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| NPRR Number | [1283](https://www.ercot.com/mktrules/issues/NPRR1283) | NPRR Title | Modification of SSR Mitigation Timeline |
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| Date | July 8, 2025 |
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| Submitter’s Information |
| Name | Robert Helton / Blan Holman |
| E-mail Address | Robert.helton@engie.com / bholman@pgrenewables.com  |
| Company | Engie N.A. / Pine Gate Renewables, LLC (“Joint Commenters”) |
| Phone Number | 832-435-7815 / 855-969-3380 |
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| Market Segment | Independent Generator |
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| Comments |

Engie and Pine Gate Renewables fully understand that ERCOT has identified Subsynchronous Ferroresonance (SSFR) as an emerging and growing risk. However, Engie and Pine Gate Renewables are concerned about the implementation timeline for Nodal Protocol Revision Request (NPRR) 1283. The commenters have several facilities in late-stage development and commissioning; an upon-approval implementation date could delay the Commercial Operation Date for those facilities potentially delaying them into this winter. It is also likely there are other facilities that could be affected but the developers may not be following this specific NPRR. ERCOT has indicated that it experienced a total of two Real-Time SSFR events. Both occurred in 2023, with one of them occurring during project commissioning. Given the disruption to facilities currently under construction that are planning to meet existing Subsynchronous Resonance (SSR) requirements by Initial Synchronization, the commenters request that the implementation date for NPRR1283 be January 1, 2026. This will ensure there are no delays to late-stage projects and give the developers time to adjust their schedules as necessary.

Engie and Pine Gate Renewables also would request and are ready to assist ERCOT working with Market Participants to develop solutions to identify these risks earlier in the interconnection process, such as a Subsynchronous Oscillation (SSO) screening study and other mechanisms to comply with study requirements, with clear timelines being a priority as to not delay energization of projects.

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| Revised Cover Page Language |

None

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| Revised Proposed Protocol Language |

None