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| NOGRR Number | [272](https://www.ercot.com/mktrules/issues/NOGRR272) | NOGRR Title | Advanced Grid Support Requirements for Inverter-Based ESRs |

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| Date | January 16, 2025 |

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| Submitter’s Information | |
| Name | Jack Clark |
| E-mail Address | [jclark@spearmintenergy.com](mailto:jclark@spearmintenergy.com); |
| Company | Spearmint Renewable Development Company, LLC (“SRDC”) |
| Phone Number | (561) 452-7380 |
| Cell Number |  |
| Market Segment | Independent Generator |

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| Comments |

Spearmint Renewable Development Company, LLC (“SRDC”) appreciates the opportunity to file comments on Nodal Operating Guide Revision Request (NOGRR) 272. SRDC owns and operates 150MW in standalone Energy Storage Resources (ESRs) in ERCOT with 200MW currently under construction as well as more in development stages.

While SRDC appreciates and understands ERCOT’s efforts in raising this issue and proactively proposing a grid forming specification for the ERCOT region, there are some concerns about the construct, as proposed, in NOGRR 272.

Similar to the comments and questions raised by Plus Power in their filed comments, SRDC agrees that these requirements should be forward looking for resources that execute a Standard Generation Interconnection Agreement (SGIA) on or after a date in the future and not retroactively, to avoid potential challenges of such a policy.

Further, SRDC believes that being required to install equipment that is “over and above” existing technology that provides an additional service to the grid indeed warrants remuneration. Again, as highlighted in comments by Plus Power, and as was presented by Energy Systems Integration Group (ESIG) at the December 13, 2024, Inverter-Based Resource Working Group (IBRWG) meeting, there are other jurisdictions that recognize the value of this service and do compensate entities who provide it.

The following are issues that require more discussion and planning before moving ahead on this NOGRR:

* How does ERCOT intend to build grid-forming services into its planning?
* How will ERCOT handle performance where the unit did ride-through but did not perform as modeled?
* What is ERCOT’s roadmap to integrating and compensating for other new grid-forming services not being required by NOGRR 272, such as Black Start Services and virtual inertia?
* How will ERCOT compensate ESRs for the lost opportunity costs of preserving headroom at High and Low SOC levels?
* How will ERCOT compensate ESRs for their increased initial and ongoing costs to provide this new service?

SRDC appreciates the opportunity to provide these comments and looks forward to working with ERCOT and other stakeholders on this important issue in future conversations.

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| Revised Cover Page Language |

None

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| Revised Proposed Guide Language |

None