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| NOGRR Number | [282](https://www.ercot.com/mktrules/issues/NOGRR282) | NOGRR Title | Board Priority - Large Electronic Load Ride-Through Requirements |

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| Date | January 23, 2026 |

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

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| Comments |

Onward Energy submits these comments to Nodal Operating Guide Revision Request (NOGRR) 282 to clarify treatment of Large Electronic Loads (LELs) co-located with Generation Resources in a net metering arrangement.

The current version of NOGRR282 establishes voltage and frequency ride-through requirements for LELs; however, it does not address how ride-through failures will be evaluated at facilities where a LEL is co-located with a Generation Resource.

The proposed NOGRR282 language does not clarify whether the NOGRR245, Inverter-Based Resource (IBR) Ride-Through Requirements, or NOGRR282 ride-through requirements apply at the Point of Interconnection (POI) in the event of a disturbance. Also, the proposed language does not specify how ERCOT intends to determine responsibility when a ride-through failure occurs at a co-located facility where the generator and LEL are connected in parallel to the grid at the POI. Without clarification, it is unclear whether compliance would be evaluated under the generation ride-through requirements of NOGRR245, the LEL ride-through requirements proposed under NOGRR282, or a combination of both.

Onward Energy requests that the final NOGRR clarify:

* Which ride-through standards will the Resource Entity and the LEL be expected to comply with at the POI or co-located facility if existing telemetry is unable to identify cause? As shown in the tables below, there are multiple ranges in which the Resource Entity is required to ride through an event longer than the LEL and vice versa.
* How will ERCOT assign responsibility and distinguish between generator-caused versus load-caused ride-through failures?
* In the absence of clear attribution, will responsibility for a ride-through failure immediately default to the Generation Resource?

**Frequency Requirements:**

| **Frequency Range (Hz)** | **NOGRR 245 – Generation Resources[[1]](#footnote-1)** | **NOGRR 282 – Large Electronic Loads[[2]](#footnote-2)** |
| --- | --- | --- |
| f > 61.8 | May ride-through or trip | May ride-through or trip |
| 61.6 < f ≤ 61.8 | **299 s** | **299 s** |
| 61.2 < f ≤ 61.6 | **540 s** | **299 s** |
| **58.8 ≤ f ≤ 61.2** | **Continuous** | **Continuous** |
| 58.4 ≤ f < 58.8 | **540 s** | **299 s** |
| **57.0 ≤ f < 58.4** | **299 s** | **299 s** |
| f < 57.0 | May ride-through or trip | May ride-through or trip |

**Voltage Requirements:**

| **RMS Voltage (p.u.)** | **NOGRR 245 – Wind IBRs**  **(2.9.1.1(1) Table A)** | **NOGRR 282 – Large Electronic Loads** |
| --- | --- | --- |
| V > 1.20 | May ride-through or trip | May ride-through or trip |
| 1.10 < V ≤ 1.20 | **1.0 s** | **2.0 s** |
| **0.90 ≤ V ≤ 1.10** | **Continuous** | **Continuous** |
| 0.80 ≤ V < 0.90 | **3.0 s** | **2.0 s** |
| 0.70 ≤ V < 0.80 | **3.0 s** | **0.5 s** |
| 0.50 ≤ V < 0.70 | **2.5 s** | **0.5 s** |
| 0.25 ≤ V < 0.50 | **1.2 s** | **0.25 s** |
| 0.20≤ V < 0.25 | **N/A** | **0.25 s** |
| 0.095625 ≤ V < 0.25 | **(V + 0.084375) / 0.5625** | **N/A** |
| V < 0.005625 | **0.16 s** | **N/A** |
| V<0.20 | **N/A** | **0.15 s** |

| **RMS Voltage (p.u.)** | **NOGRR 245 – Wind IBRs**  **(2.9.1.2(1) Table A)** | **NOGRR 282 – Large Electronic Loads** |
| --- | --- | --- |
| V > 1.20 | May ride-through or trip | May ride-through or trip |
| 1.10 < V ≤ 1.20 | **N/A** | **2.0 s** |
| **1.175<V≤1.2** | **0.2 s** | **2.0 s** |
| **1.15<V≤1.175** | **0.5 s** | **2.0 s** |
| **0.9≤V≤1.10** | **Continuous** | **Continuous** |
| **0.0<V<0.9** | **(V + 0.084375) / 0.5625** | **N/A** |
| V=0.0 | **0.15 s** | **0.15 s** |
| 0.80 ≤ V < 0.90 | **(V + 0.084375) / 0.5625** | **2.0 s** |
| 0.50 ≤ V < 0.80 | **(V + 0.084375) / 0.5625** | **0.5 s** |
| 0.20 ≤ V < 0.50 | **(V + 0.084375) / 0.5625** | **0.25 s** |
| V<0.20 | **N/A** | **0.15 s** |

Clarification on the three points above will reduce the risk of conflict following disturbance events, define clear compliance expectations, and provide important context to generators seeking to co-locate.

Onward Energy recommends that ERCOT consider adding explicit language to NOGRR282 to specify the applicable voltage and ride-through requirements at the POI and to delineate how ride-through performance and responsibility will be evaluated for a co-located generator and LEL.

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| Revised Cover Page Language |

None

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| Revised Proposed Guide Language |

None

1. [245NOGRR112 PUCT Report 092624](https://www.ercot.com/files/docs/2024/09/30/245NOGRR-112%20PUCT%20Report%20092624.docx) [↑](#footnote-ref-1)
2. [292NOGRR-04 ROS Report 210425](https://www.ercot.com/files/docs/2025/12/05/282NOGRR-03-ROS-Ballot-120425.xls) [↑](#footnote-ref-2)