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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** | December 2, 2023 |

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

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| **Comments** |

ERCOT submits these comments to expand on the ERCOT Staffing Impacts in the 12/2/23 Revised Impact Analysis.

The 1/11/23 Impact Analysis based on NOGRR245 as submitted requires 3 FTEs which are included in the ERCOT 2024-2025 approved budget. The 12/2/23 Revised Impact Analysis based on the 9/14/23 ROS Report adds an additional FTE in the Event Analysis department which is not included in the ERCOT 2024-2025 approved budget.

The ROS-recommended version of NOGRR245 in the 9/14/23 ROS Report prioritizes commercial consideration over reliability impacts and allows for broad exemptions that would likely result in additional frequency and severity of ride-through failure events. The additional FTE is needed to account for these additional events and associated follow up activities resulting from the events.

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| Revised Cover Page Language |

None

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| Revised Proposed Guide Language |

None