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| NOGRR Number | [258](https://www.ercot.com/mktrules/issues/NOGRR258) | NOGRR Title | Related to NPRR1198, Congestion Mitigation Using Topology Reconfigurations |

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| Date | March 12, 2024 |

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| Submitter’s Information | |
| Name | Mark Walker |
| E-mail Address | [mwalker@mandf.com](mailto:mwalker@mandf.com) |
| Company | Sandy Creek Associates LP |
| Phone Number | 512-404-7800 |
| Cell Number |  |
| Market Segment | Not applicable |

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| Comments |

Sandy Creek Associates LP (“Sandy Creek”) operates the Sandy Creek Energy Station. The Station began commercial operations in 2012 and is a nominal 945-Megawatt (MW) super-critical electrical generating unit that burns low sulfur sub-bituminous coal brought in by train from the Powder River Basin. The unit is equipped with one pulverized coal boiler, one multiple shell condensing steam turbine generator, multiple steam surface condensers, and efficient environmental controls. Since 2012, Sandy Creek has provided reliable, dispatchable power supply to the ERCOT market. As a large steam generation facility, the Station also provides substantial voltage support and strong, grid-stabilizing inertia value supporting the ERCOT System. The relatively recent development of transmission constraints in the area around the Station has limited its ability to provide reliable and flexible generation to the ERCOT market.

Sandy Creek provides these comments in support of Nodal Operating Guide Revision Request (NOGRR) 258, and also for its companion Nodal Protocol Revision Request (NPRR) 1198, Congestion Mitigation Using Topology Reconfigurations, that proposes needed measures to allow plants like the Sandy Creek Station to be available to more efficiently have access to the ERCOT transmission system and the ERCOT market – to support reliable operations and efficient market outcomes. Sandy Creek also supports the prior comments of:

* Potomac Economics, the ERCOT Independent Market Monitor (IMM), to NPRR1198 filed on September 6, 2023 (which also endorse NOGRR258);
* The proposal language and subsequent comments and edits of the sponsor of NOGRR258 and NPRR1198, EDF Renewables (EDF) – including EDF’s February 16, 2024 responses to the Oncor comments of January 22, 2024; and
* The comments of Lower Colorado River Authority (LCRA) filed on February 16, 2024 and as clarified in LCRA comments filed on March 8, 2024.

Sandy Creek urges ERCOT and the stakeholder leadership to move quickly to approve NOGRR258 and NPRR1198 as soon as possible to allow time to investigate and implement Extended Action Plans (EAPs) to address the urgency for not only needed capacity but also for valuable, dispatchable and grid stabilizing generation such as that created by Sandy Creek operations. Sandy Creek will continue to engage in the consideration of these proposals to enhance ERCOT processes, including by continuing to analyze them to see if any other modifications may be need to ensure their best effectiveness.

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| Revised Cover Page Language |

None

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| Revised Proposed Guide Language |

None