**Planning Working Group (PLWG) Meeting Minutes**

**March 18, 2025 (In Person + WebEx)**

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| **1.** | **Antitrust Admonition**Antitrust admonition was given. | **Chair** |
| **2.** | **Agenda Review**Agenda was reviewed. | **Chair** |
| **3.** | **Review of PLWG Meeting Minutes (February 24)**Meeting minutes reviewed. No feedback received. | **Chair** |
| **4.** | **General updates** | **Chair** |
|  | PGRR124 referral at 3/6 ROS meeting. |  |
| **5.** | **PGRR 120 – SSO Prevention for Generator Interconnection** | **PLWG** |
|  | * **Review ERCOT Comments**

Megan Miller (ERCOT) – ERCOT is still discussing internally and does not yet have new comments to present today. | **ERCOT** |
|  | * **Review Enel Green Power Comments**

Enel not available to present comments. | **Enel Green Power North America** |
|  | ***Action Taken: Left PGRR120 tabled until April PLWG meeting***. |  |
| **6.** | **PGRR 122 – Reliability Performance Criteria for Loss of Load** | **ERCOT/PLWG** |
|  | * **Review Google Comments (2-4-2025)**

Google not available to discuss comments. | **Google** |
|  | * **ERCOT Presentation**

Jeff Billo (ERCOT) presented draft comments in response to LCRA’s comments. ERCOT noted the sense of urgency on this issue as this is an imminent reliability concern. One key issue is that existing dynamic load models do not reflect the real-world behavior of the load (e.g. simulations do not show a trip but the load trips in reality). ERCOT is collaborating with university partners to develop better load models, but this will take some time to develop. In the near-term, need to make some adjustments to current assumptions with framework of PGRR122 and will continue to work out the modeling issues in parallel. ERCOT would like to move forward on requirements for new large loads and gray box the language for other studies (other than Large Load Interconnection Studies) until 1/1/2028. Mary Berkley (AEP) – What are ERCOT’s thought in terms of addressing violations for facilities which change their protections settings without notification to the transmission provider? I.e. they crossed a threshold without the benefit of interconnection study.ERCOT - With limited experiences so far, it’s not that the loads are changing the protection settings, but the desired/expected behavior is not matching up to real behavior. This is a legitimate issue that needs to be resolved. It may be outside the scope of PGRR 122 but perhaps need requirements on the loads themselves – ERCOT had proposed at one point but not there today.Mary – These discussions are worth having upfront. There could be situations where a customer has changed so that it now exceeds the threshold criteria. What would be the timeframe to address prior to 2028 with proposed gray box?ERCOT - Annual planning studies look at changes to the system. This is yet another one of those changes on the system. Would need to address criteria violations that come out of it. TPL studies that would be identified as corrective action plans brought to RPG.Evan Neel (Lancium) – Will ERCOT be replacing the 1 GW criteria in the future?ERCOT –Size of load you can lose is a physical limitation on the system. Some faults even with ride-through requirements would need to maintain frequency/stability in those situations.Evan – What studies does this apply to with an immediate effect? All new interconnection requests? Or some tranche of existing large loads that are being studied?Agee Springer (ERCOT) – We would need to work out an implementation date to encompass any studies that hadn’t been completed before the effective date. Also clarified that “completed” means approved by ERCOT.Ken Donohoo (OwnERC LLC) clarified if PGRR122 applies to large loads above 75 MW broadly and thus not restricted only to data centers. ERCOT affirmed.Martha Henson (Oncor) asked about ERCOT’s expected timing to complete the Frequency Overshoot Study. Nitika Mago (ERCOT) expects the study to be completed in early to mid-April.Raja Kakarla (CenterPoint) - If ERCOT is in process of finalizing the study, the preference would be to table at PLWG until the study is completed and then ERCOT can present both PGRR122 and study results simultaneously to ROS. ERCOT responded it wants to move the PGRR forward to stop the bleeding.Harsh Naik (Oncor) – Also wants to table as Raja suggested. Unclear how TSPs will mitigate any issues that the Study uncovers. Are there TSP fixes out there? We don’t know all the issues / all the solutions necessary to mitigate. Feels as though we are rushing the PGRR without knowing all the criteria.What if there is no solution when the gray box language becomes effective? Would ERCOT disconnect non-complying load?Jeff - No, ERCOT would not disconnect. Would work on the solutions. Want to give the Market the signal that the system has physical limitations.Kevin Hanson (Invenergy) – ERCOT expects to have 150 GW load by 2030 – with these limitations, will that load forecast be cut substantially?ERCOT - If we don’t address, it will be highly unlikely. Need to balance both so that we can serve the most load as reliably as we can. Lots of load coming and need to address concerns that we haven’t seen before.Kevin - Will this impact Permian oil and gas?ERCOT - Generally, oil and gas loads are not 75 MW.Shane Thomas (Shell) – It would be helpful to help people plan around load growth in light of this limit to see the large load chunked into buckets of size if it can be done without exposing protected customer information.Agee Springer (ERCOT) – Not sure ERCOT can commit to breaking it down. Will look and see how granular can break it down to bring to TAC.Harsh Naik (Oncor) – Yes, would impact oil and gas. If there is a constraint in an area, cannot add more load. Might not impact immediately, but eventually even a small addition of 10 MW would be prevented – thus impacted.Martha Henson (Oncor) – Oncor finds it difficult to state agreement with a set of comments posted as a draft. Would also like to see the numbers from the Study results.ERCOT stated it would continue to review draft comments at the April DWG meeting.***Action Taken: Tabled PGRR122 to April PLWG meeting.*** | **ERCOT** |
| **7.** | **NPRR 1272 – Voltage Support at Private Use Networks**Bill Blevins (ERCOT) reviewed posted presentation. Bill believes that ERCOT is currently following the protocols in this matter. Bill provided some background on the development of the current protocol language and walked through two examples to show the diverse range of metering configurations. Key policy decisions pertaining to VSS were made during PRR830 development, which formalized the “rectangle requirement” of reactive power capability at the point of interconnection (POI).Maribel Khayat (CenterPoint) asked for clarification on “net maximum power to be supplied” – is this POIB? Bill – No, HSL should be at the POI. Mina Turner (AEP) – Is the assumption for co-gen situation that the load is off when generator is off? Bill – Yes, co-gen would always have a reduced HSL. Now we have the situation where the data center may run independently of the generator.David Withrow (AEP) – Would NPRR1272 change ERCOT’s understanding of the current interpretation of protocol language? Bill – Yes. What would be new would be load making net reactive behind the POI. There would also be a cost implication.Melissa Trevino (Occidental) – Oxy disagrees with ERCOT’s interpretation. Is there anything specific in the protocols about there being a different measurement for the different situations (examples in presentation)?Bill – Not necessarily but plans to continue ERCOT’s interpretation as traditionally practiced unless NPRR1272 goes forward.Trevor Safko (LCRA) – What would be implications to Planning should NPRR1272 move forward? What assumptions would need to be made for the PUN’s behavior?Bill – Need to have discussions with the transmission companies to fully understand implications. May need to include gray box language to allow TSPs time to install field equipment – for example, a generator wouldn’t necessarily install a capacitor to meet reactive capability so this may end up being installed by the transmission company. This creates another question - if the capacitor is not there and the load is not online, how much voltage support can the operator request? This would require adjustments to the planning processes.ERCOT plans to continue conversations with TSPs and Occidental on this issue. **Action Taken: Tabled NPRR1272 until April PLWG meeting.** | **PLWG** |
| **8.** | **PGRR 124 – ESR Maintenance Exception to Modification**Tesla is preparing a presentation to deliver at the next PLWG meeting. Discussion not taken up at this time.***Action: Tabled until April PLWG meeting.*** | **Tesla** |
| **9.** | **NERC Topics Roundtable:** | **Mina Turner** |
|  | * **CIP-014-4 – Ballot in early March**

Mina Turner (AEP) provided a reminder that Ballot #3 will be going out in early March. |  |
| **10.** | **Review Open Action Items**No items reviewed.Continued tabling of “Load” vs. “load” redlines. | **Chair** |
| **11.** | **Other Business**No other business discussed.Some vendors interested in coming to discuss Statcoms vs. Synchronous condensers. Any interest in presentation at RPG or PLWG? Task force with Data Centers might be a good fit. | **Chair** |
| **12.**  | **Adjourn**Adjourned until next PLWG meeting scheduled for April 29th. | **Chair** |