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| NOGRR Number | [245](https://www.ercot.com/mktrules/issues/NOGRR245) | NOGRR Title | Inverter-Based Resource (IBR) Ride-Through Requirements |

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| Date | January 23, 2024 |

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| Submitter’s Information | |
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| Market Segment | Independent Generator |

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| Comments |

Avangrid Renewables, LLC (“Avangrid”) appreciates the opportunity to comment on Nodal Operating Guide Revision Request (“NOGRR”) 245 and continues to support ERCOT’s need for adopting rules to mitigate reliability risks associated with disturbances related to the capability of some Inverter-Based Resources (“IBRs”) to ride-through frequency and voltage deviations on the ERCOT System. While Avangrid continues to maintain that the most appropriate way to address these issues is through a bifurcated implementation of NOGRR245 (*see* Avangrid’s Comments filed on06/07/2023 and 09/25/2023), Electric Reliability Council of Texas, Inc. (“ERCOT”) appears to disagree.

On January 23, 2024, NextEra Energy Resources, LLC, Southern Power Company, and Invenergy, LLC (“Joint Commenters”) filed comments in a thoughtful attempt to reach a solution that would significantly improve reliability risks associated with disturbances on the ERCOT System. Avangrid agrees with Joint Commenters that it would be unjust and unreasonable to substantially change regulatory requirements that impose extensive physical facility changes that are cost prohibitive and/or commercially unproven. Accordingly, if bifurcation of NOGRR245 is not possible, at minimum, NOGRR245 should include a phased-in approach for implementation and provide particular exceptions to legacy IBRs where solutions are either (a) technically infeasible as determined by the original equipment manufacturer (“OEM”), or (b) commercially unreasonable as determined by the IBR.

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| Revised Cover Page Language |

None

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| Revised Proposed Guide Language |

None