) before implementation
- Exclude setting changes from the review process. Instead, IBR owners would submit updated models within 180 days after the field implementation complete

ERCOT Response:

- ERCOT does not support these proposals
- This proposal does not address NERC's recommendations and does not align with the FAC-002-4 R6 Implementation Guidance.
- It could result in significant operational challenges and concerns

Summary of ERCOT Responses (Continued)

- ❑ Regarding Joint Commenter's Comment: Lack of a clear definition or threshold of equipment or settings changes

ERCOT Response:

- Based on the comment and based on the example of “qualified changes” in the Implementation Guidance of FAC-002-4 R6, ERCOT has updated the PGRR109 to make the definition clearer

Summary of ERCOT Responses (Continued)

- ❑ Regarding Joint Commenter's Concern: Challenges related to obtaining model updates when OEMs are unavailable or their equipment is discontinued

ERCOT Response:

- ERCOT would like to emphasize the importance of diligence and proactive exploration of alternative approaches to address these issues
- ERCOT encourages the consideration of alternative approaches, such as engaging third-party experts and exploring all feasible options to ensure timely and accurate updates
- These efforts are critical to meet the requirements specified in the NERC Reliability Standard MOD-032.1 and ERCOT Planning Guide Section 5.5 and 6.2

Summary of ERCOT Responses (Continued)

- ❑ Based on the Joint Commenter's comment, ERCOT updated a couple of minor numbering references in Section 6.2

Next Steps

- ❑ ERCOT encourages stakeholders to recommend approval of the revised version of PGRR109

- ❑ Next Steps and Timelines
 - ROS in December 2023
 - TAC in January 2024
 - Board of Directors in February 2024

Questions?



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Appendix: Flowchart of Proposed Review Process

