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| NOGRR Number | [255](https://www.ercot.com/mktrules/issues/NOGRR255) | NOGRR Title | High Resolution Data Requirements |

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| Date | December 20, 2023 |

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| Comments |

The Advanced Power Alliance (APA) appreciates ERCOT’s focus on ensuring and maintaining reliability. We also appreciate the opportunity to provide feedback and comments on Nodal Operating Guide Revision Request (NOGRR) 255 based on the 11/1/23 ERCOT comments.

APA understands the Business Case presented by ERCOT for NOGRR255 and ERCOT’s desire to move forward expeditiously; however, APA agrees with the 12/4/23 AEP Service Corporation (AEPSC) comments, which state that a consensus has not been developed among the relevant ERCOT working groups with regard to the impacts of NOGRR255. APA urges further review and analysis by the System Protection Working Group (SPWG), Dynamics Working Group (DWG), and the Inverter-Based Resource (IBR) Working Group (IBRWG) before moving forward with adoption of NOGRR255.

ERCOT has stated that their intention is to align NOGRR255 with North American Electric Reliability (NERC) Reliability Standard Protection and Control (PRC)-028, Disturbance Monitoring and Reporting Requirements for IBRs. However, NERC PRC-028 is still under development and did not pass its initial ballot. NERC PRC-028 is currently in a comment period and NERC’s revised draft is not expected to be published until sometime in January 2024, with final adoption expected at a date “to be determined.” Once a final draft is adopted, it then must go through the NERC and Federal Electric Regulatory Commission (FERC) approval process. It would be premature for ERCOT to implement NOGRR255 ahead of the final standard language from NERC and FERC, as the standard adopted by ERCOT may conflict with the final adopted version of NERC PRC-028.

NERC introduced PRC-028 in January 2021 and the process for developing the proposed standards has been thoughtful and deliberative. Conversely, ERCOT only recently introduced NOGRR255 in June of 2023, and adoption at this point would come without the necessary deliberation and consensus among the requisite stakeholder groups. It is too soon to be sure what will ultimately be approved by NERC and FERC and, as such, APA urges ERCOT to wait before adopting NOGRR255, to allow time to align with the final version of NERC PRC-028.

APA believes it is important for ERCOT to recognize that requiring the installation of additional equipment to meet retroactive requirements comes with associated costs and complications including but not limited to outage time onsite, missed market revenues, new equipment costs, and field labor for installation and commissioning. In general, generators will need to ensure they have the necessary hardware in place to meet the phasor measurement unit requirements. The high costs associated with on-site feeders, and lack of available knowledge of how many will be required coupled with the costs, liability, and obligations surrounding data retention is a challenge for retrofitting legacy sites. Communications, bandwidth, and data storage at some locations may be extremely problematic. Resource owners will have to rely on original equipment manufacturers to meet the compliance requirements outlined in NOGRR255, and original equipment manufacturers will be stretched to provide the necessary retrofits across the country. As Southern Power Company and Invenergy point out in the 12/4/23 SPC and Invenergy comments, the pressure on original equipment manufacturers because of NOGRR255 is compounded by the proposed changes ERCOT is seeking in NOGRR245, Inverter-Based Resource (IBR) Ride-Through Requirements. ERCOT must be realistic with its compliance requirements and timelines in both NOGRR255 and NOGRR245, as solutions to meet the requirements are not yet understood nor is there an understanding at this time of when and if solutions can be developed for legacy IBRs.

Original equipment manufacturers or other software/hardware vendors will have to develop the necessary equipment and software to meet the requirements of NOGRR255 because solutions do not exist today. ERCOT should set reasonable and achievable compliance timelines for NOGRR255 in alignment with what original equipment manufacturers and other software/hardware vendors believe is attainable.

In Section 6.1.4.1.2, Fault Recording Data and Triggering Requirements, phase under and over-voltage fault record triggering requirements of 0.9 and 1.1, respectively, for "two cycles or longer" is confusing language at best. At two cycles, these limits are within the NERC PRC-024-3 "No Trip Zone" and would trigger unnecessary records. In this same section, the under and over-frequency requirements do not match what was issued in NERC PRC-024-3. This was referenced in item 1 of the preamble comments of the 11/1/23 ERCOT comments which states that frequency triggers should be adjusted from 59.3 to 59.5 and 60.6 to 60.5, respectively. However, the NERC PRC-024-3 "No Trip Zone" limits for under and over-frequency are 59.4 and 60.6, respectively. APA urges ERCOT to align NOGRR255 with NERC standards to ensure that resource owners can comply with both ERCOT and NERC requirements. As stated in the 12/7/23 Engie comments, a single North American reliability standard will allow the industry to focus its efforts toward complying with one, mandatory standard rather than numerous different regional standards. Further, APA supports Engie’s recommendation that ERCOT issue a Request For Information to original equipment manufacturers specifically addressing the IBR unit level data recording requirements to gain further context on the ability of existing IBR units to comply without retrofit.

In summary, APA recommends that NOGRR255 remain tabled at ROS to allow for alignment with the final NERC PRC-028 standard and to provide an opportunity for the aforementioned ERCOT working groups to have time to deliberate the appropriate path forward for NOGRR255 implementation.

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| Revised Cover Page Language |

None

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| Revised Proposed Guide Language |

None