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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 | November 17, 2025 |

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| Submitter’s Information | |
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| Market Segment | Independent Generator |

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| Comments |

NextEra Energy Resources, Southern Power Company, and Invenergy Energy Management (“Commenters Alliance”) submit these revisions to address the concerns highlighted in the 11/5/25 Commenters Alliance comments.

These revisions are built upon the 11/3/25 ERCOT comments to Planning Guide Revision Request (PGRR) 132, Update to Standard Generation Interconnection Agreement (SGIA) Requirement.  The Commenters Alliance continued to collaborate with ERCOT Staff following the November 7, 2025, Reliability and Operations Subcommittee (ROS) meeting and appreciates ERCOT Staff’s input and their engagement.

These comments address important concerns that were raised at ROS and highlighted in the Commenters Alliance and other stakeholder comments. With respect to revisions proposed by PGRR132, including the redlines proposed by these comments, the Commenters Alliance include specific language to address the point stated by ERCOT that this PGRR is not intended to change any specific provision included in existing Protocols or Operating Guides that addresses the applicability of that substantive standard to modifications to Resources or portions of Resources.

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| Revised Cover Page Language |

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| Requested Resolution | Urgent – To ensure new Resources in the interconnection queue or existing Resources, or a modified portion thereof, making significant modifications meet reliability requirements in effect at the time such modifications are added through a new Standard Generation Interconnection Agreement (SGIA) or an SGIA amendment. |
| Justification of Reason for Revision and Market Impacts | Over time, the Protocols, Operating Guides, and Other Binding Documents have been revised to make certain reliability requirements applicable only to new or modified portions of Resources with an SGIA executed after a specific date (e.g., paragraph (7) of Nodal Protocol Section 3.15, Voltage Support; Nodal Protocol Section 8.5.1.3, Wind-powered Generation Resource (WGR) Primary Frequency Response; Nodal Protocol Section 6.5.7.10, IRR Ramp Rate Limitations; paragraph (7) of Nodal Operating Guide Section 2.6.2.1, Frequency Ride-Through Requirements for Transmission-Connected Inverter-Based Resources (IBRs), Type 1 Wind-powered Generation Resources (WGRs) and Type 2 WGRs; paragraph (8) of Section 2.9.1, Voltage Ride-Through Requirements for Transmission-Connected Inverter-Based Resources (IBRs), Type 1 Wind-powered Generation Resources (WGRs), Type 2 WGRs and Type 3 WGRs). Due to the practice of amending SGIAs for new or modified Resources instead of signing new SGIAs for those Resources, the possibility exists for new or modified portions of Resources – that should have to comply with revised reliability requirements under the standard as written – to avoid the new requirements. With the large number of new Resources in the interconnection queue, clarification that reliability requirements in effect at the time of an SGIA amendment will apply to a new Resource or modified portions of existing Resources for certain modifications, unless otherwise specified in the applicable Protocol or Operating Guide language, will enhance ERCOT System reliability by ensuring those new Resources meet the updated requirements. |

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| Proposed Guide Language Revision |

**5.2.8.1 Standard Generation Interconnection Agreement for Transmission-Connected Generators**

(1) As a condition for obtaining transmission service for a Generation Resource or ESR, a Resource Entity or IE must execute a Standard Generation Interconnection Agreement (SGIA) with its TSP. A template of the SGIA can be found on the ERCOT website.

(2) If an existing SGIA is amended for any of the reasons stated below, the new or modified portion of the Resource must comply with all applicable operating and technical requirements defined in the Protocols or Operating Guides and in effect at the time of the amendment, unless otherwise clarified or modified in the Protocols or Operating Guides.

(a) Adding a new Generation Resource or ESR that is connected at the same Point of Interconnection as the existing Generation Resource or ESR;

(b) Increasing the real power rating of an IBR by 10 MW or more within a single year; or

(c) Making changes to an IBR to which paragraph (1)(c)(ii) or (v) of Section 5.2.1, Applicability, applies.

(3) The TSP must submit a change request via the online RIOO system to transmit a copy of the signed SGIA to ERCOT within ten Business Days of execution.

(4) The TSP must submit a change request via the online RIOO system to transmit a copy of any public, financially-binding agreement between the IE and the TSP, other than an SGIA, under which the interconnection for a transmission-connected generator will be constructed. The agreement must be submitted within ten Business Days of execution.

(5) The TSP must submit a change request via the online RIOO system within ten Business Days of receiving both a notice to proceed with construction of the interconnection for the transmission-connected generator and the financial security sufficient to fund the interconnection facilities pursuant to either agreement addressed in paragraphs (2) or (3) above.

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| ***[PGRR088: Insert paragraph (6) below upon system implementation:]***  (6) Within ten Business Days of providing the TSP both the notice to proceed with construction of the interconnection for the Generation Resource and the financial security sufficient to fund the interconnection facilities pursuant to the SGIA, the IE must submit a change request via the online RIOO system to provide the financial security amount if it is not redacted in the public version of the SGIA filed with the Public Utility Commission of Texas (PUCT). ERCOT will include in the monthly Generator Interconnection Status report the name of the interconnecting TSP and the total amount of financial security sufficient to fund the interconnection facilities, if provided by the IE. |