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| PGRR Number | [120](https://www.ercot.com/mktrules/issues/PGRR120) | PGRR Title | SSO Prevention for Generator Interconnection |

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| Date | May 14, 2025 |

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| Submitter’s Information |
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| Company | Lone Star Transmission, LLC (Lone Star) & American Electric Power (AEP) |
| Phone Number | (561) 603-3970 / (512) 599-2603 & 918-606-7106 / (606) 213-3182 |
| Cell Number |  |
| Market Segment | Not applicable |

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| Comments |

Lone Star and AEP thank ERCOT for the opportunity to provide feedback on Planning Guide Revision Request (PGRR) 120. Following a thorough review of ERCOT’s posted comment on April 16, 2025, Lone Star and AEP are submitting joint comments, as the proposed revisions directly impact the assets of both entities, and both the parties express their dissatisfaction equally, as they believe the current resolution does not fully address their previously articulated concerns. Consequently, Lone Star and AEP urge ERCOT to carefully consider their observations and ensure that their feedback is comprehensively integrated. To facilitate a more exhaustive resolution, Lone Star and AEP wish to reiterate their prior remarks[[1]](#footnote-2),[[2]](#footnote-3) and submit additional comments.

Lone Star and AEP have following comments on PGRR120:

1. **SSO prevention through mitigation**: We recommend addressing the Subsynchronous Oscillation (SSO) issues by exploring potential mitigation measures such as networking series the existing compensated lines with existing or new Transmission Facilities. This offers a balanced resolution without stifling necessary growth in generation capacity to meet the Load growth.
2. **Grandfathering Date Concerns**: The proposed grandfathering date of September 1, 2025, poses considerable challenges. Lone Star and AEP both have a multitude of projects currently in their pipeline which have already undergone extensive investment, both financially and temporally. Adhering to this PGRR will require restudying, rescoping, obtaining updated estimates and financial commitments, and modifying the CODs of all IPPs in the queue at these POIs that have not yet signed an SGIA. Due to these commitments, and the anticipated time lag in approval of the final PGGR, adhering to this date is not feasible. We request ERCOT to adjust this timeline to a later date to reflect a more realistic and sensitive approach to existing projects, and while providing Lone Star and AEP sufficient time for proposing projects to eliminate SSO risks.

In conclusion, ERCOT's current proposal, which prohibits further generation development, does not adequately address the challenges posed by significant load growth. To effectively resolve oscillatory issues arising from series compensation, it is recommended to network the existing series-compensated lines. This approach would safeguard the transfer limits of the system, ensuring that its operational capacity remains unaffected.

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| Revised Cover Page Language |

None

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| Revised Proposed Guide Language |

None

1. Lone Star comments, 02-07-2025: <https://www.ercot.com/files/docs/2025/02/07/120PGRR-07%20Lone%20Star%20Comments%20020725.docx> [↑](#footnote-ref-2)
2. AEP comments 01-28-2025: <https://www.ercot.com/files/docs/2025/01/28/120PGRR-06%20AEP%20Comments%20012825.docx> [↑](#footnote-ref-3)