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| NOGRR Number | [263](https://www.ercot.com/mktrules/issues/NOGRR263) | NOGRR Title | Clarification of Controllable Load Resource Primary Frequency Response Responsibilities |
| Date Posted | April 10, 2024 |
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| Requested Resolution  | Normal |
| Nodal Operating Guide Sections Requiring Revision  | 2.2.8, Performance/Disturbance/Compliance Analysis |
| Related Documents Requiring Revision/Related Revision Requests | None |
| Revision Description | This Nodal Operating Guide Revision Request (NOGRR) clarifies that a Controllable Load Resource is only required to provide Primary Frequency Response when it is providing an Ancillary Service that requires the Controllable Load Resource to be capable of providing Primary Frequency Response. |
| Reason for Revision |  [Strategic Plan](https://www.ercot.com/files/docs/2023/08/25/ERCOT-Strategic-Plan-2024-2028.pdf) Objective 1 – Be an industry leader for grid reliability and resilience [Strategic Plan](https://www.ercot.com/files/docs/2023/08/25/ERCOT-Strategic-Plan-2024-2028.pdf) Objective 2 - Enhance the ERCOT region’s economic competitiveness with respect to trends in wholesale power rates and retail electricity prices to consumers [Strategic Plan](https://www.ercot.com/files/docs/2023/08/25/ERCOT-Strategic-Plan-2024-2028.pdf) Objective 3 - Advance ERCOT, Inc. as an independent leading industry expert and an employer of choice by fostering innovation, investing in our people, and emphasizing the importance of our mission General system and/or process improvement(s) Regulatory requirements ERCOT Board/PUCT Directive*(please select ONLY ONE – if more than one apply, please select the ONE that is most relevant)* |
| Justification of Reason for Revision and Market Impacts | A Controllable Load Resource is a Load Resource that is capable of controllably reducing or increasing consumption under Dispatch control by ERCOT. A Controllable Load Resource may also be able to provide Primary Frequency Response but should not be required to be capable of providing Primary Frequency Response unless it is providing an Ancillary Service that requires this capability as detailed in Protocol Section 3.6.1, Load Resource Participation. A Controllable Load Resource that has blockier consumption can comply with Dispatch control by ERCOT but may not have the granular level of Dispatch control necessary to provide Primary Frequency Response. This Revision Request clarifies that a Controllable Load Resource that does not want to be eligible to provide an Ancillary Service to ERCOT that requires the capability to provide Primary Frequency Response may be exempt from ERCOT testing to verify its ability to provide Primary Frequency Response. This clarification allows additional Load Resources to qualify as Controllable Load Resources for all other purposes and thereby provides ERCOT greater visibility and control over such Load Resources.  |

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| Proposed Guide Language Revision |

***2.2.8 Performance/Disturbance/Compliance Analysis***

(1) Performance/Disturbance/Compliance analysis shall be performed by ERCOT for the purpose of ensuring conformance with the Protocols and Operating Guides. All Generation Resources, ESRs, SOTGs, SOTSGs, and Controllable Load Resources, except nuclear-powered Resources, Controllable Load Resources when not providing an Ancillary Service that requires the capability of providing Primary Frequency Response, or WGRs with a permanent exemption approved by ERCOT, must respond to frequency disturbances with a Governor droop as specified in Section 2.2.7, Turbine Speed Governors. Each Generation Resource, ESR, SOTG, SOTSG, and Controllable Load Resource based on participation in at least eight FMEs, shall meet a minimum 12-month rolling average initial Primary Frequency Response performance and sustained Primary Frequency Response performance of 0.75 as calculated in Section 8, Attachment J, Initial and Sustained Measurements for Primary Frequency Response. When assessing conformance with the Protocols and Operating Guides, ERCOT shall evaluate the annual rolling average and may exclude from the performance analysis Generation Resources, ESRs, SOTGs, SOTSGs, or Controllable Load Resources in accordance with, but not limited to, the following conditions:

(a) Operating within the larger of five MW or 2% of the High Sustained Limit (HSL) or the maximum capacity for low frequency disturbances;

(b) Operating within the larger of five MW or 2% of the HSL or the maximum capacity above the LSL for high frequency disturbances;

(c) For an ESR, while discharging, if operating within the larger of 3 MW or 2% of the Maximum Operating Discharge Power Limit for low frequency disturbances;

(d) For an ESR, while charging, if operating within the larger of 3 MW or 2% of the Maximum Operating Charge Power Limit for high frequency disturbances;

(e) For any Generation Resource carrying power augmentation, the maximum capacity will be computed as the HSL minus Non-Frequency Responsive Capacity (NFRC); or

(f) Having a technical or physical limitation filed with the ERCOT client representative and approved by ERCOT.

(2) Market Participants shall request an exemption from, or correction of, performance during an FME within 30 days of the MIS posting date of the “Initial and Sustained Frequency Response Unit Performance” report.

(3) ERCOT will, on an as needed basis, utilize the Performance, Disturbance, Compliance Working Group (PDCWG) as a technical resource in providing input for types of technical or physical limitations that may be approved by ERCOT.

(4) ERCOT shall make a regular report on selected system disturbances, documenting the response of individual Generation Resources, ESRs, and Controllable Load Resources. In addition, Resource Entities, QSEs, and individual members of the PDCWG are encouraged to work within their respective companies to enhance the performance of individual Generation Resource’s, ESR’s, or Controllable Load Resource’s control systems through application of the results of the PDCWG studies.