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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** | | February 16, 2026 | |
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| **Submitter’s Information** | | | |
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| **Market Segment** | | Not applicable | |

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| **Comments** |

ERCOT submits these comments regarding Nodal Operating Guide Revision Request (NOGRR) 282 in response to Onward Energy January 23, 2026, comments.

Onward Energy’s comments expressed concern that NOGRR282 does not clarify how ride-through failures will be evaluated at facilities where a Large Electronic Load (LEL) is connected behind the Point of Interconnection (POI) of a Generation Resource. In addition, the comments expressed concern that NOGRR282 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, and whether compliance would be evaluated under the generation ride-through requirements of NOGRR245, Inverter-Based Resource (IBR) Ride-Through Requirements, the LEL ride-through requirements proposed under NOGRR282, or a combination of both.

ERCOT’s position is that explicit language clarifying how ERCOT would determine responsibility and which ride-through requirements are applicable to LELs connected behind the POI of a Generation Resource or Energy Storage Resource (ESR) is not needed, since the responsible entity is defined in the appropriate ride-through sections in the Nodal Operating Guides. However, ERCOT agreed to provide additional clarity on which ride-through requirements are applicable to LELs and Generation Resources/ESRs connected behind the same POI in these comments and describe the process in which ERCOT would make this determination.

In the event that an LEL or Generation Resource/ESR connected behind the same POI trips or suddenly reduces consumption or output during a system disturbance, ERCOT has the means to determine if the LEL or the Generation Resource/ESR tripped, or both, since ERCOT receives telemetry from both the LEL and the Generation Resource/ESR. In a case where the required telemetry is not available for any reason, ERCOT would also have the telemetry from the Point of Interconnection Bus (POIB) monitoring the facilities. In addition, ERCOT may request disturbance monitoring equipment data from the interconnecting TDSP and/or the Generation Resource/ESR via Request for Information (RFI). Once the initial investigation is complete, ERCOT would determine the responsible entity, or entities, depending on if the LEL tripped or suddenly reduced consumption, the Generation Resource/ESR tripped or suddenly reduced MW output, or both. If the LEL tripped or suddenly reduced consumption during a disturbance, ERCOT would verify if the LEL complied with the Nodal Operating Guide requirements in Section 2.6.4, Frequency Ride-Through Requirements for Large Electronic Loads, or Section 2.15, Voltage Ride-Through Requirements for Large Electronic Loads. If the Generation Resource/ESR tripped or suddenly reduced MW output during a disturbance, ERCOT would verify if the Generation Resource/ESR complied with the Nodal Operating Guide requirements in Section 2.6.2, Frequency Ride-Through Requirements for Generation Resources and Energy Storage Resources, and Section 2.9, Voltage Ride-Through Requirements for Generation Resources and Energy Storage Resources, depending on the type of Generation Resource/ESR and the cause of the trip or reduction.

ERCOT also provides this response to each of Onward Energy’s requests for clarifying language in NOGRR282:

**Request 1**: NOGRR282 should clarify which ride-through standards the Resource Entity and the LEL will be expected to comply with when connected behind a common POI, if existing telemetry is unable to identify cause.

**ERCOT response**: ERCOT has the capability to determine if an LEL or a Generation Resource/ESR tripped, or both, when they are connected behind the same POI. In addition, ERCOT would send RFIs as needed to Transmission and/or Distribution Service Providers (TDSPs), Resource Entities, and Qualified Scheduling Entities (QSEs) to confirm this information. If the LEL tripped, ERCOT would verify if the LEL complied with the Nodal Operating Guide requirements in Section 2.6.4 or 2.15. If the Generation Resource/ESR tripped, ERCOT would verify if the Generation Resource/ESR complied with the Nodal Operating Guide requirements in Sections 2.6.2 and 2.9, depending on the type of Generation Resource/ESR and the cause of the trip or reduction.

**Request 2**: NOGRR282 should clarify how ERCOT will assign responsibility and distinguish between generator-caused versus load-caused ride-through failures.

**ERCOT response**: See ERCOT response to Request 1.

**Request 3**: In the absence of clear attribution, NOGRR282 should clarify if responsibility for a ride-through failure immediately defaults to the Generation Resource/ESR.

**ERCOT response**: Responsibility for a ride-through failure would only apply to a Generation Resource/ESR if the Generation Resource/ESR tripped or suddenly reduced output during a disturbance. There are no requirements applicable to Generation Resources/ESRs in NOGRR282.

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| **Revised Cover Page Language** |

None

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| **Revised Proposed Protocol Language** |

None