



Power Resources, Inc.

A MIDAMERICAN ENERGY HOLDINGS COMPANY AFFILIATE

October 28, 2025

Donald Maul (Donald.Maul@ercot.com)

Subject: exemption from the ERCOT Nodal Protocols 10.3.2.3(5-6)

This communication is in regard to the Falcon Seaboard Generation Facility also known as Power Resources Inc located (DUNS 021985348) in Big Spring, Texas. We are seeking an exemption from the ERCOT Nodal Protocols 10.3.2.3(5-6) which we understand to have a 500kW maximum load limit for auxiliary distribution transformers.

This request is due to how our facility was designed and has been operated for over the last 35 years. The design of the plant is configured such that there are three connections to the Oncor system. Two 250MVA Step-Up transmission transformers AT-1 and AT-2 deliver power to the grid at 345kV. A single 5000kVA 12.47kV-4.16kV distribution transformer (SST-1) provides power to the plant at 4.16kV for startup from a dead-end distribution line.

If we are not granted an exemption, an EPS meter will be required to be added to the 4160kV feeder to the plant. ERCOT would take the 4160 volt aux load and deduct it from the generation when settling our net generation. However, Oncor's tariff will not allow them to totalize these three meters AT-1/ AT-2 and SST-1 because they are at different voltages (345kV vs 12.47kV). Therefore, Oncor would be taking the 4160 volt aux load and sending it to the REP and ERCOT which would then result in CalEnergy being settled for the 4160 volt load individually and having it deducted from our generation which results in CalEnergy being settled twice for the same load.

Additionally, due to relay protection schemes currently in place, there is not a way to back feed the plant from AT-1 or AT-2 to start the generation assets. Therefore, we seek an exemption from the EPS meter/500kW load limit on the 4160 feeder fed from the Oncor distribution transformer (SST-1) and approval to continue to operate our plant as it was designed and has been successfully operated since construction in the early 1990's. We feel it would be beneficial to have a 3-way call with Oncor, PRI, and ERCOT to discuss this issue and would be happy to arrange this call if necessary.

Best Regards:

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