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| PGRR Number | [133](https://www.ercot.com/mktrules/issues/PGRR133) | PGRR Title | Clarifying Legacy Generation Breaker Control for PGRR115 Implementation |
| Date Posted | | October 30, 2025 | |
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| Requested Resolution | | Urgent – Urgent status is needed to correct greyboxed language prior to implementation of PGRR115, Related to NPRR1234, Interconnection Requirements for Large Loads and Modeling Standards for Loads 25 MW or Greater. | |
| Planning Guide Sections Requiring Revision | | 5.2.10, Required Interconnection Equipment | |
| Related Documents Requiring Revision/Related Revision Requests | | None | |
| Revision Description | | This Planning Guide Revision Request (PGRR) corrects for unintentional operational risk in greyboxed language adopted in PGRR115. | |
| 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 | | PGRR115 included one change unrelated to the interconnection of Large Loads – specifically, a revision to Section 5 adding greyboxed Section 5.2.10 that specifies that fault-protective breakers “be under the remote control of the applicable Transmission Operator (TO) and capable fo being operated remotely to comply with an instruction from ERCOT.”  The remote operation of generator breakers by a third party presents significant operational concerns for operators of power plants that were built prior to unbundling, where the determination of which breakers are at “each Point of Interconnection (POI)” may not be self-evident. It is not typical for TOs to control generation breakers, and that concern is particularly heightened for nuclear power plants, where remote operation of generator breakers by a third party (including a TO) could represent a security risk. The generator breakers must be under the control of the reactor operator.  Accordingly, to avoid a potential unintended consequence of the vague phrasing of new Section 5.2.10, Vistra recommends striking the last sentence of Section 5.2.10. While this does not resolve the vague phrasing directly, it is unnecessary to do so: Vistra supports the general intent of the provision that protective equipment exists to prevent the propagation of a fault current across the broader bulk electric system; Vistra’s concern is limited to the presumption that all implicated breakers need be capable of remote operation by a third party. Further, as ERCOT stated in its January 24, 2025 comments on PGRR115 in response to similar concerns raised by ERCOT Steel Mills regarding similar language that PGRR115 was adding for Large Loads in Section 9.2.5, “the removal of this phrase does not impact the overall requirements of this Section as existing Protocols already require TOs and QSEs to comply with ERCOT operating instructions with respect to equipment under their control when such actions are needed to maintain the reliability of the ERCOT System.”[[1]](#footnote-1) | |

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| Sponsor | |
| Name | Monica Jha; Katie Rich; Ned Bonskowski |
| E-mail Address | [Monica.Jha@vistracorp.com](mailto:Monica.Jha@vistracorp.com); [Katie.Rich@vistracorp.com](mailto:Katie.Rich@vistracorp.com); [ned.bonskowski@vistracorp.com](mailto:ned.bonskowski@vistracorp.com) |
| Company | Vistra Operations Company LLC |
| Phone Number |  |
| Cell Number | 832-215-5713; 712-313-9351; 214-288-2456 |
| Market Segment | Independent Generator |

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| **Market Rules Staff Contact** | |
| **Name** | Cory Phillips |
| **E-Mail Address** | [cory.phillips@ercot.com](mailto:cory.phillips@ercot.com) |
| **Phone Number** | 512-248-6464 |

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| Proposed Guide Language Revision |

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| ***[PGRR115: Insert Section 5.2.10 below upon system implementation of NPRR1234:]***  ***5.2.10 Required Interconnection Equipment***  (1) Each POI for a Generation Resource, ESR, or SOG interconnected at transmission voltage to the ERCOT System must have a permanent configuration consisting of a station with breakers capable of interrupting fault current to sectionalize the transmission lines connecting the station to the ERCOT System. |

1. [115PGRR-17 ERCOT Comments 012425](https://www.ercot.com/files/docs/2025/01/24/115PGRR-17%20ERCOT%20Comments%20012425.docx) at 4. [↑](#footnote-ref-1)