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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 6, 2025 |

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| Submitter’s Information | |
| Name | Monica Jha; Katie Rich; Ned Bonskowski |
| E-mail Address | [Monica.Jha@vistracorp.com](mailto:Monica.Jha@vistracorp.com); [Katie.Rich@vistracorp.com](mailto:Katie.Rich@vistracorp.com); [ned.bonskowski@vistracorp.com](mailto:ned.bonskowski@vistracorp.com) |
| Company | Vistra Operations Company LLC |
| Phone Number |  |
| Cell Number | 832-215-5713; 712-313-9351; 214-288-2456 |
| Market Segment | Independent Generator |

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| Comments |

Vistra appreciates ERCOT’s feedback on this Planning Guide Revision Request (PGRR) and support for the motivation behind it. Vistra reads the concern in ERCOT’s comments to be focused on application of new standards to new generation resources while avoiding impact to existing resources and Vistra is conceptually aligned. However, to accept ERCOT’s suggested alternative approach, Vistra would need to see two additional changes:

1. Exempt nuclear generators from the new proposed Section 5.2.10(2) language to avoid conflict with Nuclear Regulatory Commission requirements;[[1]](#footnote-1) and
2. Modify new proposed Section 5.2.10(2) to align with Section 9.2.5(2), so that the QSE may *direct* the operation of the breakers, but the remote control of the generation breakers can still occur from the generator control room.

Accordingly, Vistra offers these limited supplemental revisions on top of ERCOT’s November 5, 2025 comments. Vistra does note, however, that broadly requiring changes to meet the new requirements in the event that a modification changing or adding a POI to the facility (as described in paragraph (1)(c)(iv) of Section 5.2.1) could have unintended consequences, potentially discouraging the addition of new generation resources at existing generator sites.

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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 of 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 (with the exclusion of nuclear generators) 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 remotely controllable at the direction of the applicable Qualified Scheduling Entity (QSE) in lieu of the TO. A Generation Resource, ESR, or SOG with a Resource Commissioning Date on or before December 31, 2025 other than a nuclear Generation Resource 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. |

1. [↑](#footnote-ref-1)