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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** | March 22, 2024 |
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| Market Segment | Independent Generator |

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| Comments |

Luminant Generation Company LLC (“Luminant”) offers these comments to Nodal Operating Guide Revision Request (NOGRR) 255, on top of the 2/1/24 ROS Report. Luminant asks that TAC include these comments in its report on NOGRR255 to the ERCOT Board, which include both technical clarifications and changes rooted in principle.

The over-arching theme to Luminant’s comments is avoiding disconnections between the requirements in NOGRR255 and the requirements in the North American Electric Reliability Corporation’s (NERC’s) Reliability Standard PRC-002 – in particular avoiding the application of provisions intended for Inverter-Based Resources (IBRs) to synchronous machine-based generation resources (e.g., thermal generation resources). Most disturbance monitoring equipment that is installed today was designed to meet PRC-002 requirements and/or previous versions of the ERCOT Nodal Operating Guide.

The primary driver for NOGRR255, though, is IBR performance from recent disturbance events. Luminant recognizes ERCOT’s interest in enhancing its event analysis capabilities and in implementing some lessons learned from experience with investigating actual disturbance events. However, just as NERC recognizes that different disturbance monitoring and reporting requirements are appropriate for traditional generation resources and IBRs (e.g., creating a separate standard for IBRs in the proposed PRC-028-1),[[1]](#footnote-1) NOGRR255 should strive to avoid spillover of potentially costly requirements from IBRs to traditional generation resources that have not exhibited the same reliability risks. Therefore, Luminant generally recommends that Sections 6.1.2, Fault Recording and Sequence of Events Recording Equipment, and 6.1.3, Phasor Measurement Recording Equipment Including Dynamic Disturbance Recording Equipment, follow PRC-002, and that Sections that apply generally to both IBRs and traditional generators defer to PRC-002 requirements. These changes include (but are not limited to):

* Aligning the fault recording and sequence of events recording equipment requirements in 6.1.2 and dynamic disturbance recording requirements in 6.1.3.2 with the NERC Reliability Standard PRC-002 R10, which is +/- 2 milliseconds of Universal Time (UTC). Luminant also proposes to recombine the last two paragraphs under 6.1.2 since the same device is typically performing both functions so having two separate requirements may be redundant. Note that the 1 microsecond requirement contemplated in the ROS Report is based on IEEE2800, but is only applicable to IBRs; per 6.1.1.1, Applicability, this provision in 6.1.2 explicitly only applies to non-IBRs, so the PRC-002 standard is the appropriate basis for this section because most non-IBRs should have relatively recent fault recording installations that meet that standard.
* In 6.1.2.1, Fault Recording Requirements, revert from 60-cycle records to 30-cycle records. PRC-002 (R4 - 4.1) requires 30 cycles; not all devices can record 60-cycle events. From a practical standpoint, there are equipment limitations that may limit the recording length - e.g., relays in particular have limited memory. The vast majority of events that require fault recording last less than 5-10 cycles so 30 cycles should be sufficient. And longer fault record durations will reduce the number of events that are stored so events could be over written if the record length is too long.
* Allow equipment to be installed on both the high side and the low side of the Main Power Transformer in paragraph (3) of 6.1.2.3, Fault Recording and Sequence of Events Recording Data Requirements, and 6.1.3.2.3, Phasor Measurement Unit Data Recording and Redundancy Requirements. PRC-002 (R7 - 7.1) allows for both low-side and high-side. As a practical matter, some generators may not own the high side equipment and only have fault recording on the low side.
* Reverting to prior language in Section 6.1.3 to not require dynamic disturbance recording to function as phasor measurement unit retroactively. Dynamic disturbance recording and phasor measurement unit are fundamentally different. Dynamic disturbance recording equipment that was installed at a great cost to meet PRC-002 may or may not be able to provide phasor measurement unit data. From a technical standpoint, dynamic disturbance recording is effectively slower fault recording (.24-2.4kHz) and continuous data is recorded at either 30 or 60Hz. Phasor measurement unit is a form of continuous data but has to meet the IEEE C37.118 requirements. phasor measurement unit data typically requires an additional phasor data concentrator to collect the data, but not all disturbance monitoring equipment that is installed today to meet current recording requirements has the capability to provide phasor data; however, the equipment has to be able to provide at least continuous data. In conclusion, this requirement would require additional investment with very little benefit to the generator or to ERCOT.

There is one notable exception to this approach, which is the timeline for providing data to ERCOT. While PRC-002 (R11) is clear that the timeline for storing sequence of event, fault recording, and dynamic disturbance recording data is 30 days and the timeline for retrieving it is 10 days, Luminant recognizes ERCOT’s experience with a delivery time exceeding the retrievable time has created hurdles to ERCOT’s ability to compile event data. Therefore, Luminant understands ERCOT’s desire to modify these timelines and reluctantly agrees – but with the understanding that reasonable extensions should be granted when requested, as seven calendar days may present practical challenges in some instances.

One concern that Luminant has is with the proposed language in Sections paragraph (3) of Section 6.1.2.2, Fault Recording and Sequence of Events Recording Equipment Location Requirements, and paragraph (1)(e) of Section 6.1.3.2.2, Phasor Measurement Unit Location Requirements, that would give potentially unlimited scope to ERCOT to add costs to traditional generation resources through additional sequence of event, fault recording, or phasor measurement unit capabilities with little clarity regarding when ERCOT could require such changes. It is Luminant’s position that a generator that has otherwise complied with the requirements of the Nodal Operating Guide should have good reason to believe that it has met its requirements and will not be subjected to additional costs after the fact without the benefit of re-evaluating the rule itself. Therefore, Luminant recommends that these provisions be deleted. Luminant also notes that there are similar provisions regarding large Loads; Luminant does not offer suggested edits to those sections and defers to members of the large Load stakeholder community to offer changes, if any are warranted.

Additionally, as a matter of policy, Luminant disagrees with establishing retroactive requirements. New requirements should be effective no sooner than the date the new rule becomes effective following approval by the Public Utility Commission of Texas (PUCT). Therefore, in places that had contemplated new requirements effective on or after January 1, 2024, Luminant has proposed June 1, 2024 based on the assumption that NOGRR255 will be endorsed by the ERCOT Board in April 2024 and approved by the PUCT in May 2024. If approval comes sooner or later than June 1, 2024, that date could be changed to align – but the overarching comment is that January 1, 2024 is more than two months in the past and cannot be a meaningful effective date for new requirements in a rule that has not yet been approved.

Luminant has also recommended several practical modifications throughout, including but not strictly limited to:

* Ensuring that all sequence of event status points are *binary;*
* Removing dynamic disturbance recording equipment from the list of fault recording/sequence of event equipment, given that dynamic disturbance recording equipment does not have fault recording capabilities;
* Remove the proposed requirement for existing non-IBR dynamic disturbance recording equipment to retrofit to phasor measurement unit equipment;
* Ensure that continuous fault recording is able to meet the triggering requirements for fault recordings since some digital fault recordings (i.e., those meeting USI-9000 specifications) have the ability to record continuous oscillography at the required fault recording sampling rate. This is useful for capturing data when an event record may not trigger. It also reduces burden on ensuring triggers are set properly. Allowing continuous fault recording here would not impact the fault recording data quality. Given that this capability provides better quality fault recording monitoring and requires additional investment by resource owners, NOGRR255 should not arbitrarily render such investment stranded. Deleting the “point-on-wave” modifier to fault recording requirements as unnecessary since this technology is typically used for locating transmission line faults. There is not a technical basis for requiring point-on-wave recording for generation resources;
* Allow fault recording to provide calculated data for the proposed frequency and power information. Fault recording equipment will not record frequency or power information; they can be calculated but are not directly recorded and therefore cannot be “recording data” if not directly measured. Note that calculated values would not flow into required COMTRADE file format unless associated with continuous recording equipment, so may need to be provided separately as a .CSV file; and
* Allow for calculated values to meet the proposed requirement for residual or neutral current data in the phasor measurement unit data requirements if those values are not directly measured.

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| **Revised Cover Page Language** |

None

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| Revised Proposed Guide Language Revision |

6.1 Disturbance Monitoring Requirements

(1) Disturbance monitoring equipment includes sequence of events recording equipment, fault recording equipment, dynamic disturbance recording equipment, and phasor measurement units.

(a) Sequence of events equipment includes any device capable of recording circuit breaker position (open/close) or binary status points that allows analysis of the root cause of a dynamic disturbance based on the order of occurrence of events.

(b) Fault recording equipment captures data associated with an abnormal event on the system, such as phase-to-phase faults, phase-to-ground faults, etc. and includes digital fault recorders, certain protective relays, fault recording-capable meters, and some dynamic disturbance recording equipment.

(c) Dynamic disturbance recording equipment captures incidents that represent behavior of the power system during dynamic events, such as low frequency oscillations, abnormal under/over frequency, voltage excursions and system-wide transients. Some dynamic disturbance recording equipment can also serve as a phasor measurement unit.

(d) Phasor measurement involves measuring time synchronized phasors, frequency, and rate of change of frequency of the power system with accuracy in the order of one microsecond and is typically performed by a digital relay, fault recording equipment or dedicated phasor measurement unit.

6.1.1 Introduction

(1) Disturbance monitoring is necessary to:

(a) Determine performance of the ERCOT System;

(b) Determine effectiveness of protective relaying systems;

(c) Verify ERCOT System models;

(d) Determine causes of ERCOT System disturbances (trips, faults, and protective relay system actions);

(e) Determine causes of Generation Resource and Energy Storage Resource (ESR) ride-through performance failures and loss of Load events; and

(f) Meet the requirements of North American Reliability Corporation (NERC) Reliability Standards.

(2) To ensure ERCOT has adequate data for these activities, ERCOT establishes the disturbance monitoring requirements and procedures in these Operating Guides for the following:

(a) Fault recording, sequence of events recording, phasor measurement, and dynamic disturbance recording equipment owners; and

(b) Transmission Service Providers (TSPs) and Resource Entities with equipment for recording Geomagnetic Disturbance (GMD) data, including Geomagnetically-Induced Current (GIC) monitors and/or magnetometers for recording geomagnetic field data.

6.1.1.1 Applicability

(1) Section 6.1.2, Fault Recording and Sequence of Events Recording Equipment, and its subsections apply to all facilities that are not Inverter-Based Resource (IBR) facilities.

(2) Section 6.1.3, Dynamic Disturbance Recording Equipment Including Phasor Measurement Unit Equipment, and its subsections apply to all facilities that are not IBR facilities.

(3) Section 6.1.4, Fault Recording, Sequence of Events Recording, and Phasor Measurement Unit Requirements for Inverter-Based Resources (IBRs), and its subsections apply to IBR facilities.

6.1.2 Fault Recording and Sequence of Events Recording Equipment

(1) Fault recording equipment includes digital fault recorders, certain protective relays, meters with fault recording capability meeting the associated requirements in this Section.

(2) Sequence of events recording equipment includes any device capable of recording circuit breaker position (open/close) or other binary points meeting the associated requirements in this Section.

(3) Required fault recording and sequence of events recording equipment shall be time synchronized with a Global Positioning System-based clock, or ERCOT-approved alternative to within +/- 2 milliseconds of Coordinated Universal Time (UTC), with or without a local time offset for Central Prevailing Time (CPT).6.1.2.1 Fault Recording Requirements

(1) Fault recording equipment shall meet the following requirements:

(a) Either give continuous fault recording data or triggering for the following:

(i) Neutral (residual) overcurrent of 0.2 p.u. or less of rated current transformer secondary current or the equivalent of 200-500A primary current;

(ii) Any phase under-voltage below 0.85 p.u. for two cycles or longer;

(iii) Any phase overcurrent above the equipment’s maximum emergency current rating, or protective relay tripping for all protection groups;

(iv) Deviations to the above triggering minimum requirements must be reviewed and approved by ERCOT.

(v) Additional triggering beyond the minimums above are allowed and do not require review and approval by ERCOT.

(b) Minimum recording rate of 16 samples per cycle; and

(c) A single record or multiple records that include a pre-trigger record length of at least two cycles and a total record length of at least 30 cycles for the same trigger point.

6.1.2.2 Fault Recording and Sequence of Events Recording Equipment Location Requirements

(1) The location criteria listed below apply to Transmission Facilities operated at or above 100 kV unless otherwise specified. The Facility owner shall install fault recording and sequence of events recording equipment at the following locations, at a minimum:

(a) Locations identified by the Transmission Facility owner utilizing the methodology in Section 8, Attachment M, Selecting Buses for Capturing Sequence of Events Recording and Fault Recording Data;

(b) Additional locations selected at the Transmission Facility owner’s discretion, utilizing the methodology in Section 8, Attachment M;

(c) Locations operating at or above 60 kV, as defined below.

(i) Interconnections with Control Areas outside the ERCOT Region;

(ii) Substations where electrical transfers can be made between the ERCOT Control Area and a Control Area outside the ERCOT Region;

(iii) All switchyards owned by a Generation Resource or ESR connected to the ERCOT System with an aggregated gross generating nameplate capacity above 100 MVA.

(d) For locations that have experienced an abnormal trip or immediate Load change greater than or equal to 20 MW (including if caused by a Distribution Generation Resource (DGR), Distribution Energy Storage Resource (DESR), or Settlement Only Distribution Generator (SODG)) after a fault:

(i) ERCOT may require the installation of fault recording and sequence of events recording equipment;

(ii) The interconnecting Transmission Service Provider (TSP) or Distribution Service Provider (DSP) shall ensure recording equipment is installed;

(iii) A suitable location for the recording equipment will be coordinated between ERCOT and the interconnecting TSP or DSP;

(iv) The recording equipment will be installed as soon as practicable, but no longer than 18 months after ERCOT notifies the TSP or DSP of the need to install the equipment, unless ERCOT provides an extension; and

(v) If the TSP or DSP determines that the recording equipment installation is infeasible due to engineering, technical or operational reasons, it will provide such rationale to ERCOT.

(e) For any Load consisting of one or more Facilities at a single site with an aggregate peak Demand greater than or equal to 75 MW behind one or more Service Delivery Points:

(i) ERCOT may require the installation of fault recording and sequence of events recording equipment;

(ii) The interconnecting TSP or DSP shall ensure the recording equipment is installed;

(iii) A suitable location for the recording equipment will be coordinated between ERCOT and the interconnecting TSP or DSP;

(iv) The recording equipment will be installed as soon as practicable, but no longer than 18 months after ERCOT notifies the TSP or DSP of the need to install the equipment, unless ERCOT provides an extension; and

(v) If the TSP or DSP determines that the recording equipment installation is infeasible due to engineering, technical or operational reasons, it will provide such rationale in writing to ERCOT.

(2) Facility owners shall install the fault recording and sequence of events recording equipment identified in paragraph (1) above as soon as practicable.

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| ***[NOGRR255: Replace paragraph (2) above with the following no earlier than <Insert Date at least two years after PUCT approval> and renumber accordingly:]***  (2) Facility owners shall have at least 50% of the new fault recording and sequence of events recording equipment identified in paragraph (1) above installed. |

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| ***[NOGRR255: Delete paragraph (2) no earlier than <Insert Date at least four years after PUCT approval> and renumber accordingly:]*** |

6.1.2.3 Fault Recording and Sequence of Events Recording Data Requirements

(1) Each Transmission Facility owner and Generation Resource owner shall have fault recording data to determine the following electrical quantities for each triggered fault recording for the locations specified in Section 6.1.2.2, Fault Recording and Sequence of Events Recording Equipment Location Requirements:

(a) Phase-to-neutral voltage for each phase of each specified bus with two sets of substation voltage measurements for breaker-and-a-half and ring bus substation configurations and one set of substation voltage measurements for each bus in other substation configurations;

(b) For transmission lines, each phase current and neutral (residual) current; and

(c) For transformers with a low-side operating voltage of 100kV or above, each phase current and the neutral (residual) current. These phase currents can be from either the high-side or low-side of the transformer.

(2) Each Transmission Facility owner and Generation Resource owner shall have sequence of events recording data per the following requirements:

(a) Circuit breaker position (open/close) for each circuit breaker it owns associated with the required monitored elements and connected directly to the transmission buses identified in paragraphs (1)(a) and (1)(b) of Section 6.1.2.2; and

(b) The following data as either part of the sequence of events recording data or fault recording digital status data:

(i) Circuit breaker position for each circuit breaker that it owns associated with monitored generator interconnects, transmission lines, and transformers;

(ii) Carrier transmitter control status (i.e. start, stop, keying) for associated transmission lines; and

(iii) Carrier signal receive status for associated transmission lines.

(3) Each Generation Resource owner and ESR owner shall have the following fault recording data, including calculations from the fault recording data if not directly measured, for each triggered fault recording to determine:

(a) Time stamp;

(b) Phase-to-neutral voltage for each phase on low or high side of the Main Power Transformer (MPT);

(c) Each phase current and the residual or neutral current on low or high side of the MPT;

(d) Active and reactive power on high side of the MPT;

(e) Frequency and rate-of-change-of-frequency (df/dt) data for at least one generator-interconnected bus measurement;

(f) If applicable, dynamic reactive device input/output such as voltage, current, and frequency; and

(g) Applicable binary status.

(4) For each requested Facility identified by ERCOT in paragraphs (1)(d) and (1)(e) in Section 6.1.2.2, the interconnecting TSP or DSP shall have the following fault recording and sequence of events recording data for the identified Load elements to determine:

(a) Phase-to-neutral voltage for each phase of the transmission bus serving the Load, or other ERCOT approved voltages;

(b) Each phase current and neutral current for each Load terminal, or other ERCOT approved currents; and

(c) Circuit breaker status for those transmission circuit breakers directly associated with the Load terminals.

6.1.2.4 Fault Recording and Sequence of Events Recording Data Retention and Reporting Requirements

(1) Each Transmission Facility owner and Generation Resource owner shall, upon request, provide to ERCOT fault recording and sequence of events recording data for the Transmission Elements identified in these requirements as follows:

(a) Data shall be maintained and retrievable for at a minimum:

(i) Twenty calendar days, including the day the data was recorded, for fault recording and sequence of events recording equipment installed on or replaced after June1, 2024;

(ii) Ten calendar days, including the day the data was recorded, for fault recording and sequence of events recording equipment installed prior to June 1, 2024;

(b) Data subject to paragraph (1)(a) above will be provided within seven calendar days of request unless the requestor grants an extension;

(c) Sequence of events recording data will be provided in ASCII Comma Separated Value (CSV) format as follows: Date, Time, Local Time Code, Substation, Device, State;

(d) Fault recording data that is not calculated will be provided in electronic files formatted in conformance with Institute of Electrical and Electronic Engineers (IEEE) C37.111, IEEE Standard for Common Format for Transient Data Exchange (COMTRADE), revision C37.111-1999 or later;

(e) Data files will be named in conformance with C37.232, IEEE Standard for Common Format for Naming Time Sequence Data Files (COMNAME), revision C37.232-2011 or later; and

(f) If available, fault recording data may be provided in electronic files in SEL ASCII event report (.EVE), compressed ASCII (.CEV), or Motor Start Report (.MSR) in both raw and filtered format in addition to the data required above.

(2) The Transmission Facility owner and Generation Resource owner providing the requested fault recording and sequence of events recording data to ERCOT, the NERC Regional Entity, or NERC shall store the data for at least three years from the date the data was created.

6.1.3 Dynamic Disturbance Recording Equipment Including Phasor Measurement Unit Equipment

(1) Phasor measurement recording equipment includes all dynamic disturbance recording equipment with phasor measurement recording capability that meets the requirements in Section 6.1.3.1, Recording and Triggering Requirements, and 6.1.3.3, Data Recording and Redundancy Requirements.

(2) Dynamic disturbance recording equipment shall be time synchronized with a Global Positioning System-based clock, or ERCOT-approved alternative, with sub-cycle (+/-1 microsecond) timing accuracy and performance.

**6.1.3.1 Dynamic Disturbance Recording Equipment Requirements**

**6.1.3.1.1 Recording and Triggering Requirements**

(1) Dynamic disturbance recording equipment shall:

(a) Have either continuous data recording or triggering for at least the following:

(i) Any phase under-voltage below 0.85 p.u. for two cycles or longer;

(ii) Phase under-voltage that would trigger Under-Voltage Load Shed (UVLS);

(iii) Any phase over-voltage greater than 1.15 p.u. for two cycles or longer;

(iv) Frequency below 59.5 Hz or above 60.5 Hz; and

(v) Frequency rate of change for low frequency of -0.08125 Hz/sec or high frequency of 0.125 Hz/sec;

(vi) ERCOT must review and approve any requested deviations from the above-referenced requirements.

(vii) Additional triggering in excess of the minimums set forth in paragraph (a) above are permitted and do not require ERCOT’s review and approval.

(b) Record lengths of at least three minutes;

(c) A minimum output recording rate of 30 samples per second; and

(d) A minimum input sampling rate of 960 samples per second.

***6.1.3.1.2 Dynamic Disturbance Recording Equipment Location Requirements***

(1) ERCOT shall identify and provide notification to Facility owners who shall install and maintain dynamic disturbance recording equipment at the following locations:

(a) A Generation Resource(s) that is not an IBR with:

(i) Gross individual nameplate rating greater than or equal to 500 MVA; or

(ii) Gross individual nameplate rating greater than or equal to 300 MVA if the gross plant/facility aggregate nameplate rating is greater than or equal to 1,000 MVA;

(b) Any Transmission Element part of a stability-related (angular or voltage) system operating limit;

(c) Each terminal of a high-voltage, direct current (HVDC) circuit with a nameplate rating greater than or equal to 300 MVA, on the alternating current side of a converter;

(d) One or more Transmission Elements part of an Interconnection Reliability Operating Limit (IROL); and

(e) Any one Transmission Element within a major voltage sensitive area as defined by an area with an in-service UVLS program.

(2) ERCOT shall identify, and notify Facility owners of, a minimum dynamic disturbance recording coverage, including Transmission Elements identified above, of a least:

(a) One Transmission Element; and

(b) One Transmission Element per 3,000 MW of ERCOT’s historical simultaneous peak Demand.



***6.1.3.1.3 Dynamic Disturbance Recording Data Recording and Redundancy Requirements***

(1) Recorded electrical quantities shall determine the following:

(a) For Transmission Facilities meeting the requirements in Section 6.1.3.1.2, Location Requirements:

(i) Phase-to-neutral voltage magnitude/angle data for each phase from at least two distinct transmission level element measurement points;

(ii) Single phase current magnitude/angle data for each phase from at least two distinct transmission lines; and

(iii) Frequency and rate-of-change-of-frequency (df/dt) data for at least two Transmission Element measurement points.

(b) For Generation Resource owner locations meeting the requirements in Section 6.1.3.1.2:

(i) Phase-to-neutral voltage, or phase-to-phase voltage magnitude/angle data for each phase from at least one generator-interconnected bus measurement point;

(ii) Single phase current magnitude/angle data for each phase from each interconnected generator on the high or low side of a MPT; and

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| [NOGRR227: Replace item (ii) above with the following upon system implementation of NPRR973:]  (ii) Single phase current magnitude/angle data for each phase from each interconnected generator on the high or low side of a Main Power Transformer (MPT); and |

(iii) Frequency and df/dt data for at least one generator-interconnected bus measurement.

6.1.3.1.4 Dynamic Disturbance Recording Data Retention and Data Reporting Requirements

(1) A Market Participant required to have and maintain data regarding electrical quantities shall maintain and retain that data, at a minimum:

(a) A rolling ten calendar day period for all data;

(b) At least three years for event data used for model validation in accordance with NERC Reliability Standards; and

(c) At least three years for event data provided to ERCOT, the NERC Regional Entity, or NERC via written request recorded in the context of an event analysis or review.

(2) Each affected Market Participant shall provide to ERCOT, upon request, dynamic disturbance recording data as follows:

(a) Data must be retrievable for ten calendar days, including the day the data was recorded;

(b) Data subject to paragraph (2)(a) above within seven calendar days of a request unless the requestor grants an extension;

(c) Dynamic disturbance recording data in electronic files formatted in conformance with IEEE C37.111, revision C37.111-1999 or later;

(d) Data files named in conformance with IEEE C37.232, revision C37.232-2011 or later.

**6.1.3.2 Phasor Measurement Unit Requirements**

(1) Phasor measurement unit equipment includes all dynamic disturbance recording equipment with phasor measurement recording capability meeting the requirements in Sections 6.1.3.2.1, Phasor Measurement Unit Recording Requirements, and 6.1.3.2.3, Phasor Measurement Unit Data Recording and Redundancy Requirements.

(2) Phasor measurement unit equipment shall be time synchronized with a Global Positioning System-based clock, or ERCOT-approved alternative, with sub-cycle (+/-2 millisecond) timing accuracy and performance.

***6.1.3.2.1 Phasor Measurement Unit Recording Requirements***

(1) Recorded electrical quantities shall have continuous recording and shall:

(a) Comply with IEEE C37.118.1-2011 or later, IEEE Standard for Synchrophasor format;

(b) Have a minimum output recording rate of 30 samples per second;

(c) Have a minimum input sampling rate of 960 samples per second; and

(d) Be stored locally in accordance with the requirements in Section 6.1.3.2.4, Phasor Measurement Unit Data Retention and Data Reporting Requirements*.*

***6.1.3.2.2 Phasor Measurement Unit Location Requirements***

(1) Facility owner(s) shall install phasor measurement unit equipment at the following locations:

(a) Flexible AC transmission system devices configured to actively control steady-state voltage or power transfer capability operated at or above 100 kV and energized after July 1, 2015;

(b) A Transmission Facility deemed necessary for each published generic transmission constraint within two years of receiving written notice from ERCOT;

(c) New Generation Resources or ESRs over 20 MVA aggregated at a single site and connected to a Transmission Facility at or above 60 kV and placed into service after January 1, 2017;

(d) Existing Generation Resources or ESRs over 20 MVA aggregated at a single site and connected to a Transmission Facility at or above 60 kV following any modification described in paragraph (1)(c) of Planning Guide Section 5.2.1, Applicability, with the modification’s Initial Synchronization after January 1, 2022;

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| ***[NOGRR177: Insert item (e) below upon system implementation of NPRR857 and renumber accordingly:]***  (e) New Direct Current Ties (DC Ties) placed into service after January 1, 2019; |

(e) Each Transmission Element considered part of a monitored IROL interface within two years of notification by ERCOT;

(f) Synchronous condensers supporting the transmission system installed after June 1, 2024.

(g) A Transmission Element within:

(i) A voltage sensitive area consisting of an area with an active UVLS program;

(ii) An area of the ERCOT System with 3,000 MW of ERCOT’s historical simultaneous peak Demand; and

(iii) An area with greater than 1,000 MW of Generation Resources and ESRs with a stability risk identified by ERCOT.

(iv) An area identified in items (i) through (iii) above shall have its equipment installed within two years of the date on which ERCOT informs the owner of the need to install the equipment.

(h) For locations that have experienced an abnormal trip or immediate Load change greater than or equal to 20 MW (including if caused by a DGR, DESR, or SODG) after a fault:

1. ERCOT may require installation of phasor measurement recording equipment;
2. The interconnecting Transmission Service Provider (TSP) or Distribution Service Provider (DSP) shall ensure the recording equipment is installed;
3. A suitable location for the recording equipment will be coordinated between ERCOT and the interconnecting TSP or DSP;
4. The recording equipment will be installed as soon as practicable, but no longer than two years after ERCOT notifies the TSP or DSP of the need to install the equipment, unless the requestor provides an extension;
5. If the TSP or DSP determines it cannot install the recording equipment due to engineering, technical or operational constraints, it will provide to ERCOT, in writing, supporting data or documents.

(i) Any Load consisting of one or more Facilities at a single site with an aggregate peak Demand greater than or equal to 75 MW behind one or more Service Delivery Points if ERCOT requires phasor measurement recording equipment. If required:

(i) The interconnecting TSP or DSP shall ensure the recording equipment is installed;

(ii) A suitable location for the recording equipment will be coordinated between ERCOT and the interconnecting TSP or DSP;

(iii) The recording equipment will be installed as soon as practicable, but no longer than two years after ERCOT notifies the TSP or DSP of the need to install the equipment, unless ERCOT grants an extension;

(iv) If the TSP or DSP determines it cannot install the recording equipment due to engineering, technical or operational constraints, it will provide to ERCOT, in writing, supporting data or documents.

(2) Facility owners shall install new phasor measurement units identified in paragraph (1) above as soon as practicable.

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| ***[NOGRR255: Replace paragraph (2) above with the following no earlier than <Insert Date at least two years after PUCT approval>:]***  (2) Facility owners shall have at least 50% of new phasor measurement units identified in paragraph (1) above installed. |

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| ***[NOGRR255: Delete paragraph (2) no earlier than <Insert Date at least four years after PUCT approval>.]*** |

6.1.3.2.3 Phasor Measurement Unit Data Recording and Redundancy Requirements

(1) Recorded electrical quantities shall include data to determine the following:

(a) For Transmission Facility owner locations meeting the requirements in Section 6.1.3.2.2, Phasor Measurement Unit Location Requirements:

(i) Time stamp;

(ii) Phase-to-neutral voltage magnitude/angle data for each phase from at least two distinct Transmission Element measurement points;

(iii) Single phase current magnitude/angle data for each phase from at least two distinct Transmission lines; and

(iv) Frequency and rate-of-change-of-frequency (df/dt) data for at least two Transmission Element measurement points.

(b) For Generation Resource or ESR locations meeting the requirements in Section 6.1.3.2.2:

(i) Time stamp;

(ii) Phase-to-neutral voltage for each phase on the low or high side of the MPT;

(iii) Each phase current and the residual or neutral current, including calculated values if not directly measured, on the low or high side of the MPT;

(iv) Active and reactive power on the low or high side of the MPT;

(v) Frequency and df/dt data for at least one generator-interconnected bus measurement; and

(vi) If applicable, dynamic reactive device input/output such as voltage, current, and frequency.

(c) For Facilities identified by ERCOT in Section 6.1.3.2.2:

(i) Phase-to-neutral voltage, or phase-to-phase voltage magnitude/angle data for each phase from at least one transmission terminal bus measurement point, or other ERCOT approved voltages; and

(ii) Single phase current magnitude/angle data for each phase from each interconnected Load terminal on the high or low side of Load delivery point, or other ERCOT approved currents.

6.1.3.2.4 Phasor Measurement Unit Data Retention and Data Reporting Requirements

(1) Market Participants must maintain data regarding the minimum recorded electrical quantities for at least:

(a) A rolling 20 calendar day period for all data stored locally;

(b) At least three years for event data used for model validation in accordance with NERC Reliability Standards; and

(c) At least three years for event data provided to ERCOT, the NERC Regional Entity, or NERC via written request recorded in the context of an event analysis or review.

(2) Each affected Market Participant shall provide ERCOT, upon request, phasor measurement unit data for the Elements identified in these requirements as follows:

(a) Data must be retrievable for 20 calendar days, including the day the data was recorded;

(b) Data subject to paragraph (2)(a) above within seven calendar days of a request unless the requestor grants an extension;

(c) Data in electronic files formatted in conformance with IEEE C37.111, revision C37.111-1999 or later;

(d) Data files named in conformance with IEEE C37.232, revision C37.232-2011 or later.

6.1.4 Fault Recording, Sequence of Events Recording, and Phasor Measurement Unit Requirements for Inverter-Based Resources (IBRs)

(1) IBRs include any source of electric power connected to the ERCOT System via a power electronic interface that consists of one or more IBR unit(s) capable of exporting active power from a primary energy source or energy storage system.

(2) All transmission-connected IBR facilities operating at 60 kV with gross aggregated nameplate capacity of 20 MVA at a single site must meet all requirements in this section.

(3) Facility owners shall install new fault recording and sequence of events recording equipment identified in this section as soon as practicable.

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| ***[NOGRR255: Replace paragraph (3) above with the following no earlier than <Insert Date at least two years after PUCT approval>:]***  (3) Facility owners shall have at least 50% of new fault recording equipment, sequence of events recording equipment, and phasor measurement units identified in paragraph (2) above installed. |

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| ***[NOGRR255: Delete paragraph (3) no earlier than <Insert Date at least four years after PUCT approval>.]*** |

6.1.4.1 Fault Recording and Sequence of Events Recording Equipment Requirements

(1) Required fault recording equipment shall be time synchronized with a Global Positioning System-based clock, or ERCOT approved alternative, with synchronized device clock accuracy and performance within +/- 100 microseconds of Coordinated Universal Time (UTC), with or without a local time offset for Central Prevailing Time (CPT).

(2) Required sequence of events recording equipment shall be time synchronized with a Global Positioning System-based clock, or ERCOT-approved alternative, with +/- 100 microseconds of Coordinated Universal Time (UTC), with or without a local time offset for Central Prevailing Time (CPT).

*6.1.4.1.1 Sequence of Events Recording Data Requirements*

(1) Generation Resource owners and ESR owners shall have sequence of events data for all positions (open/close) for circuit breakers associated with the MPT(s), collector bus, and shunt static or dynamic reactive device(s).

*6.1.4.1.2 Fault Recording Data and Triggering Requirements*

(1) Generation Resource owners and ESR owners shall have fault recording data to determine or calculate, if not directly measured, the following electrical quantities for each triggered fault recording record:

(a) Generation Resource or ESR level fault recording data:

(i) Time stamp;

(ii) Phase-to-neutral voltage for each phase on the low or high side of the MPT;

(iii) Each phase current and the residual or neutral current on the low or high side of the MPT;

(iv) Active and reactive power on the low or high side of the MPT;

(v) Frequency and rate-of-change-of-frequency (df/dt) data for at least one generator-interconnected bus measurement; and

(vi) If applicable, dynamic reactive device input/output such as voltage, current, and frequency.

(vii) Applicable binary status.

(2) Fault recording equipment shall meet the following requirements for a Generation Resource or ESR as described in paragraph (1) above:

(a) Have either continuous data recording or triggering for at least the following:

(i) High-side of the MPT fault recording triggers and, if applicable, any dynamic reactive device FR triggers:

(A) Neutral (residual) overcurrent of 0.20 per unit (p.u.) or less of rated current transformer secondary current;

(B) Any phase under-voltage between 0.85 p.u. and 0.90 p.u., or

(1) Any phase overcurrent above 1.05 p.u. of the maximum emergency current rating, or

(2) Protective relay tripping for all protection groups;

(C) Any phase over-voltage greater that 1.10 p.u.;

(D) Frequency below 59.5 Hz or above 60.5 Hz;

(E) Frequency rate of change for low frequency of -0.08125 Hz/sec or high frequency of 0.125 Hz/sec;

(b) Minimum recording rate of:

(i) 64 samples per cycle for any Fault recording equipment installed on or replaced after June 1, 2024;

(ii) 16 samples per cycle for any Fault recording equipment installed prior to June 1, 2024; and

(c) A single record or multiple records that include pre-trigger record length of at least two cycles and a total record length of at least 2 seconds for the same trigger point.

6.1.4.3 Phasor Measurement Unit Equipment Requirements

(1) Phasor measurement unit equipment shall be time synchronized with a Global Positioning System-based clock, or ERCOT-approved alternative, with synchronized device clock accuracy and performance within +/- 100 microseconds of Coordinated Universal Time (UTC), with or without a local time offset for Central Prevailing Time (CPT).

(2) Recorded electrical quantities shall have continuous recording and be:

(a) Provided in IEEE C37.118.1-2011 or later, IEEE Standard for Synchrophasor format. However, Generation Resources in commercial operation before January 1, 2017 may provide the data in IEEE C37.118.1-2005 format when technically infeasible for its installed equipment to meet the IEEE C37.118.1-2011 or later format;

(b) A minimum output recording rate of 60 samples per second;

(c) A minimum input sampling rate of 960 samples per second; and

(d) Transmitted to an ERCOT phasor data concentrator via a communication link or stored locally per retention requirements in Section 6.1.4.4, Data Retention and Data Reporting Requirements for Fault Recording, Sequence of Events Recording, and Phasor Measurement Unit Equipment*.*

(3) Facility owners shall have phasor monitoring data to determine the following:

(a) Time stamp;

(b) Phase-to-neutral voltage, or phase-to-phase voltage magnitude/angle data for each phase from at least one generator-interconnected bus;

(c) Single phase current magnitude/angle data for each phase on the high or low side of an MPT that represents the flow from one or multiple IBR unit(s) behind the MPT;

(d) Frequency and rate-of-change-of-frequency (df/dt) data for at least one generator-interconnected bus; and

(e) Calculated active and reactive power output on the high or low side of the MPT that represents the flow from one or multiple IBR unit(s) behind the MPT.

6.1.4.4 Data Retention and Data Reporting Requirements for Fault Recording, Sequence of Events Recording, and Phasor Measurement Unit Equipment

(1) A Generation Resource owner or ESR owner required to have data regarding electrical quantities shall maintain and retain the data, at a minimum, for:

(a) A rolling 20 calendar day period for all data;

(b) At least three years (from the date the data was recorded) for event data used for model validation in accordance with NERC Reliability Standards; and

(c) At least three years for event data provided to ERCOT, the NERC Regional Entity, or NERC via written request recorded in the context of an event analysis or review.

(2) Each Generation Resource owner and ESR owner shall provide ERCOT, upon request, fault recording, sequence of events recording, and phasor measurement unit data as follows:

(a) Data for 20 calendar days, including the day the data was recorded;

(b) Data subject to paragraph (2)(a) above within seven calendar days of a request unless ERCOT grants an extension;

(c) Sequence of events data in ASCII Comma Separated Value (CSV) format as follows: Date, Time, Local Time Code, Substation, Device, State;

(d) Fault recording and phasor measurement unit data in electronic files formatted in conformance with Institute of Electrical and Electronic Engineers (IEEE) C37.111, IEEE Standard for Common Format for Transient Data Exchange (COMTRADE), revision C37.111-1999 or later;

(e) Data files named in conformance with IEEE C37.232, revision C37.232-2011 or later; and

(f) If available, fault recording data in electronic files in SEL ASCII event report (.EVE), compressed ASCII (.CEV), Motor Start Report (.MSR) and Sequential Events Recorder record (.SER) format.

6.1.5 Maintenance and Testing Requirements

(1) Each Market Participant with dynamic disturbance recording, phasor measurement recording, fault recording, or sequence of events recording equipment identified by Section 6.1.2, Fault Recording and Sequence of Events Recording Equipment, Section 6.1.3, Dynamic Disturbance Recording Equipment Including Phasor Measurement Unit Equipment, and Section 6.1.4, Fault Recording, Sequence of Events Recording, and Phasor Measurement Unit Requirements for Inverter-Based Resources (IBRs), shall maintain and test its equipment as follows:

(a) Calibrate or configure the devices at installation and when records from the equipment indicate a calibration or configuration problem;

(b) To ensure data stored locally is available upon request by verifying data availability and quality at least once every 60 calendar days, or institute an automated notification system to detect when the equipment ceases recording required data or fails to timely refresh the data.

(2) Each Market Participant with dynamic disturbance recording equipment, phasor measurement recording, fault recording, or sequence of events recording equipment identified by Section 6.1.2, Section 6.1.3, and Section 6.1.4 shall, within 90 calendar days of discovering a failure of the required data production, either:

(a) Restore the recording capability, or

(b) Notify and submit to ERCOT a plan and timeline for restoring the equipment recording capabilities.

6.1.6 Equipment Reporting Requirements

(1) Each Market Participant with dynamic disturbance recording, phasor measurement recording, fault recording, or sequence of events recording equipment identified by Section 6.1.2, Fault Recording and Sequence of Events Recording Equipment, Section 6.1.3, Dynamic Disturbance Recording Equipment Including Phasor Measurement Unit Equipment, and Section 6.1.4, Fault Recording, Sequence of Events Recording, and Phasor Measurement Unit Requirements for Inverter-Based Resources (IBRs), shall:

(a) Maintain a current database summarizing disturbance monitoring equipment installations that includes installation location, type of equipment, equipment make and model, operational status, and a list of the major equipment monitored; and

(b) Have and maintain a complete list of all monitored points at each Facility and, when requested by ERCOT, the NERC Regional Entity, or NERC, provide the list within 30 days.

6.1.7 Review Process

(1) After December 31, 2025, ERCOT shall review disturbance monitoring equipment locations for adequacy when significant changes are made to the ERCOT System or at least every five calendar years.

(2) Transmission Facility owners shall review fault recording and sequence of events recording equipment locations for compliance at least every five calendar years.

(3) Existing Facility owners identified in the reviews shall have three years from the time of review, or from the time of notification from others, to install the equipment.

**ERCOT Nodal Operating Guides**

**Section 8**

**Attachment M**

**Selecting Buses for Capturing Sequence of Events Recording and Fault Recording Data**

**TBD**

This attachment provides the Transmission Facility owner the methodology to use for selecting bus locations for capturing sequence of events recording and fault recording data.

To identify monitored bulk electric system buses for sequence of events recording and fault recording data, each Transmission Facility owner shall follow sequentially, unless otherwise noted, the steps listed below:

Step 1. Determine a complete list of bulk electric system buses that it owns, excluding buses or Facilities solely representing Inverter-Based Resources (IBRs), as those locations are addressed outside of the process described in this attachment.

For the purposes of this attachment, a single bulk electric system bus includes physical buses with breakers connected at the same voltage level within the same physical location sharing a common ground grid. These buses may be modeled or represented by a single node in fault studies. For example, ring bus or breaker-and-a-half bus configurations are considered to be a single bus.

Step 2. Reduce the list to those bulk electric system buses that have a maximum available calculated three phase short circuit MVA of 1,500 MVA or greater. If there are no buses on the resulting list, proceed to Step 7.

Step 3. Determine the 11 bulk electric system buses on the list with the highest maximum available calculated three phase short circuit MVA level. If the list has 11 or fewer buses, proceed to Step 7.

Step 4. Calculate the median MVA level of the 11 bulk electric system buses determined in Step 3.

Step 5. Multiply the median MVA level determined in Step 4 by 20 percent.

Step 6. Reduce the bulk electric system buses on the list to only those that have a maximum available calculated three phase short circuit MVA higher than the greater of:

* 1,500 MVA or
* 20 percent of median MVA level determined in Step 5.

Step 7. If there are no bulk electric system buses on the list: the procedure is complete and no fault recording and sequence of events recording data will be required. Proceed to Step 9.

If the list has one or more but less than or equal to 11 bulk electric system buses: fault recording and sequence of events recording data is required at the bulk electric system bus with the highest maximum available calculated three phase short circuit MVA as determined in Step 3.

During re-evaluation efforts, if the three-phase short circuit MVA of the newly identified bulk electric system bus is within 15% of the three-phase short circuit MVA of the currently applicable BES bus with sequence of events recording and fault recording data than it is not necessary to change the applicable BES bus. Proceed to Step 9.

If the list has more than 11 bulk electric system buses: fault recording and sequence of events recording data is required on at least the 10 percent of the bulk electric system buses determined in Step 6 with the highest maximum available calculated three phase short circuit MVA. Proceed to Step 8.

Step 8. Fault recording and sequence of events recording data is required at additional bulk electric system buses on the list determined in Step 6. The aggregate of the number of bulk electric system buses determined in Step 7 and this Step will be at least 20 percent of the bulk electric system buses determined in Step 6. The additional bulk electric system buses are selected, at the Transmission Facility owner’s discretion, to provide maximum wide-area coverage for fault recording and sequence of events recording data. The following bulk electric system bus locations are recommended:

* Electrically distant buses or electrically distant from other disturbance monitoring equipment devices.
* Voltage sensitive areas.
* Cohesive load and generation zones.
* Bulk electric system buses with a relatively high number of incident transmission circuits.
* Bulk electric system buses with reactive power devices.
* Major Facilities interconnecting outside the Transmission Owner’s area.

Step 9. The list of monitored bulk electric system buses for fault recording and sequence of events recording data is the aggregate of the bulk electric system buses determined in Steps 7 and 8.

1. <https://www.nerc.com/pa/Stand/Pages/Project-2021-04-Modifications-to-PRC-002-2.aspx> [↑](#footnote-ref-1)