|  |  |  |  |
| --- | --- | --- | --- |
| NPRR Number | [1272](https://www.ercot.com/mktrules/issues/NPRR1272) | NPRR Title | Voltage Support at Private Use Networks |
| Date Posted | | February 5, 2025 | |
|  | |  | |
| Requested Resolution | | Urgent – Urgent status is necessary due to pending priority projects that may be delayed or negatively impacted under the current application. | |
| Nodal Protocol Sections Requiring Revision | | 3.15, Voltage Support | |
| Related Documents Requiring Revision/Related Revision Requests | | None | |
| Revision Description | | This Nodal Protocol Revision Request (NPRR) clarifies that Section 3.15 should be applied to require ERCOT to independently evaluate the Reactive Power requirements of Generation Resources excluding the effects of co-located retail load. As such, any Generation Resources that meet the requirements of the Protocols as standalone Generation Resources shall not have additional Reactive Power requirements imposed as a result of co-locating with load.  Further, the language clarifies that the onsite load must also comply with the power factor requirements for retail Customers in the applicable tariff for retail delivery service. | |
| Reason for Revision | | [Strategic Plan](https://www.ercot.com/files/docs/2023/08/25/ERCOT-Strategic-Plan-2024-2028.pdf) Objective 1 – Be an industry leader for grid reliability and resilience  [Strategic Plan](https://www.ercot.com/files/docs/2023/08/25/ERCOT-Strategic-Plan-2024-2028.pdf) Objective 2 - Enhance the ERCOT region’s economic competitiveness with respect to trends in wholesale power rates and retail electricity prices to consumers  [Strategic Plan](https://www.ercot.com/files/docs/2023/08/25/ERCOT-Strategic-Plan-2024-2028.pdf) Objective 3 - Advance ERCOT, Inc. as an independent leading industry expert and an employer of choice by fostering innovation, investing in our people, and emphasizing the importance of our mission  General system and/or process improvement(s)  Regulatory requirements  ERCOT Board/PUCT Directive  *(please select ONLY ONE – if more than one apply, please select the ONE that is most relevant)* | |
| Justification of Reason for Revision and Market Impacts | | ERCOT recently indicated to Occidental that it is interpreting Section 3.15 to require a Generation Resource that is co-located with retail load in a Private Use Network to maintain Reactive Power requirements after compensating for any VAr consumption by the retail load. This imposes an additional burden on a co-located Generation Resource beyond what is required of any other Resource that is not located within a Private Use Network. Requiring the Generation Resource to compensate for any VAr consumption by a load—even when the load is satisfying the applicable utility tariff requirements—results in a higher performance standard being arbitrarily applied to Generation Resources within a Private Use Network without any explicit Protocol guidance or reliability justification.  Most importantly, this interpretation of the Protocols is not clear from the language of Section 3.15, which only states that Reactive Power will be measured at the Point of Interconnection Bus (POIB) but does not mention compensating for any retail load within the Private Use Network, or anything about how the measurement will be made differently for a Private Use Network versus any other Generation Resource. As a result, Occidental and others developing new, high-priority projects with co-located generation are in a position of potentially significantly delaying or incurring unjust costs for these projects due to this Protocol interpretation. Occidental does not believe the current Protocol language supports this interpretation but is pursuing this NPRR in an effort to clarify the issue quickly for projects currently underway. | |

|  |  |
| --- | --- |
| Sponsor | |
| Name | Melissa Trevino |
| E-mail Address | [melissa\_trevino@oxy.com](mailto:melissa_trevino@oxy.com) |
| Company | Occidental Chemical Corporation |
| Phone Number | 713-366-5826 |
| Cell Number | 281-323-8801 |
| Market Segment | Consumer (Industrial) |

|  |  |
| --- | --- |
| **Market Rules Staff Contact** | |
| **Name** | Jordan Troublefield |
| **E-Mail Address** | [Jordan.Troublefield@ercot.com](mailto:Jordan.Troublefield@ercot.com) |
| **Phone Number** | 512-248-6521 |

|  |
| --- |
| Market Rules Notes |

Please note the following NPRR(s) also propose revisions to the following section(s):

* NPRR1234, Interconnection Requirements for Large Loads and Modeling Standards for Loads 25 MW or Greater
  + Section 3.15

|  |
| --- |
| Proposed Protocol Language Revision |

3.15 Voltage Support

(1) ERCOT, in coordination with the Transmission Service Providers (TSPs), shall establish and update, as necessary, the ERCOT System Voltage Profile and shall post it on the Market Information System (MIS) Secure Area. ERCOT, the interconnecting TSP, or that TSP’s agent, may modify the Voltage Set Point described in the Voltage Profile based on current system conditions.

|  |
| --- |
| ***[NPRR1240: Replace paragraph (i) above with the following upon system implementation:]***  (1) ERCOT, in coordination with the Transmission Service Providers (TSPs), shall establish and update, as necessary, the ERCOT System Voltage Profile and shall post it on the ERCOT website. ERCOT, the interconnecting TSP, or that TSP’s agent, may modify the Voltage Set Point described in the Voltage Profile based on current system conditions. |

(2) All Generation Resources (including self-serve generating units) and Energy Storage Resources (ESRs) that are connected to Transmission Facilities and that have a gross unit rating greater than 20 MVA or those units connected at the same Point of Interconnection Bus (POIB) that have gross unit ratings aggregating to greater than 20 MVA, that supply power to the ERCOT Transmission Grid, shall provide Voltage Support Service (VSS).

(3) Except as reasonably necessary to ensure reliability or operational efficiency, TSPs should utilize available static reactive devices prior to requesting a Voltage Set Point change from a Generation Resource or ESR.

(4) Each Generation Resource and ESR required to provide VSS shall comply with the following Reactive Power requirements in Real-Time operations when issued a Voltage Set Point by a TSP or ERCOT:

(a) An over-excited (lagging or producing) power factor capability of 0.95 or less determined at the unit's maximum net power to be supplied to the ERCOT Transmission Grid and for any Voltage Set Point from 0.95 per unit to 1.04 per unit, as measured at the POIB;

(b) An under-excited (leading or absorbing) power factor capability of 0.95 or less, determined at the unit's maximum net power to be supplied to the ERCOT Transmission Grid and for any Voltage Set Point from 1.0 per unit to 1.05 per unit, as measured at the POIB;

(c) For any Voltage Set Point outside of the voltage ranges described in paragraphs (a) and (b) above, the Generation Resource or ESR shall supply or absorb the maximum amount of Reactive Power available within its inherent capability and the capability of any VAr-capable devices as necessary to achieve the Voltage Set Point;

(d) When a Generation Resource or an ESR required to provide VSS is issued a new Voltage Set Point, that Generation Resource or ESR shall make adjustments in response to the new Voltage Set Point, regardless of whether the current voltage is within the tolerances identified in paragraph (4) of Nodal Operating Guide Section 2.7.3.5, Resource Entity Responsibilities and Generation Resource and Energy Storage Resource Requirements;

(e) For Generation Resources, the Reactive Power capability shall be available at all MW output levels and may be met through a combination of the Generation Resource’s Corrected Unit Reactive Limit (CURL), which is the generating unit’s dynamic leading and lagging operating capability, and/or dynamic VAr-capable devices. This Reactive Power profile is depicted graphically as a rectangle. For Intermittent Renewable Resources (IRRs), the Reactive Power requirements shall be available at all MW output levels at or above 10% of the IRR’s nameplate capacity. When an IRR is operating below 10% of its nameplate capacity and is unable to support voltage at the POIB, ERCOT, the interconnecting TSP, or that TSP’s agent may require an IRR to disconnect from the ERCOT System for purposes of maintaining reliability. For ESRs, the Reactive Power capability shall be available at all MW levels, when charging or discharging, and may be met through a combination of the ESR’s CURL, and/or dynamic VAr-capable devices. For any ESR that achieved Initial Synchronization before December 16, 2019, the requirement to have Reactive Power capability when charging does not apply if the Resource Entity for the ESR has submitted a notarized attestation to ERCOT stating that, since the date of Initial Synchronization, the ESR has been unable to comply with this requirement without physical or software changes/modifications, and ERCOT has provided written confirmation of the exemption to the Resource Entity. The exemption shall apply only to the extent of the ESR’s inability to comply with the requirement when the ESR is charging.

(f) For any Generation Resource or Energy Storage Resource (ESR) that is part of a Self-Limiting Facility, the capabilities described in paragraphs (a) and (b) above shall be determined based on the Self-Limiting Facility’s established MW Injection limit and, if applicable, established MW Withdrawal limit.

(g) A Generation Resource that is part of a Private Use Network will be deemed to comply with paragraphs (a) and (b) above if the Generation Resource meets the power factor requirements when measured individually (i.e., without considering any VAr consumption by the load within the Private Use Network), and the load complies with the power factor requirements for retail Customers in the applicable tariff for retail delivery service when measured individually.

(5) As part of the technical Resource testing requirements prior to the Resource Commissioning Date, all Generation Resources and ESRs must conduct an engineering study, and demonstrate through performance testing, the ability to comply with the Reactive Power capability requirements in paragraph (4), (7), (8), or (9) of this Section, as applicable. Any study and testing results must be accepted by ERCOT prior to the Resource Commissioning Date.

(6) Except for a Generation Resource or an ESR subject to Planning Guide Section 5.2.1, Applicability, a Generation Resource or an ESR that has already been commissioned is not required to submit a new reactive study or conduct commissioning-related reactive testing, as described in paragraph (5) above.

(7) Wind-powered Generation Resources (WGRs) that commenced operation on or after February 17, 2004, and have a signed Standard Generation Interconnection Agreement (SGIA) on or before December 1, 2009 (“Existing Non-Exempt WGRs”), must be capable of producing a defined quantity of Reactive Power to maintain a set point in the Voltage Profile established by ERCOT in accordance with the Reactive Power requirements established in paragraph (4) above, except in the circumstances described in paragraph (a) below.

(a) Existing Non-Exempt WGRs whose current design does not allow them to meet the Reactive Power requirements established in paragraph (4) above must conduct an engineering study using the Summer/Fall 2010 on-peak/off-peak Voltage Profiles, or conduct performance testing to determine their actual Reactive Power capability. Any study or testing results must be accepted by ERCOT. The Reactive Power requirements applicable to these Existing Non-Exempt WGRs will be the greater of: the leading and lagging Reactive Power capabilities established by the Existing Non-Exempt WGR’s engineering study or testing results; or Reactive Power proportional to the real power output of the Existing Non-Exempt WGR (this Reactive Power profile is depicted graphically as a triangle) sufficient to provide an over-excited (lagging) power factor capability of 0.95 or less and an under-excited (leading) power factor capability of 0.95 or less, both determined at the WGR’s set point in the Voltage Profile established by ERCOT, and both measured at the POIB.

(i) Existing Non-Exempt WGRs shall submit the engineering study results or testing results to ERCOT no later than five Business Days after its completion.

(ii) Existing Non-Exempt WGRs shall update any and all Resource Registration data regarding their Reactive Power capability documented by the engineering study results or testing results.

(iii) If the Existing Non-Exempt WGR’s engineering study results or testing results indicate that the WGR is not able to provide Reactive Power capability that meets the triangle profile described in paragraph (a) above, then the Existing Non-Exempt WGR will take steps necessary to meet that Reactive Power requirement depicted graphically as a triangle by a date mutually agreed upon by the Existing Non-Exempt WGR and ERCOT. The Existing Non-Exempt WGR may meet the Reactive Power requirement through a combination of the WGR’s Unit Reactive Limit (URL) and/or automatically switchable static VAr-capable devices and/or dynamic VAr-capable devices. No later than five Business Days after completion of the steps to meet that Reactive Power requirement, the Existing Non-Exempt WGR will update any and all Resource Registration data regarding its Reactive Power and provide written notice to ERCOT that it has completed the steps necessary to meet its Reactive Power requirement.

(iv) For purposes of measuring future compliance with Reactive Power requirements for Existing Non-Exempt WGRs, results from performance testing or the Summer/Fall 2010 on-peak/off-peak Voltage Profiles utilized in the Existing Non-Exempt WGR’s engineering study shall be the basis for measuring compliance, even if the Voltage Profiles provided to the Existing Non-Exempt WGR are revised for other purposes.

(b) Existing Non-Exempt WGRs whose current design allows them to meet the Reactive Power requirements established in paragraph (4) above (depicted graphically as a rectangle) shall continue to comply with that requirement. ERCOT, with cause, may request that these Existing Non-Exempt WGRs provide further evidence, including an engineering study, or performance testing, to confirm accuracy of Resource Registration data supporting their Reactive Power capability.

(8) Qualified Renewable Generation Resources (as described in Section 14, State of Texas Renewable Energy Credit Trading Program) in operation before February 17, 2004, required to provide VSS and all other Generation Resources required to provide VSS that were in operation prior to September 1, 1999, whose current design does not allow them to meet the Reactive Power requirements established in paragraph (4) above, will be required to maintain a Reactive Power requirement as defined by the Generation Resource’s URL that was submitted to ERCOT and established per the criteria in the ERCOT Operating Guides.

(9) New generating units connected before May 17, 2005, whose owners demonstrate to ERCOT’s satisfaction that design and/or equipment procurement decisions were made prior to February 17, 2004, based upon previous standards, whose design does not allow them to meet the Reactive Power requirements established in paragraph (4) above, will be required to maintain a Reactive Power requirement as defined by the Generation Resource’s URL that was submitted to ERCOT and established per the criteria in the Operating Guides.

(10) For purposes of meeting the Reactive Power requirements in paragraphs (4) through (9) above, multiple units including IRRs shall, at a Resource Entity’s option, be treated as a single Resource if the units are connected to the same transmission bus.

(11) Resource Entities may submit to ERCOT specific proposals to meet the Reactive Power requirements established in paragraph (4) above by employing a combination of the CURL and added VAr capability, provided that the added VAr capability shall be automatically switchable static and/or dynamic VAr devices. A Resource Entity and TSP may enter into an agreement in which the proposed static VAr devices can be switchable using Supervisory Control and Data Acquisition (SCADA). ERCOT may, at its sole discretion, either approve or deny a specific proposal, provided that in either case, ERCOT shall provide the submitter an explanation of its decision.

(12) A Resource Entity and TSP may enter into an agreement in which the Generation Resource or ESR compensates the TSP to provide VSS to meet the Reactive Power requirements of paragraph (4) above in part or in whole. The TSP shall certify to ERCOT that the agreement complies with the Reactive Power requirements of paragraph (4).

(13) Unless specifically approved by ERCOT, no unit equipment replacement or modification at a Generation Resource or ESR shall reduce the capability of the unit below the Reactive Power requirements that applied prior to the replacement or modification.

(14) Generation Resources or ESRs shall not reduce high reactive loading on individual units during abnormal conditions without the consent of ERCOT unless equipment damage is imminent.

(15) All WGRs must provide a Real-Time SCADA point that communicates to ERCOT the number of wind turbines that are available for real power and Reactive Power injection into the ERCOT Transmission Grid. WGRs must also provide two other Real-Time SCADA points that communicate to ERCOT the following:

(a) The number of wind turbines that are not able to communicate and whose status is unknown; and

(b) The number of wind turbines out of service and not available for operation.

(16) All PhotoVoltaic Generation Resources (PVGRs) must provide a Real-Time SCADA point that communicates to ERCOT the capacity of PhotoVoltaic (PV) equipment that is available for real power and Reactive Power injection into the ERCOT Transmission Grid. PVGRs must also provide two other Real-Time SCADA points that communicate to ERCOT the following:

(a) The capacity of PV equipment that is not able to communicate and whose status is unknown; and

(b) The capacity of PV equipment that is out of service and not available for operation.

|  |
| --- |
| ***[NPRR1029: Insert paragraph (17) below upon system implementation and renumber accordingly:]***  (17) Each DC-Coupled Resource must provide a Real-Time SCADA point that communicates to ERCOT the capacity of the intermittent renewable generation component of the Resource that is available for real power and/or Reactive Power injection into the ERCOT System. Each DC-Coupled Resource must also provide Real-Time SCADA points that communicate to ERCOT the following:  (a) The capacity of any PV generation equipment that is not able to communicate and whose status is unknown;  (b) The capacity of any PV generation equipment that is out of service and not available for operation;  (c) The number of any wind turbines that are not able to communicate and whose status is unknown; and  (d) The number of any wind turbines out of service and not available for operation. |

(17) For the purpose of complying with the Reactive Power requirements under this Section 3.15, Reactive Power losses that occur on privately-owned transmission lines behind the POIB may be compensated by automatically switchable static VAr-capable devices.