|  |  |  |  |
| --- | --- | --- | --- |
| NOGRR Number | [255](https://www.ercot.com/mktrules/issues/NOGRR255) | NOGRR Title | High Resolution Data Requirements |
|  |  |
| **Date** | March 26, 2024 |
|  |  |
| **Submitter’s Information** |
| Name | Stephen Solis |
| E-mail Address | Stephen.Solis@ercot.com |
| Company | ERCOT |
| Phone Number | 512-248-6772 |
| Cell Number | 512-426-4721 |
| Market Segment | Not Applicable |

|  |
| --- |
| Comments |

ERCOT appreciates the 3/22/24 Luminant comments but continues to urge TAC to recommend approval of the language endorsed and forwarded to TAC in the 3/7/24 ROS Report. Due to the need to begin implementing Nodal Operating Guide Revision Request (NOGRR) 255 to address the reliability need for this data, consistent with Federal Energy Regulatory Commission Order 901, and North American Electric Reliability Corporation Reliability Standards to Address Inverter-Based Resources, ERCOT recommends Luminant issue a separate NOGRR to vet concerns raised at this late hour and encourages Luminant to consider inventorying its current disturbance monitoring equipment to evaluate future language to ensure new and replaced equipment will meet the higher standard and include a phase-in period. ERCOT generally opposes reducing requirements to the lowest common denominator, which encourages use of low settings even on equipment with greater capabilities.

ERCOT objects to reducing the fault recording window from 60 cycles to 30 cycles because some generator responses and dynamic modeling may need to account for additional system changes extending beyond the normal fault and fault clearing period as Loads trip and other dynamic and governor responses begin to respond.  While ERCOT originally sought 5 seconds (*i.e.*, 300 cycles), it reduced the requirement to 60 cycles to minimize impact. ERCOT encourages Luminant to evaluate settings adjustments, upgrades, or replacements as needed. Though most modern relays may be sufficient, fault recorders are readily available if relay capabilities are insufficient.

ERCOT also opposes removing language allowing ERCOT to require disturbance monitoring equipment at any Load locations that experience abnormal changes such as those caused by Distribution Generation Resources (DGRs)/Distribution Energy Storage Resources (DESRs) or other distribution system or distribution-system-to-transmission-system interactions.  ERCOT already reduced NOGRR255’s impact by not changing the requirement for disturbance monitoring equipment from all such instances to only where observations of abnormal responses necessitate investigation. Removing ERCOT’s proposed location language would fail to provide ERCOT the necessary information it needs to perform event analysis and modeling, which is contrary to FERC Order 901.

Finally, ERCOT opposes removing the requirement to ensure all dynamic disturbance recording will be phasor measurement units by a certain date.  ERCOT would consider, in a future NOGRR, revising the language such that all dynamic disturbance recording devices would have continuous recording as opposed to trigger-based recording under the currently-proposed timeframe to ensure reliable data capture and consistency for critical data.

|  |
| --- |
| **Revised Cover Page Language** |

None

|  |
| --- |
| Revised Proposed Guide Language |

None