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| PGRR Number | [122](https://www.ercot.com/mktrules/issues/PGRR122) | PGRR Title | Reliability Performance for Loss of Load |

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| Date | February 21, 2025 |

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| Comments |

LCRA submits these comments to Planning Guide Revision Request (PGRR) 122:

A new subsection was added (4.1.1.9, Maximum Load Loss Criteria) to capture the spirit of redline changes as drafted by ERCOT in their November 11, 2024 filing of PGRR122. LCRA believes bringing this language into its own subsection will allow for more flexibility to improve and amend the criteria, if necessary.

Additionally, LCRA expanded on ERCOT’s redlines to clarify how the maximum load loss criteria should be interpreted for N-1 and N-2 contingency events – in paragraphs (2) and (3) of Section 4.1.1.9, respectively – based on prior discussions at the Planning Working Group (PLWG). LCRA also revised the definition of total Load loss to align with NERC definitions for Consequential Load Loss and Non-Consequential Load Loss.

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| Revised Cover Page Language |

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| **Planning Guide Sections Requiring Revision** | 4.1.1.2, Reliability Performance Criteria  4.1.1.9, Maximum Load Loss Criteria |

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| Revised Proposed Guide Language |

**4.1.1.2 Reliability Performance Criteria**

(1) The following reliability performance criteria (summarized in Table 1: ERCOT-specific Reliability Performance Criteria, below) shall be applicable to planning analyses in the ERCOT Region:

(a) With all Facilities in their normal state, following a common tower outage with or without a single line-to-ground fault, all Facilities shall be within their applicable Ratings, the ERCOT System shall remain stable with no cascading or uncontrolled Islanding, and there shall be no non-consequential Load loss;

(b) With all Facilities in their normal state, following an outage of a DC Tie Resource or DC Tie Load with or without a single line-to-ground fault, all Facilities shall be within their applicable Ratings, the ERCOT System shall remain stable with no cascading or uncontrolled Islanding, and there shall be no non-consequential Load loss;

(c) With any single generating unit unavailable, followed by Manual System Adjustments, followed by a common tower outage or outage of a DC Tie Resource or DC Tie Load with or without a single line-to-ground fault, all Facilities shall be within their applicable Ratings, the ERCOT System shall remain stable with no cascading or uncontrolled Islanding, and there shall be no non-consequential Load loss;

(d) With any single transformer, with the high voltage winding operated at 300 kV or above and low voltage winding operated at 100 kV or above unavailable, followed by Manual System Adjustments, followed by a common tower outage, or the contingency loss of a single generating unit, transmission circuit, transformer, shunt device, FACTS device, or DC Tie Resource or DC Tie Load with or without a single line-to-ground fault, all Facilities shall be within their applicable Ratings, the ERCOT System shall remain stable with no cascading or uncontrolled Islanding, and there shall be no non-consequential Load loss. An operational solution may be planned on a permanent basis to resolve a performance deficiency under this condition; and

(e) With any single DC Tie Resource or DC Tie Load unavailable, followed by Manual System Adjustments, followed by a common tower outage, or the contingency loss of a single generating unit, transmission circuit, transformer, shunt device, FACTS device, or DC Tie Resource or DC Tie Load, with or without a single line-to-ground fault, all Facilities shall be within their applicable Ratings, the ERCOT System shall remain stable with no cascading or uncontrolled Islanding, and there shall be no non-consequential Load loss. An operational solution may be planned on a permanent basis to resolve a performance deficiency under this condition.

| **Initial Condition** | | **Event** | **Facilities within Applicable Ratings and System Stable with No Cascading or Uncontrolled Outages** | **Non-consequential Load Loss Allowed** |
| --- | --- | --- | --- | --- |
| 1 | Normal System | Common tower outage, DC Tie Resource outage, or DC Tie Load outage | Yes | No |
| 2 | Unavailability of a generating unit, followed by Manual System Adjustments | Common tower outage, DC Tie Resource outage, or DC Tie Load outage | Yes | No |
| 3 | Unavailability of a transformer with the high voltage winding operated at 300 kV or above and low voltage winding operated at 100 kV or above, followed by Manual System Adjustments | Common tower outage; or  Contingency loss of one of the following:  1. Generating unit;  2. Transmission circuit;  3. Transformer;  4. Shunt device;  5. FACTS device; or  6. DC Tie Resource or DC Tie Load | Yes | No |
| 4 | Unavailability of a DC Tie Resource or DC Tie Load, followed by Manual System Adjustments | Common tower outage; or  Contingency loss of one of the following:  1. Generating unit;  2. Transmission circuit;  3. Transformer;  4. Shunt device;  5. FACTS device; or  6. DC Tie Resource or DC Tie Load | Yes | No |

Table 1: ERCOT-specific Reliability Performance Criteria

(2) ERCOT and the TSPs shall endeavor to resolve any performance deficiencies as appropriate. If a Transmission Facility improvement is required to meet the criteria in this Section 4.1.1.2, but the improvement cannot be implemented in time to resolve the performance deficiency, an interim solution may be used to resolve the deficiency until the improvement has been implemented.

(a) A Remedial Action Scheme (RAS) shall not be planned to resolve a planning criteria performance deficiency unless it is expected that system conditions will change such that the RAS will no longer be needed within the next five years.

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| ***[PGRR113: Replace item (a) above with the following upon system implementation of NPRR1198:]***  (a) A Remedial Action Scheme (RAS) or Constraint Management Plan (CMP) shall not be planned to resolve a planning criteria performance deficiency unless it is expected that system conditions will change such that the RAS or CMP will no longer be needed within the next five years. |

4.1.1.9 Maximum Load Loss Criteria

(1) For the purposes of this section, the total Load loss for a contingency event includes consequential Load loss, the response of voltage sensitive Load, and Load that is disconnected from the ERCOT System by end-user equipment.

(2) For any operating condition in category P1, P2, P4, P5, or P7 of the NERC Reliability Standard addressing Transmission System Planning Performance Requirements, or following a common tower outage, the total Load loss shall be less than 1,000 MW.

(3) With any of the following Facilities unavailable, followed by Manual System Adjustments, followed by a common tower outage or the contingency loss of a transmission circuit, transformer, shunt device, or FACTS device, the total Load loss shall be less than 1,000 MW:

(a) Any transmission circuit, transformer, shunt device, or FACTS device;

(b) Any double-circuit transmission line consisting of two circuits sharing a tower of 0.5 miles or greater; or

(c) Any single generating unit.

(4) The total Load loss in paragraph (3) above does not include the total Load loss resulting from the unavailability of any Facility included in paragraph (3) above, prior to Manual System Adjustments.