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| PGRR Number | [132](https://www.ercot.com/mktrules/issues/PGRR132) | PGRR Title | Update to Standard Generation Interconnection Agreement (SGIA) Requirement |

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| Date | October 31, 2025 |

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| Submitter’s Information | |
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| Comments |

Pattern Energy appreciates the opportunity to provide the following comments on Planning Guide Revision Request (PGRR) 132:

**1) ROS should reject ERCOT’s request for Urgent status and process PGRR132 on a normal timeline so it can be properly vetted for unintended consequences.**

Paragraph (1) of Section 1.2.4, Urgent Requests, clearly states, “The party submitting a PGRR may request that the PGRR be considered on an urgent timeline (“Urgent”) **only** when the submitter can reasonably show that an existing Planning Guide provision **is impairing or could imminently impair ERCOT System reliability** or wholesale or retail market operations, or is causing or could imminently cause a discrepancy between a Settlement formula and a provision of the ERCOT Protocols.” (emphasis added)

In this instance, ERCOT has clearly failed to make such a showing. The cited concern relates to market rules not yet effective or enforceable for a class of resources for which extensions on compliance or even total exemption from compliance are currently pending. There is nothing “imminent” about any “impairment” to ERCOT system reliability based upon the claimed gap in PGRR132 intends to address.

**2) PGRR132 is overly broad, requiring new interconnection agreements for existing units where such a requirement is burdensome and superfluous.**

ERCOT’s proposed amendment to apply paragraph (1) of Section 5.2.8.1, Standard Generation Interconnection Agreement for Transmission-Connected Generators, to all Generation Resources and Energy Storage Resources (ESRs) to which Section 5.2.1, Applicability, applies is overly broad. Specifically, requiring a new Standard Generation Interconnection Agreement (SGIA) for Resources utilizing the “PGRR109, Dynamic Model Review Process Improvement for Inverter-Based Resource (IBR) Modification, Process” for updating models and settings as specified in paragraph (1)(c)(iii) of Section 5.2.1 is unnecessary and burdensome to Resource owners, Transmission Service Providers (TSP), and ERCOT staff. Moreover, it thoroughly violates the letter and the spirit of the agreed-upon approach to the Resource update process created by PGRR109. Indeed, because the PGRR109 Process is required for every Resource making the changes necessary to comply with Nodal Operating Guide Revision Request (NOGRR) 245, Inverter-Based Resource (IBR) Ride-Through Requirements, (whether adding new equipment or simply maximizing existing equipment), ERCOT’s proposed language in PGRR132 would render the underlying SGIA date-based demarcations of NOGRR245 moot: as soon as a Resource owner utilizes the PGRR109 process to maximize, a new SGIA would be required to be executed which would, in turn, require instant full compliance, not simply maximization. At a minimum, ERCOT must exclude applicability of paragraph (1) of Section 5.2.8.1 to entities to which paragraph (1)(c)(iii) of Section 5.2.1applies.

**3) PGRR132 would significantly impact existing generators in unintended ways completely separate from provisions of the ERCOT universe of binding documents.**

There are a number of performance requirements and compliance obligations in the ERCOT market rules which only apply to certain Resources based upon the execution date of their SGIAs and stakeholders should carefully vet ERCOT’s proposed amendment to Section 5.2.8.1against each of them to ascertain whether unintended consequences may result. Additionally, there are provisions in Texas statute and Public Utility Commission of Texas (PUCT) Substantive Rules which similarly apply to apply to certain Resources based upon the execution date of their SGIAs and stakeholders should also vet ERCOT’s proposed amendment to Section 5.2.8.1 against each of them. For example, the Commission is currently considering a rule to create a “firming requirement” for certain resources which will only be applicable based upon certain criteria which include the execution date of the Resource’s SGIA (a criterion established in statute by the Texas Legislature).[[1]](#footnote-1) It is not hard to imagine a scenario in which an IBR granted an extension to comply with NOGRR245 finds itself inadvertently captured by the provisions of PGRR132 when it utilizes the PGRR109 process to comply with NOGRR245 and is suddenly captured by the firming requirement even though the Texas Legislature specifically carved such a unit out of the requirement by the plain language of the statute.

Similarly, PGRR132 could impact the application of PUCT Substantive Rule 25.195(f), Cost responsibilities to interconnect transmission-level generators at transmission voltage. Subsection (f)(2) of this Rule provides, “If the SGIA between the transmission-level generator and the TSP is executed on or before December 31, 2025, then the TSP is responsible for the cost of installing any new transmission facilities.” However, pursuant to subsection (f)(3), “If the SGIA between the transmission-level generator and the TSP is executed after December 31, 2025, then the interconnecting transmission-level generator is responsible for all costs of installing interconnection facilities that are incurred by the TSP that exceed the allowance established in accordance with this paragraph.” As a result of these provisions, the broad requirement to execute a new SGIA as proposed by PGRR132 could impose additional costs on a generator unrelated to the stated purpose of PGRR132 and contrary to the Legislature’s determination of which generators will be impacted by implementation of the change related to the allocation of transmission costs.[[2]](#footnote-2)

PGRR132 also could significantly restrict the ability of a Resource owner to amend an SGIA as expressly permitted by PUCT Substantive Rule §25.195(c). That subsection provides in relevant part: “The SGIA may be modified by mutual agreement of the parties to address specific facts presented by a particular interconnection request provided that the modifications do not frustrate the goal of expeditious, nondiscriminatory interconnection and are not otherwise inconsistent with the principles underlying the commission-approved SGIA.” As proposed, PGRR132 could significantly limit the current ability of parties to an SGIA to modify that agreement as permitted by the Commission’s current rules rather than executing an entirely new SGIA.

In summary, ROS should reject ERCOT’s request for Urgent status and refer PGRR132 to the Planning Working Group (PLWG) for thorough evaluation with particular focus on eliminating overly broad application and unintended consequences.

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| Revised Cover Page Language |

None

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| Revised Proposed Guide Language |

None

1. See PUCT Project No. 58198 Rulemaking to Implement Firming Reliability Requirements for Electric Generating Facilities in the ERCOT Region Under PURA §39.1592. See also Utilities Code §39.1592(a). [↑](#footnote-ref-1)
2. Act of May 29, 2023, 88th Leg. R.S., ch. 410 (HB 1500), §49. [↑](#footnote-ref-2)