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

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| Date | July 9, 2025 |

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| Submitter’s Information |
| Name | Caitlin Smith / Bob Helton |
| E-mail Address | Caitlin.Smith@JupiterPower.com / Robert.Helton@engie.com |
| Company | Jupiter Power LLC / Engie NA (“Joint Commenters”) |
| Phone Number |  |
| Cell Number | 832-326-1238 / 832-435-7815 |
| Market Segment | Independent Generator  |

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| Comments |

Jupiter Power LLC and Engie N.A. (“Joint Commenters”) submit these comments in addition to ERCOT’s July 1, 2025, comments, in response to two remaining issues:

* **Effective date:** Joint Commenters acknowledge that ERCOT has moved the applicability date to apply to Resources that have a Standard Generation Interconnection Agreement (SGIA) after January 1, 2026, in order to ensure that the date is after potential Public Utility Commission (PUC) approval of Nodal Operating Guide Revision Request (NOGRR) 272. Joint Commenters further ask that this applicability date be moved to April 1, 2026. Equipment for Energy Storage Resources (ESRs) often must be purchased years ahead of an SGIA date in order to be ready for use for the Resource’s start of commercial operations. Joint Commenters propose a later date to preserve regulatory certainty and non-retroactivity in relation to Resources that may not yet have an SGIA but do have purchased equipment, and to not delay the commercial operations of additional dispatchable Resources on the ERCOT grid.
* **Compliance concerns**: Joint Commenters appreciate ERCOT’s revisions to clarify that ESRs must meet performance requirements for existing Inverter-Based Resources (IBRs) and that NOGRR272 will create a new capability requirement. Joint Comments make further edits to avoid confusion and continue the clarifications that NOGRR272 creates a **capability** requirement and not a new performance requirement, in addition to those existing requirements for voltage support, frequency support, and ride-through.

Joint Commenters request that ROS approve NOGRR272 with Joint Commenters’ comments, or alternatively continue to table NOGRR272, in order for interested stakeholders to work with ERCOT. We are aware of ERCOT’s desire to get NOGRR272 in front of the Board in September and will commit to working with ERCOT and to supporting Urgency at ROS in August if appropriate to meet a timeline for September Board consideration.

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| Revised Cover Page Language |

None

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| Revised Proposed Guide Language |

**2.14 Advanced Grid Support Requirements for Inverter-Based Resources (IBRs)**

(1) An ESR shall meet the modeling requirements described in Planning Guide Section 6.2, Dynamics Model Development, to demonstrate its capability to maintain an internal voltage phasor in the sub-transient-to-transient timeframe and control the voltage phasor to maintain synchronism with the ERCOT Transmission Grid.

(2) An ESR interconnected to the ERCOT Transmission Grid pursuant to a Standard Generation Interconnection Agreement (SGIA) executed before April 1, 2026, is not required to comply with the requirements of this Section. The requirements of this Section apply to those portions of any subsequent ESR modifications that add MW capacity or make non-in-kind replacements of equipment.