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| **NOGRR Number** | [**261**](https://www.ercot.com/mktrules/issues/NOGRR261) | **NOGRR Title** | **Move OBD to Section 8 – Procedure for Calculating RRS Limits for Individual Resources** |
| **Date of Decision** | | April 11, 2024 | |
| **Action** | | Approved | |
| **Timeline** | | Normal | |
| **Estimated Impacts** | | Cost/Budgetary: Less than $5k (Operations & Maintenance (O&M))  Project Duration: No project required | |
| **Effective Date** | | May 1, 2024 | |
| **Priority and Rank Assigned** | | Not applicable | |
| **Nodal Operating Guide Sections Requiring Revision** | | 2.3.1.2.1, Limit on Generation Resources and Controllable Load Resources Providing RRS  Section 8, Attachment N, Procedure for Calculating Responsive RRS Limits for Individual Resources (new) | |
| **Related Documents Requiring Revision/Related Revision Requests** | | Procedure for Calculating Responsive Reserve (RRS) Limits for Individual Resources (Upon approval of this NOGRR, this will be removed from the Other Binding Documents List.) | |
| **Revision Description** | | This Nodal Operating Guide Revision Request (NOGRR) incorporates the Other Binding Document “Procedure for Calculating Responsive Reserve (RRS) Limits for Individual Resources” into the Nodal Operating Guide. | |
| **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** | | This NOGRR is published for transparency and to standardize the approval process for all binding language. | |
| **ROS Decision** | | On 1/8/24, ROS voted unanimously to waive notice to consider NOGRR261, and to recommend approval of NOGRR261 as submitted. All Market Segments participated in the vote.  On 2/1/24, ROS voted unanimously to endorse and forward to TAC the 1/8/24 ROS Report and 12/21/23 Impact Analysis for NOGRR261. All Market Segments participated in the vote. | |
| **Summary of ROS Discussion** | | On 1/8/24, participants noted NOGRR261 is part of an ongoing effort to move Other Binding Documents into the Protocols and Guides.  On 2/1/24, participants reviewed the 12/21/23 Impact Analysis. | |
| **TAC Decision** | | On 2/14/24, TAC voted unanimously to recommend approval of NOGRR261 as recommended by ROS in the 2/1/24 ROS Report. All Market Segments participated in the vote. | |
| **Summary of TAC Discussion** | | On 2/14/24, there was no additional discussion beyond TAC review of the items below. | |
| **TAC Review/Justification of Recommendation** | | Revision Request ties to Reason for Revision as explained in Justification  Impact Analysis reviewed and impacts are justified as explained in Justification  Opinions were reviewed and discussed  Comments were reviewed and discussed (if applicable)  Other: (explain) | |
| **ERCOT Board Decision** | | On 2/27/24, the ERCOT Board voted unanimously to recommend approval of NOGRR261 as recommended by TAC in the 2/14/24 TAC Report. | |
| **PUCT Decision** | | On 4/11/24, the PUCT approved NOGRR261 and accompanying ERCOT Market Impact Statement as presented in Project No. 54445, Review of Protocols Adopted by the Independent Organization. | |

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| **Opinions** | |
| **Credit Review** | Not applicable |
| **Independent Market Monitor Opinion** | The Independent Market Monitor (IMM) has no opinion on NOGRR261. |
| **ERCOT Opinion** | ERCOT supports approval of NOGRR261. |
| **ERCOT Market Impact Statement** | ERCOT Staff has reviewed NOGRR261 and believes it has a positive market impact by standardizing the approval process for binding language. |

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| **Sponsor** | |
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| **Market Segment** | Not Applicable |

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| **Comments Received** | |
| **Comment Author** | **Comment Summary** |
| None |  |

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| **Market Rules Notes** |

To improve transparency, existing Other Binding Document language for new Section 8, Attachment N, is represented as blackline, with only proposed changes marked as redline.

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| **Proposed Nodal Operating Guide Language Revision** |

2.3.1.2.1 Limit on Generation Resources and Controllable Load Resources Providing RRS

(1) ERCOT shall establish MW limits on individual Resource’s ability to provide RRS using Primary Frequency Response. The MW limit shall be based on Generating Resource and Controllable Load Resource performance during Frequency Measurable Events (FME).

(2) The default maximum MW limit of Primary Frequency Response shall be set to 20% of its High Sustained Limit (HSL) for any newly RRS-qualified Generation Resource or Generation Resource not yet evaluated per Section 8, Attachment N, Procedure for Calculating RRS Limits for Individual Resources, for measuring actual performance.

(3) A Private Use Network with a registered Resource may use the gross HSL for qualification and establishing a limit on the amount of RRS capacity that the Resource within the Private Use Network can provide.

**ERCOT Nodal Operating Guide**

**Section 8**

**Attachment N: Procedure for Calculating RRS Limits for Individual Resources**

**Date TBD**

1. Introduction

Changes to this attachment shall be reviewed by the Performance, Disturbance, Compliance Working Group (PDCWG).

2. Responsive Reserve Service

Response Reserve (RRS) is an operating reserve on Generation Resources, Load Resources, and Resources capable of providing Fast Frequency Response (FFR) maintained by ERCOT to help control the frequency of the system. RRS on Generation Resources and Controllable Load Resources that are capable of providing Primary Frequency Response can be released to Security-Constrained Economic Dispatch (SCED) during scarcity conditions as outlined in Section 4.8, Responsive Reserve Service During Scarcity Conditions.

# 3. RRS MW Limits for Individual Resources

Thermal Resources that do not meet the 12 months or the last eight Frequency Measurable Events (FMEs) (applicable if a minimum threshold of eight FMEs within the 12 month period is not met) rolling average criteria, or have failed to score greater than or equal to 0.75 for Primary Frequency Response initial or Primary Frequency Response sustained measures (computed per Section 8, Attachment J, Initial and Sustained Measurements for Primary Frequency Response) for three consecutive FMEs, where the unit was evaluated, over a minimum period of two calendar months, will be subject to review of their respective RRS limit using the process outlined in Section 4 below. All other thermal Resources shall continue to be limited to 20% of their respective High Sustained Limit (HSL) as their RRS limit.

The default MW limit for any new thermal Generation Resource or Controllable Load Resource providing RRS shall be set to 20% of its HSL or Maximum Power Consumption (MPC), as appropriate. A Private Use Network with a registered Resource may use its gross HSL for qualifying and establishing a limit on the amount of RRS capacity that the Resources within the Private Use Network can provide.

RRS limits for non-thermal Resources or Generation Resources with a Resource Category of either (i) aeroderivative simple cycle commissioned after 1996, or (ii) Reciprocating Engines may be updated to be higher or lower than 20% threshold based on their droop performance characteristics, actual tests, and the need to keep the frequency responsive capability fairly distributed across multiple Resources. Based on Protocol Section 3.18, Resource Limits in Providing Ancillary Service, (i) Generation Resources operating in synchronous condenser fast-response mode may provide RRS up to the Generation Resource’s ERCOT-validated 20-second response capability (which may be 100% of their HSL), and (ii) Resources providing RRS as FFR may provide RRS up to the Resource’s ERCOT-validated 15-minute capability.

# 4. Calculating RRS MW Limits for Individual Resources

For Resources that fail the Primary Frequency Response initial or Primary Frequency Response sustained measures for three consecutive FMEs, where the unit was evaluated, over a minimum period of two calendar months or are failing the 12 months or the last eight FMEs (applicable if a minimum threshold of eight FMEs within the 12 month period is not met) rolling average criteria, ERCOT shall establish MW limit for providing RRS based on their respective performance during FMEs, any limitations exhibited within its dynamic models, or through droop performance tests on as needed basis.

If the RRS limit is to be determined based upon the Resource’s performance during an FME, then such RRS limit shall be calculated as follows,

1. The MW Limit for each Generation Resource and Controllable Load Resource will be calculated using the droop performance during an FME. The Calculated Droop Performance and RRS MW Limit for an FME is calculated as follows:

**Delta Hertz (∆Hz):** The pre-perturbation [the 16-second period of time before t(0)] average frequency minus the post-perturbation [the 32-second period of time starting 20 seconds after t(0)] average frequency

**Delta MW (∆MW):** The pre-perturbation average MW of the Resource minus the post-perturbation average MW of the Resource

**Scheduled Frequency:** The frequency value to be maintained on the system, always 60 Hz

**Power Augmentation (PA) Capacity:** The telemetered portion of a Generation Resource’s HSL that represents the sustainable non-Dispatched power augmentation capability from duct firing, inlet air cooling, auxiliary boilers, or other methods which does not immediately respond, arrest, or stabilize frequency excursions during the first minutes following a disturbance without secondary frequency response or instructions from ERCOT

**Deadband (Deadbandmax):** The range of deviations of system frequency (+/-) that produces no PFR

1. The median of the calculated MW Limits in the last five FMEs where the unit was evaluated will be computed for each individual Generation Resource and Controllable Load Resource. If Resource hasn’t participated in five FMEs, proceed to Step 3.
2. The median of all FMEs during previous three months where the unit was evaluated will be computed for each individual Generation Resource and Controllable Load Resource.
3. RRS MW limit will be established based on lower of the values computed in Steps 2 and 3.

If a Generation Resource’s or Controllable Load Resource’s performance during an FME is excluded per the current process (NERC Reliability Standard BAL-TRE-001) from the rolling average calculation, the Resource’s performance will also be excluded from the RRS MW Limit calculation. Also note that all members of a Combined Cycle Generation Resource will be evaluated as one Generation Resource for the purposes of this evaluation.

# 5. Timeline to Establish RRS MW Limits

ERCOT will recalculate the MW Limit on each individual Generation Resource and Controllable Load Resource on a monthly basis. ERCOT shall post on the Market Information System (MIS) Certified area the MW limit for each Resource qualified to provide RRS by the 10th day of each month. These RRS limits will be effective in ERCOT systems coincident with first Network Model Database Load[[1]](#footnote-1) two months later. For example, ERCOT shall post the MW Limit for each Resource by January 10, 2020. These RRS Limits will be effective in ERCOT systems beginning March 4, 2020. These recalculated values will follow any threshold limitations as expressed in Section 3 above.

If at the time of recalculation, a Generation Resource or Controllable Load Resource was previously limited due to any failure mentioned in Section 4 above, then the established RRS limit will continue to apply. In order to reset the RRS limit, Generation Resource or Controllable Load Resource may use dynamic models, droop performance tests, or documentation of an implemented corrective action plan to demonstrate that it is capable of carrying standard RRS limit as mentioned in Section 3 above.

# Appendix RRS Limit Decision Tree

The diagram below describes at a high level the decision tree this procedure will compute a RRS limit for every Generation Resource. In the event there is a conflict between the diagram below and text stated in the sections above, the language stated in text above takes precedence.

Monthly RRS Limit Calculation for a Generation Resource

Is the Generation Resource currently limited due to previous failure?

Entry criteria\* met?

Compute new RRS Limit and post

Corrective Actions Complete?

Set RRS Limit to 20% and post

RRS Limit remains unchanged at prior limited value and post

Y

Y

Y

N

N

N

\*failed rolling average or score in last three evaluated events in two consecutive months < 0.75

1. The most recent Network Model Database Load Schedules can be accessed at the following link.

   <http://www.ercot.com/gridinfo/transmission/opsys-change-schedule.html> [↑](#footnote-ref-1)