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| PGRR Number | [133](https://www.ercot.com/mktrules/issues/PGRR133) | PGRR Title | Clarifying Legacy Generation Breaker Control for PGRR115 Implementation |

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| Date | November 5, 2025 |

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| Submitter’s Information | |
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| Market Segment | Not applicable |

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| Comments |

ERCOT appreciates the opportunity to offer the following comments on Planning Guide Revision Request (PGRR) 133. While ERCOT understands and supports the motivation for this Revision Request, it has concerns with the proposed revisions. Specifically, ERCOT does not support removal of the requirement that the breakers be capable of remote operation. Additionally, while ERCOT understands that configurations of some legacy Generation Resources necessitate revising language in Section 5.2.10, Required Interconnection Equipment, that was approved in PGRR115, further proliferation of these configurations going forward is not desirable because Transmission Operators (Tos) should have operational control of breakers at substations that connect generators to the ERCOT System.

Accordingly, ERCOT offers these revisions to restore the language to paragraph (1) of Section 5.2.10 that was approved in PGRR115 and add a new paragraph (2) that allows for a Generation Resource, Energy Storage Resource (ESR), or Settlement Only Generator (SOG) with a Resource Commissioning Date on or before December 31, 2025 to maintain its current configuration. These units would need to come into compliance with the new requirements in the event a modification changing or adding a POI to the facility (as described in paragraph (1)(c)(iv) of Section 5.2.1) is made.

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| Revised Cover Page Language |

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| 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 phrasing of new Section 5.2.10, an additional paragraph (2) in Section 5.2.10 allows existing generators with a Resource Commissioning Date on or before December 31, 2025 to maintain their current configuration. These units would need to come into compliance with the new requirements in the event a modification changing or adding a POI to the facility (as described in paragraph (1)(c)(iv) of Section 5.2.1) is made. |

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| Revised Proposed Guide Language |

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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. The breakers shall be under the remote control of the applicable Transmission Operator (TO) and capable of being operated remotely to comply with an instruction from ERCOT.  (2) For a Generation Resource, ESR, or SOG with a Resource Commissioning Date on or before December 31, 2025, the applicable breakers described in paragraph (1) of this Section may be under the remote control of the Qualified Scheduling Entity (QSE) in lieu of the TO. The Generation Resource, ESR, or SOG shall comply with the requirements of paragraph (1) of this Section if a modification subject to the requirements of paragraph (1)(c)(iv) of Section 5.2.1, Applicability, is made. |