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| PGRR Number | [109](https://www.ercot.com/mktrules/issues/PGRR109) | PGRR Title | Dynamic Model Review Process Improvement for Inverter-Based Resource (IBR) Modification |

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| Date | October 10, 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 in response to the October 4, 2023 Texas Advanced Energy Business Alliance (TAEBA) comments regarding ERCOT's proposed rule changes in this Planning Guide Revision Request (PGRR). While ERCOT appreciates TAEBA’s support for ERCOT's proposed rule changes with certain modifications and reference to similar practices by other grid operators, ERCOT does not support the TAEBA comments for the reasons explained below.

TAEBA proposes to reduce the ERCOT response time to five Business Days following an Interconnecting Entity’s (IE’s) submission of its dynamic models. ERCOT believes the proposed 10 Business Day timeframe appropriately allows for thorough reviews, ensuring the accuracy and reliability of assessments. It is important to understand that ERCOT Staff often handles multiple tasks concurrently. This year, in particular, there was a record-breaking influx of review requests, totaling approximately 600, all related to new generation interconnection projects – excluding reviews for existing units.

It is essential that ERCOT have the discretion to extend the review period for submissions as the need arises. The 20 Business Day extension provision is intended to provide ERCOT sufficient time to address unforeseen situations such as the high volume of review requests mentioned above or other urgent priorities emerging simultaneously. The extension provision would also provide time to have discussions with internal and/or external parties to resolve questions and issues. That being said, ERCOT remains committed to conducting reviews as promptly and efficiently as possible, and is dedicated to balancing expediency with the thoroughness required to uphold the quality and dependability of its assessments. It is also important to note that the evaluation process encompasses a comprehensive assessment of all response characteristics, extending beyond the consideration of the MW output alone.

ERCOT appreciates TAEBA’s concern regarding the need for clarity on what constitutes a modification to settings or equipment for IBRs that affect electrical performance requiring dynamic model updates. ERCOT, as the Planning Coordinator, does not possess the discretion or expertise to determine what specific settings or equipment changes directly impact electrical performance and necessitate dynamic model updates. These responsibilities belong to facility owners and Original Equipment Manufacturers (“OEMs”). ERCOT recommends facility owners closely collaborate with their OEMs since they have comprehensive insight into the equipment's specifications and capabilities and the complex details of dynamic models. This collaboration with OEMs will facilitate facility owners’ ability to make well-informed decisions regarding modifications. However, to provide some guidance, examples of such modifications could include changes like transformer replacements or adjustments to tunable model parameters such as control gains and protection settings.

TAEBA proposes to shorten the Transmission Service Provider’s (TSP's) timeline for the limited dynamic stability studies. The proposed 90-day timeline has been carefully established to allow for appropriate assessments, including any necessary discussions or meetings with relevant parties. Using a 30-day timeline has been explored in the past at Dynamics Working Group (DWG) meetings, and the DWG TSPs reached a consensus on the proposed 90-day timeline based on the fact that TSPs often contend with resource and time constraints due to multiple workloads including study requests.

Based on the considerations mentioned above, ERCOT encourages stakeholders to recommend approval of PGRR109 in its original form as submitted by ERCOT.

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| Revised Cover Page Language |

None

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| Revised Proposed Guide Language |

None