

Technical Question & Comments

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Background

- Prior to implementation of RTC+B, ERCOT, in its Network Model, was modeling the Energy Storage Resource (ESR) as the combination of a Generation Resource to represent ESR discharging condition and a Controllable Load Resource (CLR) to represent the ESR charging conditions.
 - ERCOT defines CLR as a Load Resource capable of controllably reducing or increasing consumption under Dispatch control by ERCOT.
 - Modeling ESRs as the combination of GR and CLR indicates that Planning Guide requirements associated with interconnection of ESR should closely mirror the PG interconnection requirements associated with CLRs.

Question

- Given the above similarity between ESR and CLR, if the Interconnecting Entity has once completed the Full Interconnection Study (FIS) process for a planned ESR, should the IE decide to modify the Interconnection Application from ESR to a Large CLR Load, should the IE (LLIE) again go through the process of Large Load Interconnection Study (LLIS) (assuming the FIS reports are still “valid”) ?

Background

Under existing Planning Guide (PG 9.4):

- Following completion of the Large Load Interconnection Study (LLIS), and informed by its results, the Lead TSP is responsible for identifying any required updates to the Load Commissioning Plan (LCP). The LCP should specify load increments, commissioning schedule, and any contingent transmission upgrades.
- During the LLIS, the Lead TSP, in coordination with ERCOT, will also identify and account for nearby large loads that are currently in the queue and have approved LLIS studies.

Comments

- When performing an LLIS for a given Large Load, including other nearby large loads based solely on approved MW—without accounting for their respective final Load Commissioning Plans (LCPs) (which includes any contingent transmission upgrades), may be misleading and could result in double-counting of required transmission upgrades.
- For an LLIS, the most recent dynamic models associated with other nearby large loads expected to be included in the study should be used. Reliance on generic models and assumptions may materially distort LLIS study results.

Thank You !

Z E R O - E M I S S I O N G R I D

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