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CONFIDENTIAL-FILING MEMORANDUM

TO: Central Records

FROM: Salt Fork Wind LLC

DATE: September 30, 2026

RE: Public Utility Commission (PUC) Docket No. _____– *Complaint of Salt Fork Wind LLC Against ERCOT and Request for an Extension and Exemption from an ERCOT Reliability Requirement under 16 TAC § 22.251(r).*

Pursuant to 16 Tex. Admin. Code (TAC) § 22.71(j)(1)(A)–(E), Salt Fork Wind LLC ("Salt Fork") designates its Complaint of Salt Fork Wind LLC Against the Electric Reliability Council of Texas as partially confidential.

This filing contains detailed information regarding a resource belonging to Salt Fork including detailed plans for modifying the resource, communications with the independent system operator regarding the resource, and information regarding the resource's technical limitations and capabilities.

The following pages contain redactions for the reasons stated below:

- Pages 000024-000046; 000049-000086; 000089-000104; 000106-000149; 000154-000155; 000158; 000164; 000169-000179; 000184-000238; 000240-000241; 000244; 000250; 000255-000265; 000270-000324; 000327-000329; 000333; 000335-000338; 000340; 000342; 000345-000346; 000350-000352; 000355-000357.

The pages were redacted because they contain confidential commercial information under Sections 552.110 and 552.117 of the Government Code, contain information considered to be confidential by law under Section 552.101 of the Government Code, which includes information that is protected under the ERCOT Nodal Protocols,[1] or contain information that could disclose particular vulnerabilities of critical infrastructure to an act of terrorism, which is confidential under Section 418.181 of the Government Code. Salt Fork hereby designates all redacted information as Protected Information under Section 1.3.1.1(1)(q) of the ERCOT Nodal Protocols. The

[1] Open Records Decision No. 2021-16568A at 5 (Jan. 18, 2022).

information included is confidential because it contains detailed plans and technical performance information of a generation resource in the ERCOT area of Texas.

Select the appropriate box below:

[ ] Protected Material

[ ] Highly Sensitive Protected Material

[X] Not Applicable (a protective order has not been issued in the proceeding)

Salt Fork acknowledges that the confidential filing status of this document may be subject to challenge by another party in the proceeding or by the presiding officer.

Respectfully submitted,

Chris Kirby
Balch & Bingham LLP
600 Congress Ave. Suite 2700
Austin, Texas 78701
Telephone: (512) 583-1714
Fax: (512) 744-9399
Email: ckirby@balch.com

ATTORNEY FOR SALT FORK WIND LLC

DOCKET NO. _____

COMPLAINT OF SALT FORK WIND LLC AGAINST ERCOT AND REQUEST FOR AN EXTENSION AND EXEMPTION FROM AN ERCOT RELIABILITY REQUIREMENT UNDER 16 TAC § 22.251(R)	**§ § § § § §**	**BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS**

COMPLAINT OF SALT FORK WIND LLC AGAINST ERCOT AND REQUEST FOR AN EXTENSION AND EXEMPTION FROM AN ERCOT RELIABILITY REQUIREMENT UNDER 16 TAC § 22.251(R)

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TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

I. INTRODUCTION AND BACKGROUND

Salt Fork Wind LLC ("Salt Fork") respectfully files this complaint ("Complaint") against the Electric Reliability Council of Texas, Inc. ("ERCOT") based on ERCOT's denial of Salt Fork's extension and exemption requests, as set forth below, under 16 Texas Administrative Code ("TAC") § 25.517(c). Salt Fork is registered with ERCOT as a resource entity and with the Public Utility Commission of Texas (the "Commission") as a power generation company. Salt Fork is a subsidiary of Southern Power Company.[1]

Salt Fork requested an extension for compliance with the requirements of the Nodal Operating Guide ("NOG") § 2.9.1.2(3) and exemptions from the requirements of NOG

[1] Southern Power Company, a subsidiary of Southern Company, is a leading wholesale energy provider meeting the electricity needs of municipalities, electric cooperatives, investor-owned utilities, and commercial and industrial customers. Southern Power and its subsidiaries own 55 facilities nationally—including natural gas (56.7% of generating capacity), wind (19.5%), solar (22.5%), battery storage and fuel cells (1.4%)—operating or under development in 15 states with more than 13,000 megawatts ("MW") of generating capacity. In Texas, Southern Power owns five wind and four solar generation facilities in operation or under development totaling approximately 1,870 MW of generating capacity. Southern Power has a unique perspective as a competitive generation company owning and operating a diverse fleet of generating facilities in multiple power markets across the country and as an affiliate of three retail electric operating companies in the Southeast.

§§ 2.9.1.2(4), (5) and (6).[2] On August 26, 2026, ERCOT denied the exemption requests and rejected the extension request. This appeal follows the denial by ERCOT of Salt Fork's requests.

This appeal represents the fifth such appeal from a denial by ERCOT of applications under Commission Rule 25.517. Notably, certain factual differences distinguish Salt Fork's appeal from those filed previously. First, ERCOT denied both Salt Fork's application for an extension and exemption. This matters because in the prior appeals, which dealt only with requests for extensions, ERCOT argued that Commission Rule 25.517 did not apply to extension requests because the rule's nomenclature did not expressly reference extension requests, only requests for exemptions.[3] While Salt Fork does not concede to ERCOT's position on extension requests, obviously, this argument fails as it relates to Salt Fork's exemption request that is the subject of this appeal.[4]

Second, prior to ERCOT's denial, Salt Fork delivered to ERCOT a compliant, post-maximization model that ERCOT actually approved via email.[5] In prior appeals ERCOT has argued that it has discretion to deny a request if the applicant did not timely provide a post-maximization model meeting ERCOT's internal standards. ERCOT argues that it must issue

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[2] An extension request seeks additional time past December 31, 2025, to implement field changes necessary for the resource to meet the requirements of Nodal Operating Guide §2.1.9.2, whereas an exemption request seeks continued operations for legacy equipment for which there is no available software-based solution to come into compliance with the new regulations.

[3] *See, e.g.*, *Complaint of 225DD 8ME LLC against the Electric Reliability Council of Texas Inc.*, Docket No. 59868, ERCOT Response to 225DD 8ME Complaint at 22–23 (July 8, 2026); *Complaint of Hackberry Wind LLC against the Electric Reliability Council of Texas Inc.*, Docket No. 59871, ERCOT Response to Hackberry Wind Complaint at 21–22 (July 8, 2026); *Complaint of Pattern Gulf Wind LLC and Logan's Gap Wind LLC against the Electric Reliability Council of Texas Inc.*, Docket No. 59962, ERCOT Response to Pattern Gulf Wind LLC & Logan's Gap Wind LLC Complaint at 22–30 (August 3, 2026); and *Complaint of Upton County Solar 2 LLC against the Electric Reliability Council of Texas Inc.*, Docket No. 59983, ERCOT Response to Upton Solar Complaint – PUBLIC at 29–37 (August 10, 2026).

[4] *See* 16 TAC § 25.517(d)(1).

[5] *See* Attachment C at 4-5.

denials where ERCOT does not deem the submitted models sufficient in order to allow ERCOT to move forward with its review of applications meeting its post-maximization model requirement. ERCOT states that it should not have to wait indefinitely for applicants to meet ERCOT standards for provision of a post-maximization model. In this instance, as evidenced by Salt Fork's communications to ERCOT, Salt Fork worked diligently with ERCOT Staff to provide a model that met ERCOT's requirements and received notification by email that ERCOT approved Salt Fork's post-maximization model. In addition, Southern Power Company received notice during this time period that certain of its other resources' models were insufficient. With ERCOT's apparent approval and the lack of similar communication Southern Power Company received for other sites, Salt Fork believed that ERCOT had approved the model. Following the apparent approval, ERCOT asked for a technical clarification unspecified by law, then failed to engage with Salt Fork for more than five months to finalize that requested technical modification, before denying Salt Fork's requests on the basis that its model did not timely meet ERCOT's post-maximization model requirements.

ERCOT, by its own admission, did not conduct a threshold reliability assessment on Salt Fork's applications as required by Commission rule.[6] Based on the rejection notice sent to Salt Fork, ERCOT will likely respond that Salt Fork did not timely submit an acceptable model, therefore the Commission's rule, and ERCOT's obligations under that rule, do not apply. In essence, ERCOT argues that it can determine which applications are and are not governed by the Commission's rule, including the requirement to perform a threshold reliability assessment, based on how ERCOT views the sufficiency of the applicant's submitted post-maximization model.

[6] *See* 16 TAC § 25.517(d)(1); *see also* Attachment E at 2.

Although NOG § 2.12.1 and the Commission's substantive rules[7] require submission of models that show an applicant resource's capabilities and limitations, many of the technical requirements ERCOT imposes on post-maximization models do not appear in PURA, the Commission's substantive rules, or the Planning Guide. As noted, Salt Fork timely provided ERCOT with a post-maximization model meeting Commission Rule 25.517's requirements. And ERCOT cannot avoid its obligations under Commission Rule 25.517 by subsequently finding in its "sole and reasonable discretion" that Salt Fork did not timely file a sufficient model.

Southern Power Company, and by extension, Salt Fork, participated throughout the stakeholder process at ERCOT in developing NOGRR 245, and at the Commission in developing Commission Rule 25.517. Salt Fork timely filed its initial extension and exemption requests on April 1, 2025, and its supplemental requests on September 15, 2025.[8] Salt Fork communicated proactively with ERCOT throughout the entire extension and exemption request process. Once developed, the record will reflect consistent communication from Salt Fork to ERCOT, but not always from ERCOT to Salt Fork. Salt Fork sought to provide ERCOT with everything it requested. It replied to ERCOT and made all changes to the model that it could. When it could not make the requested changes, it engaged its OEM for assistance. These efforts appeared to be rewarded when on January 13, 2026, ERCOT indicated that Salt Fork's submitted model was sufficient and its modifications approved. But shortly thereafter ERCOT simply stopped responding. On June 3, 2026, Salt Fork requested a status update on its submissions, and ERCOT did not respond. And more than five months after ERCOT ceased communications with Salt Fork, ERCOT denied Salt Fork's requests contrary to its earlier communications. Below is a table

[7] *See* 16 TAC § 25.517(c)(4).

[8] Salt Fork's initial requests are attached as Attachment A, and the supplemental requests are attached as Attachment B.

summarizing Salt Fork's communications with ERCOT regarding its extension and exemption requests. Copies of the correspondence are attached as Attachment C.

Date	**Action**
April 1, 2025	Salt Fork submits initial extension request and exemption requests via DocuSign and attachments.
September 15, 2025	Salt Fork submits a supplemental extension request consistent with ERCOT's deadline.
November 21, 2025	ERCOT sends missing information request to Salt Fork (the "MIR").[9]
December 16, 2025	Salt Fork timely submits response to the MIR via RIOO, including post-maximized dynamic model package.
January 13, 2026	ERCOT staff requests PSSE model using ERCOT template, stating "afterwards I can approve the submission."
January 13, 2026	Salt Fork attaches PSSE model using ERCOT template via email submission.
January 13, 2026	ERCOT states the new submission is sufficient and approves the modification.
January 13, 2026	ERCOT staff notes a discrepancy in the unit aggregation between the PSSE model submitted and RIOO.
January 13, 2026	Salt Fork asks ERCOT to clarify what changes ERCOT is requesting.
January 14, 2026	ERCOT provides two options for Salt Fork to correct the discrepancy with the PSSE model and RIOO and suggests that Salt Fork work with its OEM to correct the discrepancy in the PSSE model.
February 2026	Salt Fork works with its OEM to prepare a new PSSE model consistent with ERCOT's January 14 suggestion.
February 25, 2026	ERCOT asks for a status update. Salt Fork provides an update and states that it needs additional time to align the PSSE model with RIOO while still accurately representing the resource's dynamic performance.
March 2, 2026	Salt Fork emails ERCOT client services representative seeking information as to how to adjust RIOO consistent with the discrepancy noted by ERCOT on January 13.
March 9, 2026	ERCOT staff replies to Salt Fork's March 2 email stating it will look into Salt Fork's question. **ERCOT never follows up on this request.**
March 12, 2026	Salt Fork asks ERCOT whether it can implement software modifications while investigating the PSSE model issues in parallel.
March 12, 2026	ERCOT staff confirms receipt of Salt Fork's question and states it will check internally on how Salt Fork should proceed. **This is the final**

[9] Salt Fork's MIR responses are attached as Attachment D.

Date	Action
	correspondence Salt Fork received from ERCOT related to the extension and exemption requests.
June 3, 2026	Southern Power Company requests status updates for several affiliated resources, including Salt Fork. **ERCOT never responds to this email.**
August 26, 2026	ERCOT denies Salt Fork's requests.[10]

ERCOT's rejection of Salt Fork's requests is not based on any substantive analysis of the reliability risk associated with Salt Fork's operations. Nor did ERCOT act reasonably by denying Salt Fork's applications based on the insufficiency of a post-maximization model that it had previously approved. For these reasons Salt Fork respectfully requests that the Commission (1) reverse ERCOT's denials, (2) grant Salt Fork an extension for compliance with NOG § 2.9.1.2(3) until January 1, 2027, and (3) grant Salt Fork exemptions from the requirements of NOG §§ 2.9.1.2(4), (5) and (6). Alternatively, the Commission should reverse ERCOT's denials and remand the matter back to ERCOT with instructions to substantively evaluate Salt Fork's requests, consistent with 16 TAC § 25.517.

II. PARTIES; AUTHORIZED REPRESENTATIVES

The complainant in this case is Salt Fork Wind, LLC. The name and address of the complainants' authorized representatives are as follows:

Dane McKaughan
Chris Kirby
Fariraishe Muzondo
Balch and Bingham LLP
919 Congress Ave. Suite 840
Austin, Texas 78701
Telephone: (512) 583-1714
Fax: (866) 258-8980
Email: dmckaughan@balch.com
ckirby@balch.com
fmuzondo@balch.com

Matt Madison
Deputy General Counsel
Southern Power Company
3535 Colonnade Parkway
Birmingham, AL 35243
Telephone: (205) 992-0041
Email: mmadison@southernco.com

[10] ERCOT's Denial is attached as Attachment E.

Salt Fork agrees to accept electronic service and requests that service of all pleadings be made to the individuals listed above.

Salt Fork seeks relief against ERCOT. Notice in this proceeding is governed by 16 Tex. Admin. Code § 22.55, which provides that the presiding officer may require a party to provide reasonable notice to affected persons. To Salt Fork's knowledge, ERCOT's authorized representatives are as listed below. Salt Fork will serve a copy of this complaint on the ERCOT representatives listed below.

Chad V. Seely
Senior Vice President, Regulatory Policy, General Counsel, Chief Compliance Officer, Corporate Secretary

Brandon Gleason
ERCOT Vice-President, Legal & Compliance

A. Andrew Gallo
Assistant General Counsel – Regulatory
Electric Reliability Council of Texas, Inc.
8000 Metropolis Drive (Building E), Suite 100
Austin, TX 78744
Telephone: (512) 248-6800
Email: Chad.Seely@ercot.com
Brandon.Gleason@ercot.com
Andrew.Gallo@ercot.com

Consistent with 16 TAC § 22.251(e)(5)(c), Salt Fork will also serve a copy of this complaint on the Office of Public Utility Counsel ("OPUC"). To Salt Fork's knowledge, OPUC's authorized representative is listed below.

Benjamin Barkly
Chief Executive and Public Counsel
1701 N. Congress Ave., Suite 9-180
P.O. Box 12397
Austin, TX 78711-2397
Telephone: 512-936-7500
Email: opuc_eservice@opuc.texas.gov

III. PROCEDURAL AND HISTORICAL STATEMENT OF THE CASE

A. Description of Underlying Proceeding. This case arises because of ERCOT's denial of Salt Fork's request under 16 TAC 25.517 for an extension of the requirements of NOG § 2.9.1.2(3) and exemptions from the requirements of NOG Sections § 2.9.1.2(4), (5) and (6). These voltage ride-through ("VRT") and frequency ride-through ("FRT") requirements were implemented as a part of the implementation of NOGRR 245, which was filed on January 11, 2023, and was approved by the Commission on September 26, 2024. ERCOT denied Salt Fork's requests on August 26, 2026. These appeals are filed pursuant to Commission Rule 25.517 and Commission Rule 25.251, both approved by the Commission on June 20, 2025.

B. Affected Entities. Salt Fork and ERCOT are the directly affected entities under this Complaint.

C. ERCOT Conduct. On August 26, 2026, ERCOT denied Salt Fork's extension and exemption requests.

D. Applicable Law and ERCOT Protocols. The following is a list of all applicable laws and ERCOT protocols and operating guides: PURA §§ 31.001, 39.151; 16 TAC § 22.251, 16 TAC § 25.517; Nodal Operating Guide §§ 2.6.2.1, 2.9.1.2, 2.11.1(1)(1), 2.12.1(3)(c), 2.12.1.3.

E. Applicable ERCOT Procedures. Salt Fork is not required to follow any applicable ERCOT Procedures prior to filing this case under 16 TAC § 22.251(r)(1).

F. Suspension of ERCOT Conduct. Salt Fork does not request suspension of any ERCOT conduct at this time. It reserves the right to request suspension of future ERCOT conduct that may be taken while this complaint is pending.

G. Jurisdiction. The Commission has jurisdiction over this complaint pursuant to PURA §§ 14.001 and 39.151 and 16 TAC §§ 22.251 and 25.517.

IV. STATEMENT OF ISSUES PRESENTED FOR COMMISSION REVIEW

A. Whether it is reasonable for ERCOT to deny an extension and/or exemption request because the model provided by the resource entity does not meet certain technical specifications that are not required in the NOG or Commission rules;

B. Whether ERCOT acted reasonably by denying Salt Fork's requests under the specific facts related to these requests;

C. Whether ERCOT conducted the threshold reliability assessment required by 16 TAC § 25.517(d)(1) before denying Salt Fork's requests;

D. Whether ERCOT considered all factors required by 16 TAC § 25.517(d) before denying Salt Fork's requests;

E. Whether granting Salt Fork an extension and exemptions is in the public interest; and

F. Whether the Commission will impose any conditions on Salt Fork if the Commission decides to grant Salt Fork's extension and exemption requests.

V. STATEMENT OF FACTS

NOGRR 245,[11] which implemented new VRT and FRT requirements on inverter-based resources, was approved by the Commission on September 26, 2024, and took effect on October 1, 2024. To avoid causing significant resource adequacy problems by forcing existing generation assets off the grid, existing resources with a Standard Generation Interconnection Agreement executed before August 1, 2024, were afforded the opportunity to request an extension for compliance or exemption from compliance from the FRT and VRT requirements by April 1, 2025.

[11] Nodal Operating Guide Revision Request 245, Inverter Based Resource (IBR) Ride-Through Requirements

As detailed by ERCOT in pleadings from prior appeals,[12] and as described by ERCOT at a NOGRR 245 Workshop on August 8, 2025, 429 entities requested an extension, an exemption, or both on April 1, 2025, including Salt Fork.[13] Notably, ERCOT stated at that workshop that *none* of the submissions met ERCOT's interpretation of the requirements in the NOG.[14] Following the August 8, 2025 workshop, resource entities were given until September 15, 2025 to provide supplemental information to bring their requests into compliance with ERCOT's desires. Salt Fork provided the supplemental information on September 15, 2025. As a part of Salt Fork's supplemental request, it reduced its extension request from October 1, 2027 to January 1, 2027, consistent with the faster-than-anticipated development of the dynamic models by its wind turbine generator original equipment manufacturer ("OEM"). Salt Fork received a request for missing information from ERCOT on November 21, 2025; Salt Fork timely provided the requested information—including a model package—to ERCOT on December 16, 2025 (after Salt Fork requested, and ERCOT granted, an extension from the original deadline).

After Salt Fork provided the additional information, ERCOT requested on January 13, 2026, that Salt Fork provide the PSSE model in ERCOT's preferred template; Salt Fork provided the model on that template later that same day. After receiving Salt Fork's submission, ERCOT staff approved of the model, stating "I approve the modification." ERCOT subsequently requested that Salt Fork make technical changes to align the PSSE model with Salt Fork's RIOO[15] data, but

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[12] *See* dockets cited *supra* note 3.

[13] *See* ERCOT Presentation, NOGRR 245 Workshop III (Aug. 8, 2025).

[14] *See id.*, *see also* transcript at 09:00 – 09:30. The fact that none of the 429 applicants could timely file a model meeting ERCOT's specifications raises the suspicion that those specifications and expectations were not reasonable.

[15] Resource Integration and Ongoing Operations, an online software system used by resource entities and ERCOT to submit change requests and update technical data for existing operational facilities.

this request did not change the functionality of the model to reflect the post-maximized plant capability.

Salt Fork and ERCOT exchanged communications to address the requested technical changes, as set forth in the chart above and as shown in the copies of communications included in Attachment C. To summarize, Salt Fork asked ERCOT staff whether ERCOT preferred that it update RIOO or change the PSSE model to reflect the RIOO data, and ERCOT indicated either option would work. ERCOT staff again noted that Salt Fork's PSCAD model was sufficient and needed no changes. Throughout the month of February, Salt Fork worked with its OEM to update the PSSE model to reflect the RIOO registration while still accurately representing the units' dynamic performance. On February 25, 2026, Salt Fork provided a status update to ERCOT on its work with the OEM to update the model. Salt Fork asked ERCOT on March 12, 2026 if the PSSE/RIOO discrepancy needed to be resolved prior to Salt Fork advancing the Planning Guide Revision Request ("PGRR") 109 process and receiving approval from ERCOT thereunder. Salt Fork reiterated again that it believed the dynamic models accurately represented the resource's performance. Also on March 12, 2026, ERCOT staff stated they would check internally on how Salt Fork should proceed. That was the last communication related to the extension and exemption requests Salt Fork received from ERCOT until August 26, 2026, when Salt Fork received the denial of its exemption requests and rejection of its extension request.

VI. ARGUMENT

A. ERCOT ACTED UNREASONABLY WHEN IT DENIED SALT FORK'S REQUESTS

The NOG requires ERCOT to grant an extension or exemption request if it meets ERCOT's requirements, in its "sole and *reasonable* discretion."[16] Commission Rule 25.517 includes seven statements requiring ERCOT to act in a reasonable manner.[17] Regulatory agencies—like ERCOT—have a duty to treat regulated entities fairly and reasonably. The entire policy purpose underlying Commission Rule 25.517 is to implement a fair and reasonable process by which resource entities can appeal ERCOT determinations regarding extension and exemption requests. This rule accords with the fairness inherent in the due course of law protections under the Texas constitution and the "rudiments of fair play" agencies must observe to comply with Texas law.[18] As demonstrated below, ERCOT did not meet its burden of acting reasonably.

As noted earlier, Salt Fork timely met every deadline set by ERCOT, including submitting a model meeting the requirements of NOG 2.9.1. When ERCOT asked for changes to the model, Salt Fork worked with ERCOT and ultimately submitted a model that ERCOT approved by email. Salt Fork continued to work with ERCOT to put the model in ERCOT's preferred format, despite these modifications not being required by Commission Rule 25.517. But when Salt Fork asked ERCOT how to proceed with finalizing these changes, ERCOT failed to provide direction until it summarily denied Salt Fork's applications five months later, alleging only that the model ERCOT previously found acceptable was now insufficient. Salt Fork also requested a status update on June

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[16] NOG § 2.12.1(3) (emphasis added).

[17] ERCOT must set a "reasonable deadline" for resource entities to submit exemption requests (a)(1)(A); ERCOT must perform the threshold reliability assessment using "a reasonable set of operating conditions" and "reasonable and expected" topology, equipment status and dispatch (d)(1)(B)-(C); ERCOT must "make a reasonable effort" to work with resource entities to determine mitigation options (d)(2); ERCOT may request "reasonable and necessary" information to evaluate requests to extend exemptions (g)(1); ERCOT must make "reasonable efforts" to identify mitigation options before revoking or modifying and exemption (g)(3)(A)(ii); ERCOT must give resource entities a "reasonable period" of time to comply with reliability requirements after revoking an exemption (g)(3)(A)(iii).

[18] *See, e.g.*, Tex. Comm'n on Environ. Qual. v. Friends of Dry Comal Creek, 669 S.W.3d 506, 533-34 (Tex. App.—Austin 2023).

3, 2026, and ERCOT never responded. This is not a reasonable way to interact with an entity ERCOT regulates and violates Commission Rule 25.517's requirements to act reasonably when evaluating exemption or extension requests. Nor does this conduct appear reasonable in light of the policy need to keep resources on the grid in times of constraint. The NOG, Commission rules, and indeed principles of good government and due process require that a regulator act reasonably. ERCOT failed that standard.

B. ERCOT MUST COMPLY WITH COMMISSION RULE § 25.517

ERCOT's jurisdiction and authority are subordinate to that of the Commission.[19] Like Salt Fork and every entity affected by Commission Rule 25.517, ERCOT must comply with the requirements imposed by that rule. This rule puts very specific obligations on ERCOT when evaluating exemption and exception requests.[20] ERCOT participated throughout the rulemaking process and is aware of its obligations under the rule. It cannot simply preempt those obligations by setting up a pre-condition (stricter standards on the submitted model than those required by rule)[21] and then determining, solely within its own discretion, whether an applicant meets that threshold pre-condition. This undermines the Commission's jurisdiction and authority and deprives Salt Fork and other applicants of their rights under that rule.[22] Rule 25.517 requires ERCOT to make an assessment of whether an exemption granted to a resource would result in a threshold reliability risk. If ERCOT determines that a resource presents a threshold reliability risk, it must engage with the resource entity to determine mutually acceptable options to mitigate any

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[19] *See* PURA § 39.151(d).

[20] *See* 16 TAC § 25.517(d)(1).

[21] 16 TAC § 25.517(c)(4) requires only that the model "accurately represent expected resource performance and reflect the actual, as-built resource equipment and settings, with all technical limitations, before and after maximizing the resource's operational capability . . . ." It does not, for instance, require that the model mirror RIOO.

[22] *See* 16 TAC § 25.517(c).

threshold reliability risk.[23] ERCOT has acknowledged that it performed no such assessment under its theory that the Commission's rule does not apply to ERCOT until an applicant first meets ERCOT's preconditions; it similarly considered no mitigation options.[24] This position deprives the Commission of the information required by Commission Rule 25.517 that the Commission has deemed necessary to evaluate ERCOT's decision or the potential risk, if any, of the applicant resource's continued connection to the grid. Because ERCOT failed to follow Commission Rule 25.517, its denials should be reversed.

C. GRANTING SALT FORK'S EXTENSION AND EXEMPTION REQUESTS COMPORTS WITH THE PUBLIC INTEREST

The Commission has broad discretion to decide what is and is not in the public interest.[25] The Commission must use its special knowledge and expertise to determine whether an act is in the public interest, and it must assess "competing policies" to determine the public interest.[26] Deciding how to balance these competing priorities requires fulsome analysis of the Commission's rules and the statutes that grant the Commission its authority.

The Commission's duty is to uphold the public interest by considering all the competing priorities it oversees. The electric industry is complex, and there are a variety of principles that compete for priority when the Commission makes decisions. The Legislature has laid down markers of what constitutes the public interest, sometimes expressly and sometimes implicitly. The Legislature has expressly stated (1) that the public interest is inherent in the rates and services

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[23] 16 TAC § 25.517(d)(2).

[24] *See* Attachment E at 2.

[25] *See Public Utility Commission v. Texas Telephone*, 163 S.W.3d 204, 213 (Tex. App.—Austin 2005) ("It is within the Commission's authority to decide what public interest means in a particular case.").

[26] *Id.*; *see also Amtel Communications, Inc. v. Public Util. Comm'n*, 687 S.W.2d 95, 99 (Tex. App.—Austin 1985).

of the electric industry,[27] (2) the public interest requires that rules, policies, and principles be formulated and applied to protect the public interest in a competitive marketplace,[28] and (3) that the development of a competitive wholesale electricity market *that allows for increased participation by electric utilities and certain non-utilities is in the public interest.*[29] The Legislature has expressly determined that allowing market participants to participate in the ERCOT market is in the public interest.

Here, the public interest is served by granting Salt Fork's extension request and exemption requests and allowing its facilities to continue to provide electricity, especially given rising demand. Salt Fork worked in good faith to provide the models (and all other necessary information) to ERCOT, consistent with the Commission's rules and the NOG. However, ERCOT decided in its sole but unreasonable discretion that Salt Fork's models were invalid. If this conclusion was solely related to the post-acceptance ERCOT request for technical clarification, even though Salt Fork stood ready and waiting—for more than five months—to provide the necessary updates to the PSSE model or its RIOO registration, then the decision was unreasonable. In so doing, ERCOT violated 16 TAC § 25.517(d).

Salt Fork has made every effort to improve the facility's performance. The changes it identified and will deploy upon ERCOT approval, as fully shown in the models provided to ERCOT, will address Salt Fork's performance. The ERCOT system faces unprecedented load growth and a looming resource adequacy issue. The public interest is served by allowing Salt Fork to continue serving the ERCOT system.

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[27] *See* PURA 31.001(a).

[28] *See* PURA § 31.001(c).

[29] *See id.* (emphasis added).

VII. QUESTIONS OF FACT REQUIRING AN EVIDENTIARY HEARING

If factual determinations related to the ERCOT conduct complained of have not been provided or established in a manner that meets the procedural standards set forth in the Commission's procedural rules, then the Commission must resolve any factual issues on a de novo basis.[30] The Commission's procedural rules provide that the Commission will grant deference to asserted factual matters only if those facts were determined (1) in a proceeding to which the parties have voluntarily agreed to participate and (2) by an impartial third party under circumstances that are consistent with the guarantees of due process inherent in the Administrative Procedures Act.[31]

Unlike ERCOT, which primarily has discretion to analyze only technical factors, the Commission has authority and the responsibility to consider all factors when determining whether to grant an exemption or extension request. To appropriately develop the record, Salt Fork requests that the Commission order a discovery period to allow Salt Fork to develop the facts related to ERCOT's review and denial of the requests. Ensuring the Commission has access to all relevant information will allow the Commission to have all the information it needs to make a determination of (1) whether ERCOT complied with its obligations under the NOG and Commission rules and (2) whether it is in the public interest to grant Salt Fork an extension and exemption from certain requirements of the NOG.

VIII. PROPOSED PROCEDURAL SCHEDULE

Complainant respectfully requests that the Commission adopt the following proposed procedural schedule for the Complaint:

Event	Date
Complaint Filed	September 30, 2026

[30] *See* 16 TAC § 22.251(m)(1).

[31] *See* 16 TAC § 22.251(m)(3); *see also* Tex. Gov. Code Ch. 2001 (the "APA").

Event	Date
ERCOT Notice	October 12, 2026
ERCOT's Response	October 26, 2026
Motion to Intervene Commission Staff Comments Intervenor Responses	November 20, 2026
Complainant Reply	November 30, 2026
Joint Determination re Evidentiary Hearing/ SOAH referral	December 14, 2026
Joint Proposed Procedural Schedule (Evidentiary Phase) (if necessary)	December 21, 2026
Commission Consideration (if no evidentiary phase)	December 21, 2026 + First Available Open Meeting
SOAH Referral / Procedural Order (Evidentiary Phase) (if factual determinations are required)	December 21, 2026 + As Soon As Practicable
Complainant Direct Testimony	January 11, 2027
Serve Discovery on Complainant's Direct Case	January 21, 2027
ERCOT/Staff/Intervenor Direct and Rebuttal on Complainant	February 1, 2027
Serve Discovery on ERCOT/Staff/Intervenor Direct and Rebuttal on Complainant	February 11, 2027
Complainant Rebuttal Testimony	February 15, 2027
Deadline for Serving Discovery on Complainant Rebuttal Testimony	February 25, 2027
Objections to Pre-filed Testimony and Exhibits	March 1, 2027
Replies to Objections / Exhibit Lists / Witness Lists	March 8, 2027
Hearing on the Merits	March 15–16, 2027
Initial Briefs	April 7, 2027
Reply Briefs	April 21, 2027
Proposal for Decision (PFD) / Proposed Order	June 21, 2027
Exceptions to PFD / Proposed Order	Date set in PFD/Procedural Order
Replies to Exceptions	Date set in PFD/Procedural Order
Commission Decision	PFD exceptions/replies + First Available Open Meeting

This Schedule is consistent with 16 TAC § 22.251.

IX. REQUIRED HISTORICAL INFORMATION

Commission Rule 22.251(r)(4)(D) requires a complainant to include the resource's history of violations or reliability-related ERCOT protocols, operating guides or other binding documents.[32] Salt Fork has not been found by the Commission to have violated a reliability-related ERCOT protocol, operating guide, or other binding document (collectively, "Market Rules"). However, Salt Fork has received requests for information ("RFIs") from ERCOT related to system events on December 13, 2019, March 28, 2022, June 11, 2024, September 23, 2024, April 15, 2025 and June 29, 2026. The RFI related to the September 23, 2024 event resulted in notice from the ERCOT Reliability Monitor that the incident was referred to the Commission for review. As of the date of this complaint, Salt Fork has not received any correspondence from the Commission related to this event.

X. REQUEST FOR ENTRY OF A PROTECTIVE ORDER

Salt Fork is including information with this filing that it considers to be Protected Materials or Highly Sensitive Protected Materials. Salt Fork expects that information submitted may also constitute ERCOT Critical Energy Infrastructure Information. Salt Fork requests that the Administrative Law Judge issue a Protective Order protecting confidential or highly sensitive information that may be produced in this proceeding. A copy of the standard for protective order is attached as Attachment F.

XI. CONCLUSION AND RELIEF REQUESTED

Salt Fork respectfully requests that the Commission (i) reverse ERCOT's denials, (ii) grant Salt Fork an extension for compliance with NOG § 2.9.1.2(3) until January 1, 2027, (ii) grant Salt

[32] *See* 16 TAC § 22.251(r)(4)(D).

Fork exemptions from the requirements of NOG §§ 2.9.1.2(4), (5) and (6), and (iv) provide Salt Fork with such other and further relief as the Commission deems just and appropriate. Alternatively, the Commission should reverse ERCOT's denials and remand the matter back to ERCOT with instructions to substantively evaluate Salt Fork's requests, consistent with 16 TAC § 25.517.

Respectfully submitted,



Dane McKaughan
State Bar No. 24007651
Christopher J. Kirby
State Bar No. 24116620
Fariraishe Muzondo
State Bar No. 24146608
BALCH & BINGHAM, LLP
600 Congress Ave. Suite 2700
Austin, Texas 78701
Telephone: (512) 583-1714
Fax: (512) 744-9399
Email: dmckaughan@balch.com
ckirby@balch.com
fmuzondo@balch.com

ATTORNEYS FOR SALT FORK WIND LLC

ATTACHMENT A

Initial Extension Exemption Requests

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

2025 NOGRR245 IBR RFI

(Market Notice: M-A071024-02)

Resource Entity: SALT FORK WIND LLC (RE)

Resource Name: SALTFORK_UNIT1

DocuSign Instructions:

- Responses are due on or before April 1, 2025
- Only one person can provide responses.
- The document can be forwarded or "Assigned to Someone Else" via the "Other Actions" menu at the top of the DocuSign web page.
- Please contact your ERCOT Account Manager with any additional questions.

Background Information:

The Public Utility Commission of Texas approved NOGRR 245 to be effective October 1, 2024. Accordingly, the revised ride-through requirements in the Nodal Operating Guides (NOG) are currently in effect. ERCOT has developed an intake process for data associated with the requirements established through NOGRR 245 and this DocuSign document implements that process.

NOTE: IF YOU INTEND TO REQUEST AN EXEMPTION OR EXTENSION FOR YOUR RESOURCE, YOU MUST SUBMIT THE REQUESTED INFORMATION BY MIDNIGHT ON APRIL 1, 2025 OR YOU WILL BE FOREVER BARRED FROM REQUESTING AN EXEMPTION OR EXTENSION. *See*, Nodal Operating Guide § 2.11.1(2); § 2.11.2(2) and § 2.12.1(2).

Submitter signature: DocuSigned by: Chase Smith 0DCB77E32063497...

Submitter name: **Chase Smith**

Submitter title: Manager, Market Compliance & Policy

Date: **4/1/2025**

General Comments:

The responses contained in this DocuSign and Attachments reflect Southern Power Company's ("Southern Power") good faith effort to provide the best available information at this time. Southern Power has worked extensively with an engineering consulting firm, inhouse subject matter experts, and our original equipment manufacturer ("OEM") partners to conduct the engineering analysis and to diligently assess the capabilities and limitations of our Inverter-Based Resources. The ability of OEMs to support detailed engineering analysis varies widely between companies and the vintages of equipment. Southern Power's submission of capability and limitation reports, extension requests, and/or notices of intent to request an exemption are the result of Southern Power's technical assessment and the best available information from our OEMs as of this date.

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

General Information

Pursuant to Public Utility Commission of Texas Electric Substantive Rule § 25.503(f)(10), ERCOT requests the following information to be returned to ERCOT on or before April 1, 2025.

Resource Entity Name:	SALT FORK WIND LLC (RE)
Resource Entity Data Universal Numbering System (DUNS) Number:	0797475733000
Substation Name:	SALTFORK
Resource Name:	SALTFORK_UNIT1
Fuel Type:	Wind
(if fuel type = wind) Wind Turbine Type:	
Does the Resource have a Standard Generation Interconnection Agreement (SGIA) date prior to August 1, 2024?	Yes
Has the Resource implemented any modification covered by ERCOT Planning Guide Section 5.2.1(1)(c) since its original Commercial Operation Date (COD)?	No
Was the most recent Generation Interconnection or Modification (GIM) covered by ERCOT Planning Guide Section 5.2.1(1)(c) initiated prior to August 1, 2024?	

Comments:

Type 3 WTG.

Throughout this document a response of "123456789" indicates that the OEM did not provide a response to this question and/or does not know the answer at this time.

Throughout this document a response of "99999" indicates continuous ride-through capability.

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Frequency Ride-Through

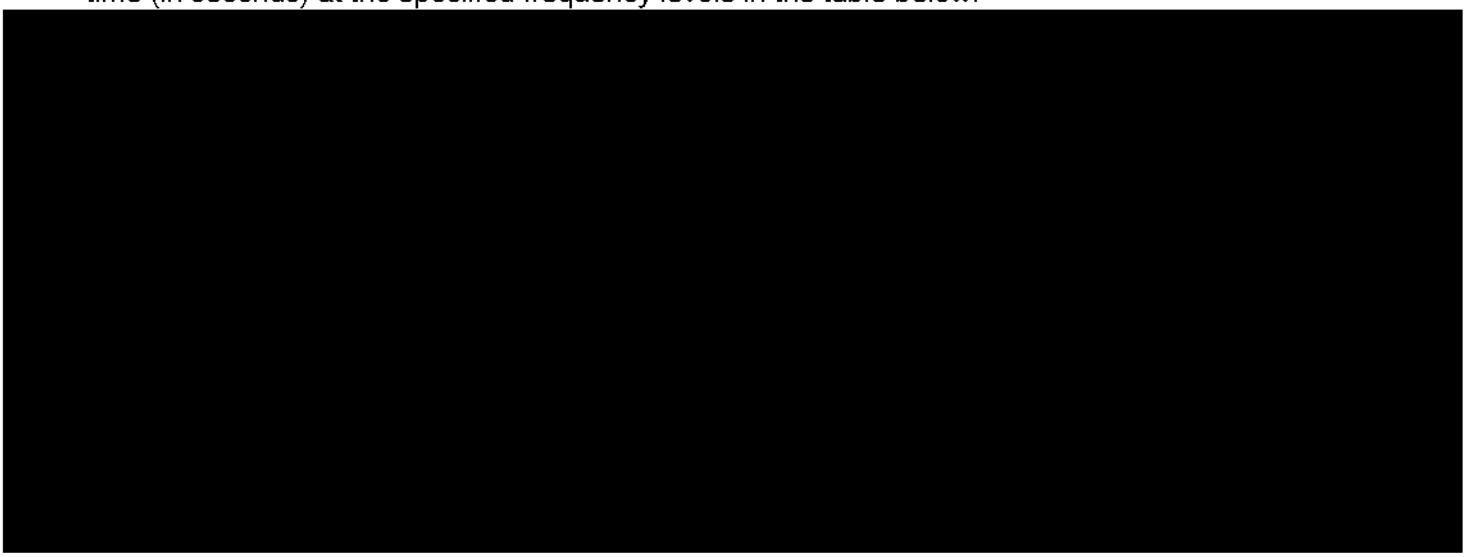


Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

FRT-2. Will the Resource owner implement changes to existing equipment *other than* software, firmware, settings or parameterization changes to increase the Resource's frequency ride-through capability, and if yes, describe those modifications and attach any supporting

No

FRT-3. Based on the Resource's maximum frequency ride-through capability, provide the ride-through time (in seconds) at the specified frequency levels in the table below:



I attest the table above accurately represents the pre-maximization and post-maximization frequency ride-through performance capability of the Resource and all its inter-dependent systems (such as plant controls, turbine controls and/or inverter controls - not just protective relay settings).

Yes

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

FRT-4. Provide a post-maximization complete frequency ride-through capability curve (0-600 seconds) superimposed on the minimum applicable requirement.
NOTE: Submit pdf or image for curve.



[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

[redacted]



[redacted]

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Voltage Ride-Through

[redacted]

VRT-2. Will the Resource owner implement changes to existing equipment *other than* software, firmware, settings or parameterization changes to increase the Resource's voltage ride-through capability?

No

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

VRT-3. Based on the Resource's maximum voltage ride-through capability, provide the ride-through time (in seconds) at the specified voltage levels in the table below:



I attest the table above accurately represents the Resource's pre-maximization and post-maximization voltage ride-through performance capability and all its inter-dependent systems (such as plant controls, turbine controls and/or inverter controls - not just protective relay settings).

Yes

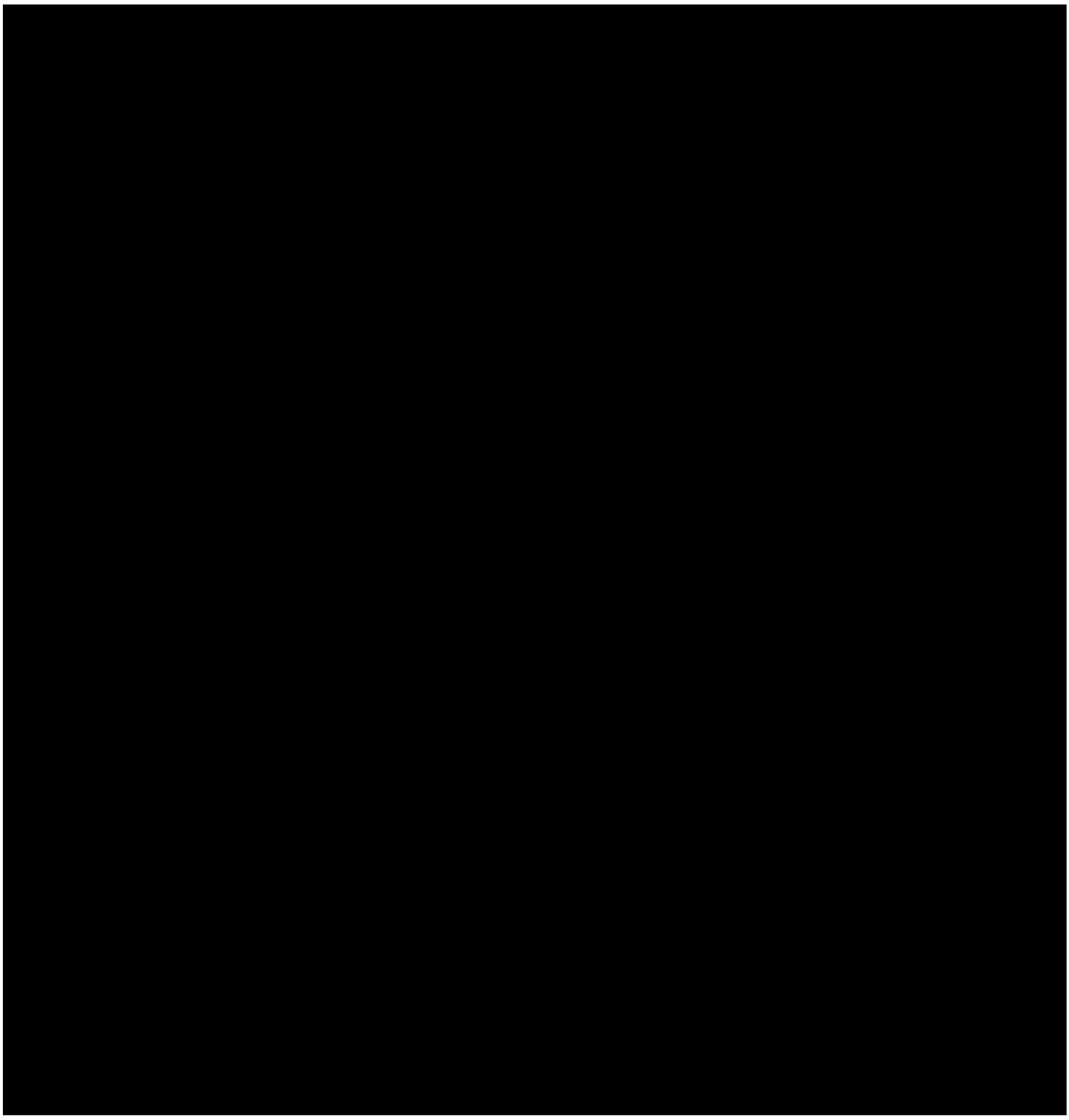
Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

VRT-4. Provide a complete voltage ride-through capability curve (0-10 seconds) superimposed on the minimum applicable requirement. A separate curve may be necessary to show sub-cycle overvoltage capability.
NOTE: Submit pdf or image.



[redacted]

[redacted]







Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F







Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

[redacted]

IEEE-4. Complete the following IBR Performance Specifications per IEEE 2800-2022 Section 7.2.2.3.5, Table 13 (note that maximizing capability does not imply that actual performance needs to match the fastest response times and settling times):

[redacted]

Provide any additional information you deem relevant.

[redacted]

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IEEE-5. Does the Resource use current blocking?

Yes

(If Yes) Provide restart time in the following table:

[redacted]

IEEE-6. Provide the Rate of Change of Frequency ride-through capability in the following table (*See* IEEE 2800-2022 Section 7.3.2.3.5):

[redacted]

IEEE-7. Provide the phase angle jump (change) ride-through capability in the following table (*See* IEEE 2800-2022 Section 7.3.2.4):

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

IEEE-8. Provide consecutive voltage deviations ride-through data (*See*, IEEE 2800-2022 Section 7.2.2.4):

[redacted]

IEEE-9. I attest the Resource owner has collaborated with the interconnecting TSP(s) to ensure any auto-reclosing settings are coordinated with the Resource multiple fault ride-through capability to not result in unnecessary tripping of the Resource.

No



Extension Request

EXT-1. Are you requesting an extension for the Resource under Nodal Operating Guide Sections 2.6.2.1(7); 2.9.1(6); 2.9.1.1(8) or (9); or 2.9.1.2(9)?

[redacted]

What is the Resource's Commercial Operations Date? 12/01/2016

For each section you are requesting an extension, provide the information set forth in NOG Sections 2.11.1 (for frequency ride-through extensions) or 2.11.2 (for voltage ride-through extensions).

[redacted]

Provide the information set forth in NOG Section 2.12.1.2 as applicable for the extension requested.

Please see attached "2.12.1.2 Extension Attachment_SALTFORK" document.

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Exemption Request

[redacted]

EXP-2. Do you intend to request an exemption pursuant to Nodal Operating Guide Section 2.9.1.2(9) for the Resource?

[redacted]

Comments:

See attached IVRTCR.

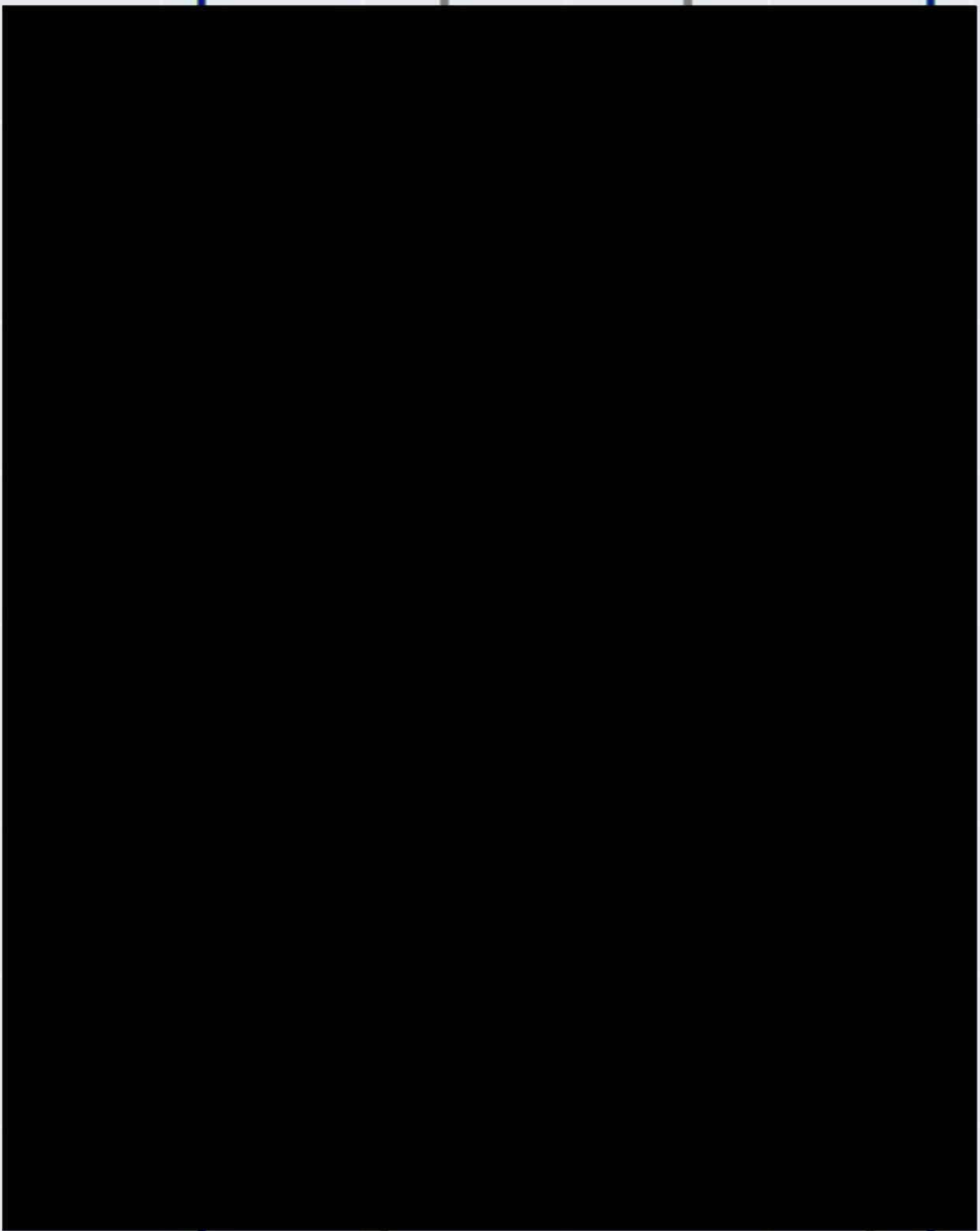
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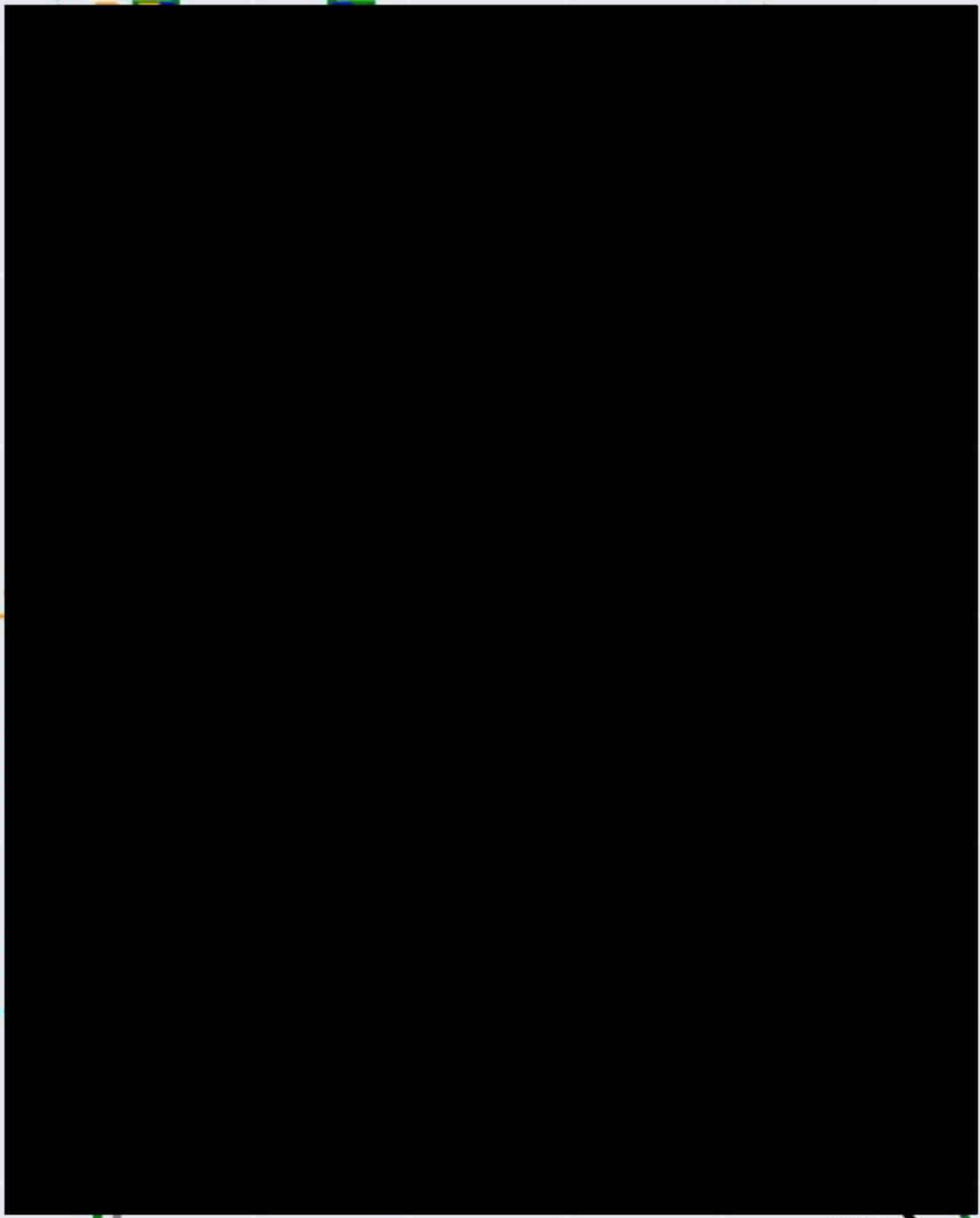
[redacted]

General Comments or Attachments:

See attached Attestation signed by the President of Southern Power Company.







Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Southern Power's Commitment and Actions Regarding ERCOT Nodal Operating Guide Revision Request 245 Compliance

To Whom It May Concern,

I hereby attest on behalf of Southern Power Company ("Southern Power") to the following statements:

Commitment to Compliance

Southern Power, as the wholesale subsidiary of Southern Company, adheres to the highest standards of ethics and compliance. One of our core company values is "Act with Integrity", which helps establish the foundational behaviors that guide how we work and, more specifically, how we approach our compliance obligations. Southern Power is committed to fully adhering to the requirements set forth in NOGRR 245 to the extent of the technical capabilities of its Inverter-Based Resources ("IBRs"). We recognize the importance of compliance to support the reliable operation of the ERCOT grid and affirm our dedication to meeting all reporting and performance requirements in the rule to the best of our IBRs' technical capabilities.

Rigorous Engineering Analysis and Collaboration with OEM Partners

Southern Power has diligently undertaken comprehensive engineering analysis, utilizing in-house technical engineering expertise and external contracted engineering services. We began these efforts before NOGRR 245 was finalized and have been intensely focused since the rule details became known and the April 1, 2025 deadline was set.

Southern Power has worked extensively with our original equipment manufacturer ("OEM") partners to complement our own engineering analysis and to more exhaustively assess the capabilities and limitations of our IBRs. The ability of OEMs to support detailed engineering analysis varies widely between companies and the vintages of equipment. Southern Power has gone to great lengths, including designing a customized data collection template, to facilitate information gathering from our OEM partners. Through this collaboration, we gained a more comprehensive understanding of the capabilities and limitations of our IBRs, identified opportunities for software and parameter-based performance maximization, and identified narrow technical extension and exemption needs. Southern Power's submissions of capability and limitation reports and extension requests and/or notices of intent to request an exemption are a result of the best available information from our OEMs as of this date.

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Ongoing Efforts and Commitment

Southern Power is committed to performing ongoing engineering analysis and collaborating with our OEM partners to ensure the best possible performance of our IBRs within equipment limitations. We are dedicated to implementing the identified software-based maximization modifications as soon as reasonably practicable after they become available and have ERCOT final approval. Southern Power is also committed to ongoing communication and collaboration with ERCOT staff and is available to answer any questions relating to our initial submissions.

Date: March 27, 2025

Sincerely,

Robin Boren
President
Southern Power

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Initial Voltage Ride-Through Capability Report

Resource Entity or Interconnecting Entity Name: Salt Fork Wind LLC

(a) **Resource Entity or Interconnecting Entity Data Universal Numbering System (DUNS) Number:** 0797475733000

(b) **IBR/WGR Site Name:** Salt Fork Wind (SALTFORK)

(c) **IBR/WGR Unit Name(s):** saltfork_unit1

[redacted]

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

(f) **Known voltage ride-through limitations of the IBR, Type 1 WGR or Type 2 WGR as compared to the requirements in Sections 2.9.1.2(1)-(7):**



(g) **A detailed description of the technical limitation preventing the Resource from meeting the ride-through requirement(s), including a letter signed by an officer or executive of the original equipment manufacturer (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm verifying the limitations:**



Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

[redacted]

(i) If a Resource Entity cannot address the entire plant design with a letter required in Section 2.11.1(1)(g), the Resource Entity must supplement a letter from the original equipment manufacturer for its equipment (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm by providing a notarized attestation sworn to by the Resource Entity's highest-ranking representative, official, or officer with binding authority over the entity attesting to the efforts made to obtain the letter, why those efforts failed, and which parts of the plant design is attested to. The attestation shall also include a detailed description of the technical limitation(s) preventing the Resource from meeting the ride-through requirement, including any information on technical limitations on all or part of the Resource which the Resource Entity is able to obtain from original equipment manufacturers or an engineering consulting firm under Section (g) above.

[redacted]

(h) Available software, firmware, settings, or parameterization modifications the Resource Entity will implement to maximize the voltage ride-through capability of the IBR, Type 1 WGR or Type 2 WGR to approach or meet the voltage ride-through requirements in Sections 2.9.1.2(1)-(7) within known equipment limitations, to the greatest extent possible:

[redacted]

(i) To the extent the Resource Entity chooses to implement changes to existing equipment other than software, firmware, settings or parameterization modifications that increase the voltage ride-through capability, identification of any such equipment modifications:

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

(j) Expected post-modification Resource capability in a format similar to the table in Section 2.9.1.2(1) and documentation of any expected remaining limitation(s) following implementation of such modifications:

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Salt Fork



Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

(k) A schedule for implementing the modification(s):

[redacted]

(l) A model accurately representing expected performance reflecting all technical limitations, or a statement that there are no new models available other than what is currently submitted to ERCOT that already reflect all technical limitations in voltage ride-through capability:

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

(m) A description of any limitation that cannot be accurately represented in a model:









Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Attachment 1: Detailed Description of Technical Limitation

Resource Entity Name: Salt Fork Wind LLC
Resource Name (Unit): saltfork_unit1

Detailed Description of the Technical Limitation:

Applicable Nodal Operating Guide Requirement(s):
2.9.1.2(4), 2.9.1.2(5), 2.9.1.2(6), 2.9.1(8)

Description of Technical Limitation:

[redacted]

Need for Exemption:

[redacted]

Need for Extension:

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Request for Extension – Salt Fork Wind LLC

Required Information pursuant to Nodal Operating Guide Section 2.12.1.2 (2):

(a) **Requesting Entity Name:** SALT FORK WIND LLC

(b) **Requesting Entity DUNS Number:** 0797475733000

(c) **IBR/WGR Site Name:** Salt Fork Wind (SALTFORK)

(d) **IBR/WGR Unit Name(s):** SALTFORK_UNIT1

(e) **Nodal Operating Guide Section(s) under which the extension is requested:**

[redacted]

(f) **A detailed description of the grounds for the extension and the basis for each request:**

[redacted]

(g) **Documentation from the equipment manufacturer describing any known limitations associated with the extension request, a description of proposed modifications, and a schedule for implementing modifications:**

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

[redacted]

(h) **Other information specified in this Section.** None.

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Initial Voltage Ride-Through Capability Report

Resource Entity or Interconnecting Entity Name: Salt Fork Wind LLC

(a) **Resource Entity or Interconnecting Entity Data Universal Numbering System (DUNS) Number:** 0797475733000

(b) **IBR/WGR Site Name:** Salt Fork Wind (SALTFORK)

(c) **IBR/WGR Unit Name(s):** saltfork_unit1

(d) **Nodal Operating Guide Section(s) with which the Resource cannot comply:**

[redacted]

(e) Current voltage ride-through capability in a format similar to the table in Section 2.9.1.2(1):



Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

(f) **Known voltage ride-through limitations of the IBR, Type 1 WGR or Type 2 WGR as compared to the requirements in Sections 2.9.1.2(1)-(7):**

[redacted]

(g) **A detailed description of the technical limitation preventing the Resource from meeting the ride-through requirement(s), including a letter signed by an officer or executive of the original equipment manufacturer (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm verifying the limitations:**

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

[redacted]

(i) If a Resource Entity cannot address the entire plant design with a letter required in Section 2.11.1(1)(g), the Resource Entity must supplement a letter from the original equipment manufacturer for its equipment (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm by providing a notarized attestation sworn to by the Resource Entity's highest-ranking representative, official, or officer with binding authority over the entity attesting to the efforts made to obtain the letter, why those efforts failed, and which parts of the plant design is attested to. The attestation shall also include a detailed description of the technical limitation(s) preventing the Resource from meeting the ride-through requirement, including any information on technical limitations on all or part of the Resource which the Resource Entity is able to obtain from original equipment manufacturers or an engineering consulting firm under Section (g) above.

[redacted]

(h) Available software, firmware, settings, or parameterization modifications the Resource Entity will implement to maximize the voltage ride-through capability of the IBR, Type 1 WGR or Type 2 WGR to approach or meet the voltage ride-through requirements in Sections 2.9.1.2(1)-(7) within known equipment limitations, to the greatest extent possible:

[redacted]

(i) To the extent the Resource Entity chooses to implement changes to existing equipment other than software, firmware, settings or parameterization modifications that increase the voltage ride-through capability, identification of any such equipment modifications:

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

(j) Expected post-modification Resource capability in a format similar to the table in Section 2.9.1.2(1) and documentation of any expected remaining limitation(s) following implementation of such modifications:

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Salt Fork



Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

(k) A schedule for implementing the modification(s):

[redacted]

(l) A model accurately representing expected performance reflecting all technical limitations, or a statement that there are no new models available other than what is currently submitted to ERCOT that already reflect all technical limitations in voltage ride-through capability:

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

(m) A description of any limitation that cannot be accurately represented in a model:



Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F



Subject: NOGRR 245 Verification of Technical Limitation – Need for Exemption or Extension



Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Attachment 1: Detailed Description of Technical Limitation

Resource Entity Name: Salt Fork Wind LLC
Resource Name (Unit): saltfork_unit1

Detailed Description of the Technical Limitation:

Applicable Nodal Operating Guide Requirement(s):

[redacted]

Description of Technical Limitation:

[redacted]

Need for Exemption:

[redacted]

Need for Extension:

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Initial Voltage Ride-Through Capability Report

Resource Entity or Interconnecting Entity Name: Salt Fork Wind LLC

(a) **Resource Entity or Interconnecting Entity Data Universal Numbering System (DUNS) Number:** 0797475733000

(b) **IBR/WGR Site Name:** Salt Fork Wind (SALTFORK)

(c) **IBR/WGR Unit Name(s):** saltfork_unit1

(d) **Nodal Operating Guide Section(s) with which the Resource cannot comply:**

[redacted]

(e) Current voltage ride-through capability in a format similar to the table in Section 2.9.1.2(1):

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

(f) **Known voltage ride-through limitations of the IBR, Type 1 WGR or Type 2 WGR as compared to the requirements in Sections 2.9.1.2(1)-(7):**

[redacted]

(g) **A detailed description of the technical limitation preventing the Resource from meeting the ride-through requirement(s), including a letter signed by an officer or executive of the original equipment manufacturer (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm verifying the limitations:**

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

[redacted]

(i) If a Resource Entity cannot address the entire plant design with a letter required in Section 2.11.1(1)(g), the Resource Entity must supplement a letter from the original equipment manufacturer for its equipment (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm by providing a notarized attestation sworn to by the Resource Entity's highest-ranking representative, official, or officer with binding authority over the entity attesting to the efforts made to obtain the letter, why those efforts failed, and which parts of the plant design is attested to. The attestation shall also include a detailed description of the technical limitation(s) preventing the Resource from meeting the ride-through requirement, including any information on technical limitations on all or part of the Resource which the Resource Entity is able to obtain from original equipment manufacturers or an engineering consulting firm under Section (g) above.

[redacted]

(h) Available software, firmware, settings, or parameterization modifications the Resource Entity will implement to maximize the voltage ride-through capability of the IBR, Type 1 WGR or Type 2 WGR to approach or meet the voltage ride-through requirements in Sections 2.9.1.2(1)-(7) within known equipment limitations, to the greatest extent possible:

[redacted]

(i) To the extent the Resource Entity chooses to implement changes to existing equipment other than software, firmware, settings or parameterization modifications that increase the voltage ride-through capability, identification of any such equipment modifications:

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

(j) Expected post-modification Resource capability in a format similar to the table in Section 2.9.1.2(1) and documentation of any expected remaining limitation(s) following implementation of such modifications:

[redacted]

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Salt Fork



Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

(k) A schedule for implementing the modification(s):

[redacted]

(l) A model accurately representing expected performance reflecting all technical limitations, or a statement that there are no new models available other than what is currently submitted to ERCOT that already reflect all technical limitations in voltage ride-through capability:

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

(m) A description of any limitation that cannot be accurately represented in a model:

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F



Subject: NOGRR 245 Verification of Technical Limitation – Need for Exemption or Extension



Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Attachment 1: Detailed Description of Technical Limitation

Resource Entity Name: Salt Fork Wind LLC
Resource Name (Unit): saltfork_unit1

Detailed Description of the Technical Limitation:

Applicable Nodal Operating Guide Requirement(s):

[redacted]

Description of Technical Limitation:

[redacted]

Need for Exemption:

[redacted]

Need for Extension:

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Initial Voltage Ride-Through Capability Report

Resource Entity or Interconnecting Entity Name: Salt Fork Wind LLC

(a) **Resource Entity or Interconnecting Entity Data Universal Numbering System (DUNS) Number:** 0797475733000

(b) **IBR/WGR Site Name:** Salt Fork Wind (SALTFORK)

(c) **IBR/WGR Unit Name(s):** saltfork_unit1

(d) **Nodal Operating Guide Section(s) with which the Resource cannot comply:**

[redacted]

(e) Current voltage ride-through capability in a format similar to the table in Section 2.9.1.2(1):

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

(f) **Known voltage ride-through limitations of the IBR, Type 1 WGR or Type 2 WGR as compared to the requirements in Sections 2.9.1.2(1)-(7):**

[redacted]

(g) **A detailed description of the technical limitation preventing the Resource from meeting the ride-through requirement(s), including a letter signed by an officer or executive of the original equipment manufacturer (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm verifying the limitations:**

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

[redacted]

(i) If a Resource Entity cannot address the entire plant design with a letter required in Section 2.11.1(1)(g), the Resource Entity must supplement a letter from the original equipment manufacturer for its equipment (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm by providing a notarized attestation sworn to by the Resource Entity's highest-ranking representative, official, or officer with binding authority over the entity attesting to the efforts made to obtain the letter, why those efforts failed, and which parts of the plant design is attested to. The attestation shall also include a detailed description of the technical limitation(s) preventing the Resource from meeting the ride-through requirement, including any information on technical limitations on all or part of the Resource which the Resource Entity is able to obtain from original equipment manufacturers or an engineering consulting firm under Section (g) above.

[redacted]

(h) Available software, firmware, settings, or parameterization modifications the Resource Entity will implement to maximize the voltage ride-through capability of the IBR, Type 1 WGR or Type 2 WGR to approach or meet the voltage ride-through requirements in Sections 2.9.1.2(1)-(7) within known equipment limitations, to the greatest extent possible:

[redacted]

(i) To the extent the Resource Entity chooses to implement changes to existing equipment other than software, firmware, settings or parameterization modifications that increase the voltage ride-through capability, identification of any such equipment modifications:

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

(j) Expected post-modification Resource capability in a format similar to the table in Section 2.9.1.2(1) and documentation of any expected remaining limitation(s) following implementation of such modifications:

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Salt Fork



Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

(k) A schedule for implementing the modification(s):

[redacted]

(l) A model accurately representing expected performance reflecting all technical limitations, or a statement that there are no new models available other than what is currently submitted to ERCOT that already reflect all technical limitations in voltage ride-through capability:

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

(m) A description of any limitation that cannot be accurately represented in a model:

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F



Subject: NOGRR 245 Verification of Technical Limitation – Need for Exemption or Extension



Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Attachment 1: Detailed Description of Technical Limitation

Resource Entity Name: Salt Fork Wind LLC
Resource Name (Unit): saltfork_unit1

Detailed Description of the Technical Limitation:

Applicable Nodal Operating Guide Requirement(s):

[redacted]

Description of Technical Limitation:

[redacted]

Need for Exemption:

[redacted]

Need for Extension:

[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

2025 NOGRR245 IBR RFI

(Market Notice: M-A071024-02)

Resource Entity: SALT FORK WIND LLC (RE)

Resource Name: SALTFORK_UNIT2

DocuSign Instructions:

- Responses are due on or before April 1, 2025
- Only one person can provide responses.
- The document can be forwarded or "Assigned to Someone Else" via the "Other Actions" menu at the top of the DocuSign web page.
- Please contact your ERCOT Account Manager with any additional questions.

Background Information:

The Public Utility Commission of Texas approved NOGRR 245 to be effective October 1, 2024. Accordingly, the revised ride-through requirements in the Nodal Operating Guides (NOG) are currently in effect. ERCOT has developed an intake process for data associated with the requirements established through NOGRR 245 and this DocuSign document implements that process.

NOTE: IF YOU INTEND TO REQUEST AN EXEMPTION OR EXTENSION FOR YOUR RESOURCE, YOU MUST SUBMIT THE REQUESTED INFORMATION BY MIDNIGHT ON APRIL 1, 2025 OR YOU WILL BE FOREVER BARRED FROM REQUESTING AN EXEMPTION OR EXTENSION. *See*, Nodal Operating Guide § 2.11.1(2); § 2.11.2(2) and § 2.12.1(2).

Submitter signature: Signed by: Kristin Cook 0DCB77E32063497...

Submitter name: **Kristin Cook**

Submitter title: Sr. Analyst, Market Compliance & Policy

Date: **4/1/2025**

General Comments:

The responses contained in this DocuSign and Attachments reflect Southern Power Company's ("Southern Power") good faith effort to provide the best available information at this time. Southern Power has worked extensively with an engineering consulting firm, inhouse subject matter experts, and our original equipment manufacturer ("OEM") partners to conduct the engineering analysis and to diligently assess the capabilities and limitations of our Inverter-Based Resources. The ability of OEMs to support detailed engineering analysis varies widely between companies and the vintages of equipment. Southern Power's submission of capability and limitation reports, extension requests, and/or notices of intent to request an exemption are the result of Southern Power's technical assessment and the best available information from our OEMs as of this date.

General Information

Pursuant to Public Utility Commission of Texas Electric Substantive Rule § 25.503(f)(10), ERCOT requests the following information to be returned to ERCOT on or before April 1, 2025.

Resource Entity Name:	SALT FORK WIND LLC (RE)
Resource Entity Data Universal Numbering System (DUNS) Number:	0797475733000
Substation Name:	SALTFORK
Resource Name:	SALTFORK_UNIT2
Fuel Type:	Wind
(if fuel type = wind) Wind Turbine Type:	
Does the Resource have a Standard Generation Interconnection Agreement (SGIA) date prior to August 1, 2024?	Yes
Has the Resource implemented any modification covered by ERCOT Planning Guide Section 5.2.1(1)(c) since its original Commercial Operation Date (COD)?	No
Was the most recent Generation Interconnection or Modification (GIM) covered by ERCOT Planning Guide Section 5.2.1(1)(c) initiated prior to August 1, 2024?	

Comments:

Type 3 WTG.

Throughout this document a response of "123456789" indicates that the OEM did not provide a response to this question and/or does not know the answer at this time.

Throughout this document a response of "99999" indicates continuous ride-through capability.

Frequency Ride-Through

FRT-1. Is the Resource frequency ride-through capability (i.e., software, settings, firmware, and parameterization) set to the maximum level the equipment allows in accordance with Good Utility Practice? **Yes**

As of what date did the Resource maximize its frequency ride-through capability?:

[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

FRT-2. Will the Resource owner implement changes to existing equipment *other than* software, firmware, settings or parameterization changes to increase the Resource's frequency ride-through capability, and if yes, describe those modifications and attach any supporting

[redacted]

FRT-3. Based on the Resource's maximum frequency ride-through capability, provide the ride-through time (in seconds) at the specified frequency levels in the table below:

[redacted]

I attest the table above accurately represents the pre-maximization and post-maximization frequency ride-through performance capability of the Resource and all its inter-dependent systems (such as plant controls, turbine controls and/or inverter controls - not just protective relay settings).

[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

FRT-4. Provide a post-maximization complete frequency ride-through capability curve (0-600 seconds) superimposed on the minimum applicable requirement.
NOTE: Submit pdf or image for curve.



FRT-5. Can the Resource meet or exceed the minimum frequency ride-through requirements in Nodal Operating Guide Sections 2.6.2.1(1) - (5)?

[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

FRT-6. Can the Resource currently remain reliably connected to the ERCOT grid as set forth in NOG Section 2.6.2.1.1(2)?

[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

FRT-7. I attest the Resource owner has made or caused to be made all software, settings, firmware, and parameterization changes (which includes memory upgrades to accommodate such changes that do not involve modifying other Resource equipment or components) to maximize the performance of the Resource's protection systems, controls, and other plant equipment (within equipment limitations and in accordance with Good Utility Practice) to exceed or achieve as close as reasonably possible, the capability and performance requirements set forth in Nodal Operating Guide Section 2.6.2.1.

[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

FRT-8. If already submitted, I attest all dynamic models including PSSE, TSAT, and PSCAD for this Resource are accurate and reflect actual frequency ride-through capability.

[redacted]

FRT-9. If not already submitted, I attest all dynamic models including PSSE, TSAT, and PSCAD for this Resource will be accurate and reflect actual frequency ride-through capability when submitted.

[redacted]

Voltage Ride-Through

VRT-1. Is the Resource voltage ride-through capability (i.e., software, settings, firmware, and parameterization) set to the maximum level the equipment allows in accordance with Good Utility Practice?

[redacted]

If the Resource has a SGIA dated before 8/1/24, does the Resource meet the voltage ride-through requirements in NOG Section 2.9.1.2?:

[redacted]

Will the Resource maximize its voltage ride-through capability on or before 12/31/25 or its Commercial Operations Date (if not yet commercial)?

[redacted]

VRT-2. Will the Resource owner implement changes to existing equipment *other than* software, firmware, settings or parameterization changes to increase the Resource's voltage ride-through capability?

[redacted]

VRT-3. Based on the Resource's maximum voltage ride-through capability, provide the ride-through time (in seconds) at the specified voltage levels in the table below:



I attest the table above accurately represents the Resource's pre-maximization and post-maximization voltage ride-through performance capability and all its inter-dependent systems (such as plant controls, turbine controls and/or inverter controls - not just protective relay settings).

Yes

VRT-4. Provide a complete voltage ride-through capability curve (0-10 seconds) superimposed on the minimum applicable requirement. A separate curve may be necessary to show sub-cycle overvoltage capability.
NOTE: Submit pdf or image.



VRT-5. Can the Resource meet or exceed all the voltage ride-through requirements in Nodal Operating Guide Sections 2.9.1.1(1) – (7)?

[redacted]

By the latter of 12/31/25 or its Commercial Operations Date, will the Resource meet or exceed the voltage ride-through requirements in Nodal Operating Guide Sections 2.9.1.1(1) – (7)?

[redacted]

Does the Resource meet or exceed the voltage ride-through requirements in NOG Sections 2.9.1.2(1) – (7)?

[redacted]

Submit the Initial Voltage Ride-Through Capability Report required in NOG Section NOG 2.11.2(1).

See attached IVRTCR.



By the latter of 12/31/25 or its Commercial Operations Date, will the Resource meet or exceed the voltage ride-through requirements in NOG Sections 2.9.1.2(1) – (7)?

[redacted]

Does the Resource meet the voltage ride-through requirements in effect on May 1, 2024 at this time?

[redacted]

CONFIDENTIAL-FILING MEMORANDUM

TO: Central Records

FROM: Salt Fork Wind LLC

DATE: September 30, 2026

RE: Public Utility Commission (PUC) Docket No. _____– *Complaint of Salt Fork Wind LLC Against ERCOT and Request for an Extension and Exemption from an ERCOT Reliability Requirement under 16 TAC § 22.251(r).*

Pursuant to 16 Tex. Admin. Code (TAC) § 22.71(j)(1)(A)–(E), Salt Fork Wind LLC ("Salt Fork") designates its Complaint of Salt Fork Wind LLC Against the Electric Reliability Council of Texas as partially confidential.

This filing contains detailed information regarding a resource belonging to Salt Fork including detailed plans for modifying the resource, communications with the independent system operator regarding the resource, and information regarding the resource's technical limitations and capabilities.

The following pages contain redactions for the reasons stated below:

- Pages 000024-000046; 000049-000086; 000089-000104; 000106-000149; 000154-000155; 000158; 000164; 000169-000179; 000184-000238; 000240-000241; 000244; 000250; 000255-000265; 000270-000324; 000327-000329; 000333; 000335-000338; 000340; 000342; 000345-000346; 000350-000352; 000355-000357.

The pages were redacted because they contain confidential commercial information under Sections 552.110 and 552.117 of the Government Code, contain information considered to be confidential by law under Section 552.101 of the Government Code, which includes information that is protected under the ERCOT Nodal Protocols,[1] or contain information that could disclose particular vulnerabilities of critical infrastructure to an act of terrorism, which is confidential under Section 418.181 of the Government Code. Salt Fork hereby designates all redacted information as Protected Information under Section 1.3.1.1(1)(q) of the ERCOT Nodal Protocols. The

[1] Open Records Decision No. 2021-16568A at 5 (Jan. 18, 2022).

information included is confidential because it contains detailed plans and technical performance information of a generation resource in the ERCOT area of Texas.

Select the appropriate box below:

[ ] Protected Material

[ ] Highly Sensitive Protected Material

[X] Not Applicable (a protective order has not been issued in the proceeding)

Salt Fork acknowledges that the confidential filing status of this document may be subject to challenge by another party in the proceeding or by the presiding officer.

Respectfully submitted,



Chris Kirby
Balch & Bingham LLP
600 Congress Ave. Suite 2700
Austin, Texas 78701
Telephone: (512) 583-1714
Fax: (512) 744-9399
Email: ckirby@balch.com

ATTORNEY FOR SALT FORK WIND LLC

DOCKET NO. _____

COMPLAINT OF SALT FORK WIND LLC AGAINST ERCOT AND REQUEST FOR AN EXTENSION AND EXEMPTION FROM AN ERCOT RELIABILITY REQUIREMENT UNDER 16 TAC § 22.251(R)	**§**	**BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS**

COMPLAINT OF SALT FORK WIND LLC AGAINST ERCOT AND REQUEST FOR AN EXTENSION AND EXEMPTION FROM AN ERCOT RELIABILITY REQUIREMENT UNDER 16 TAC § 22.251(R)

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DOCKET NO. _____

COMPLAINT OF SALT FORK WIND LLC AGAINST ERCOT AND REQUEST FOR AN EXTENSION AND EXEMPTION FROM AN ERCOT RELIABILITY REQUIREMENT UNDER 16 TAC § 22.251(R)	**§ § § § § §**	**BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS**

COMPLAINT OF SALT FORK WIND LLC AGAINST ERCOT AND REQUEST FOR AN EXTENSION AND EXEMPTION FROM AN ERCOT RELIABILITY REQUIREMENT UNDER 16 TAC § 22.251(R)

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

I. INTRODUCTION AND BACKGROUND

Salt Fork Wind LLC ("Salt Fork") respectfully files this complaint ("Complaint") against the Electric Reliability Council of Texas, Inc. ("ERCOT") based on ERCOT's denial of Salt Fork's extension and exemption requests, as set forth below, under 16 Texas Administrative Code ("TAC") § 25.517(c). Salt Fork is registered with ERCOT as a resource entity and with the Public Utility Commission of Texas (the "Commission") as a power generation company. Salt Fork is a subsidiary of Southern Power Company.[1]

Salt Fork requested an extension for compliance with the requirements of the Nodal Operating Guide ("NOG") § 2.9.1.2(3) and exemptions from the requirements of NOG

[1] Southern Power Company, a subsidiary of Southern Company, is a leading wholesale energy provider meeting the electricity needs of municipalities, electric cooperatives, investor-owned utilities, and commercial and industrial customers. Southern Power and its subsidiaries own 55 facilities nationally—including natural gas (56.7% of generating capacity), wind (19.5%), solar (22.5%), battery storage and fuel cells (1.4%)—operating or under development in 15 states with more than 13,000 megawatts ("MW") of generating capacity. In Texas, Southern Power owns five wind and four solar generation facilities in operation or under development totaling approximately 1,870 MW of generating capacity. Southern Power has a unique perspective as a competitive generation company owning and operating a diverse fleet of generating facilities in multiple power markets across the country and as an affiliate of three retail electric operating companies in the Southeast.

§§ 2.9.1.2(4), (5) and (6).[2] On August 26, 2026, ERCOT denied the exemption requests and rejected the extension request. This appeal follows the denial by ERCOT of Salt Fork's requests.

This appeal represents the fifth such appeal from a denial by ERCOT of applications under Commission Rule 25.517. Notably, certain factual differences distinguish Salt Fork's appeal from those filed previously. First, ERCOT denied both Salt Fork's application for an extension and exemption. This matters because in the prior appeals, which dealt only with requests for extensions, ERCOT argued that Commission Rule 25.517 did not apply to extension requests because the rule's nomenclature did not expressly reference extension requests, only requests for exemptions.[3] While Salt Fork does not concede to ERCOT's position on extension requests, obviously, this argument fails as it relates to Salt Fork's exemption request that is the subject of this appeal.[4]

Second, prior to ERCOT's denial, Salt Fork delivered to ERCOT a compliant, post-maximization model that ERCOT actually approved via email.[5] In prior appeals ERCOT has argued that it has discretion to deny a request if the applicant did not timely provide a post-maximization model meeting ERCOT's internal standards. ERCOT argues that it must issue

[2] An extension request seeks additional time past December 31, 2025, to implement field changes necessary for the resource to meet the requirements of Nodal Operating Guide §2.1.9.2, whereas an exemption request seeks continued operations for legacy equipment for which there is no available software-based solution to come into compliance with the new regulations.

[3] *See, e.g.*, *Complaint of 225DD 8ME LLC against the Electric Reliability Council of Texas Inc.*, Docket No. 59868, ERCOT Response to 225DD 8ME Complaint at 22–23 (July 8, 2026); *Complaint of Hackberry Wind LLC against the Electric Reliability Council of Texas Inc.*, Docket No. 59871, ERCOT Response to Hackberry Wind Complaint at 21–22 (July 8, 2026); *Complaint of Pattern Gulf Wind LLC and Logan's Gap Wind LLC against the Electric Reliability Council of Texas Inc.*, Docket No. 59962, ERCOT Response to Pattern Gulf Wind LLC & Logan's Gap Wind LLC Complaint at 22–30 (August 3, 2026); and *Complaint of Upton County Solar 2 LLC against the Electric Reliability Council of Texas Inc.*, Docket No. 59983, ERCOT Response to Upton Solar Complaint – PUBLIC at 29–37 (August 10, 2026).

[4] *See* 16 TAC § 25.517(d)(1).

[5] *See* Attachment C at 4-5.

denials where ERCOT does not deem the submitted models sufficient in order to allow ERCOT to move forward with its review of applications meeting its post-maximization model requirement. ERCOT states that it should not have to wait indefinitely for applicants to meet ERCOT standards for provision of a post-maximization model. In this instance, as evidenced by Salt Fork's communications to ERCOT, Salt Fork worked diligently with ERCOT Staff to provide a model that met ERCOT's requirements and received notification by email that ERCOT approved Salt Fork's post-maximization model. In addition, Southern Power Company received notice during this time period that certain of its other resources' models were insufficient. With ERCOT's apparent approval and the lack of similar communication Southern Power Company received for other sites, Salt Fork believed that ERCOT had approved the model. Following the apparent approval, ERCOT asked for a technical clarification unspecified by law, then failed to engage with Salt Fork for more than five months to finalize that requested technical modification, before denying Salt Fork's requests on the basis that its model did not timely meet ERCOT's post-maximization model requirements.

ERCOT, by its own admission, did not conduct a threshold reliability assessment on Salt Fork's applications as required by Commission rule.[6] Based on the rejection notice sent to Salt Fork, ERCOT will likely respond that Salt Fork did not timely submit an acceptable model, therefore the Commission's rule, and ERCOT's obligations under that rule, do not apply. In essence, ERCOT argues that it can determine which applications are and are not governed by the Commission's rule, including the requirement to perform a threshold reliability assessment, based on how ERCOT views the sufficiency of the applicant's submitted post-maximization model.

[6] *See* 16 TAC § 25.517(d)(1); *see also* Attachment E at 2.

Although NOG § 2.12.1 and the Commission's substantive rules[7] require submission of models that show an applicant resource's capabilities and limitations, many of the technical requirements ERCOT imposes on post-maximization models do not appear in PURA, the Commission's substantive rules, or the Planning Guide. As noted, Salt Fork timely provided ERCOT with a post-maximization model meeting Commission Rule 25.517's requirements. And ERCOT cannot avoid its obligations under Commission Rule 25.517 by subsequently finding in its "sole and reasonable discretion" that Salt Fork did not timely file a sufficient model.

Southern Power Company, and by extension, Salt Fork, participated throughout the stakeholder process at ERCOT in developing NOGRR 245, and at the Commission in developing Commission Rule 25.517. Salt Fork timely filed its initial extension and exemption requests on April 1, 2025, and its supplemental requests on September 15, 2025.[8] Salt Fork communicated proactively with ERCOT throughout the entire extension and exemption request process. Once developed, the record will reflect consistent communication from Salt Fork to ERCOT, but not always from ERCOT to Salt Fork. Salt Fork sought to provide ERCOT with everything it requested. It replied to ERCOT and made all changes to the model that it could. When it could not make the requested changes, it engaged its OEM for assistance. These efforts appeared to be rewarded when on January 13, 2026, ERCOT indicated that Salt Fork's submitted model was sufficient and its modifications approved. But shortly thereafter ERCOT simply stopped responding. On June 3, 2026, Salt Fork requested a status update on its submissions, and ERCOT did not respond. And more than five months after ERCOT ceased communications with Salt Fork, ERCOT denied Salt Fork's requests contrary to its earlier communications. Below is a table

[7] *See* 16 TAC § 25.517(c)(4).

[8] Salt Fork's initial requests are attached as Attachment A, and the supplemental requests are attached as Attachment B.

summarizing Salt Fork's communications with ERCOT regarding its extension and exemption requests. Copies of the correspondence are attached as Attachment C.

Date	**Action**
April 1, 2025	Salt Fork submits initial extension request and exemption requests via DocuSign and attachments.
September 15, 2025	Salt Fork submits a supplemental extension request consistent with ERCOT's deadline.
November 21, 2025	ERCOT sends missing information request to Salt Fork (the "MIR").[9]
December 16, 2025	Salt Fork timely submits response to the MIR via RIOO, including post-maximized dynamic model package.
January 13, 2026	ERCOT staff requests PSSE model using ERCOT template, stating "afterwards I can approve the submission."
January 13, 2026	Salt Fork attaches PSSE model using ERCOT template via email submission.
January 13, 2026	ERCOT states the new submission is sufficient and approves the modification.
January 13, 2026	ERCOT staff notes a discrepancy in the unit aggregation between the PSSE model submitted and RIOO.
January 13, 2026	Salt Fork asks ERCOT to clarify what changes ERCOT is requesting.
January 14, 2026	ERCOT provides two options for Salt Fork to correct the discrepancy with the PSSE model and RIOO and suggests that Salt Fork work with its OEM to correct the discrepancy in the PSSE model.
February 2026	Salt Fork works with its OEM to prepare a new PSSE model consistent with ERCOT's January 14 suggestion.
February 25, 2026	ERCOT asks for a status update. Salt Fork provides an update and states that it needs additional time to align the PSSE model with RIOO while still accurately representing the resource's dynamic performance.
March 2, 2026	Salt Fork emails ERCOT client services representative seeking information as to how to adjust RIOO consistent with the discrepancy noted by ERCOT on January 13.
March 9, 2026	ERCOT staff replies to Salt Fork's March 2 email stating it will look into Salt Fork's question. **ERCOT never follows up on this request.**
March 12, 2026	Salt Fork asks ERCOT whether it can implement software modifications while investigating the PSSE model issues in parallel.
March 12, 2026	ERCOT staff confirms receipt of Salt Fork's question and states it will check internally on how Salt Fork should proceed. **This is the final**

[9] Salt Fork's MIR responses are attached as Attachment D.

Date	Action
	correspondence Salt Fork received from ERCOT related to the extension and exemption requests.
June 3, 2026	Southern Power Company requests status updates for several affiliated resources, including Salt Fork. **ERCOT never responds to this email.**
August 26, 2026	ERCOT denies Salt Fork's requests.[10]

ERCOT's rejection of Salt Fork's requests is not based on any substantive analysis of the reliability risk associated with Salt Fork's operations. Nor did ERCOT act reasonably by denying Salt Fork's applications based on the insufficiency of a post-maximization model that it had previously approved. For these reasons Salt Fork respectfully requests that the Commission (1) reverse ERCOT's denials, (2) grant Salt Fork an extension for compliance with NOG § 2.9.1.2(3) until January 1, 2027, and (3) grant Salt Fork exemptions from the requirements of NOG §§ 2.9.1.2(4), (5) and (6). Alternatively, the Commission should reverse ERCOT's denials and remand the matter back to ERCOT with instructions to substantively evaluate Salt Fork's requests, consistent with 16 TAC § 25.517.

II. PARTIES; AUTHORIZED REPRESENTATIVES

The complainant in this case is Salt Fork Wind, LLC. The name and address of the complainants' authorized representatives are as follows:

Dane McKaughan
Chris Kirby
Fariraishe Muzondo
Balch and Bingham LLP
919 Congress Ave. Suite 840
Austin, Texas 78701
Telephone: (512) 583-1714
Fax: (866) 258-8980
Email: dmckaughan@balch.com
ckirby@balch.com
fmuzondo@balch.com

Matt Madison
Deputy General Counsel
Southern Power Company
3535 Colonnade Parkway
Birmingham, AL 35243
Telephone: (205) 992-0041
Email: mmadison@southernco.com

[10] ERCOT's Denial is attached as Attachment E.

Salt Fork agrees to accept electronic service and requests that service of all pleadings be made to the individuals listed above.

Salt Fork seeks relief against ERCOT. Notice in this proceeding is governed by 16 Tex. Admin. Code § 22.55, which provides that the presiding officer may require a party to provide reasonable notice to affected persons. To Salt Fork's knowledge, ERCOT's authorized representatives are as listed below. Salt Fork will serve a copy of this complaint on the ERCOT representatives listed below.

Chad V. Seely
Senior Vice President, Regulatory Policy, General Counsel, Chief Compliance Officer, Corporate Secretary

Brandon Gleason
ERCOT Vice-President, Legal & Compliance

A. Andrew Gallo
Assistant General Counsel – Regulatory
Electric Reliability Council of Texas, Inc.
8000 Metropolis Drive (Building E), Suite 100
Austin, TX 78744
Telephone: (512) 248-6800
Email: Chad.Seely@ercot.com
Brandon.Gleason@ercot.com
Andrew.Gallo@ercot.com

Consistent with 16 TAC § 22.251(e)(5)(c), Salt Fork will also serve a copy of this complaint on the Office of Public Utility Counsel ("OPUC"). To Salt Fork's knowledge, OPUC's authorized representative is listed below.

Benjamin Barkly
Chief Executive and Public Counsel
1701 N. Congress Ave., Suite 9-180
P.O. Box 12397
Austin, TX 78711-2397
Telephone: 512-936-7500
Email: opuc_eservice@opuc.texas.gov

III. PROCEDURAL AND HISTORICAL STATEMENT OF THE CASE

A. Description of Underlying Proceeding. This case arises because of ERCOT's denial of Salt Fork's request under 16 TAC 25.517 for an extension of the requirements of NOG § 2.9.1.2(3) and exemptions from the requirements of NOG Sections § 2.9.1.2(4), (5) and (6). These voltage ride-through ("VRT") and frequency ride-through ("FRT") requirements were implemented as a part of the implementation of NOGRR 245, which was filed on January 11, 2023, and was approved by the Commission on September 26, 2024. ERCOT denied Salt Fork's requests on August 26, 2026. These appeals are filed pursuant to Commission Rule 25.517 and Commission Rule 25.251, both approved by the Commission on June 20, 2025.

B. Affected Entities. Salt Fork and ERCOT are the directly affected entities under this Complaint.

C. ERCOT Conduct. On August 26, 2026, ERCOT denied Salt Fork's extension and exemption requests.

D. Applicable Law and ERCOT Protocols. The following is a list of all applicable laws and ERCOT protocols and operating guides: PURA §§ 31.001, 39.151; 16 TAC § 22.251, 16 TAC § 25.517; Nodal Operating Guide §§ 2.6.2.1, 2.9.1.2, 2.11.1(1)(1), 2.12.1(3)(c), 2.12.1.3.

E. Applicable ERCOT Procedures. Salt Fork is not required to follow any applicable ERCOT Procedures prior to filing this case under 16 TAC § 22.251(r)(1).

F. Suspension of ERCOT Conduct. Salt Fork does not request suspension of any ERCOT conduct at this time. It reserves the right to request suspension of future ERCOT conduct that may be taken while this complaint is pending.

G. Jurisdiction. The Commission has jurisdiction over this complaint pursuant to PURA §§ 14.001 and 39.151 and 16 TAC §§ 22.251 and 25.517.

IV. STATEMENT OF ISSUES PRESENTED FOR COMMISSION REVIEW

A. Whether it is reasonable for ERCOT to deny an extension and/or exemption request because the model provided by the resource entity does not meet certain technical specifications that are not required in the NOG or Commission rules;

B. Whether ERCOT acted reasonably by denying Salt Fork's requests under the specific facts related to these requests;

C. Whether ERCOT conducted the threshold reliability assessment required by 16 TAC § 25.517(d)(1) before denying Salt Fork's requests;

D. Whether ERCOT considered all factors required by 16 TAC § 25.517(d) before denying Salt Fork's requests;

E. Whether granting Salt Fork an extension and exemptions is in the public interest; and

F. Whether the Commission will impose any conditions on Salt Fork if the Commission decides to grant Salt Fork's extension and exemption requests.

V. STATEMENT OF FACTS

NOGRR 245,[11] which implemented new VRT and FRT requirements on inverter-based resources, was approved by the Commission on September 26, 2024, and took effect on October 1, 2024. To avoid causing significant resource adequacy problems by forcing existing generation assets off the grid, existing resources with a Standard Generation Interconnection Agreement executed before August 1, 2024, were afforded the opportunity to request an extension for compliance or exemption from compliance from the FRT and VRT requirements by April 1, 2025.

[11] Nodal Operating Guide Revision Request 245, Inverter Based Resource (IBR) Ride-Through Requirements

As detailed by ERCOT in pleadings from prior appeals,[12] and as described by ERCOT at a NOGRR 245 Workshop on August 8, 2025, 429 entities requested an extension, an exemption, or both on April 1, 2025, including Salt Fork.[13] Notably, ERCOT stated at that workshop that *none* of the submissions met ERCOT's interpretation of the requirements in the NOG.[14] Following the August 8, 2025 workshop, resource entities were given until September 15, 2025 to provide supplemental information to bring their requests into compliance with ERCOT's desires. Salt Fork provided the supplemental information on September 15, 2025. As a part of Salt Fork's supplemental request, it reduced its extension request from October 1, 2027 to January 1, 2027, consistent with the faster-than-anticipated development of the dynamic models by its wind turbine generator original equipment manufacturer ("OEM"). Salt Fork received a request for missing information from ERCOT on November 21, 2025; Salt Fork timely provided the requested information—including a model package—to ERCOT on December 16, 2025 (after Salt Fork requested, and ERCOT granted, an extension from the original deadline).

After Salt Fork provided the additional information, ERCOT requested on January 13, 2026, that Salt Fork provide the PSSE model in ERCOT's preferred template; Salt Fork provided the model on that template later that same day. After receiving Salt Fork's submission, ERCOT staff approved of the model, stating "I approve the modification." ERCOT subsequently requested that Salt Fork make technical changes to align the PSSE model with Salt Fork's RIOO[15] data, but

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[12] *See* dockets cited *supra* note 3.

[13] *See* ERCOT Presentation, NOGRR 245 Workshop III (Aug. 8, 2025).

[14] *See id.*, *see also* transcript at 09:00 – 09:30. The fact that none of the 429 applicants could timely file a model meeting ERCOT's specifications raises the suspicion that those specifications and expectations were not reasonable.

[15] Resource Integration and Ongoing Operations, an online software system used by resource entities and ERCOT to submit change requests and update technical data for existing operational facilities.

this request did not change the functionality of the model to reflect the post-maximized plant capability.

Salt Fork and ERCOT exchanged communications to address the requested technical changes, as set forth in the chart above and as shown in the copies of communications included in Attachment C. To summarize, Salt Fork asked ERCOT staff whether ERCOT preferred that it update RIOO or change the PSSE model to reflect the RIOO data, and ERCOT indicated either option would work. ERCOT staff again noted that Salt Fork's PSCAD model was sufficient and needed no changes. Throughout the month of February, Salt Fork worked with its OEM to update the PSSE model to reflect the RIOO registration while still accurately representing the units' dynamic performance. On February 25, 2026, Salt Fork provided a status update to ERCOT on its work with the OEM to update the model. Salt Fork asked ERCOT on March 12, 2026 if the PSSE/RIOO discrepancy needed to be resolved prior to Salt Fork advancing the Planning Guide Revision Request ("PGRR") 109 process and receiving approval from ERCOT thereunder. Salt Fork reiterated again that it believed the dynamic models accurately represented the resource's performance. Also on March 12, 2026, ERCOT staff stated they would check internally on how Salt Fork should proceed. That was the last communication related to the extension and exemption requests Salt Fork received from ERCOT until August 26, 2026, when Salt Fork received the denial of its exemption requests and rejection of its extension request.

VI. ARGUMENT

A. ERCOT ACTED UNREASONABLY WHEN IT DENIED SALT FORK'S REQUESTS

The NOG requires ERCOT to grant an extension or exemption request if it meets ERCOT's requirements, in its "sole and *reasonable* discretion."[16] Commission Rule 25.517 includes seven statements requiring ERCOT to act in a reasonable manner.[17] Regulatory agencies—like ERCOT—have a duty to treat regulated entities fairly and reasonably. The entire policy purpose underlying Commission Rule 25.517 is to implement a fair and reasonable process by which resource entities can appeal ERCOT determinations regarding extension and exemption requests. This rule accords with the fairness inherent in the due course of law protections under the Texas constitution and the "rudiments of fair play" agencies must observe to comply with Texas law.[18] As demonstrated below, ERCOT did not meet its burden of acting reasonably.

As noted earlier, Salt Fork timely met every deadline set by ERCOT, including submitting a model meeting the requirements of NOG 2.9.1. When ERCOT asked for changes to the model, Salt Fork worked with ERCOT and ultimately submitted a model that ERCOT approved by email. Salt Fork continued to work with ERCOT to put the model in ERCOT's preferred format, despite these modifications not being required by Commission Rule 25.517. But when Salt Fork asked ERCOT how to proceed with finalizing these changes, ERCOT failed to provide direction until it summarily denied Salt Fork's applications five months later, alleging only that the model ERCOT previously found acceptable was now insufficient. Salt Fork also requested a status update on June

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[16] NOG § 2.12.1(3) (emphasis added).

[17] ERCOT must set a "reasonable deadline" for resource entities to submit exemption requests (a)(1)(A); ERCOT must perform the threshold reliability assessment using "a reasonable set of operating conditions" and "reasonable and expected" topology, equipment status and dispatch (d)(1)(B)-(C); ERCOT must "make a reasonable effort" to work with resource entities to determine mitigation options (d)(2); ERCOT may request "reasonable and necessary" information to evaluate requests to extend exemptions (g)(1); ERCOT must make "reasonable efforts" to identify mitigation options before revoking or modifying and exemption (g)(3)(A)(ii); ERCOT must give resource entities a "reasonable period" of time to comply with reliability requirements after revoking an exemption (g)(3)(A)(iii).

[18] *See, e.g.*, Tex. Comm'n on Environ. Qual. v. Friends of Dry Comal Creek, 669 S.W.3d 506, 533-34 (Tex. App.—Austin 2023).

3, 2026, and ERCOT never responded. This is not a reasonable way to interact with an entity ERCOT regulates and violates Commission Rule 25.517's requirements to act reasonably when evaluating exemption or extension requests. Nor does this conduct appear reasonable in light of the policy need to keep resources on the grid in times of constraint. The NOG, Commission rules, and indeed principles of good government and due process require that a regulator act reasonably. ERCOT failed that standard.

B. ERCOT MUST COMPLY WITH COMMISSION RULE § 25.517

ERCOT's jurisdiction and authority are subordinate to that of the Commission.[19] Like Salt Fork and every entity affected by Commission Rule 25.517, ERCOT must comply with the requirements imposed by that rule. This rule puts very specific obligations on ERCOT when evaluating exemption and exception requests.[20] ERCOT participated throughout the rulemaking process and is aware of its obligations under the rule. It cannot simply preempt those obligations by setting up a pre-condition (stricter standards on the submitted model than those required by rule)[21] and then determining, solely within its own discretion, whether an applicant meets that threshold pre-condition. This undermines the Commission's jurisdiction and authority and deprives Salt Fork and other applicants of their rights under that rule.[22] Rule 25.517 requires ERCOT to make an assessment of whether an exemption granted to a resource would result in a threshold reliability risk. If ERCOT determines that a resource presents a threshold reliability risk, it must engage with the resource entity to determine mutually acceptable options to mitigate any

[19] *See* PURA § 39.151(d).

[20] *See* 16 TAC § 25.517(d)(1).

[21] 16 TAC § 25.517(c)(4) requires only that the model "accurately represent expected resource performance and reflect the actual, as-built resource equipment and settings, with all technical limitations, before and after maximizing the resource's operational capability… ." It does not, for instance, require that the model mirror RIOO.

[22] *See* 16 TAC § 25.517(c).

threshold reliability risk.[23] ERCOT has acknowledged that it performed no such assessment under its theory that the Commission's rule does not apply to ERCOT until an applicant first meets ERCOT's preconditions; it similarly considered no mitigation options.[24] This position deprives the Commission of the information required by Commission Rule 25.517 that the Commission has deemed necessary to evaluate ERCOT's decision or the potential risk, if any, of the applicant resource's continued connection to the grid. Because ERCOT failed to follow Commission Rule 25.517, its denials should be reversed.

C. GRANTING SALT FORK'S EXTENSION AND EXEMPTION REQUESTS COMPORTS WITH THE PUBLIC INTEREST

The Commission has broad discretion to decide what is and is not in the public interest.[25] The Commission must use its special knowledge and expertise to determine whether an act is in the public interest, and it must assess "competing policies" to determine the public interest.[26] Deciding how to balance these competing priorities requires fulsome analysis of the Commission's rules and the statutes that grant the Commission its authority.

The Commission's duty is to uphold the public interest by considering all the competing priorities it oversees. The electric industry is complex, and there are a variety of principles that compete for priority when the Commission makes decisions. The Legislature has laid down markers of what constitutes the public interest, sometimes expressly and sometimes implicitly. The Legislature has expressly stated (1) that the public interest is inherent in the rates and services

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[23] 16 TAC § 25.517(d)(2).

[24] *See* Attachment E at 2.

[25] *See Public Utility Commission v. Texas Telephone*, 163 S.W.3d 204, 213 (Tex. App.—Austin 2005) ("It is within the Commission's authority to decide what public interest means in a particular case.").

[26] *Id.*; *see also Amtel Communications, Inc. v. Public Util. Comm'n*, 687 S.W.2d 95, 99 (Tex. App.—Austin 1985).

of the electric industry,[27] (2) the public interest requires that rules, policies, and principles be formulated and applied to protect the public interest in a competitive marketplace,[28] and (3) that the development of a competitive wholesale electricity market *that allows for increased participation by electric utilities and certain non-utilities is in the public interest*.[29] The Legislature has expressly determined that allowing market participants to participate in the ERCOT market is in the public interest.

Here, the public interest is served by granting Salt Fork's extension request and exemption requests and allowing its facilities to continue to provide electricity, especially given rising demand. Salt Fork worked in good faith to provide the models (and all other necessary information) to ERCOT, consistent with the Commission's rules and the NOG. However, ERCOT decided in its sole but unreasonable discretion that Salt Fork's models were invalid. If this conclusion was solely related to the post-acceptance ERCOT request for technical clarification, even though Salt Fork stood ready and waiting—for more than five months—to provide the necessary updates to the PSSE model or its RIOO registration, then the decision was unreasonable. In so doing, ERCOT violated 16 TAC § 25.517(d).

Salt Fork has made every effort to improve the facility's performance. The changes it identified and will deploy upon ERCOT approval, as fully shown in the models provided to ERCOT, will address Salt Fork's performance. The ERCOT system faces unprecedented load growth and a looming resource adequacy issue. The public interest is served by allowing Salt Fork to continue serving the ERCOT system.

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[27] *See* PURA 31.001(a).

[28] *See* PURA § 31.001(c).

[29] *See id.* (emphasis added).

VII. QUESTIONS OF FACT REQUIRING AN EVIDENTIARY HEARING

If factual determinations related to the ERCOT conduct complained of have not been provided or established in a manner that meets the procedural standards set forth in the Commission's procedural rules, then the Commission must resolve any factual issues on a de novo basis.[30] The Commission's procedural rules provide that the Commission will grant deference to asserted factual matters only if those facts were determined (1) in a proceeding to which the parties have voluntarily agreed to participate and (2) by an impartial third party under circumstances that are consistent with the guarantees of due process inherent in the Administrative Procedures Act.[31]

Unlike ERCOT, which primarily has discretion to analyze only technical factors, the Commission has authority and the responsibility to consider all factors when determining whether to grant an exemption or extension request. To appropriately develop the record, Salt Fork requests that the Commission order a discovery period to allow Salt Fork to develop the facts related to ERCOT's review and denial of the requests. Ensuring the Commission has access to all relevant information will allow the Commission to have all the information it needs to make a determination of (1) whether ERCOT complied with its obligations under the NOG and Commission rules and (2) whether it is in the public interest to grant Salt Fork an extension and exemption from certain requirements of the NOG.

VIII. PROPOSED PROCEDURAL SCHEDULE

Complainant respectfully requests that the Commission adopt the following proposed procedural schedule for the Complaint:

Event	Date
Complaint Filed	September 30, 2026

[30] *See* 16 TAC § 22.251(m)(1).

[31] *See* 16 TAC § 22.251(m)(3); *see also* Tex. Gov. Code Ch. 2001 (the "APA").

Event	Date
ERCOT Notice	October 12, 2026
ERCOT's Response	October 26, 2026
Motion to Intervene Commission Staff Comments Intervenor Responses	November 20, 2026
Complainant Reply	November 30, 2026
Joint Determination re Evidentiary Hearing/ SOAH referral	December 14, 2026
Joint Proposed Procedural Schedule (Evidentiary Phase) (if necessary)	December 21, 2026
Commission Consideration (if no evidentiary phase)	December 21, 2026 + First Available Open Meeting
SOAH Referral / Procedural Order (Evidentiary Phase) (if factual determinations are required)	December 21, 2026 + As Soon As Practicable
Complainant Direct Testimony	January 11, 2027
Serve Discovery on Complainant's Direct Case	January 21, 2027
ERCOT/Staff/Intervenor Direct and Rebuttal on Complainant	February 1, 2027
Serve Discovery on ERCOT/Staff/Intervenor Direct and Rebuttal on Complainant	February 11, 2027
Complainant Rebuttal Testimony	February 15, 2027
Deadline for Serving Discovery on Complainant Rebuttal Testimony	February 25, 2027
Objections to Pre-filed Testimony and Exhibits	March 1, 2027
Replies to Objections / Exhibit Lists / Witness Lists	March 8, 2027
Hearing on the Merits	March 15–16, 2027
Initial Briefs	April 7, 2027
Reply Briefs	April 21, 2027
Proposal for Decision (PFD) / Proposed Order	June 21, 2027
Exceptions to PFD / Proposed Order	Date set in PFD/Procedural Order
Replies to Exceptions	Date set in PFD/Procedural Order
Commission Decision	PFD exceptions/replies + First Available Open Meeting

This Schedule is consistent with 16 TAC § 22.251.

IX. REQUIRED HISTORICAL INFORMATION

Commission Rule 22.251(r)(4)(D) requires a complainant to include the resource's history of violations or reliability-related ERCOT protocols, operating guides or other binding documents.[32] Salt Fork has not been found by the Commission to have violated a reliability-related ERCOT protocol, operating guide, or other binding document (collectively, "Market Rules"). However, Salt Fork has received requests for information ("RFIs") from ERCOT related to system events on December 13, 2019, March 28, 2022, June 11, 2024, September 23, 2024, April 15, 2025 and June 29, 2026. The RFI related to the September 23, 2024 event resulted in notice from the ERCOT Reliability Monitor that the incident was referred to the Commission for review. As of the date of this complaint, Salt Fork has not received any correspondence from the Commission related to this event.

X. REQUEST FOR ENTRY OF A PROTECTIVE ORDER

Salt Fork is including information with this filing that it considers to be Protected Materials or Highly Sensitive Protected Materials. Salt Fork expects that information submitted may also constitute ERCOT Critical Energy Infrastructure Information. Salt Fork requests that the Administrative Law Judge issue a Protective Order protecting confidential or highly sensitive information that may be produced in this proceeding. A copy of the standard for protective order is attached as Attachment F.

XI. CONCLUSION AND RELIEF REQUESTED

Salt Fork respectfully requests that the Commission (i) reverse ERCOT's denials, (ii) grant Salt Fork an extension for compliance with NOG § 2.9.1.2(3) until January 1, 2027, (ii) grant Salt

[32] *See* 16 TAC § 22.251(r)(4)(D).

Fork exemptions from the requirements of NOG §§ 2.9.1.2(4), (5) and (6), and (iv) provide Salt Fork with such other and further relief as the Commission deems just and appropriate. Alternatively, the Commission should reverse ERCOT's denials and remand the matter back to ERCOT with instructions to substantively evaluate Salt Fork's requests, consistent with 16 TAC § 25.517.

Respectfully submitted,



Dane McKaughan
State Bar No. 24007651
Christopher J. Kirby
State Bar No. 24116620
Fariraishe Muzondo
State Bar No. 24146608
BALCH & BINGHAM, LLP
600 Congress Ave. Suite 2700
Austin, Texas 78701
Telephone: (512) 583-1714
Fax: (512) 744-9399
Email: dmckaughan@balch.com
ckirby@balch.com
fmuzondo@balch.com

ATTORNEYS FOR SALT FORK WIND LLC

ATTACHMENT A

Initial Extension Exemption Requests

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

2025 NOGRR245 IBR RFI

(Market Notice: M-A071024-02)

Resource Entity: SALT FORK WIND LLC (RE)

Resource Name: SALTFORK_UNIT1

DocuSign Instructions:

- Responses are due on or before April 1, 2025
- Only one person can provide responses.
- The document can be forwarded or "Assigned to Someone Else" via the "Other Actions" menu at the top of the DocuSign web page.
- Please contact your ERCOT Account Manager with any additional questions.

Background Information:

The Public Utility Commission of Texas approved NOGRR 245 to be effective October 1, 2024. Accordingly, the revised ride-through requirements in the Nodal Operating Guides (NOG) are currently in effect. ERCOT has developed an intake process for data associated with the requirements established through NOGRR 245 and this DocuSign document implements that process.

NOTE: IF YOU INTEND TO REQUEST AN EXEMPTION OR EXTENSION FOR YOUR RESOURCE, YOU MUST SUBMIT THE REQUESTED INFORMATION BY MIDNIGHT ON APRIL 1, 2025 OR YOU WILL BE FOREVER BARRED FROM REQUESTING AN EXEMPTION OR EXTENSION. *See*, Nodal Operating Guide § 2.11.1(2); § 2.11.2(2) and § 2.12.1(2).

Submitter signature: DocuSigned by: Chase Smith 0DCB77E32063497...

Submitter name: **Chase Smith**

Submitter title: Manager, Market Compliance & Policy

Date: **4/1/2025**

General Comments:

The responses contained in this DocuSign and Attachments reflect Southern Power Company's ("Southern Power") good faith effort to provide the best available information at this time. Southern Power has worked extensively with an engineering consulting firm, inhouse subject matter experts, and our original equipment manufacturer ("OEM") partners to conduct the engineering analysis and to diligently assess the capabilities and limitations of our Inverter-Based Resources. The ability of OEMs to support detailed engineering analysis varies widely between companies and the vintages of equipment. Southern Power's submission of capability and limitation reports, extension requests, and/or notices of intent to request an exemption are the result of Southern Power's technical assessment and the best available information from our OEMs as of this date.

General Information

Pursuant to Public Utility Commission of Texas Electric Substantive Rule § 25.503(f)(10), ERCOT requests the following information to be returned to ERCOT on or before April 1, 2025.

Resource Entity Name:	SALT FORK WIND LLC (RE)
Resource Entity Data Universal Numbering System (DUNS) Number:	0797475733000
Substation Name:	SALTFORK
Resource Name:	SALTFORK_UNIT1
Fuel Type:	Wind
(if fuel type = wind) Wind Turbine Type:	
Does the Resource have a Standard Generation Interconnection Agreement (SGIA) date prior to August 1, 2024?	Yes
Has the Resource implemented any modification covered by ERCOT Planning Guide Section 5.2.1(1)(c) since its original Commercial Operation Date (COD)?	No
Was the most recent Generation Interconnection or Modification (GIM) covered by ERCOT Planning Guide Section 5.2.1(1)(c) initiated prior to August 1, 2024?	

Comments:

Type 3 WTG.

Throughout this document a response of "123456789" indicates that the OEM did not provide a response to this question and/or does not know the answer at this time.

Throughout this document a response of "99999" indicates continuous ride-through capability.

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Frequency Ride-Through



Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

FRT-2. Will the Resource owner implement changes to existing equipment *other than* software, firmware, settings or parameterization changes to increase the Resource's frequency ride-through capability, and if yes, describe those modifications and attach any supporting

No

FRT-3. Based on the Resource's maximum frequency ride-through capability, provide the ride-through time (in seconds) at the specified frequency levels in the table below:



I attest the table above accurately represents the pre-maximization and post-maximization frequency ride-through performance capability of the Resource and all its inter-dependent systems (such as plant controls, turbine controls and/or inverter controls - not just protective relay settings).

Yes

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

FRT-4. Provide a post-maximization complete frequency ride-through capability curve (0-600 seconds) superimposed on the minimum applicable requirement.
NOTE: Submit pdf or image for curve.



[redacted]

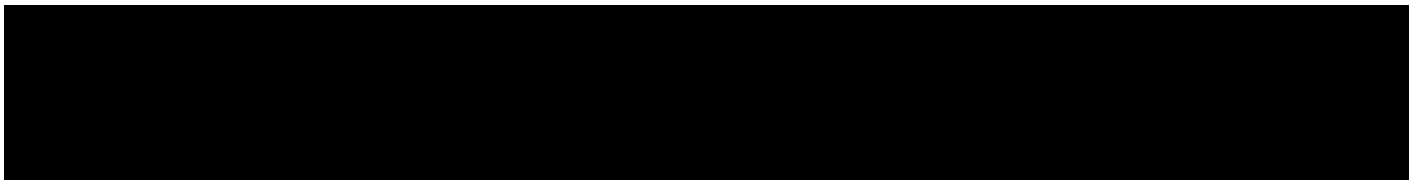
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[redacted]

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Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Voltage Ride-Through



VRT-2. Will the Resource owner implement changes to existing equipment *other than* software, firmware, settings or parameterization changes to increase the Resource's voltage ride-through capability?

No

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

VRT-3. Based on the Resource's maximum voltage ride-through capability, provide the ride-through time (in seconds) at the specified voltage levels in the table below:



I attest the table above accurately represents the Resource's pre-maximization and post-maximization voltage ride-through performance capability and all its inter-dependent systems (such as plant controls, turbine controls and/or inverter controls - not just protective relay settings).

Yes

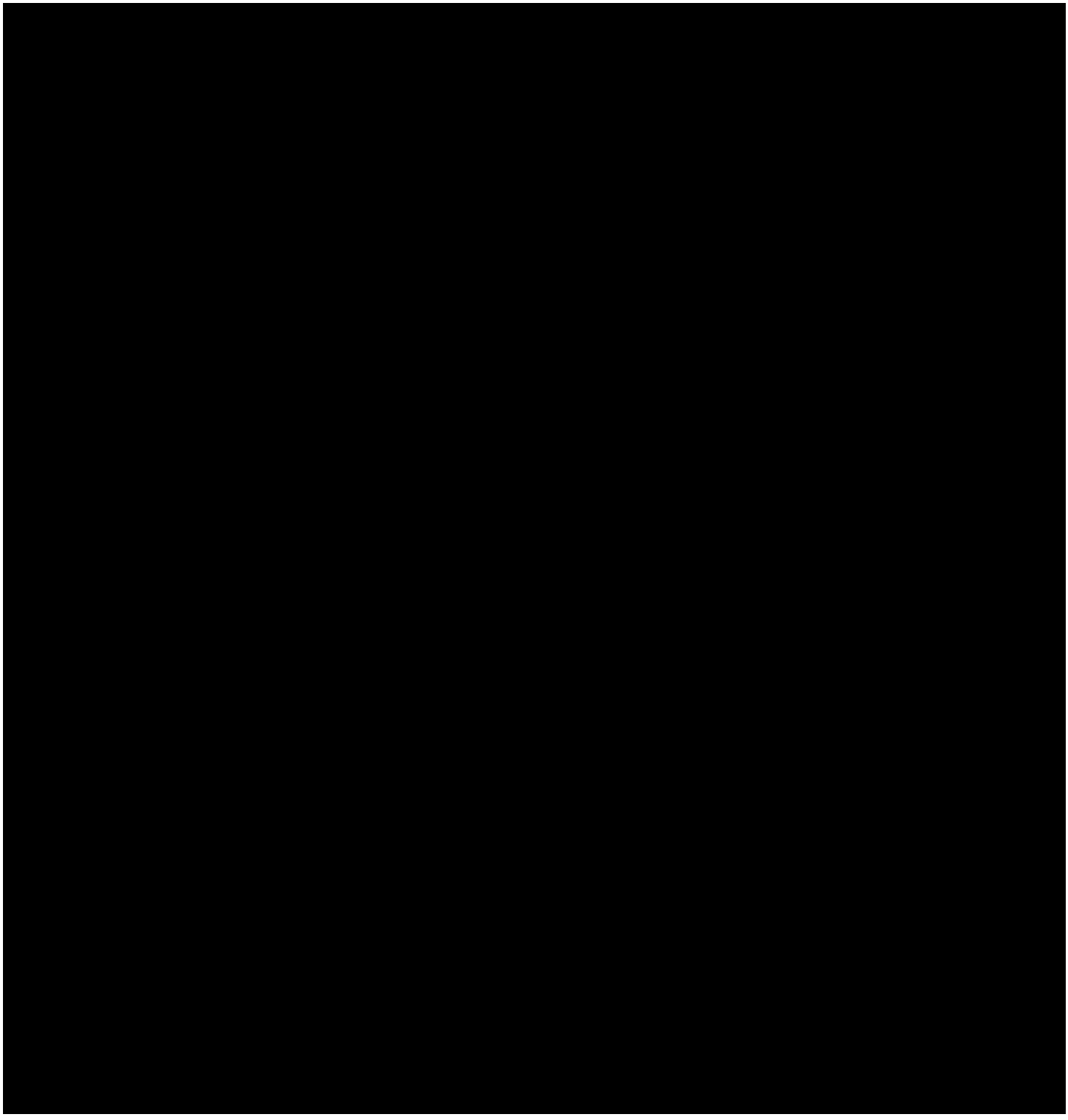
Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

VRT-4. Provide a complete voltage ride-through capability curve (0-10 seconds) superimposed on the minimum applicable requirement. A separate curve may be necessary to show sub-cycle overvoltage capability.
NOTE: Submit pdf or image.





Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F







Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F







[redacted]

IEEE-4. Complete the following IBR Performance Specifications per IEEE 2800-2022 Section 7.2.2.3.5, Table 13 (note that maximizing capability does not imply that actual performance needs to match the fastest response times and settling times):

[redacted]

Provide any additional information you deem relevant.

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

IEEE-5. Does the Resource use current blocking?

Yes

(If Yes) Provide restart time in the following table:

[redacted]

IEEE-6. Provide the Rate of Change of Frequency ride-through capability in the following table (*See* IEEE 2800-2022 Section 7.3.2.3.5):

[redacted]

IEEE-7. Provide the phase angle jump (change) ride-through capability in the following table (*See* IEEE 2800-2022 Section 7.3.2.4):

[redacted]

IEEE-8. Provide consecutive voltage deviations ride-through data (*See*, IEEE 2800-2022 Section 7.2.2.4):

[redacted]

IEEE-9. I attest the Resource owner has collaborated with the interconnecting TSP(s) to ensure any auto-reclosing settings are coordinated with the Resource multiple fault ride-through capability to not result in unnecessary tripping of the Resource.

No



Extension Request

EXT-1. Are you requesting an extension for the Resource under Nodal Operating Guide Sections 2.6.2.1(7); 2.9.1(6); 2.9.1.1(8) or (9); or 2.9.1.2(9)?



What is the Resource's Commercial Operations Date? 12/01/2016

For each section you are requesting an extension, provide the information set forth in NOG Sections 2.11.1 (for frequency ride-through extensions) or 2.11.2 (for voltage ride-through extensions).



Provide the information set forth in NOG Section 2.12.1.2 as applicable for the extension requested. Please see attached "2.12.1.2 Extension Attachment_SALTFORK" document.

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Exemption Request

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

EXP-2. Do you intend to request an exemption pursuant to Nodal Operating Guide Section 2.9.1.2(9) for the Resource?



Comments:

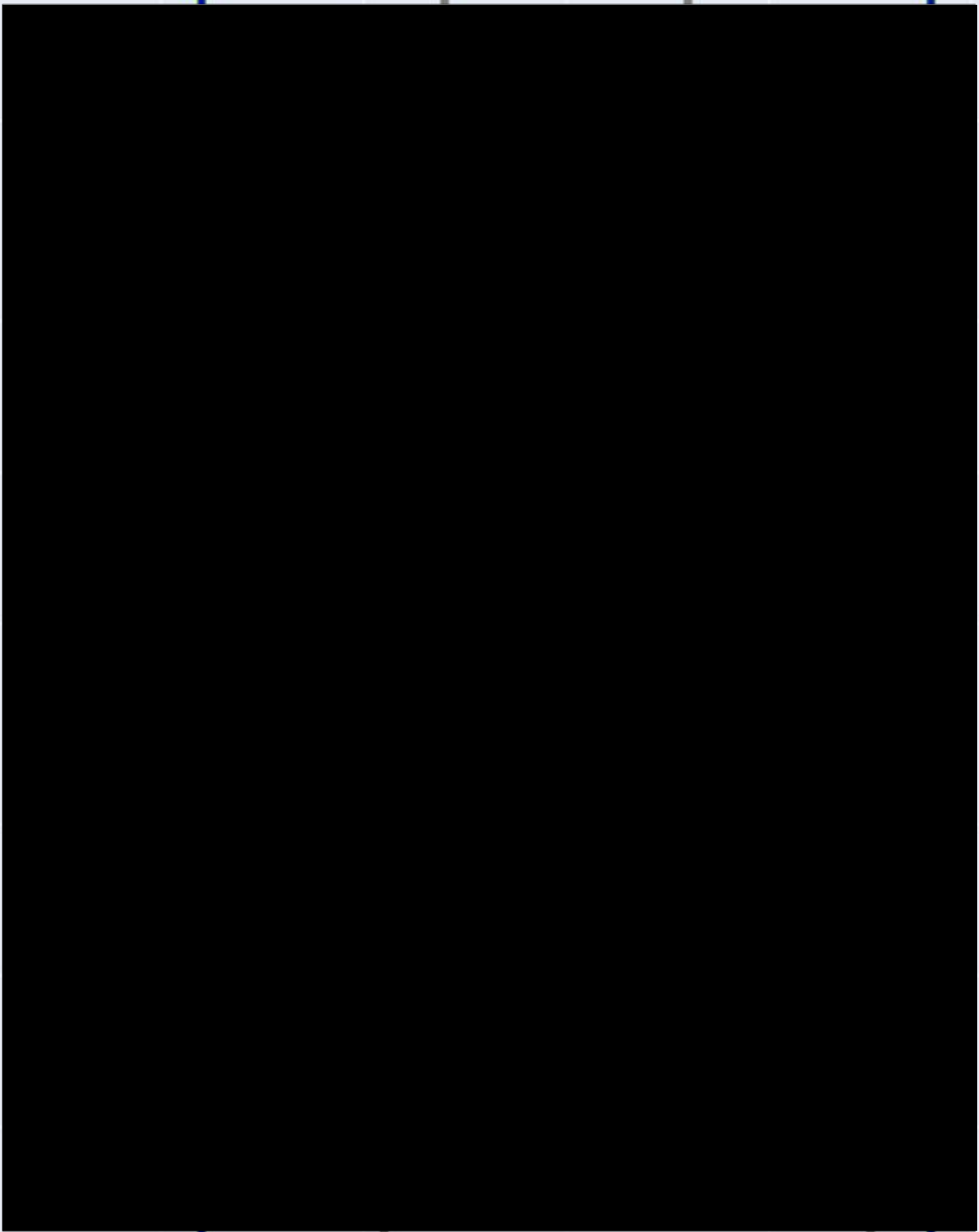
See attached IVRTCR.

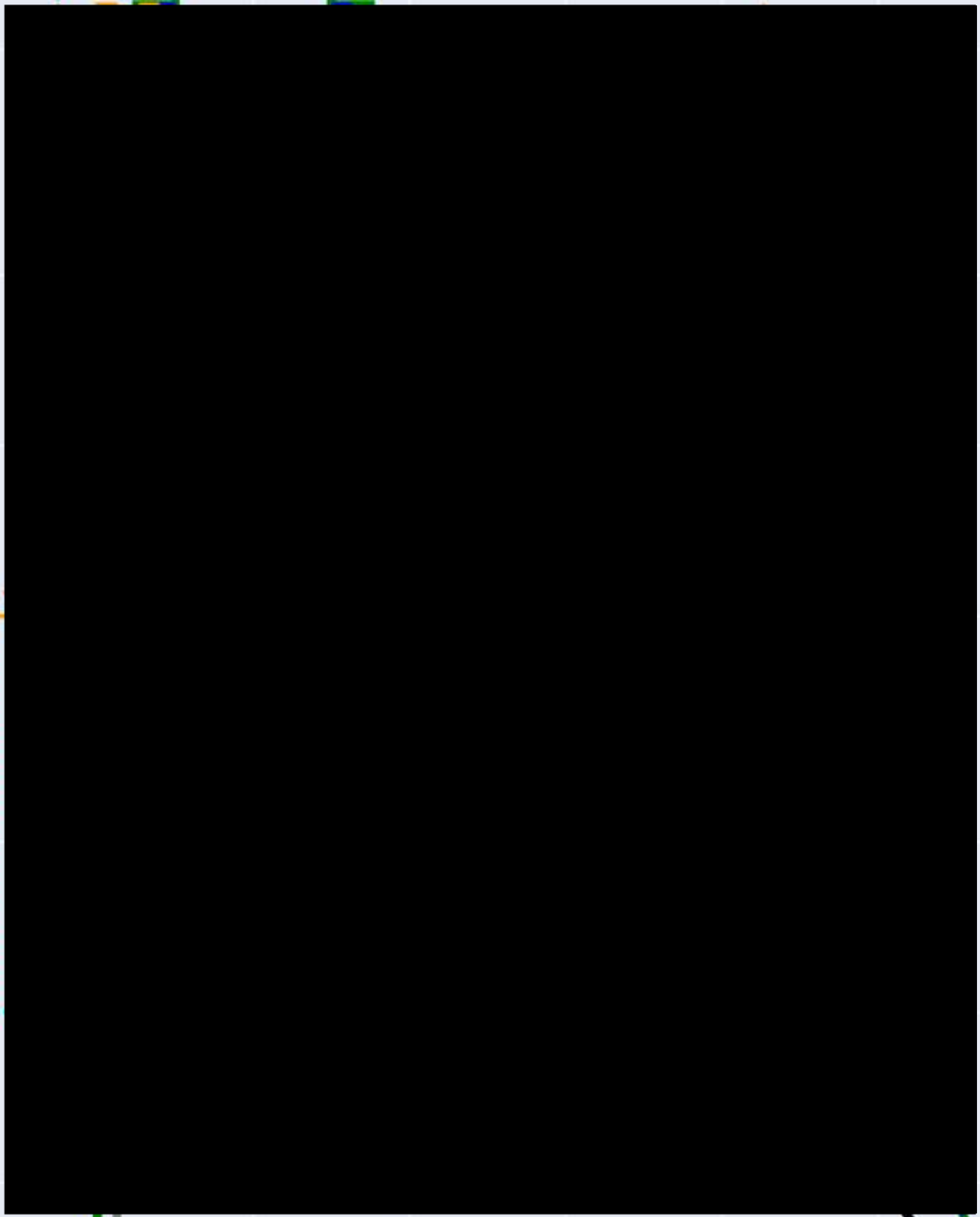
[redacted]

General Comments or Attachments:

See attached Attestation signed by the President of Southern Power Company.







Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Southern Power's Commitment and Actions Regarding ERCOT Nodal Operating Guide Revision Request 245 Compliance

To Whom It May Concern,

I hereby attest on behalf of Southern Power Company ("Southern Power") to the following statements:

Commitment to Compliance

Southern Power, as the wholesale subsidiary of Southern Company, adheres to the highest standards of ethics and compliance. One of our core company values is "Act with Integrity", which helps establish the foundational behaviors that guide how we work and, more specifically, how we approach our compliance obligations. Southern Power is committed to fully adhering to the requirements set forth in NOGRR 245 to the extent of the technical capabilities of its Inverter-Based Resources ("IBRs"). We recognize the importance of compliance to support the reliable operation of the ERCOT grid and affirm our dedication to meeting all reporting and performance requirements in the rule to the best of our IBRs' technical capabilities.

Rigorous Engineering Analysis and Collaboration with OEM Partners

Southern Power has diligently undertaken comprehensive engineering analysis, utilizing in-house technical engineering expertise and external contracted engineering services. We began these efforts before NOGRR 245 was finalized and have been intensely focused since the rule details became known and the April 1, 2025 deadline was set.

Southern Power has worked extensively with our original equipment manufacturer ("OEM") partners to complement our own engineering analysis and to more exhaustively assess the capabilities and limitations of our IBRs. The ability of OEMs to support detailed engineering analysis varies widely between companies and the vintages of equipment. Southern Power has gone to great lengths, including designing a customized data collection template, to facilitate information gathering from our OEM partners. Through this collaboration, we gained a more comprehensive understanding of the capabilities and limitations of our IBRs, identified opportunities for software and parameter-based performance maximization, and identified narrow technical extension and exemption needs. Southern Power's submissions of capability and limitation reports and extension requests and/or notices of intent to request an exemption are a result of the best available information from our OEMs as of this date.

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Ongoing Efforts and Commitment

Southern Power is committed to performing ongoing engineering analysis and collaborating with our OEM partners to ensure the best possible performance of our IBRs within equipment limitations. We are dedicated to implementing the identified software-based maximization modifications as soon as reasonably practicable after they become available and have ERCOT final approval. Southern Power is also committed to ongoing communication and collaboration with ERCOT staff and is available to answer any questions relating to our initial submissions.

Date: March 27, 2025

Sincerely,

Robin Boren
President
Southern Power

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Initial Voltage Ride-Through Capability Report

Resource Entity or Interconnecting Entity Name: Salt Fork Wind LLC

(a) **Resource Entity or Interconnecting Entity Data Universal Numbering System (DUNS) Number:** 0797475733000

(b) **IBR/WGR Site Name:** Salt Fork Wind (SALTFORK)

(c) **IBR/WGR Unit Name(s):** saltfork_unit1

[redacted]

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

(f) Known voltage ride-through limitations of the IBR, Type 1 WGR or Type 2 WGR as compared to the requirements in Sections 2.9.1.2(1)-(7):

[redacted]

(g) A detailed description of the technical limitation preventing the Resource from meeting the ride-through requirement(s), including a letter signed by an officer or executive of the original equipment manufacturer (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm verifying the limitations:

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

[redacted]

(i) If a Resource Entity cannot address the entire plant design with a letter required in Section 2.11.1(1)(g), the Resource Entity must supplement a letter from the original equipment manufacturer for its equipment (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm by providing a notarized attestation sworn to by the Resource Entity's highest-ranking representative, official, or officer with binding authority over the entity attesting to the efforts made to obtain the letter, why those efforts failed, and which parts of the plant design is attested to. The attestation shall also include a detailed description of the technical limitation(s) preventing the Resource from meeting the ride-through requirement, including any information on technical limitations on all or part of the Resource which the Resource Entity is able to obtain from original equipment manufacturers or an engineering consulting firm under Section (g) above.

[redacted]

(h) Available software, firmware, settings, or parameterization modifications the Resource Entity will implement to maximize the voltage ride-through capability of the IBR, Type 1 WGR or Type 2 WGR to approach or meet the voltage ride-through requirements in Sections 2.9.1.2(1)-(7) within known equipment limitations, to the greatest extent possible:

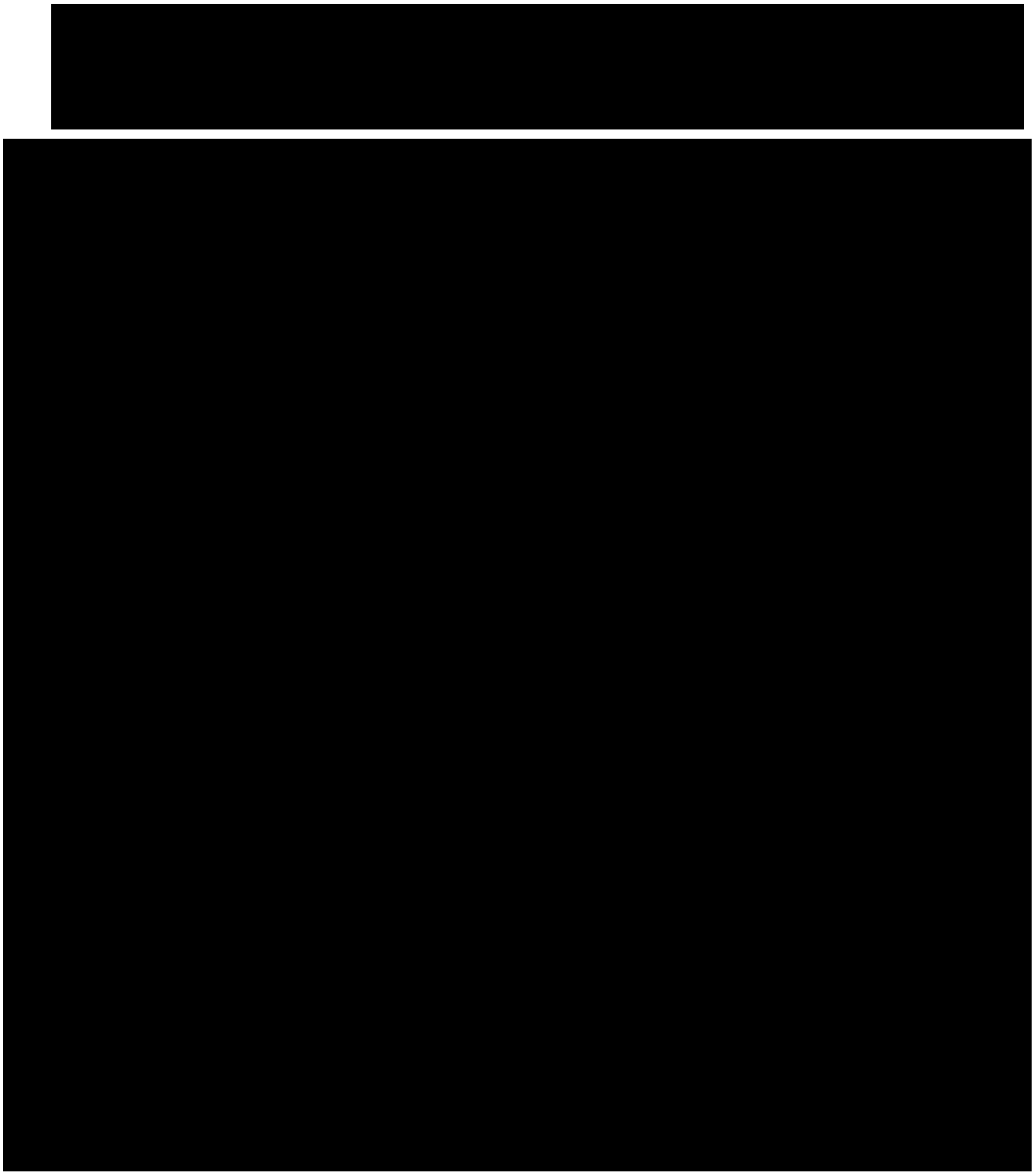
[redacted]

(i) To the extent the Resource Entity chooses to implement changes to existing equipment other than software, firmware, settings or parameterization modifications that increase the voltage ride-through capability, identification of any such equipment modifications:

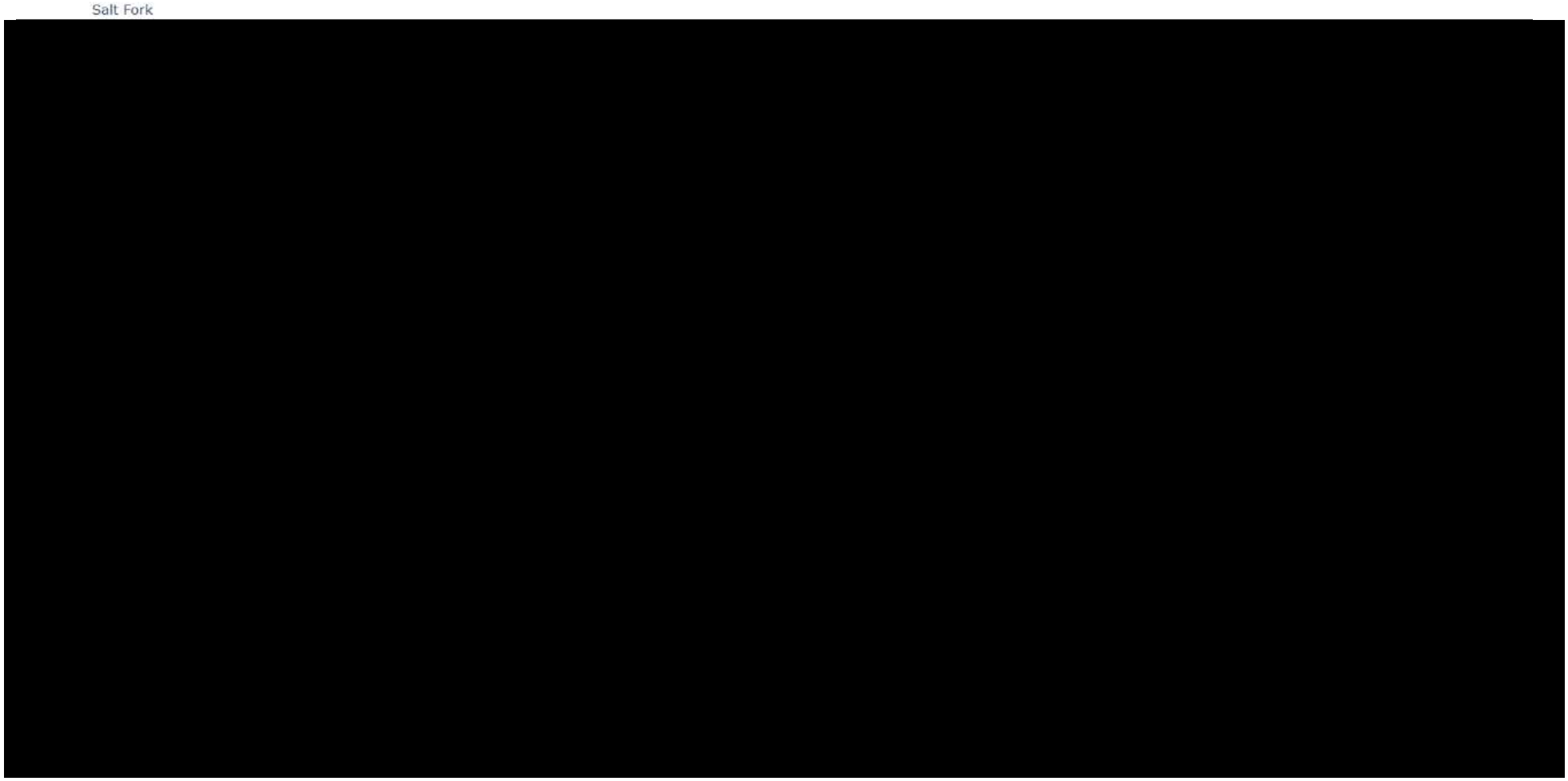
[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

(j) Expected post-modification Resource capability in a format similar to the table in Section 2.9.1.2(1) and documentation of any expected remaining limitation(s) following implementation of such modifications:



Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F



Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

(k) A schedule for implementing the modification(s):

[redacted]

(l) A model accurately representing expected performance reflecting all technical limitations, or a statement that there are no new models available other than what is currently submitted to ERCOT that already reflect all technical limitations in voltage ride-through capability:

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

(m) A description of any limitation that cannot be accurately represented in a model:









Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Attachment 1: Detailed Description of Technical Limitation

Resource Entity Name: Salt Fork Wind LLC
Resource Name (Unit): saltfork_unit1

Detailed Description of the Technical Limitation:

Applicable Nodal Operating Guide Requirement(s):
2.9.1.2(4), 2.9.1.2(5), 2.9.1.2(6), 2.9.1(8)

Description of Technical Limitation:

[redacted]

Need for Exemption:

[redacted]

Need for Extension:

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Request for Extension – Salt Fork Wind LLC

Required Information pursuant to Nodal Operating Guide Section 2.12.1.2 (2):

(a) **Requesting Entity Name:** SALT FORK WIND LLC

(b) **Requesting Entity DUNS Number:** 0797475733000

(c) **IBR/WGR Site Name:** Salt Fork Wind (SALTFORK)

(d) **IBR/WGR Unit Name(s):** SALTFORK_UNIT1

(e) **Nodal Operating Guide Section(s) under which the extension is requested:**

[redacted]

(f) **A detailed description of the grounds for the extension and the basis for each request:**

[redacted]

(g) **Documentation from the equipment manufacturer describing any known limitations associated with the extension request, a description of proposed modifications, and a schedule for implementing modifications:**

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

[redacted]

(h) **Other information specified in this Section.** None.

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Initial Voltage Ride-Through Capability Report

Resource Entity or Interconnecting Entity Name: Salt Fork Wind LLC

(a) **Resource Entity or Interconnecting Entity Data Universal Numbering System (DUNS) Number:** 0797475733000

(b) **IBR/WGR Site Name:** Salt Fork Wind (SALTFORK)

(c) **IBR/WGR Unit Name(s):** saltfork_unit1

(d) **Nodal Operating Guide Section(s) with which the Resource cannot comply:**

[redacted]

(e) Current voltage ride-through capability in a format similar to the table in Section 2.9.1.2(1):



Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

(f) Known voltage ride-through limitations of the IBR, Type 1 WGR or Type 2 WGR as compared to the requirements in Sections 2.9.1.2(1)-(7):

[redacted]

(g) A detailed description of the technical limitation preventing the Resource from meeting the ride-through requirement(s), including a letter signed by an officer or executive of the original equipment manufacturer (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm verifying the limitations:

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

[redacted]

(i) If a Resource Entity cannot address the entire plant design with a letter required in Section 2.11.1(1)(g), the Resource Entity must supplement a letter from the original equipment manufacturer for its equipment (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm by providing a notarized attestation sworn to by the Resource Entity's highest-ranking representative, official, or officer with binding authority over the entity attesting to the efforts made to obtain the letter, why those efforts failed, and which parts of the plant design is attested to. The attestation shall also include a detailed description of the technical limitation(s) preventing the Resource from meeting the ride-through requirement, including any information on technical limitations on all or part of the Resource which the Resource Entity is able to obtain from original equipment manufacturers or an engineering consulting firm under Section (g) above.

[redacted]

(h) Available software, firmware, settings, or parameterization modifications the Resource Entity will implement to maximize the voltage ride-through capability of the IBR, Type 1 WGR or Type 2 WGR to approach or meet the voltage ride-through requirements in Sections 2.9.1.2(1)-(7) within known equipment limitations, to the greatest extent possible:

[redacted]

(i) To the extent the Resource Entity chooses to implement changes to existing equipment other than software, firmware, settings or parameterization modifications that increase the voltage ride-through capability, identification of any such equipment modifications:

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

(j) Expected post-modification Resource capability in a format similar to the table in Section 2.9.1.2(1) and documentation of any expected remaining limitation(s) following implementation of such modifications:

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Salt Fork



Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

(k) A schedule for implementing the modification(s):

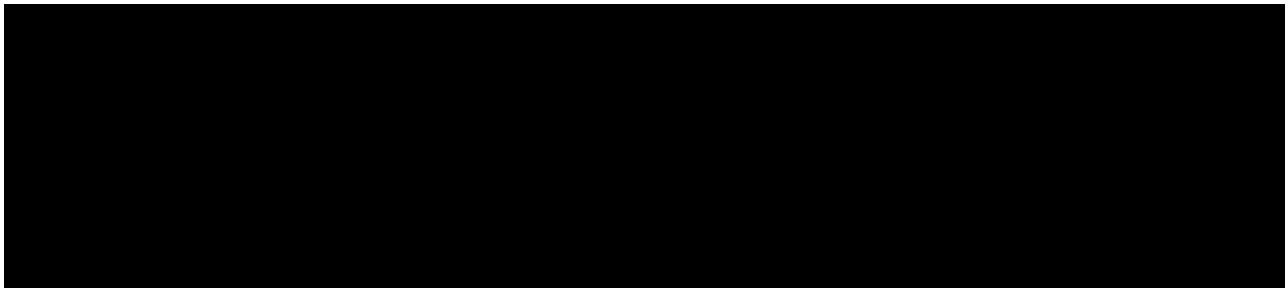
[redacted]

(l) A model accurately representing expected performance reflecting all technical limitations, or a statement that there are no new models available other than what is currently submitted to ERCOT that already reflect all technical limitations in voltage ride-through capability:

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

(m) A description of any limitation that cannot be accurately represented in a model:



Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F



Subject: NOGRR 245 Verification of Technical Limitation – Need for Exemption or Extension



Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Attachment 1: Detailed Description of Technical Limitation

Resource Entity Name: Salt Fork Wind LLC
Resource Name (Unit): saltfork_unit1

Detailed Description of the Technical Limitation:

Applicable Nodal Operating Guide Requirement(s):

[redacted]

Description of Technical Limitation:

[redacted]

Need for Exemption:

[redacted]

Need for Extension:

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Initial Voltage Ride-Through Capability Report

Resource Entity or Interconnecting Entity Name: Salt Fork Wind LLC

(a) **Resource Entity or Interconnecting Entity Data Universal Numbering System (DUNS) Number:** 0797475733000

(b) **IBR/WGR Site Name:** Salt Fork Wind (SALTFORK)

(c) **IBR/WGR Unit Name(s):** saltfork_unit1

(d) **Nodal Operating Guide Section(s) with which the Resource cannot comply:**

[redacted]

(e) Current voltage ride-through capability in a format similar to the table in Section 2.9.1.2(1):

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

(f) Known voltage ride-through limitations of the IBR, Type 1 WGR or Type 2 WGR as compared to the requirements in Sections 2.9.1.2(1)-(7):

[redacted]

(g) A detailed description of the technical limitation preventing the Resource from meeting the ride-through requirement(s), including a letter signed by an officer or executive of the original equipment manufacturer (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm verifying the limitations:

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

[redacted]

(i) If a Resource Entity cannot address the entire plant design with a letter required in Section 2.11.1(1)(g), the Resource Entity must supplement a letter from the original equipment manufacturer for its equipment (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm by providing a notarized attestation sworn to by the Resource Entity's highest-ranking representative, official, or officer with binding authority over the entity attesting to the efforts made to obtain the letter, why those efforts failed, and which parts of the plant design is attested to. The attestation shall also include a detailed description of the technical limitation(s) preventing the Resource from meeting the ride-through requirement, including any information on technical limitations on all or part of the Resource which the Resource Entity is able to obtain from original equipment manufacturers or an engineering consulting firm under Section (g) above.

[redacted]

(h) Available software, firmware, settings, or parameterization modifications the Resource Entity will implement to maximize the voltage ride-through capability of the IBR, Type 1 WGR or Type 2 WGR to approach or meet the voltage ride-through requirements in Sections 2.9.1.2(1)-(7) within known equipment limitations, to the greatest extent possible:

[redacted]

(i) To the extent the Resource Entity chooses to implement changes to existing equipment other than software, firmware, settings or parameterization modifications that increase the voltage ride-through capability, identification of any such equipment modifications:

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

(j) Expected post-modification Resource capability in a format similar to the table in Section 2.9.1.2(1) and documentation of any expected remaining limitation(s) following implementation of such modifications:

[redacted]

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Salt Fork



Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

(k) A schedule for implementing the modification(s):

[redacted]

(l) A model accurately representing expected performance reflecting all technical limitations, or a statement that there are no new models available other than what is currently submitted to ERCOT that already reflect all technical limitations in voltage ride-through capability:

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

(m) A description of any limitation that cannot be accurately represented in a model:



Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F



Subject: NOGRR 245 Verification of Technical Limitation – Need for Exemption or Extension



Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Attachment 1: Detailed Description of Technical Limitation

Resource Entity Name: Salt Fork Wind LLC
Resource Name (Unit): saltfork_unit1

Detailed Description of the Technical Limitation:

Applicable Nodal Operating Guide Requirement(s):

[redacted]

Description of Technical Limitation:

[redacted]

Need for Exemption:

[redacted]

Need for Extension:

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Initial Voltage Ride-Through Capability Report

Resource Entity or Interconnecting Entity Name: Salt Fork Wind LLC

(a) **Resource Entity or Interconnecting Entity Data Universal Numbering System (DUNS) Number:** 0797475733000

(b) **IBR/WGR Site Name:** Salt Fork Wind (SALTFORK)

(c) **IBR/WGR Unit Name(s):** saltfork_unit1

(d) **Nodal Operating Guide Section(s) with which the Resource cannot comply:**

[redacted]

(e) Current voltage ride-through capability in a format similar to the table in Section 2.9.1.2(1):

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

(f) Known voltage ride-through limitations of the IBR, Type 1 WGR or Type 2 WGR as compared to the requirements in Sections 2.9.1.2(1)-(7):

[redacted]

(g) A detailed description of the technical limitation preventing the Resource from meeting the ride-through requirement(s), including a letter signed by an officer or executive of the original equipment manufacturer (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm verifying the limitations:

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

[redacted]

(i) If a Resource Entity cannot address the entire plant design with a letter required in Section 2.11.1(1)(g), the Resource Entity must supplement a letter from the original equipment manufacturer for its equipment (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm by providing a notarized attestation sworn to by the Resource Entity's highest-ranking representative, official, or officer with binding authority over the entity attesting to the efforts made to obtain the letter, why those efforts failed, and which parts of the plant design is attested to. The attestation shall also include a detailed description of the technical limitation(s) preventing the Resource from meeting the ride-through requirement, including any information on technical limitations on all or part of the Resource which the Resource Entity is able to obtain from original equipment manufacturers or an engineering consulting firm under Section (g) above.

[redacted]

(h) Available software, firmware, settings, or parameterization modifications the Resource Entity will implement to maximize the voltage ride-through capability of the IBR, Type 1 WGR or Type 2 WGR to approach or meet the voltage ride-through requirements in Sections 2.9.1.2(1)-(7) within known equipment limitations, to the greatest extent possible:

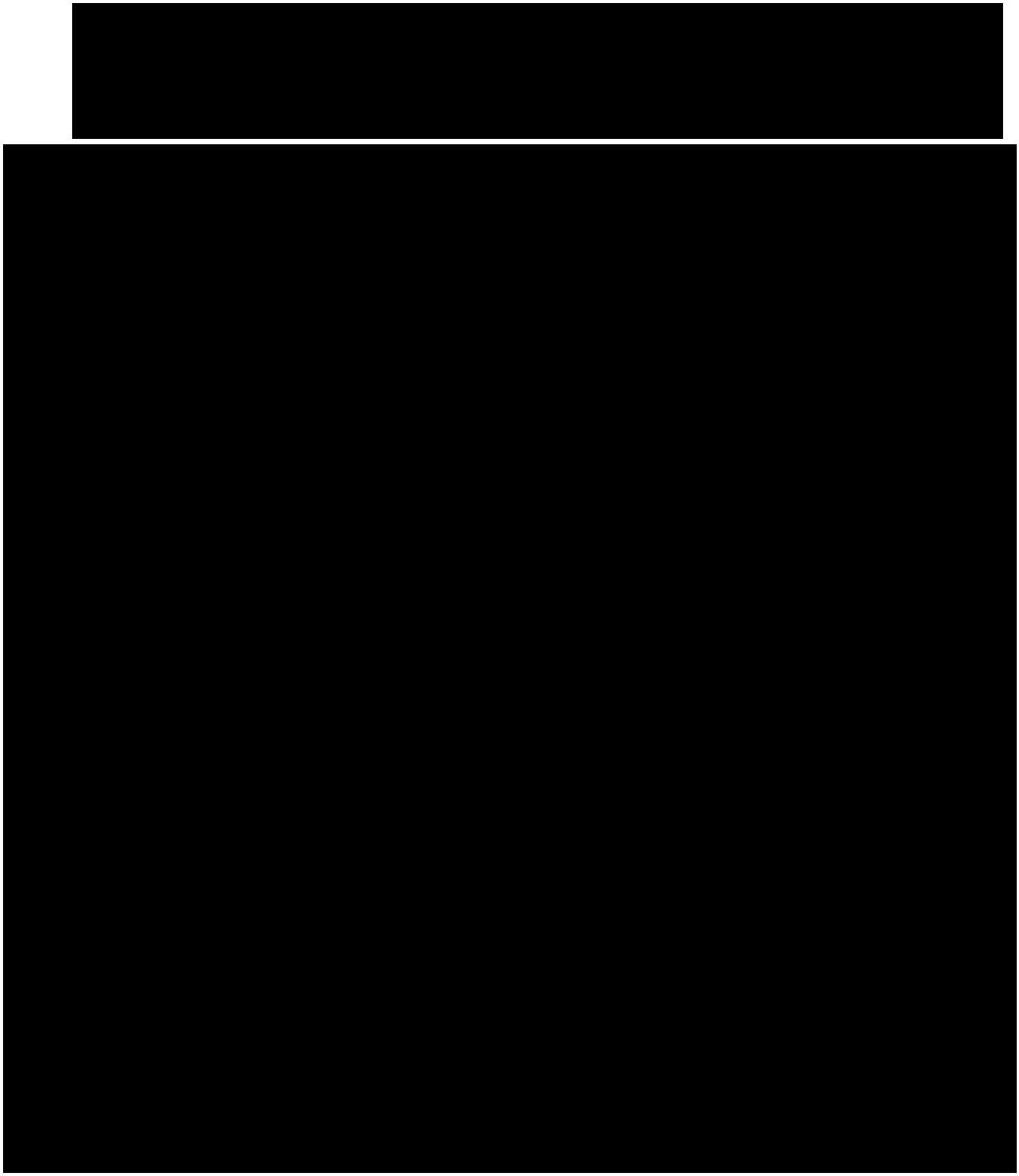
[redacted]

(i) To the extent the Resource Entity chooses to implement changes to existing equipment other than software, firmware, settings or parameterization modifications that increase the voltage ride-through capability, identification of any such equipment modifications:

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

(j) Expected post-modification Resource capability in a format similar to the table in Section 2.9.1.2(1) and documentation of any expected remaining limitation(s) following implementation of such modifications:



Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Salt Fork



Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

(k) A schedule for implementing the modification(s):

[redacted]

(l) A model accurately representing expected performance reflecting all technical limitations, or a statement that there are no new models available other than what is currently submitted to ERCOT that already reflect all technical limitations in voltage ride-through capability:

[redacted]

Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

(m) A description of any limitation that cannot be accurately represented in a model:



Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F



Subject: NOGRR 245 Verification of Technical Limitation – Need for Exemption or Extension



Docusign Envelope ID: CAF8ED60-284D-4D4B-B165-E40ADEB1AF3F

Attachment 1: Detailed Description of Technical Limitation

Resource Entity Name: Salt Fork Wind LLC
Resource Name (Unit): saltfork_unit1

Detailed Description of the Technical Limitation:

Applicable Nodal Operating Guide Requirement(s):

[redacted]

Description of Technical Limitation:

[redacted]

Need for Exemption:

[redacted]

Need for Extension:

[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

2025 NOGRR245 IBR RFI

(Market Notice: M-A071024-02)

Resource Entity: SALT FORK WIND LLC (RE)

Resource Name: SALTFORK_UNIT2

DocuSign Instructions:

- Responses are due on or before April 1, 2025
- Only one person can provide responses.
- The document can be forwarded or "Assigned to Someone Else" via the "Other Actions" menu at the top of the DocuSign web page.
- Please contact your ERCOT Account Manager with any additional questions.

Background Information:

The Public Utility Commission of Texas approved NOGRR 245 to be effective October 1, 2024. Accordingly, the revised ride-through requirements in the Nodal Operating Guides (NOG) are currently in effect. ERCOT has developed an intake process for data associated with the requirements established through NOGRR 245 and this DocuSign document implements that process.

NOTE: IF YOU INTEND TO REQUEST AN EXEMPTION OR EXTENSION FOR YOUR RESOURCE, YOU MUST SUBMIT THE REQUESTED INFORMATION BY MIDNIGHT ON APRIL 1, 2025 OR YOU WILL BE FOREVER BARRED FROM REQUESTING AN EXEMPTION OR EXTENSION. *See*, Nodal Operating Guide § 2.11.1(2); § 2.11.2(2) and § 2.12.1(2).

Submitter signature: Signed by: Kristin Cook 0DCB77E32063497...

Submitter name: **Kristin Cook**

Submitter title: Sr. Analyst, Market Compliance & Policy

Date: **4/1/2025**

General Comments:

The responses contained in this DocuSign and Attachments reflect Southern Power Company's ("Southern Power") good faith effort to provide the best available information at this time. Southern Power has worked extensively with an engineering consulting firm, inhouse subject matter experts, and our original equipment manufacturer ("OEM") partners to conduct the engineering analysis and to diligently assess the capabilities and limitations of our Inverter-Based Resources. The ability of OEMs to support detailed engineering analysis varies widely between companies and the vintages of equipment. Southern Power's submission of capability and limitation reports, extension requests, and/or notices of intent to request an exemption are the result of Southern Power's technical assessment and the best available information from our OEMs as of this date.

General Information

Pursuant to Public Utility Commission of Texas Electric Substantive Rule § 25.503(f)(10), ERCOT requests the following information to be returned to ERCOT on or before April 1, 2025.

Resource Entity Name:	SALT FORK WIND LLC (RE)
Resource Entity Data Universal Numbering System (DUNS) Number:	0797475733000
Substation Name:	SALTFORK
Resource Name:	SALTFORK_UNIT2
Fuel Type:	Wind
(if fuel type = wind) Wind Turbine Type:	
Does the Resource have a Standard Generation Interconnection Agreement (SGIA) date prior to August 1, 2024?	Yes
Has the Resource implemented any modification covered by ERCOT Planning Guide Section 5.2.1(1)(c) since its original Commercial Operation Date (COD)?	No
Was the most recent Generation Interconnection or Modification (GIM) covered by ERCOT Planning Guide Section 5.2.1(1)(c) initiated prior to August 1, 2024?	

Comments:

Type 3 WTG.

Throughout this document a response of "123456789" indicates that the OEM did not provide a response to this question and/or does not know the answer at this time.

Throughout this document a response of "99999" indicates continuous ride-through capability.

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

Frequency Ride-Through

FRT-1. Is the Resource frequency ride-through capability (i.e., software, settings, firmware, and parameterization) set to the maximum level the equipment allows in accordance with Good Utility Practice? Yes

As of what date did the Resource maximize its frequency ride-through capability?:

[redacted]

FRT-2. Will the Resource owner implement changes to existing equipment *other than* software, firmware, settings or parameterization changes to increase the Resource's frequency ride-through capability, and if yes, describe those modifications and attach any supporting

[redacted]

FRT-3. Based on the Resource's maximum frequency ride-through capability, provide the ride-through time (in seconds) at the specified frequency levels in the table below:

[redacted]

I attest the table above accurately represents the pre-maximization and post-maximization frequency ride-through performance capability of the Resource and all its inter-dependent systems (such as plant controls, turbine controls and/or inverter controls - not just protective relay settings).

[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

FRT-4. Provide a post-maximization complete frequency ride-through capability curve (0-600 seconds) superimposed on the minimum applicable requirement.
NOTE: Submit pdf or image for curve.

FRT-5. Can the Resource meet or exceed the minimum frequency ride-through requirements in Nodal Operating Guide Sections 2.6.2.1(1) - (5)?

[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

FRT-6. Can the Resource currently remain reliably connected to the ERCOT grid as set forth in NOG Section 2.6.2.1.1(2)?

[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

FRT-7. I attest the Resource owner has made or caused to be made all software, settings, firmware, and parameterization changes (which includes memory upgrades to accommodate such changes that do not involve modifying other Resource equipment or components) to maximize the performance of the Resource's protection systems, controls, and other plant equipment (within equipment limitations and in accordance with Good Utility Practice) to exceed or achieve as close as reasonably possible, the capability and performance requirements set forth in Nodal Operating Guide Section 2.6.2.1.

[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

FRT-8. If already submitted, I attest all dynamic models including PSSE, TSAT, and PSCAD for this Resource are accurate and reflect actual frequency ride-through capability.

[redacted]

FRT-9. If not already submitted, I attest all dynamic models including PSSE, TSAT, and PSCAD for this Resource will be accurate and reflect actual frequency ride-through capability when submitted.

[redacted]

Voltage Ride-Through

VRT-1. Is the Resource voltage ride-through capability (i.e., software, settings, firmware, and parameterization) set to the maximum level the equipment allows in accordance with Good Utility Practice?

[redacted]

If the Resource has a SGIA dated before 8/1/24, does the Resource meet the voltage ride-through requirements in NOG Section 2.9.1.2?:

[redacted]

Will the Resource maximize its voltage ride-through capability on or before 12/31/25 or its Commercial Operations Date (if not yet commercial)?

[redacted]

VRT-2. Will the Resource owner implement changes to existing equipment *other than* software, firmware, settings or parameterization changes to increase the Resource's voltage ride-through capability?

[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

VRT-3. Based on the Resource's maximum voltage ride-through capability, provide the ride-through time (in seconds) at the specified voltage levels in the table below:



I attest the table above accurately represents the Resource's pre-maximization and post-maximization voltage ride-through performance capability and all its inter-dependent systems (such as plant controls, turbine controls and/or inverter controls - not just protective relay settings).

Yes

VRT-4. Provide a complete voltage ride-through capability curve (0-10 seconds) superimposed on the minimum applicable requirement. A separate curve may be necessary to show sub-cycle overvoltage capability.
NOTE: Submit pdf or image.

VRT-5. Can the Resource meet or exceed all the voltage ride-through requirements in Nodal Operating Guide Sections 2.9.1.1(1) – (7)?

[redacted]

By the latter of 12/31/25 or its Commercial Operations Date, will the Resource meet or exceed the voltage ride-through requirements in Nodal Operating Guide Sections 2.9.1.1(1) – (7)?

[redacted]

Does the Resource meet or exceed the voltage ride-through requirements in NOG Sections 2.9.1.2(1) – (7)?

[redacted]

Submit the Initial Voltage Ride-Through Capability Report required in NOG Section NOG 2.11.2(1).

See attached IVRTCR.

By the latter of 12/31/25 or its Commercial Operations Date, will the Resource meet or exceed the voltage ride-through requirements in NOG Sections 2.9.1.2(1) – (7)?

[redacted]

Does the Resource meet the voltage ride-through requirements in effect on May 1, 2024 at this time?

[redacted]

VRT-6. Do all instantaneous over-current or over-voltage protection systems installed and activated to trip the Resource use filtered quantities or time delays sufficient to prevent misoperation while providing the desired equipment protection?

[redacted]

VRT-7. Does all alternating current instantaneous over-voltage protection that could disrupt power output use a measurement period of at least one cycle (of fundamental frequency)?

[redacted]

VRT-8. Does the Resource use Rate of Change of Frequency measurement quantities to reduce power output or trip offline during fault conditions and subsequent recovery to a steady-state operating point within the applicable ride-through profiles in NOG Section 2.9.1.1(1) or 2.9.1.2(1)?

[redacted]

VRT-9. Does the Resource use phase angle jump measurement quantities to reduce power output or trip offline during fault conditions and subsequent recovery to a steady-state operating point within the applicable ride-through profiles in NOG Section 2.9.1.1(1) or 2.9.1.2(1)?

[redacted]

VRT-10. I attest the Resource owner has made or caused to be made all software, settings, firmware, and parameterization (which includes memory upgrades to accommodate such changes that do not involve modifying other Resource equipment or components), and other changes to maximize the performance of the Resource's protection systems, controls, and other plant equipment (within equipment limitations and in accordance with Good Utility Practice) to exceed, or achieve as close as reasonably possible, the capability and performance in Nodal Operating Guide Sections 2.9.1, 2.9.1.1 or 2.9.1.2, as applicable

[redacted]

I attest the Resource owner will make or cause to be made all software, settings, firmware, and parameterization (which includes memory upgrades to accommodate such changes that do not involve modifying other Resource equipment or components), and other changes to maximize the performance of the Resource's protection systems, controls, and other plant equipment (within equipment limitations and in accordance with Good Utility Practice) to exceed, or achieve as close as reasonably possible, the capability and performance in Nodal Operating Guide Sections 2.9.1, 2.9.1.1 or 2.9.1.2, as applicable.

[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

VRT-11. If already submitted, I attest all dynamic models including PSSE, TSAT, and PSCAD for this Resource are accurate and reflect actual post-maximization voltage ride-through capability.

[redacted]

Explain why the models are not accurate or do not reflect actual voltage ride-through capability:

[redacted]

VRT-12. If not already submitted, I attest all dynamic models including PSSE, TSAT, and PSCAD for this Resource will be accurate and reflect actual post-maximization voltage ride-through capability when submitted.

[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

IEEE 2800-2022

IEEE-1. Has the Resource owner maximized the Resource's capabilities with respect to the requirements in IEEE 2800-2022 Sections 5, 7, and 9 to the fullest extent the equipment allows in accordance with Good Utility Practice?

[redacted]

By the latter of 12/31/25 or its Commercial Operations Date, will the Resource maximize it capabilities with respect to the requirements in IEEE 2800-2022 Sections 5, 7, and 9 to the fullest extent the equipment allows in accordance with Good Utility Practice?

[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

IEEE-2. Can the Resource meet or exceed the capability and performance set forth in sections 5, 7 and 9 of the IEEE 2800-2022 standard?

[redacted]

Describe which parts of IEEE 2800-2022 Sections 5, 7 and 9 the Resource can meet (if any) and which it cannot meet.

[redacted]

By the latter of 12/31/25 or its Commercial Operations Date, will the Resource meet or exceed the capability and performance set forth in sections 5, 7 and 9 of the IEEE 2800-2022 standard?

[redacted]

Describe which parts of IEEE 2800-2022 Sections 5, 7 and 9 the Resource will be able to meet (if any) and which it will not be able to meet.

Resource can meet:

[redacted]

Resource cannot meet:

[redacted]

The ability to meet or exceed requirements of other sections is unknown at this time due to the fact that the turbines were designed and developed prior to the promulgation of these standards.

IEEE-3. Will the IBR be configured to inject negative sequence current for unbalanced faults (in addition to increased positive-sequence reactive current) as described in IEEE 2800 Section 7.2.2.3.4?

[redacted]

(If Yes) Complete the following table and provided additional explanation, if necessary.

[redacted]

Describe why the Resource has not been configured to inject negative sequence current for unbalanced faults (in addition to increased positive-sequence reactive current).

[redacted]

IEEE-4. Complete the following IBR Performance Specifications per IEEE 2800-2022 Section 7.2.2.3.5, Table 13 (note that maximizing capability does not imply that actual performance needs to match the fastest response times and settling times):

[redacted]

Provide any additional information you deem relevant.

[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

IEEE-5. Does the Resource use current blocking?

[redacted]

(If Yes) Provide restart time in the following table:

[redacted]

Please describe any use of current blocking to ride through disturbances. Note: Current blocking is not allowed within the continuous or mandatory operations regions ("no trip zones") and, if used in the "may trip" regions, current exchange must restart in ≤ 5 cycles (IEEE 2800-2022 Section 7.2.3).

[redacted]

IEEE-6. Provide the Rate of Change of Frequency ride-through capability in the following table (*See* IEEE 2800-2022 Section 7.3.2.3.5):

[redacted]

IEEE-7. Provide the phase angle jump (change) ride-through capability in the following table (*See* IEEE 2800-2022 Section 7.3.2.4):

[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

IEEE-8. Provide consecutive voltage deviations ride-through data (*See*, IEEE 2800-2022 Section 7.2.2.4):

[redacted]

IEEE-9. I attest the Resource owner has collaborated with the interconnecting TSP(s) to ensure any auto-reclosing settings are coordinated with the Resource multiple fault ride-through capability to not result in unnecessary tripping of the Resource.

[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

IEEE-10. I attest the Resource owner has made or caused to be made all software, settings, firmware, and parameterization changes (which includes memory upgrades to accommodate such changes that do not involve modifying other Resource equipment or components) to maximize the performance of the Resource's protection systems, controls, and other plant equipment (within equipment limitations and in accordance with Good Utility Practice) to exceed, or achieve as close as reasonably possible, the capability and performance set forth in Sections 5, 7 and 9 of the IEEE 2800-2022 standard.

No

I attest the Resource owner will make or cause to be made all software, settings, firmware, and parameterization changes (which includes memory upgrades to accommodate such changes that do not involve modifying other Resource equipment or components) to maximize the performance of the Resource's protection systems, controls, and other plant equipment (within equipment limitations and in accordance with Good Utility Practice) to exceed, or achieve as close as reasonably possible, the capability and performance set forth in Sections 5, 7 and 9 of the IEEE 2800-2022 standard.

Yes

Extension Request

EXT-1. Are you requesting an extension for the Resource under Nodal Operating Guide Sections 2.6.2.1(7); 2.9.1(6); 2.9.1.1(8) or (9); or 2.9.1.2(9)?

[redacted]

(If Yes) Complete the following table:

[redacted]

What is the Resource's Commercial Operations Date? 12/01/2016

For each section you are requesting an extension, provide the information set forth in NOG Sections 2.11.1 (for frequency ride-through extensions) or 2.11.2 (for voltage ride-through extensions).

[redacted]

Provide the information set forth in NOG Section 2.12.1.2 as applicable for the extension requested.

Please see attached "2.12.1.2 Extension Attachment_SALTFORK" document.

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

Exemption Request

EXP-1. Do you intend to request an exemption pursuant to Nodal Operating Guide Section 2.6.2.1(7) for the Resource?

[redacted]

EXP-2. Do you intend to request an exemption pursuant to Nodal Operating Guide Section 2.9.1.2(9) for the Resource?

[redacted]

Specify the sub-section(s) of NOG Section 2.9.1.2 for which you seek the exemption and provide the information set forth in NOG Section 2.11.2:

Section 2.9.1.2(1)? [redacted]

Section 2.9.1.2(3)? [redacted]

Section 2.9.1.2(4)?

Section 2.9.1.2(5)?

Section 2.9.1.2(6)?

Section 2.9.1.2(7)?

Comments:

See attached IVRTCR.

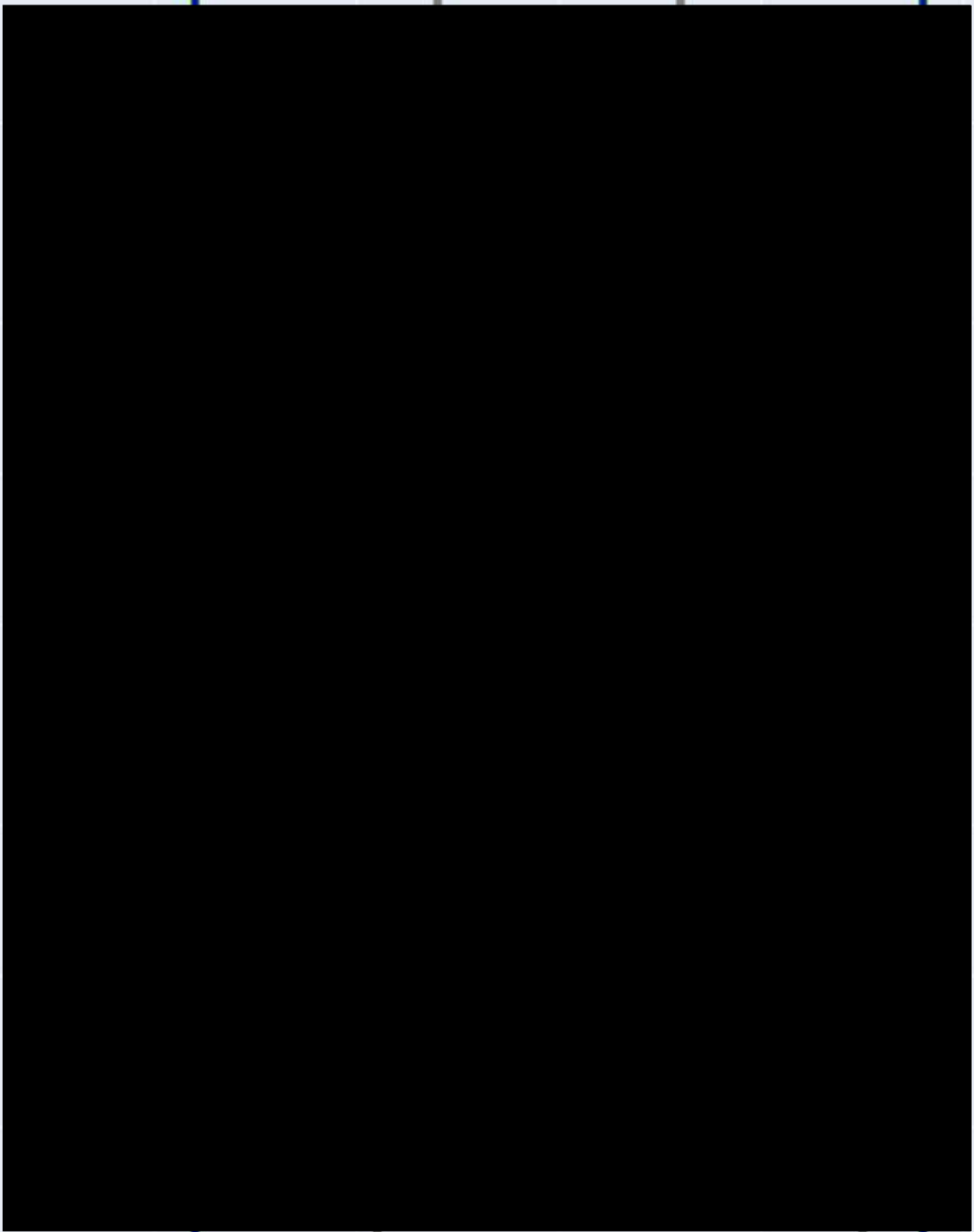
EXP-3. Do you intend to request an exemption pursuant to Nodal Operating Guide Section 2.9.1(5)?

[redacted]

General Comments or Attachments:

See attached Attestation signed by the President of Southern Power Company.





[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

Initial Voltage Ride-Through Capability Report

Resource Entity or Interconnecting Entity Name: Salt Fork Wind LLC

(a) **Resource Entity or Interconnecting Entity Data Universal Numbering System (DUNS) Number:** 0797475733000

(b) **IBR/WGR Site Name:** Salt Fork Wind (SALTFORK)

(c) **IBR/WGR Unit Name(s):** saltfork_unit2

(d) **Nodal Operating Guide Section(s) with which the Resource cannot comply:**

[redacted]

(e) Current voltage ride-through capability in a format similar to the table in Section 2.9.1.2(1):



Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

(f) Known voltage ride-through limitations of the IBR, Type 1 WGR or Type 2 WGR as compared to the requirements in Sections 2.9.1.2(1)-(7):

[redacted]

(g) A detailed description of the technical limitation preventing the Resource from meeting the ride-through requirement(s), including a letter signed by an officer or executive of the original equipment manufacturer (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm verifying the limitations:

[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

[redacted]

(i) If a Resource Entity cannot address the entire plant design with a letter required in Section 2.11.1(1)(g), the Resource Entity must supplement a letter from the original equipment manufacturer for its equipment (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm by providing a notarized attestation sworn to by the Resource Entity's highest-ranking representative, official, or officer with binding authority over the entity attesting to the efforts made to obtain the letter, why those efforts failed, and which parts of the plant design is attested to. The attestation shall also include a detailed description of the technical limitation(s) preventing the Resource from meeting the ride-through requirement, including any information on technical limitations on all or part of the Resource which the Resource Entity is able to obtain from original equipment manufacturers or an engineering consulting firm under Section (g) above.

[redacted]

(h) Available software, firmware, settings, or parameterization modifications the Resource Entity will implement to maximize the voltage ride-through capability of the IBR, Type 1 WGR or Type 2 WGR to approach or meet the voltage ride-through requirements in Sections 2.9.1.2(1)-(7) within known equipment limitations, to the greatest extent possible:

[redacted]

(i) To the extent the Resource Entity chooses to implement changes to existing equipment other than software, firmware, settings or parameterization modifications that increase the voltage ride-through capability, identification of any such equipment modifications:

[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

(j) Expected post-modification Resource capability in a format similar to the table in Section 2.9.1.2(1) and documentation of any expected remaining limitation(s) following implementation of such modifications:

[redacted]

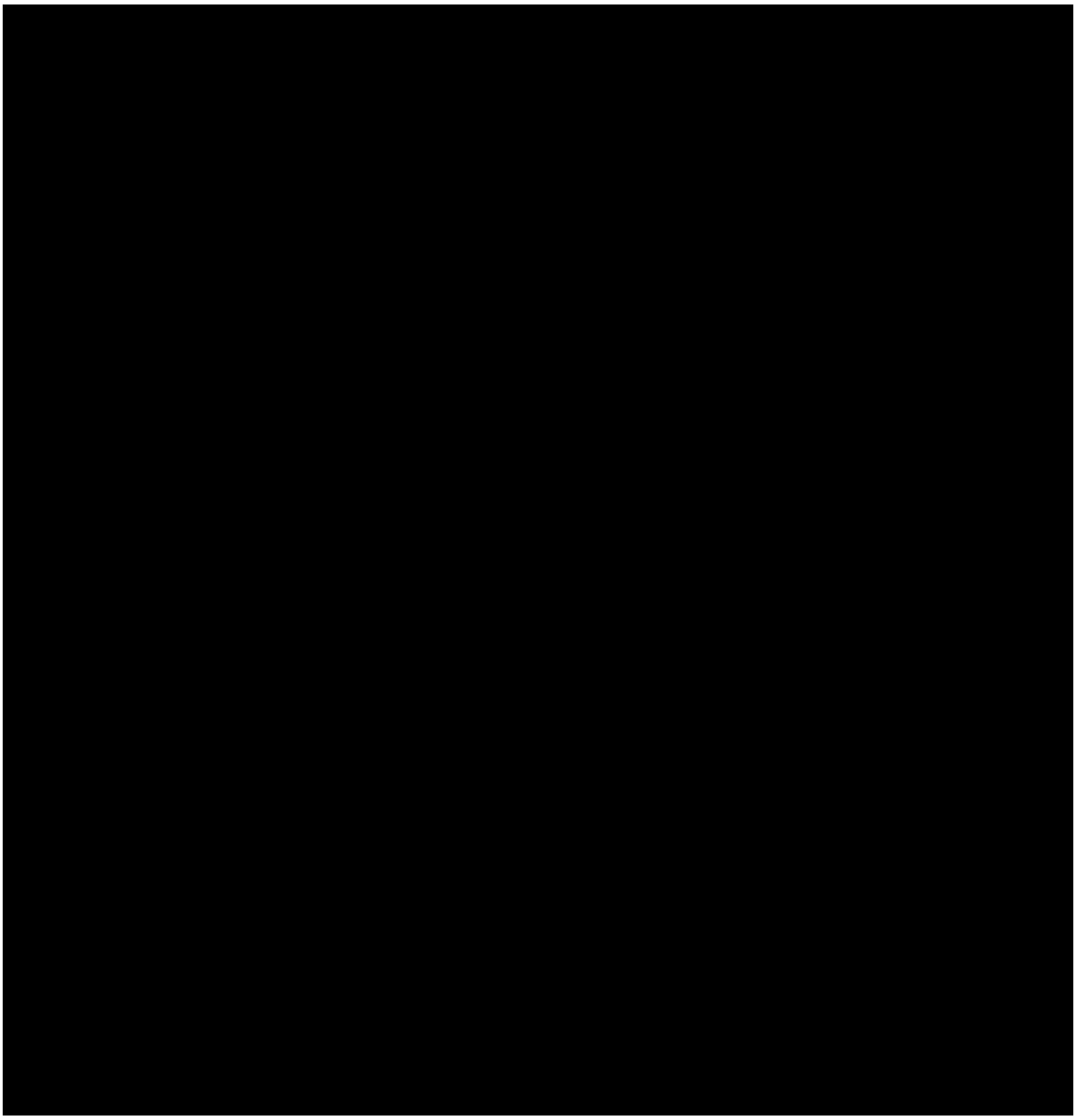
Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

Salt Fork



Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

(k) A schedule for implementing the modification(s):

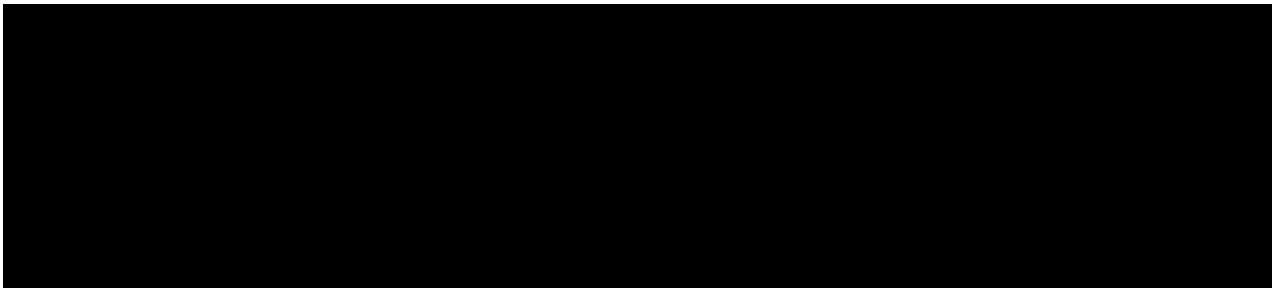


(l) A model accurately representing expected performance reflecting all technical limitations, or a statement that there are no new models available other than what is currently submitted to ERCOT that already reflect all technical limitations in voltage ride-through capability:



Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

(m) A description of any limitation that cannot be accurately represented in a model:



Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D



Subject: NOGRR 245 Verification of Technical Limitation – Need for Exemption or Extension



Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

Attachment 1: Detailed Description of Technical Limitation

Resource Entity Name: Salt Fork Wind LLC
Resource Name (Unit): saltfork_unit2

Detailed Description of the Technical Limitation:

Applicable Nodal Operating Guide Requirement(s):

[redacted]

Description of Technical Limitation:

[redacted]

Need for Exemption:

[redacted]

Need for Extension:

[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

Request for Extension – Salt Fork Wind LLC

Required Information pursuant to Nodal Operating Guide Section 2.12.1.2 (2):

(a) **Requesting Entity Name:** SALT FORK WIND LLC

(b) **Requesting Entity DUNS Number:** 0797475733000

(c) **IBR/WGR Site Name:** Salt Fork Wind (SALTFORK)

(d) **IBR/WGR Unit Name(s):** SALTFORK_UNIT1; SALTFORK_UNIT2

(e) **Nodal Operating Guide Section(s) under which the extension is requested:**

[redacted]

(f) **A detailed description of the grounds for the extension and the basis for each request:**

[redacted]

(g) **Documentation from the equipment manufacturer describing any known limitations associated with the extension request, a description of proposed modifications, and a schedule for implementing modifications:**

[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

[redacted]

(h) **Other information specified in this Section.** None.

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

Initial Voltage Ride-Through Capability Report

Resource Entity or Interconnecting Entity Name: Salt Fork Wind LLC

(a) **Resource Entity or Interconnecting Entity Data Universal Numbering System (DUNS) Number:** 0797475733000

(b) **IBR/WGR Site Name:** Salt Fork Wind (SALTFORK)

(c) **IBR/WGR Unit Name(s):** saltfork_unit2

(d) **Nodal Operating Guide Section(s) with which the Resource cannot comply:**

[redacted]

(e) Current voltage ride-through capability in a format similar to the table in Section 2.9.1.2(1):



Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

(f) Known voltage ride-through limitations of the IBR, Type 1 WGR or Type 2 WGR as compared to the requirements in Sections 2.9.1.2(1)-(7):

[redacted]

(g) A detailed description of the technical limitation preventing the Resource from meeting the ride-through requirement(s), including a letter signed by an officer or executive of the original equipment manufacturer (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm verifying the limitations:

[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

[redacted]

(i) If a Resource Entity cannot address the entire plant design with a letter required in Section 2.11.1(1)(g), the Resource Entity must supplement a letter from the original equipment manufacturer for its equipment (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm by providing a notarized attestation sworn to by the Resource Entity's highest-ranking representative, official, or officer with binding authority over the entity attesting to the efforts made to obtain the letter, why those efforts failed, and which parts of the plant design is attested to. The attestation shall also include a detailed description of the technical limitation(s) preventing the Resource from meeting the ride-through requirement, including any information on technical limitations on all or part of the Resource which the Resource Entity is able to obtain from original equipment manufacturers or an engineering consulting firm under Section (g) above.

[redacted]

(h) Available software, firmware, settings, or parameterization modifications the Resource Entity will implement to maximize the voltage ride-through capability of the IBR, Type 1 WGR or Type 2 WGR to approach or meet the voltage ride-through requirements in Sections 2.9.1.2(1)-(7) within known equipment limitations, to the greatest extent possible:

[redacted]

(i) To the extent the Resource Entity chooses to implement changes to existing equipment other than software, firmware, settings or parameterization modifications that increase the voltage ride-through capability, identification of any such equipment modifications:

[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

(j) Expected post-modification Resource capability in a format similar to the table in Section 2.9.1.2(1) and documentation of any expected remaining limitation(s) following implementation of such modifications:

[redacted]

[redacted]

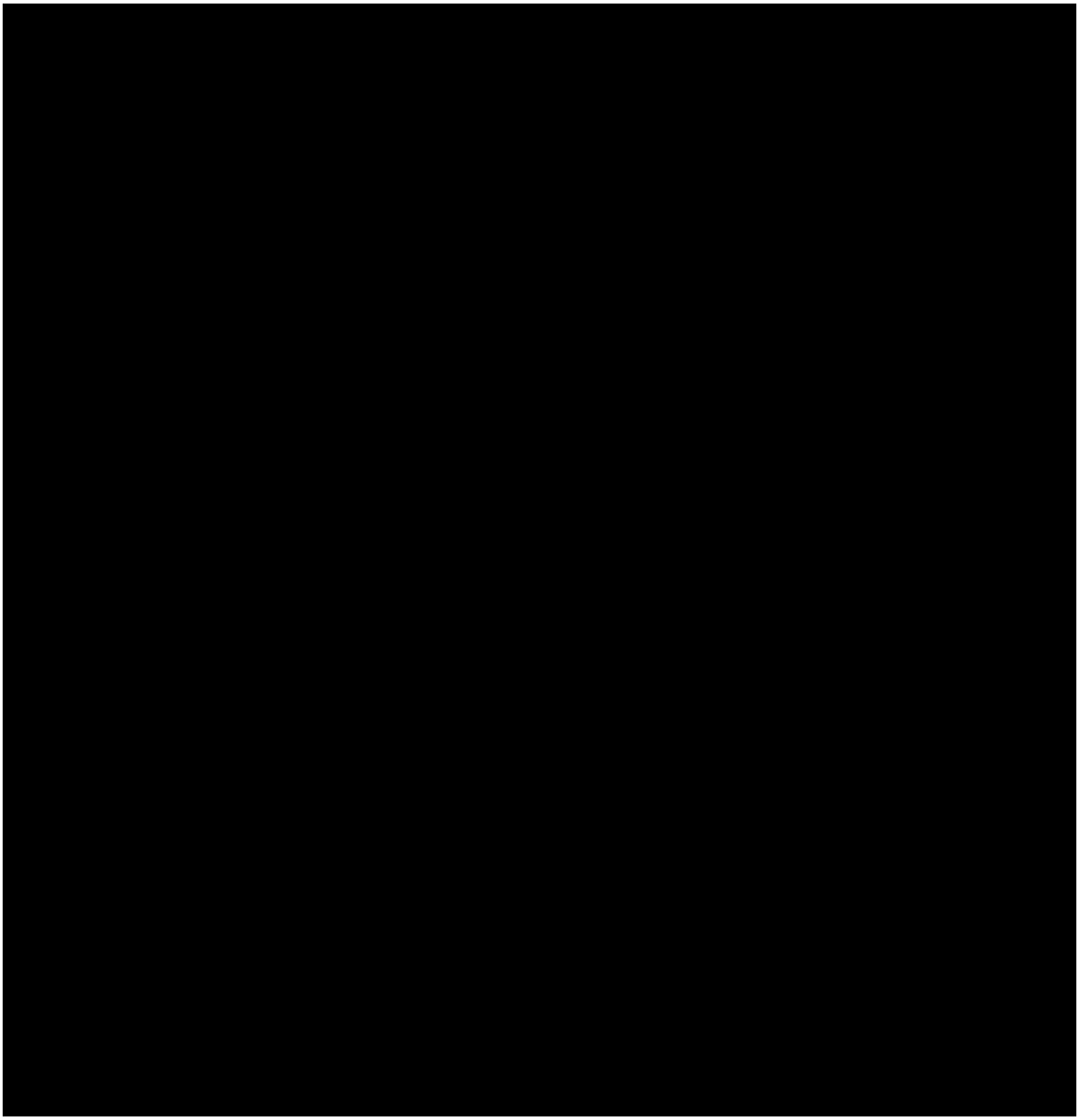
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Salt Fork



Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

(k) A schedule for implementing the modification(s):



(l) A model accurately representing expected performance reflecting all technical limitations, or a statement that there are no new models available other than what is currently submitted to ERCOT that already reflect all technical limitations in voltage ride-through capability:



Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

(m) A description of any limitation that cannot be accurately represented in a model:



Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

[redacted]

Subject: NOGRR 245 Verification of Technical Limitation – Need for Exemption or Extension

[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

Attachment 1: Detailed Description of Technical Limitation

Resource Entity Name: Salt Fork Wind LLC
Resource Name (Unit): saltfork_unit2

Detailed Description of the Technical Limitation:

Applicable Nodal Operating Guide Requirement(s):

[redacted]

Description of Technical Limitation:

[redacted]

Need for Exemption:

[redacted]

Need for Extension:

[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

Initial Voltage Ride-Through Capability Report

Resource Entity or Interconnecting Entity Name: Salt Fork Wind LLC

(a) **Resource Entity or Interconnecting Entity Data Universal Numbering System (DUNS) Number:** 0797475733000

(b) **IBR/WGR Site Name:** Salt Fork Wind (SALTFORK)

(c) **IBR/WGR Unit Name(s):** saltfork_unit2

(d) **Nodal Operating Guide Section(s) with which the Resource cannot comply:**

[redacted]

(e) Current voltage ride-through capability in a format similar to the table in Section 2.9.1.2(1):



Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

(f) Known voltage ride-through limitations of the IBR, Type 1 WGR or Type 2 WGR as compared to the requirements in Sections 2.9.1.2(1)-(7):

[redacted]

(g) A detailed description of the technical limitation preventing the Resource from meeting the ride-through requirement(s), including a letter signed by an officer or executive of the original equipment manufacturer (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm verifying the limitations:

[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

[redacted]

(i) If a Resource Entity cannot address the entire plant design with a letter required in Section 2.11.1(1)(g), the Resource Entity must supplement a letter from the original equipment manufacturer for its equipment (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm by providing a notarized attestation sworn to by the Resource Entity's highest-ranking representative, official, or officer with binding authority over the entity attesting to the efforts made to obtain the letter, why those efforts failed, and which parts of the plant design is attested to. The attestation shall also include a detailed description of the technical limitation(s) preventing the Resource from meeting the ride-through requirement, including any information on technical limitations on all or part of the Resource which the Resource Entity is able to obtain from original equipment manufacturers or an engineering consulting firm under Section (g) above.

[redacted]

(h) Available software, firmware, settings, or parameterization modifications the Resource Entity will implement to maximize the voltage ride-through capability of the IBR, Type 1 WGR or Type 2 WGR to approach or meet the voltage ride-through requirements in Sections 2.9.1.2(1)-(7) within known equipment limitations, to the greatest extent possible:

[redacted]

(i) To the extent the Resource Entity chooses to implement changes to existing equipment other than software, firmware, settings or parameterization modifications that increase the voltage ride-through capability, identification of any such equipment modifications:

[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

(j) Expected post-modification Resource capability in a format similar to the table in Section 2.9.1.2(1) and documentation of any expected remaining limitation(s) following implementation of such modifications:

[redacted]

[redacted]

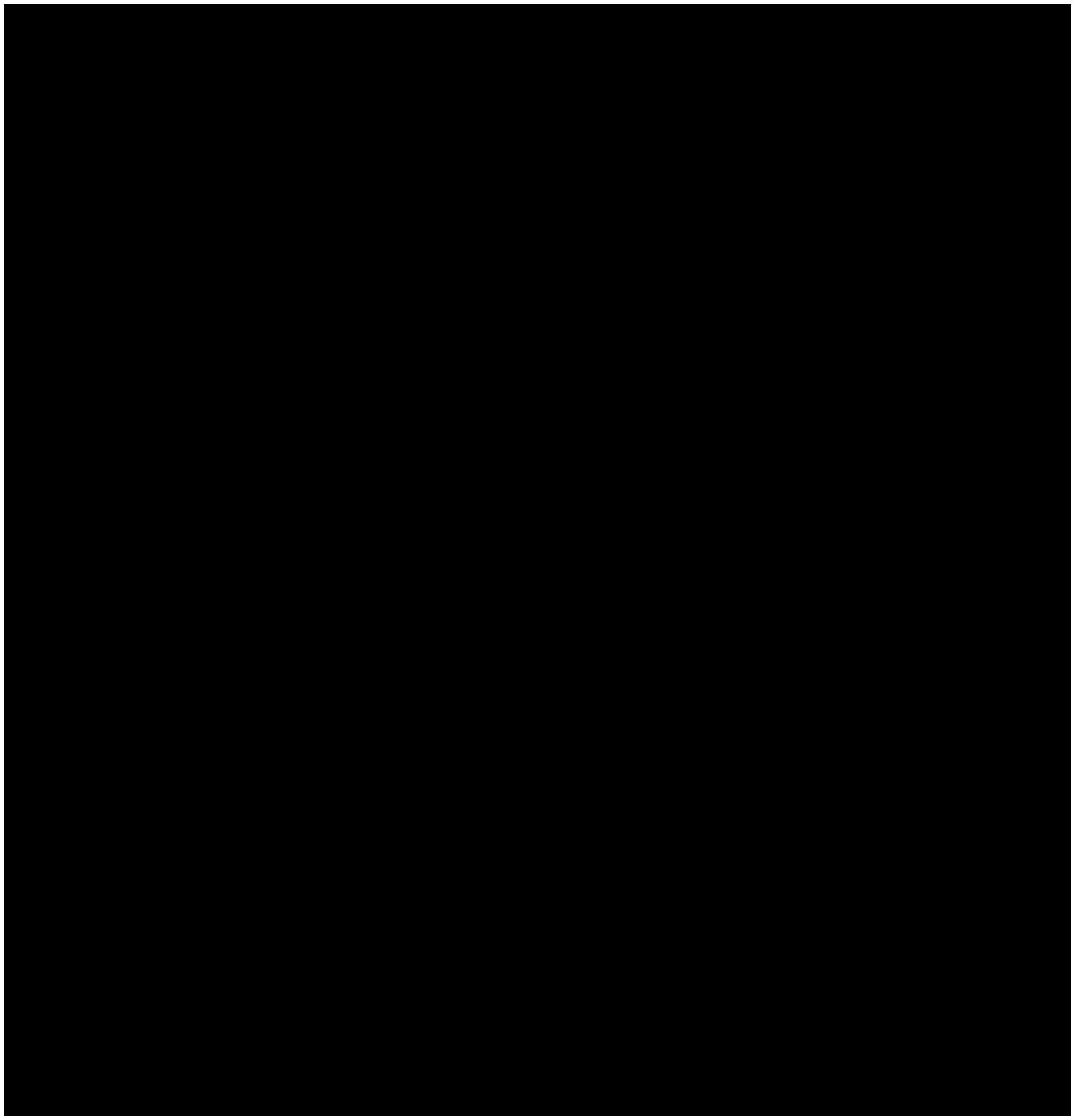
Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

Salt Fork



Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

(k) A schedule for implementing the modification(s):



(l) A model accurately representing expected performance reflecting all technical limitations, or a statement that there are no new models available other than what is currently submitted to ERCOT that already reflect all technical limitations in voltage ride-through capability:



Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

(m) A description of any limitation that cannot be accurately represented in a model:



Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D



Subject: NOGRR 245 Verification of Technical Limitation – Need for Exemption or Extension



Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

Attachment 1: Detailed Description of Technical Limitation

Resource Entity Name: Salt Fork Wind LLC
Resource Name (Unit): saltfork_unit2

Detailed Description of the Technical Limitation:

Applicable Nodal Operating Guide Requirement(s):

[redacted]

Description of Technical Limitation:

[redacted]

Need for Exemption:

[redacted]

Need for Extension:

[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

Initial Voltage Ride-Through Capability Report

Resource Entity or Interconnecting Entity Name: Salt Fork Wind LLC

(a) **Resource Entity or Interconnecting Entity Data Universal Numbering System (DUNS) Number:** 0797475733000

(b) **IBR/WGR Site Name:** Salt Fork Wind (SALTFORK)

(c) **IBR/WGR Unit Name(s):** saltfork_unit2

(d) **Nodal Operating Guide Section(s) with which the Resource cannot comply:**

[redacted]

(e) Current voltage ride-through capability in a format similar to the table in Section 2.9.1.2(1):



Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

(f) Known voltage ride-through limitations of the IBR, Type 1 WGR or Type 2 WGR as compared to the requirements in Sections 2.9.1.2(1)-(7):

[redacted]

(g) A detailed description of the technical limitation preventing the Resource from meeting the ride-through requirement(s), including a letter signed by an officer or executive of the original equipment manufacturer (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm verifying the limitations:

[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

[redacted]

(i) If a Resource Entity cannot address the entire plant design with a letter required in Section 2.11.1(1)(g), the Resource Entity must supplement a letter from the original equipment manufacturer for its equipment (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm by providing a notarized attestation sworn to by the Resource Entity's highest-ranking representative, official, or officer with binding authority over the entity attesting to the efforts made to obtain the letter, why those efforts failed, and which parts of the plant design is attested to. The attestation shall also include a detailed description of the technical limitation(s) preventing the Resource from meeting the ride-through requirement, including any information on technical limitations on all or part of the Resource which the Resource Entity is able to obtain from original equipment manufacturers or an engineering consulting firm under Section (g) above.

[redacted]

(h) Available software, firmware, settings, or parameterization modifications the Resource Entity will implement to maximize the voltage ride-through capability of the IBR, Type 1 WGR or Type 2 WGR to approach or meet the voltage ride-through requirements in Sections 2.9.1.2(1)-(7) within known equipment limitations, to the greatest extent possible:

[redacted]

(i) To the extent the Resource Entity chooses to implement changes to existing equipment other than software, firmware, settings or parameterization modifications that increase the voltage ride-through capability, identification of any such equipment modifications:

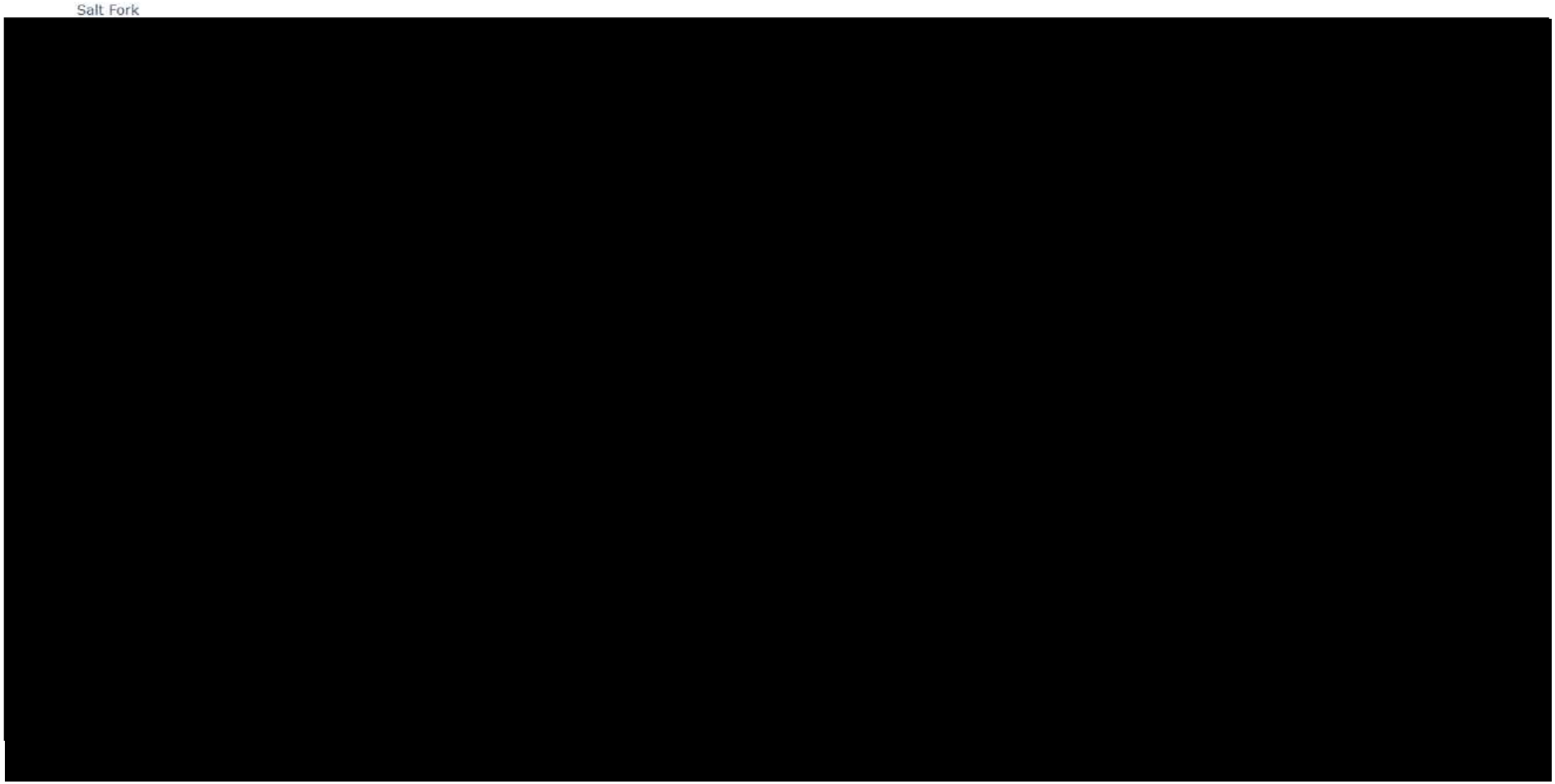
[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

(j) Expected post-modification Resource capability in a format similar to the table in Section 2.9.1.2(1) and documentation of any expected remaining limitation(s) following implementation of such modifications:

[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D



Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

(k) A schedule for implementing the modification(s):

[redacted]

(l) A model accurately representing expected performance reflecting all technical limitations, or a statement that there are no new models available other than what is currently submitted to ERCOT that already reflect all technical limitations in voltage ride-through capability:

[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

(m) A description of any limitation that cannot be accurately represented in a model:



Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D



Subject: NOGRR 245 Verification of Technical Limitation – Need for Exemption or Extension



Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

Attachment 1: Detailed Description of Technical Limitation

Resource Entity Name: Salt Fork Wind LLC
Resource Name (Unit): saltfork_unit2

Detailed Description of the Technical Limitation:

Applicable Nodal Operating Guide Requirement(s):

[redacted]

Description of Technical Limitation:

[redacted]

Need for Exemption:

[redacted]

Need for Extension:

[redacted]

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

Southern Power's Commitment and Actions Regarding ERCOT Nodal Operating Guide Revision Request 245 Compliance

To Whom It May Concern,

I hereby attest on behalf of Southern Power Company ("Southern Power") to the following statements:

Commitment to Compliance

Southern Power, as the wholesale subsidiary of Southern Company, adheres to the highest standards of ethics and compliance. One of our core company values is "Act with Integrity", which helps establish the foundational behaviors that guide how we work and, more specifically, how we approach our compliance obligations. Southern Power is committed to fully adhering to the requirements set forth in NOGRR 245 to the extent of the technical capabilities of its Inverter-Based Resources ("IBRs"). We recognize the importance of compliance to support the reliable operation of the ERCOT grid and affirm our dedication to meeting all reporting and performance requirements in the rule to the best of our IBRs' technical capabilities.

Rigorous Engineering Analysis and Collaboration with OEM Partners

Southern Power has diligently undertaken comprehensive engineering analysis, utilizing in-house technical engineering expertise and external contracted engineering services. We began these efforts before NOGRR 245 was finalized and have been intensely focused since the rule details became known and the April 1, 2025 deadline was set.

Southern Power has worked extensively with our original equipment manufacturer ("OEM") partners to complement our own engineering analysis and to more exhaustively assess the capabilities and limitations of our IBRs. The ability of OEMs to support detailed engineering analysis varies widely between companies and the vintages of equipment. Southern Power has gone to great lengths, including designing a customized data collection template, to facilitate information gathering from our OEM partners. Through this collaboration, we gained a more comprehensive understanding of the capabilities and limitations of our IBRs, identified opportunities for software and parameter-based performance maximization, and identified narrow technical extension and exemption needs. Southern Power's submissions of capability and limitation reports and extension requests and/or notices of intent to request an exemption are a result of the best available information from our OEMs as of this date.

Docusign Envelope ID: F4B2FAF1-583E-4B30-B6CA-8F686502366D

Ongoing Efforts and Commitment

Southern Power is committed to performing ongoing engineering analysis and collaborating with our OEM partners to ensure the best possible performance of our IBRs within equipment limitations. We are dedicated to implementing the identified software-based maximization modifications as soon as reasonably practicable after they become available and have ERCOT final approval. Southern Power is also committed to ongoing communication and collaboration with ERCOT staff and is available to answer any questions relating to our initial submissions.

Date: March 27, 2025

Sincerely,

Robin Boren
President
Southern Power

ATTACHMENT B

Supplemental Extension Exemption Requests

(Market Notice: M-A010825-07)

Resource Entity (RE), Interconnecting Entity (IE):

SALT FORK WIND LLC (RE)

Resource Name or Project Name:

SALTFORK_UNIT1

DocuSign Instructions:

- Responses are due on or before September 15th, 2025.
- Only one person can provide responses.
- The document can be forwarded or “Assigned to Someone Else” via the “Other Actions” menu at the top of the DocuSign web page.
- Please contact NOGRR245@ercot.com with any additional questions.

Background Information:

Refer to Market Notices M-A010825-06 and M-A010825-07 for background information.

NOTE: IF YOU ALREADY REQUESTED AN EXEMPTION OR EXTENSION FOR YOUR RESOURCE ON OR BEFORE APRIL 15, 2025, YOU MUST SUBMIT THE INFORMATION REQUESTED BELOW BY MIDNIGHT ON SEPTEMBER 15TH, 2025 OR YOU WILL BE FOREVER BARRED FROM REQUESTING AN EXEMPTION OR EXTENSION. *See*, Nodal Operating Guide § 2.11.1(2); § 2.11.2(2) and § 2.12.1(2).

Submitter signature: DocuSigned by: Chase Smith 0DCB77E32063497...

Submitter name: Chase Smith

Submitter title: Market Compliance & Policy Manager

Date: 9/15/2025

General Comments (4000 Character Limit, attach supporting documentation as needed):

[redacted]

1. Did you submit a Notice of Intent to Request an Exemption for the above-referenced Resource by April 15, 2025? Yes

   a) Are you requesting an official exemption now? Yes

   Attach the Exemption Request Form and any supplemental documents:

   Request Form:

   Supplemental Documents:

2. If you requested an Extension by April 15, 2025, for the above-referenced Resource, does the Resource still need an Extension? Yes

Complete the table below (NOTE: ERCOT will compare the answers below to the April 2025 submission).

[redacted]

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

FRT-1. If you are requesting an Extension or Exemption for any **Frequency** Ride-Through requirement, select "yes" and complete the following questions.

No

(a) RE/IE Data Universal Numbering System (DUNS) Number:

(b) and (c)

NOTE: For Resources synchronized or with a Production Load Date, provide the following information as it appears in the ERCOT Network Operations Model.

NOTE: For Resources that have not received a Production Load Date, provide the following information as entered in ERCOT's Resource Integration and Ongoing Operations (RIOO) system.

IBR/WGR Site Name:

IBR/WGR Resource Name:

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

(d) Nodal Operating Guide Section(s) with which the Resource cannot comply (4000 Character Limit):

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

(e) Current frequency ride-through capability in a format similar to the table in Nodal Operating Guide (NOG) Section 2.6.2.1(1):

Instructions:
Use 99999 to indicate “continuous”
Use 88888 to indicate “Will Trip”
Use 77777 for “Not Known”

If you need to use any other generic numbers, be sure to indicate the definition of the numbers here:



If the Resource has different capabilities than the Point of Interconnection Bus (POIB) frequency in the first column of the table, provide the additional capabilities in an attachment.

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

(f) Known frequency ride-through limitations of the Resource as compared to the requirements in NOG Sections 2.6.2.1(1)-(5) [**NOTE**: Be specific] (4000 Character Limit):

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

(g) A **detailed** description of the technical limitation preventing the Resource from meeting the ride-through requirement(s), **including a letter** signed by an officer or executive of the original equipment manufacturer (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm verifying the limitations [**NOTE**: Be specific and be sure to attach the required letter] (4000 Character Limit):

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

If you cannot address the entire plant design with a letter required in item (g), you **must** supplement the letter from the original equipment manufacturer for its equipment (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm by providing a **notarized attestation sworn to by the Resource Entity's highest-ranking representative, official, or officer with binding authority over the entity** attesting to: (i) the efforts made to obtain the letter, (ii) why those efforts failed, and (iii) which parts of the plant design is attested to. The attestation **must also include** a ***detailed description*** of the technical limitation(s) preventing the Resource from meeting the ride-through requirement, including any information on technical limitations on all or part of the Resource the Resource Entity is able to obtain from original equipment manufacturers or an engineering consulting firm under item (g) above (4000 Character Limit):

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

(h) Available software, firmware, settings or parameterization modifications the Resource Entity will implement to maximize the frequency ride-through capability of the Resource within known equipment limitations, to the greatest extent possible (4000 Character Limit):

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

(i) To the extent the Resource Entity chooses to implement changes to existing equipment ***other than*** software, firmware, settings or parameterization modifications that increase the frequency ride-through capability, identify those equipment modifications (4000 Character Limit):

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

(j) Expected **post-modification** Resource capability in a format similar to the table in Section 2.6.2.1(1) and **documentation of** any expected remaining limitation(s) following implementation of such modifications:

Instructions:
Use 99999 to indicate “continuous”
Use 88888 to indicate “Will Trip”
Use 77777 for “Not Known”

If you need to use any other generic numbers, be sure to indicate the definition of the numbers here:



If your Resource has different capabilities than the POIB frequency in the first column of the table, please provide the additional capabilities in an attachment.

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

(k) A schedule for implementing the modification(s) (4000 Character Limit):

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

(l) **A model accurately representing expected performance reflecting all technical limitations** or a statement there are no new models available because the Resource is requesting an exemption and the current model submitted to ERCOT already reflects all technical limitations in frequency ride-through capability (4000 Character Limit) :

[**NOTE**: Submit via ERCOT's Resource Integration and Ongoing Operations (RIOO) System and provide the RIOO Change Request number here]

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

(m) A description of any limitation that cannot be accurately represented in a model (4000 Character Limit):

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

Voltage Ride-Through

VRT-1. If you are requesting an Extension or Exemption for the **Voltage** Ride-Through requirements, select yes and complete the following questions.

Yes

(a) RE/IE Data Universal Numbering System (DUNS) Number: 0797475733000

(b) and (c)

NOTE: For Resources synchronized or with a Production Load Date, provide the following information as it appears in the ERCOT Network Operations Model.

NOTE: For Resources that have not received a Production Load Date, provide the following information as entered in ERCOT's Resource Integration and Ongoing Operations (RIOO) system.

IBR/WGR Site Name: SALTFORK

IBR/WGR Resource Name: SALTFORK_UNIT1

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

(d) Nodal Operating Guide Section(s) with which the Resource cannot comply (4000 Character Limit):

[redacted]

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

(e) Current voltage ride-through capability in a format similar to the table in NOG Section 2.9.1.2(1):

Instructions:
Use 99999 to indicate “continuous”
Use 88888 to indicate “Will Trip”
Use 77777 for “Not Known”

If you need to use any other generic numbers, be sure to indicate the definition of the numbers here:



If your Resource has different capabilities than the Point of Interconnection Bus (POIB) voltage in the first column of the table, please provide the additional capabilities in an attachment.

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

(f) Known voltage ride-through limitations of the IBR, Type 1 WGR or Type 2 WGR as compared to the requirements in Sections 2.9.1.2(1)-(7) [**NOTE**: Be specific] (4000 Character Limit):

[redacted]

[redacted]

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

(g) A **detailed** description of the technical limitation preventing the Resource from meeting the ride-through requirement(s), **including a letter** signed by an officer or executive of the original equipment manufacturer (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm verifying the limitations [**NOTE**: Be specific and be sure to attach the required letter] (4000 Character Limit):

[redacted]

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

If you cannot address the entire plant design with a letter required in item (g), you **must** supplement the letter from the original equipment manufacturer for its equipment (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm by providing a **notarized attestation sworn to by the Resource Entity's highest-ranking representative, official, or officer with binding authority over the entity** attesting to: (i) the efforts made to obtain the letter, (ii) why those efforts failed, and (iii) which parts of the plant design is attested to. The attestation **must also include** a ***detailed description*** of the technical limitation(s) preventing the Resource from meeting the ride-through requirement, including any information on technical limitations on all or part of the Resource the Resource Entity is able to obtain from original equipment manufacturers or an engineering consulting firm under item (g) above (4000 Character Limit):

[redacted]

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

(h) Available software, firmware, settings, or parameterization modifications the Resource Entity will implement to maximize the voltage ride-through capability of the Resource to approach or meet the voltage ride-through requirements in NOG Sections 2.9.1.2(1)-(7) within known equipment limitations, to the greatest extent possible (4000 Character Limit):

[redacted]

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

(i) To the extent the Resource Entity chooses to implement changes to existing equipment ***other than*** software, firmware, settings or parameterization modifications that increase the voltage ride-through capability, identify those equipment modifications (4000 Character Limit):

[redacted]

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

(j) Expected **post-modification** Resource capability in a format similar to the table in Section 2.9.1.2(1) and **documentation of** any expected remaining limitation(s) following implementation of such modifications:

Instructions:
Use 99999 for “Continuous”
Use 88888 for “Will Trip”
Use 77777 for “Not Known”

If you need to use any other generic numbers, be sure to indicate the definition of the numbers here:



If your Resource has different capabilities than the POIB voltage in the first column of the table, please provide the additional capabilities in an attachment.

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

(k) A schedule for implementing the modification(s) (4000 Character Limit):

[redacted]

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

(l) **A model accurately representing expected performance reflecting all technical limitations** or a statement there are no new models available because the Resource is requesting an exemption and the current model submitted to ERCOT already reflects all technical limitations in voltage ride-through capability (4000 Character Limit):

[**NOTE**: Submit via ERCOT's Resource Integration and Ongoing Operations (RIOO) System and provide the RIOO Change Request number here]

[redacted]

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

(m) A description of any limitation that cannot be accurately represented in a model (4000 Character Limit):

[redacted]

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

Misc

Other Attachments (if any):



Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

Request for Exemption

This Request for Exemption form constitutes a formal request for exemption[1] under 16 Texas Administrative Code § 25.517(c) from one or more requirements of the following Nodal Operating Guides Sections:

- 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); and
- 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.

The Resource Entity/Interconnecting Entity (Requesting Entity) must ***complete all sections*** and submit the form, ***including all information noted below***, to ERCOT via DocuSign on or before **September 15, 2025**. Information submitted as part of this Request for Exemption shall be treated as Protected Information in accordance with the ERCOT Protocols.

NOTE: If you, as the Requesting Entity, did not submit a Notice of Intent to Request an Exemption for the Resource on or before April 15, 2025, you may *not* request an exemption now.

RE/IE NAME: Salt Fork Wind LLC

RE/IE DUNS NUMBER: 0797475733000

*For Resources synchronized or with a Production Load Date, provide the following information **as it appears in the ERCOT Network Operations Model**:*

SUBSTATION ACRONYM: SALTFORK

RESOURCE NAME: SALTFORK_UNIT1

*For Resources that have **not** received a Production Load Date, provide the following information **as entered in ERCOT's Resource Integration and Ongoing Operations (RIOO) system**:*

INR NUMBER:

PROJECT NAME:

As the Requesting Entity, I request the above-referenced Resource be exempted from the following Nodal Operating Guides requirement(s)[2] *[check all that apply]*:

Frequency Ride-Through

- ☐ Section 2.6.2.1(1)
- ☐ Section 2.6.2.1(3)
- ☐ Section 2.6.2.1(4)
- ☐ Section 2.6.2.1(5)

Voltage Ride-Through

- ☐ Section 2.9.1(5) [Type 3 WGRs only]
- ☐ Section 2.9.1.2(1)
- ☐ Section 2.9.1.2(3)
- ☒ Section 2.9.1.2(4)
- ☒ Section 2.9.1.2(5)
- ☒ Section 2.9.1.2(6)
- ☐ Section 2.9.1.2(7)

The following items are required unless otherwise indicated:

[1] *See*, 16 Texas Administrative Code (TAC) § 25.517(c)(9).

[2] Include cross-references to ERCOT Protocols where the applicable reliability requirement is contained. *See*, 16 TAC § 25.517(c)(1).

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

☒ Provide a succinct description, with supporting documentation, of the Requesting Entity's efforts to comply with the applicable reliability requirement and an explanation of the Requesting Entity's inability to comply.[3]

☒ Provide documentation describing all feasible modifications, replacements, or upgrades the Requesting Entity could implement, but has not yet implemented, to improve the performance of the Resource toward meeting the requirement(s) from which an exemption is requested.[4]

☒ Provide a schedule for implementing modifications the Requesting Entity provided as part of the Initial Frequency Ride-Through Capability Report (IFRTCR) and/or Initial Voltage Ride-Through Capability Report (IVRTCR), as appropriate, including the following information:

(A) a proposed completion deadline for each proposed modification, replacement, or upgrade;

(B) proposed dates for the Requesting Entity to provide updates to ERCOT on the plan's progress;

(C) any supporting documentation relevant to plan implementation; and

(D) potential mitigation options, if applicable.[5]

SELECT ONLY ONE: Requesting Entity has ☐ / has not ☒ submitted any other exemption requests for the Resource made the subject of this exemption request.[6]

☐ **(REQUIRED IF *HAS* WAS MARKED IN RESPONSE TO THE PREVIOUS QUESTION)** Attach a description of the outcome of all other exemption requests submitted for the Resource made the subject of this exemption request.

☒ Resource Energization Date (*i.e.*, the Initial Energization date as defined in Section 2 of the ERCOT Protocols):[7] 9/23/2016

☒ Provide copies of the Resource's Standard Generation Interconnection Agreement (SGIA) and any amendments not already submitted to ERCOT.[8] If the Requesting Entity already provided the SGIA to ERCOT, mark this box: ☐

[3] *See*, 16 TAC § 25.517(c)(2).
[4] *See*, 16 TAC § 25.517(c)(3).
[5] *See*, 16 TAC § 25.517(c)(5).
[6] *See*, 16 TAC § 25.517(c)(6).
[7] *See*, 16 TAC § 25.517(c)(8). **NOTE**: For projects that have not yet reached the Initial Energization step in the Generation Interconnection and Modification (GIM) process, enter the projected Initial Energization date currently in RIOO.
[8] *Id.*

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

☒ Requesting Entity understands that, in support of this request, it must submit a ***complete and accurate*** IFRTCR and/or IVRTCR, as appropriate, ***with emphasis on a model accurately representing expected Resource performance reflecting all technical limitations***.[9]

Signature of Authorized Representative: Chase Smith

AR Printed Name: _B. Chase Smith

Date: 9/14/2025

[9] *See*, 16 TAC § 25.517(c)(4).

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

Request for Extension – Salt Fork Wind LLC

Any response contained in this document should be considered Protected Information in accordance with the ERCOT Protocols.

Required Information pursuant to Nodal Operating Guide Section 2.12.1.2 (2):

(a) **Requesting Entity Name:** SALT FORK WIND LLC

(b) **Requesting Entity DUNS Number:** 0797475733000

(c) **IBR/WGR Site Name:** Salt Fork Wind (SALTFORK)

(d) **IBR/WGR Unit Name(s):** SALTFORK_UNIT1, SALTFORK_UNIT2

(e) **Nodal Operating Guide Section(s) under which the extension is requested:**

[redacted]

(f) **A detailed description of the grounds for the extension and the basis for each request:**

[redacted]

(g) **Documentation from the equipment manufacturer describing any known limitations associated with the extension request, a description of proposed modifications, and a schedule for implementing modifications:**

Known Limitations

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

[redacted]

Description of Proposed Modifications

Modification #1: [redacted]

[redacted]

Modification #2: [redacted]

[redacted]

[1] Please see [redacted]

PROTECTED INFORMATION

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

[redacted]

Schedule for Implementing Modifications

[redacted]

Proposed Modification Implementation Tasks	Schedule
[redacted]	

[2] Southern Power previously requested an extension until October 1, 2027. This revised filing reduces the necessary timeframe by 9 months. This is primarily based on a faster-than-anticipated development of the OEM-provided turbine dynamic models reflecting proposed modifications.

PROTECTED INFORMATION

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

Proposed dates for RE to provide updates to ERCOT on its progress	
[redacted]	

(h) **Other information specified in this Section.** None.

PROTECTED INFORMATION

Vestas

T[04]

DOCUMENT:
[0130-2808]

DESCRIPTION:
Salt Fork Protection Settings

Original Instruction: T05 0130-2808 VER 00

Salt Fork Protection Settings
V100 Mk10B BV2020.04.129



T05 0130-2808 Ver 00 - Approved- Exported from DMS: 2022-08-03 by THANR

DISCLAIMER

[redacted]

COPYRIGHT NOTICE

[redacted]

Original Instruction: T05 0130-2808 VER 00

T05 0130-2808 Ver 00 - Approved- Exported from DMS: 2022-08-03 by THANR

Version History

Version no.	Date	Initials	Description of changes
00	Aug-01-2022	THANR	First edition.

Table of Contents

[redacted]

Original Instruction: T05 0130-2808 VER 00

T05 0130-2808 Ver 00 - Approved- Exported from DMS: 2022-08-03 by THANR

1 Introduction

[redacted]

Original Instruction: T05 0130-2808 VER 00
T05 0130-2808 Ver 00 - Approved- Exported from DMS: 2022-08-03 by THANR

2 Settings

2.1 Voltage Settings



2.2 Frequency Protection



Original Instruction: T05 0130-2808 VER 00
T05 0130-2808 Ver 00 - Approved- Exported from DMS: 2022-08-03 by THANR

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

Smith, Chase (SPC)

From: Cook, Kristin (SPC)
Sent: Tuesday, August 19, 2025 2:11 PM
To: Moore, Ava
Cc: [redacted]
Subject: [redacted]
Attachments:

Good afternoon Ava,

[redacted]

Thank you,

Kristin Cook
Market Compliance & Policy | Southern Power
krcook@southernco.com | C: 678.453.3623
Southern Power

From: Smith, Chase (SPC) <BCSMI@southernco.com>
Sent: Wednesday, May 21, 2025 11:46 AM
To: Moore, Ava <Ava.Moore@ercot.com>; Cook, Kristin (SPC) <KRCOOK@SOUTHERNCO.COM>; SPC ERCOT (SPC) <G2SPCERCOT@southernco.com>
[redacted]

Hi Ava,

[redacted]

Thank You,

B. Chase Smith
Market Compliance & Policy Manager
Commercial Optimization, Trading & Transmission
Southern Power Company
Tel 205.992.0145, Mobile 850.509.0500
Email bcsmi@southernco.com
southernpowercompany.com
Southern Power

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

Root Cause Analysis & Corrective Action Plan

Facility: Salt Fork Wind LLC ("Salt Fork Wind")

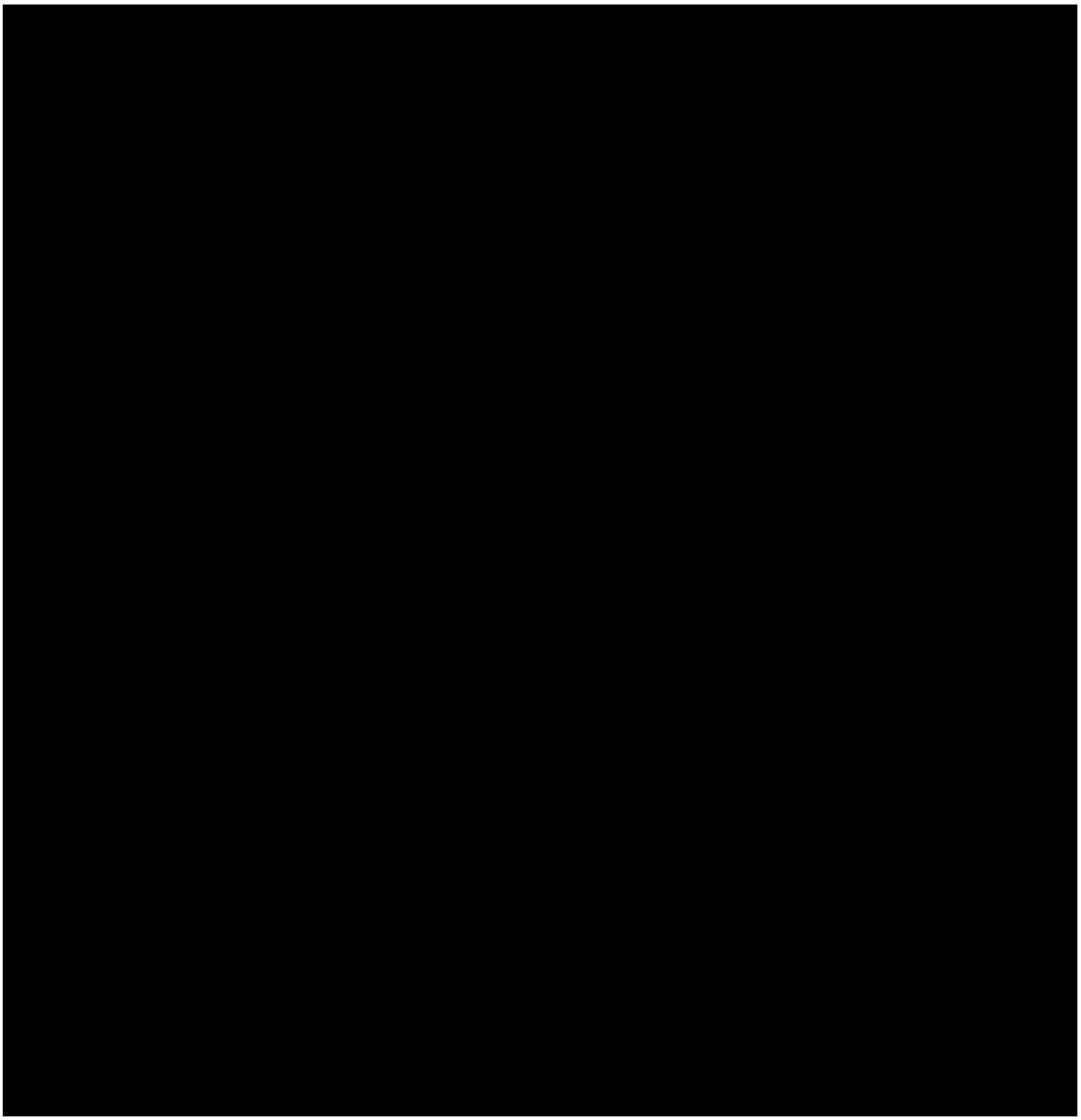
Event Date: April 14, 2025, 12:05 pm CST

Apparent Performance Failure Notification Date: May 21, 2025

Response Deadline: August 19, 2025 (within 90 days of notification)

Submitter: Southern Power Company (Southern Power")

Root Cause Analysis:



Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

[redacted]

Corrective Action Plan:

[redacted]

Modification #1 [redacted]

[redacted]

Modification #2: [redacted]

[redacted]

Implementation Timeline

[redacted]

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394



Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

Smith, Chase (SPC)

From: Rose, Jonathan <Jonathan.Rose@ercot.com>
Sent: Tuesday, March 11, 2025 5:46 AM
To: Smith, Chase (SPC); Davarikia, Hamzeh
Cc: Keith, Kerri Michelle (SPC); SPC ERCOT (SPC); Zieba, Cezary
Subject: RE: ACTION REQUIRED: SALTFORK pscad model update

CAUTION: This email originated from the Internet. Do not click links or open attachments unless you trust the sender and know the content is safe. If in doubt, report this email using the PhishAlarm button.

Good morning Chase,

Thank you for the package upload. Two initial questions:

1. [redacted]
2. [redacted]
3. [redacted]

Observation:1

[redacted]

I see mismatch looking at the individual device plots but less difference at the POI. We will evaluate further.

Thanks,

Jonathan Rose
ERCOT Transmission Planning

From: Smith, Chase (SPC) <BCSMI@southernco.com>
Sent: Monday, March 10, 2025 3:09 PM
To: Davarikia, Hamzeh <Hamzeh.Davarikia@ercot.com>; Rose, Jonathan <Jonathan.Rose@ercot.com>
Cc: Keith, Kerri Michelle (SPC) <KMKEITH@southernco.com>; G2SPCERCOT <G2SPCERCOT@southernco.com>; Zieba, Cezary <CZIEBA@southernco.com>
Subject: RE: ACTION REQUIRED: SALTFORK pscad model update

***** EXTERNAL Email *****

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

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[redacted]

Thanks,

B. Chase Smith
Market Compliance & Policy Manager
Commercial Optimization, Trading & Transmission
Southern Power Company
Tel 205.992.0145, Mobile 850.509.0500
Email bcsmi@southernco.com
southernpowercompany.com



From: Davarikia, Hamzeh <Hamzeh.Davarikia@ercot.com>
Sent: Monday, March 10, 2025 1:41 PM
To: Smith, Chase (SPC) <BCSMI@southernco.com>; Rose, Jonathan <Jonathan.Rose@ercot.com>
Cc: Keith, Kerri Michelle (SPC) <KMKEITH@southernco.com>; SPC ERCOT (SPC) <G2SPCERCOT@southernco.com>; Zieba, Cezary <CZIEBA@southernco.com>
Subject: RE: ACTION REQUIRED: SALTFORK pscad model update

Hi Chase,
Please try the following link, and let me know if there is any issues.

Southern Power2 [ercot.sharepoint.com]

Regards,
Hamzeh

From: Smith, Chase (SPC) <BCSMI@southernco.com>
Sent: Monday, March 10, 2025 1:30 PM
To: Davarikia, Hamzeh <Hamzeh.Davarikia@ercot.com>; Rose, Jonathan <Jonathan.Rose@ercot.com>
Cc: Keith, Kerri Michelle (SPC) <KMKEITH@southernco.com>; G2SPCERCOT <G2SPCERCOT@southernco.com>; Zieba, Cezary <CZIEBA@southernco.com>
Subject: RE: ACTION REQUIRED: SALTFORK pscad model update

***** EXTERNAL Email *****

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Date: February 27, 2025

From: Vestas – Power Plant Solutions AME

RE: 245NOGRR-112 PUCT Report 092624 Clarifications

Frequency and Voltage Ride-Through Capabilities

[redacted]

1417 NW Everett St, Portland, OR 97211, USA
Tel: +1 503 327 2000, vestas-americas@vestas.com, www.vestas.com

Original Instruction: T05 0204-3263 VER 00

T05 0204-3263 Ver 00 - Approved- Exported from DMS: 2025-02-27 by SCLEA

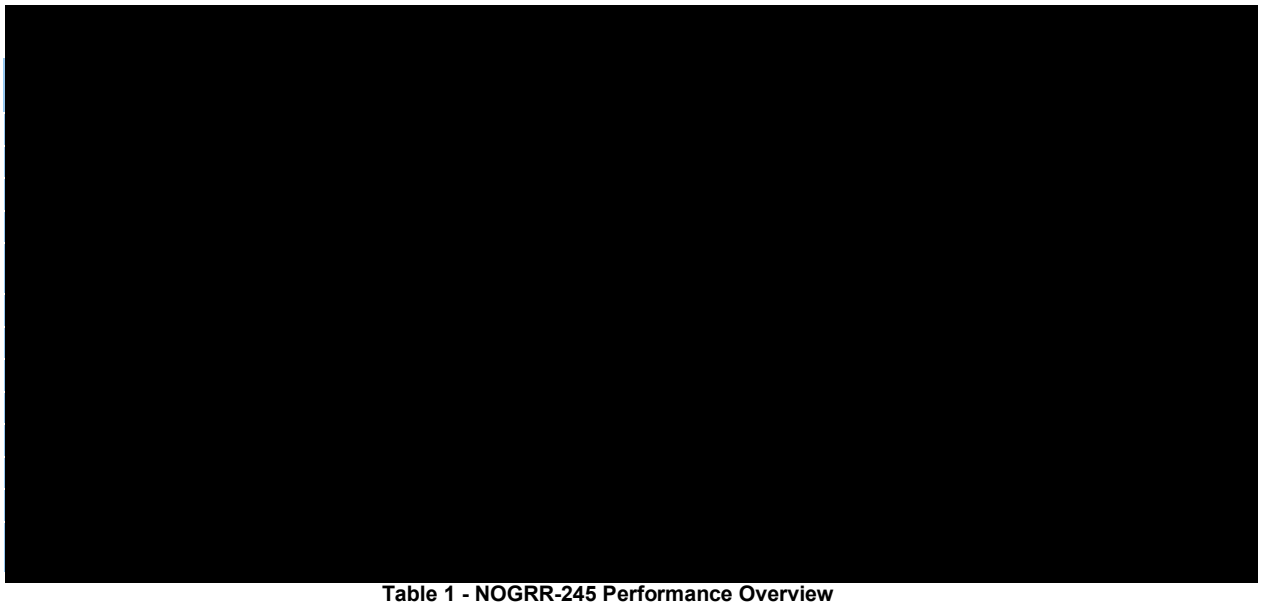


Table 1 - NOGRR-245 Performance Overview

In addition to Table 1. The following table describes the wind turbine Mk versions included in the evaluation.



Table 2 – Current Overview



Original Instruction: T05 0204-3263 VER 00
T05 0204-3263 Ver 00 - Approved- Exported from DMS: 2025-02-27 by SCLEA

[redacted]

NOGRR-245 Questions:

[redacted]

Frequency and Voltage Ride-through:

1. **Is the Resource frequency `and voltage ride-through capability (i.e., software, settings, firmware, and parameterization) set to the maximum level the equipment allows?**

[redacted]

2. **Will the Resource owner implement changes to existing equipment other than software, firmware, settings or parameterization changes to increase the Resource's voltage ride-through capability?**

[redacted]

Voltage Ride-through:

3. **Do all instantaneous over-current or over-voltage protection systems installed and activated to trip the Resource use filtered quantities or time delays sufficient to prevent**

Original Instruction: T05 0204-3263 VER 00
T05 0204-3263 Ver 00 - Approved- Exported from DMS: 2025-02-27 by SCLEA

misoperation while providing the desired equipment protection?

[redacted]

4. **Does all alternating current instantaneous over-voltage protection that could disrupt power output use a measurement period of at least one cycle (of fundamental frequency)?**

[redacted]

5. **Does the Resource use Rate of Change of Frequency measurement quantities to reduce power output or trip offline during fault conditions and subsequent recovery to a steady-state operating point within the applicable ride-through profiles in NOG Section 2.9.1.1(1) or 2.9.1.2(1)?**

[redacted]

6. **Does the Resource use phase angle jump measurement quantities to reduce power output or trip offline during fault conditions and subsequent recovery to a steady-state operating point within the applicable ride-through profiles in NOG Section 2.9.1.1(1) or 2.9.1.2(1)?**

[redacted]

IEEE 2800-2022

7. **Has the Resource owner maximized the Resource's capabilities with respect to the requirements in IEEE 2800-2022 Sections 5, 7, and 9 to the fullest extent the equipment allows?**

[redacted]

8. **Will the IBR be configured to inject negative sequence current for unbalanced faults (in addition to increased positive-sequence reactive current) as described in IEEE 2800 Section 7.2.2.3.4?**

[redacted]

9. **IBR Performance Specifications per IEEE 2800-2022 Section 7.2.2.3.5, Table 13.**

[redacted]

10. **Does the Resource use current blocking (IEEE 2800-2022 Section 7.2.3)?**

[redacted]

Original Instruction: T05 0204-3263 VER 00
T05 0204-3263 Ver 00 - Approved- Exported from DMS: 2025-02-27 by SCLEA

Original Instruction: T05 0204-3263 VER 00

11. **Provide the Rate of Change of Frequency ride-through capability in the following table (See IEEE 2800-2022 Section 7.3.2.3.5):**

[redacted]

12. **Provide the phase angle jump (change) ride-through capability in the following table (See IEEE 2800-2022 Section 7.3.2.4):**

[redacted]

13. **Provide consecutive voltage deviations ride-through data (See, IEEE 2800-2022 Section 7.2.2.4):**

[redacted]

T05 0204-3263 Ver 00 - Approved- Exported from DMS: 2025-02-27 by SCLEA

Date: March 19, 2025

From: Vestas – Power Plant Solutions AME

RE: 245NOGRR-112 PUCT Report 092624 Clarifications Addendum

[redacted]

Frequency Ride-Through

F [redacted]

FR [redacted]

FR [redacted]

FR [redacted]

FR [redacted]

FR [redacted]

Power Plant Soultions
Vestas American Wind Technology

1417 NW Everett St, Portland, OR 97211, USA
Tel: +1 503 327 2000, vestas-americas@vestas.com, www.vestas.com

Original Instruction: T05 0204-3263 VER 01

T05 0204-3263 Ver 01 - Approved- Exported from DMS: 2025-03-19 by THANR

Voltage Ride-Through

VRT-1 [redacted].

VRT-2 [redacted].

VRT-3 [redacted].

VRT-4 [redacted]

VRT-5 [redacted].

VRT-6 [redacted].

VRT-7 [redacted],

Original Instruction: T05 0204-3263 VER 01

T05 0204-3263 Ver 01 - Approved- Exported from DMS: 2025-03-19 by THANR

[redacted]

[redacted].

VRT-8 [redacted]

[redacted]

VRT-9 [redacted]

[redacted].

IEEE 2800-2022

IEEE-1 [redacted]

[redacted]

IEEE-2 [redacted]

[redacted].

IEEE-3 [redacted]

[redacted]

IEEE-4 [redacted]

[redacted]

Original Instruction: T05 0204-3263 VER 01

T05 0204-3263 Ver 01 - Approved- Exported from DMS: 2025-03-19 by THANR

Original Instruction: T05 0204-3263 VER 01



IEEE-5

.

IEEE-6

.

T05 0204-3263 Ver 01 - Approved- Exported from DMS: 2025-03-19 by THANR

Original Instruction: T05 0204-3263 VER 01

[redacted]

IEEE-7 [redacted]

[redacted].

IEEE-8 [redacted]

[redacted].

Thermal Limitations

[redacted].

Mechanical Limitations

[redacted].

[redacted]:

T05 0204-3263 Ver 01 - Approved- Exported from DMS: 2025-03-19 by THANR



Original Instruction: T05 0204-3263 VER 01

T05 0204-3263 Ver 01 - Approved- Exported from DMS: 2025-03-19 by THANR

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

Any response contained in this document should be considered Protected Information in accordance with the ERCOT Protocols.

Provide a succinct description, with supporting documentation, of the Requesting Entity's efforts to comply with the applicable reliability requirement and an explanation of the Requesting Entity's inability to comply.

[redacted]

Inability to Comply:

- [redacted]

[1] Please see response to Question IEEE-5 from the document titled "ERCOT NOGRR245 Memo Addendum_Vestas_2025-3-19.pdf."

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IE [redacted]

- [redacted]

V [redacted]

Efforts to Comply:

[2] Please see the response to Question VRT-7 from the document titled "ERCOT NOGRR245 Memo Addendum_Vestas_2025-3-19.pdf".

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[redacted]

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

Provide documentation describing all feasible modifications, replacements, or upgrades the resource entity could implement, but has not yet implemented, to improve the performance of the resource toward meeting the applicable reliability requirement.

[redacted]

Modification #1: [redacted]

[redacted]

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

Modification #2: [redacted]

[redacted]

Modification #3: [redacted]

[redacted]

Modification #4: [redacted]

[redacted]

[redacted]

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

[redacted]

Evaluated Modifications that Salt Fork Wind has Elected to not Implement

[redacted]

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

Schedule for implementing modifications the Requesting Entity provided as part of the Initial Frequency Ride-Through Capability Report (IFRTCR) and/or Initial Voltage Ride-Through Capability Report (IVRTCR).

[redacted]

Proposed Modification Implementation Tasks	Schedule
[redacted]	
Proposed dates for RE to provide updates to ERCOT on its progress	

[redacted]

[7] Southern Power previously requested an extension until October 1, 2027. This revised filing reduces the necessary timeframe by 9 months. This is primarily based on a faster-than-anticipated development of the OEM-provided turbine dynamic models reflecting proposed modifications.

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

[redacted]

a.	Proposed completion deadline	[redacted]
b.	Proposed dates for the RE to provide updates to ERCOT on its progress	
c.	Supporting documentation	
d.	Potential mitigation options	

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

Attachments / Technical Documentation:

[redacted]

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Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

Smith, Chase (SPC)

From:	Zieba, Cezary
Sent:	Friday, September 5, 2025 2:40 PM
To:	Smith, Chase (SPC)
Cc:	Humphreys, Craig; Melton, Christopher Daniel; Cook, Kristin (SPC); Hale, Joshua A. (SPC)
Subject:	RE: Roserock NOGRR 245 Evaluation and Proposed Ride Through Settings 9-5-2025
Attachments:	NOGRR245_Wake_Wind.xlsx; NOGRR245_Cactus_Flats.xlsx; NOGRR245_East_Pecos.xlsx; NOGRR245_Lamesa.xlsx; NOGRR245_Roserock.xlsx; NOGRR245_Salt_Fork.xlsx; NOGRR245_Tyler_Bluff.xlsx

Chase,

[redacted]

Please let us know if you have any questions.

Thanks,

Cezary

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

[redacted]

Subject: NOGRR 245 Verification of Technical Limitation – Need for Exemption or Extension

[redacted]

[redacted]

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

Attachment 1: Detailed Description of Technical Limitation

Resource Entity Name: Salt Fork Wind LLC
Resource Name (Unit): saltfork_unit1, saltfork_unit2

Detailed Description of the Technical Limitation:

Applicable Nodal Operating Guide Requirement(s):

[redacted]

Description of Technical Limitation:

[redacted]

Need for Extension:

[redacted]

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

[redacted]

Modification #1: [redacted]

Modification #2: [redacted]

[1] Southern Power previously requested an extension until October 1, 2027. This revised filing reduces the necessary timeframe by 9 months. This is primarily based on a faster-than-anticipated development of the OEM-provided turbine dynamic models reflecting proposed modifications.

[redacted]

Proposed Modification Implementation Tasks	Schedule
[redacted]	
Proposed dates for RE to provide updates to ERCOT on its progress	

[redacted]

Need for Exemption:

[redacted]

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

Initial Voltage Ride-Through Capability Report

Resource Entity or Interconnecting Entity Name: Salt Fork Wind LLC

(a) **Resource Entity or Interconnecting Entity Data Universal Numbering System (DUNS) Number:** 0797475733000

(b) **IBR/WGR Site Name:** Salt Fork Wind (SALTFORK)

(c) **IBR/WGR Unit Name(s):** saltfork_unit1, saltfork_unit2

(d) **Nodal Operating Guide Section(s) with which the Resource cannot comply:**

[redacted]

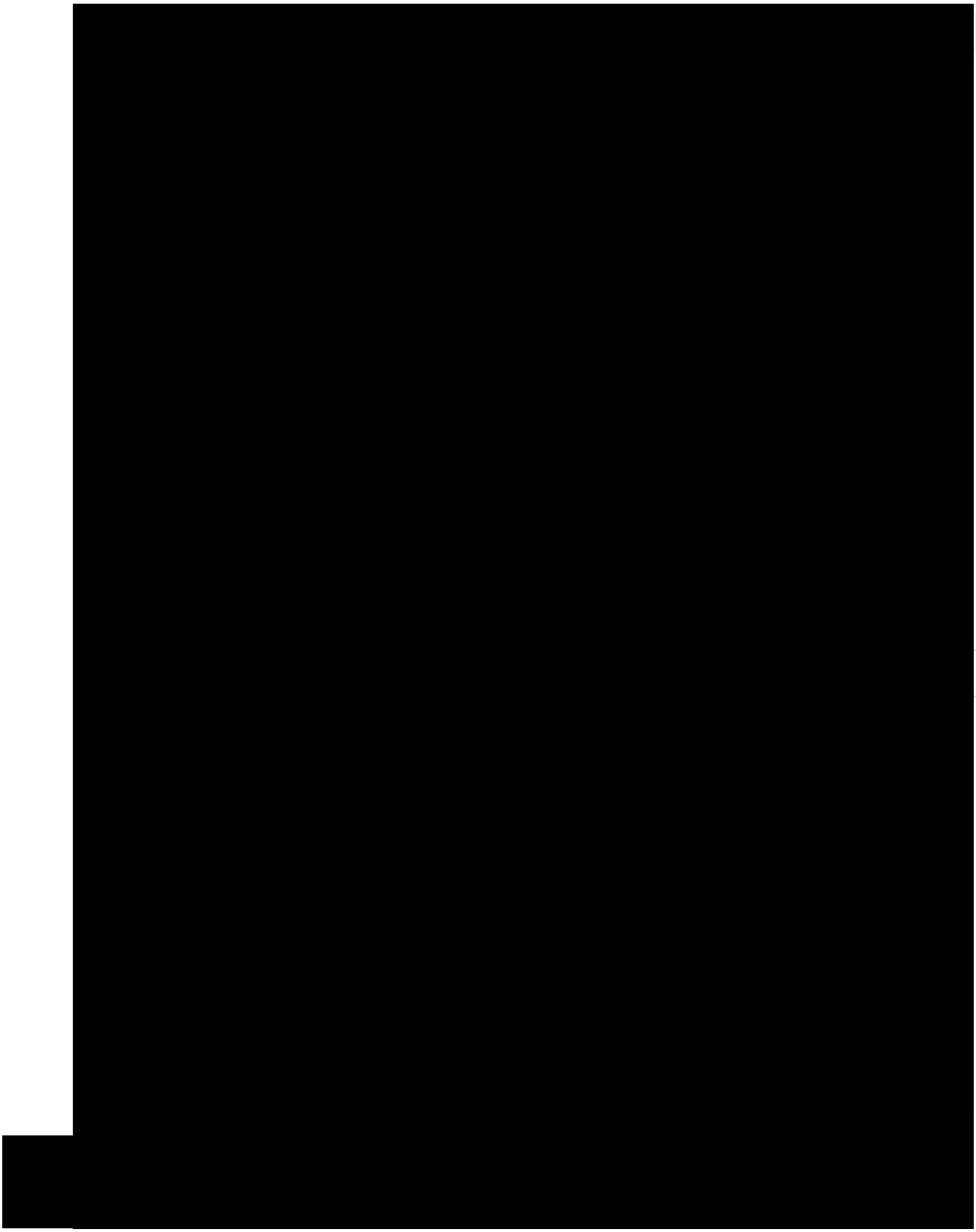
(e) **Current voltage ride-through capability in a format similar to the table in Section 2.9.1.2(1):**

[redacted]

[1] See section 2.1 of "0130-2808_V00 - Salt Fork - V100 Mk10B - PRC-024 Settings.pdf" which shows the as-left ride-through capability.

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Salt Fork



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(f) Known voltage ride-through limitations of the IBR, Type 1 WGR or Type 2 WGR as compared to the requirements in Sections 2.9.1.2(1)-(7):

[redacted]

IEEE-5 Does the Resource use current blocking?

[redacted]

[redacted]

[redacted]

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[redacted]

(g) A detailed description of the technical limitation preventing the Resource from meeting the ride-through requirement(s), including a letter signed by an officer or executive of the original equipment manufacturer (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm verifying the limitations:

[redacted]

[redacted]

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(i) If a Resource Entity cannot address the entire plant design with a letter required in Section 2.11.1(1)(g), the Resource Entity must supplement a letter from the original equipment manufacturer for its equipment (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm by providing a notarized attestation sworn to by the Resource Entity's highest-ranking representative, official, or officer with binding authority over the entity attesting to the efforts made to obtain the letter, why those efforts failed, and which parts of the plant design is attested to. The attestation shall also include a detailed description of the technical limitation(s) preventing the Resource from meeting the ride-through requirement, including any information on technical limitations on all or part of the Resource which the Resource Entity is able to obtain from original

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

equipment manufacturers or an engineering consulting firm under Section (g) above.

[redacted]

(h) Available software, firmware, settings, or parameterization modifications the Resource Entity will implement to maximize the voltage ride-through capability of the IBR, Type 1 WGR or Type 2 WGR to approach or meet the voltage ride-through requirements in Sections 2.9.1.2(1)-(7) within known equipment limitations, to the greatest extent possible:

[redacted]

Modification #1: [redacted]

[redacted]

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[redacted]

Modification #2: [redacted]

[redacted]

(i) To the extent the Resource Entity chooses to implement changes to existing equipment other than software, firmware, settings or parameterization modifications that increase the voltage ride-through capability, identification of any such equipment modifications:

[redacted]

[7] Please see email to ERCOT dated 8/19/2025 containing root cause analysis and corrective action plan.

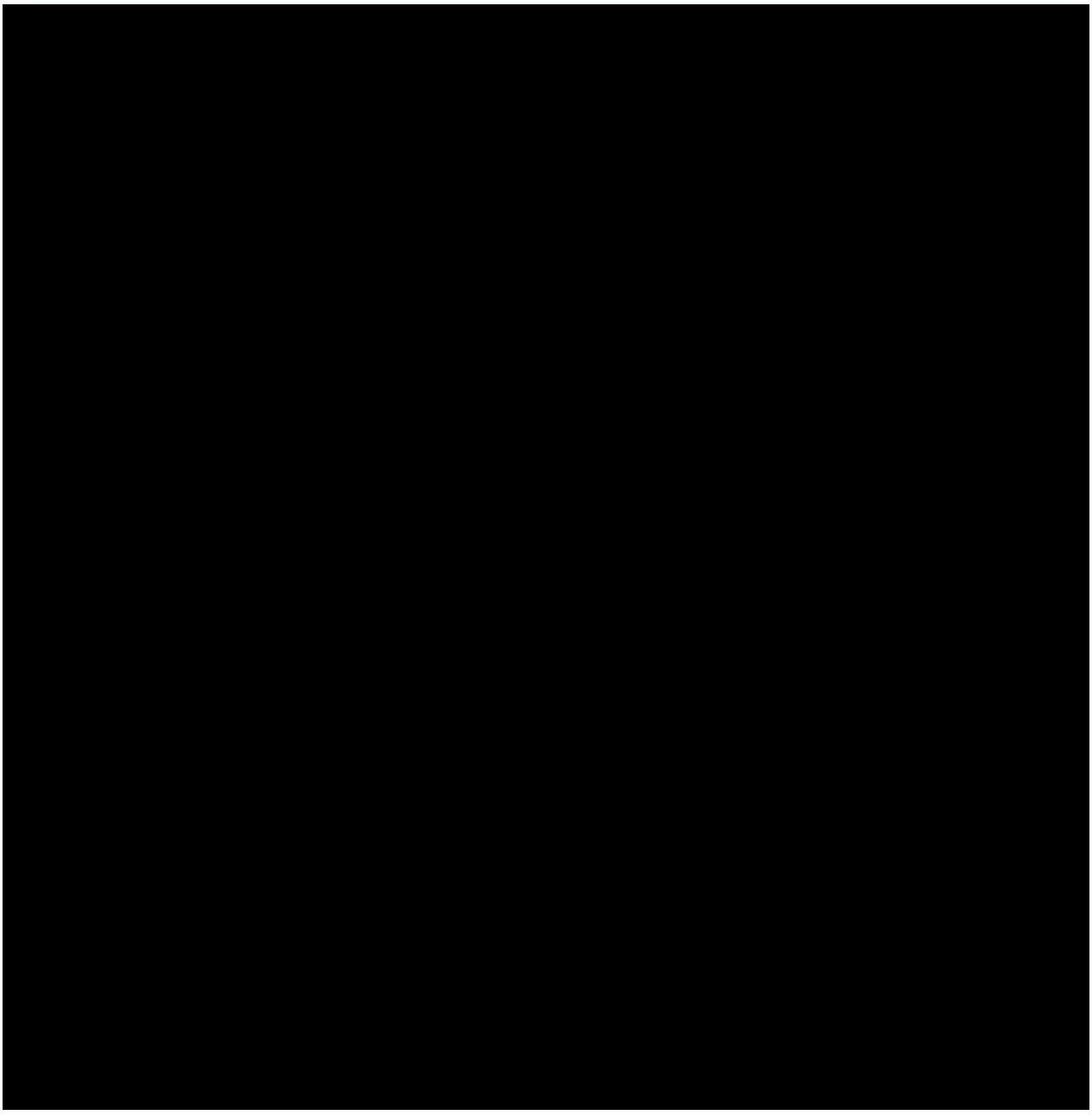
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[redacted]

(j) Expected post-modification Resource capability in a format similar to the table in Section 2.9.1.2(1) and documentation of any expected remaining limitation(s) following implementation of such modifications:

[redacted]

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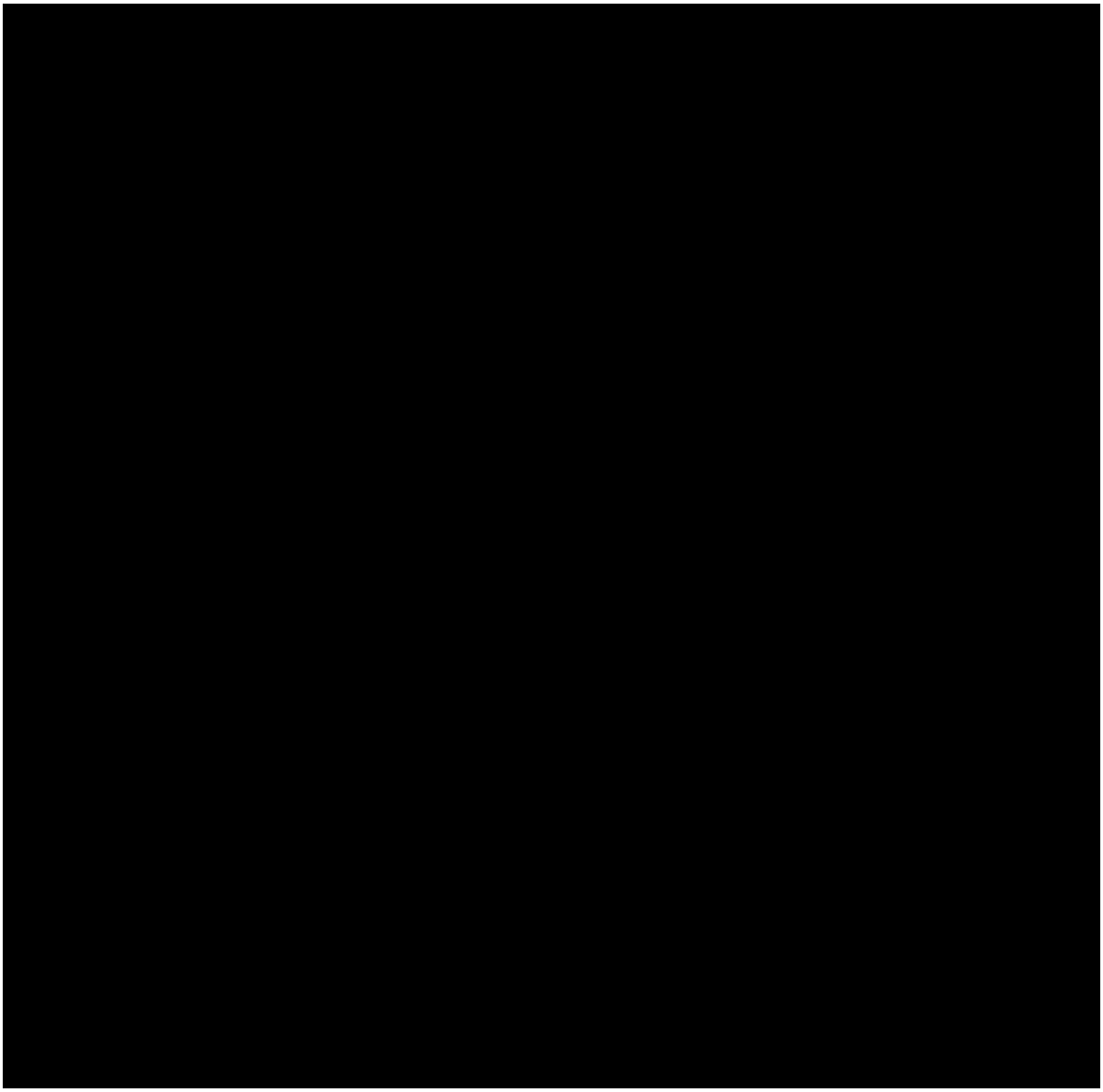
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Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394



(k) A schedule for implementing the modification(s):



[8] Please see response to Question IEEE-5 from the document titled "ERCOT NOGRR245 Memo Addendum_Vestas_2025-3-19.pdf."
[9] Please see the response to Question VRT-7 from the document titled "ERCOT NOGRR245 Memo Addendum_Vestas_2025-3-19.pdf".

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

[redacted]

Proposed Modification Implementation Tasks	Schedule
[redacted]	
Proposed dates for RE to provide updates to ERCOT on its progress	

[10] Southern Power previously requested an extension until October 1, 2027. This revised filing reduces the necessary timeframe by 9 months. This is primarily based on a faster-than-anticipated development of the OEM-provided turbine dynamic models reflecting proposed modifications.

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

[redacted]

(l) A model accurately representing expected performance reflecting all technical limitations or a statement there are no new models available because the Resource is requesting an exemption and the current model submitted to ERCOT already reflects all technical limitations in voltage ride-through capability:

[redacted]

[redacted]

Docusign Envelope ID: 6C1A724A-03F0-41C1-BC61-EB065BC01394

[redacted]

(m) A description of any limitation that cannot be accurately represented in a model:

[redacted]

[redacted]

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

(Market Notice: M-A010825-07)

Resource Entity (RE), Interconnecting Entity (IE):

SALT FORK WIND LLC (RE)

Resource Name or Project Name:

SALTFORK_UNIT2

DocuSign Instructions:

- Responses are due on or before September 15th, 2025.
- Only one person can provide responses.
- The document can be forwarded or “Assigned to Someone Else” via the “Other Actions” menu at the top of the DocuSign web page.
- Please contact NOGRR245@ercot.com with any additional questions.

Background Information:

Refer to Market Notices M-A010825-06 and M-A010825-07 for background information.

NOTE: IF YOU ALREADY REQUESTED AN EXEMPTION OR EXTENSION FOR YOUR RESOURCE ON OR BEFORE APRIL 15, 2025, YOU MUST SUBMIT THE INFORMATION REQUESTED BELOW BY MIDNIGHT ON SEPTEMBER 15TH, 2025 OR YOU WILL BE FOREVER BARRED FROM REQUESTING AN EXEMPTION OR EXTENSION. *See*, Nodal Operating Guide § 2.11.1(2); § 2.11.2(2) and § 2.12.1(2).

Submitter signature: DocuSigned by: Chase Smith 0DCB77E32063497...

Submitter name: Chase Smith

Submitter title: Market Compliance & Policy Manager

Date: 9/15/2025

General Comments (4000 Character Limit, attach supporting documentation as needed):

[redacted]

1. Did you submit a Notice of Intent to Request an Exemption for the above-referenced Resource by April 15, 2025? Yes

   a) Are you requesting an official exemption now? Yes

   Attach the Exemption Request Form and any supplemental documents:

   Request Form:

   Supplemental Documents:

2. If you requested an Extension by April 15, 2025, for the above-referenced Resource, does the Resource still need an Extension? Yes

Complete the table below (NOTE: ERCOT will compare the answers below to the April 2025 submission).

[redacted]

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

Frequency Ride-Through

FRT-1. If you are requesting an Extension or Exemption for any **Frequency** Ride-Through requirement, select "yes" and complete the following questions.

No

(a) RE/IE Data Universal Numbering System (DUNS) Number:

(b) and (c)

NOTE: For Resources synchronized or with a Production Load Date, provide the following information as it appears in the ERCOT Network Operations Model.

NOTE: For Resources that have not received a Production Load Date, provide the following information as entered in ERCOT's Resource Integration and Ongoing Operations (RIOO) system.

IBR/WGR Site Name:

IBR/WGR Resource Name:

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

(d) Nodal Operating Guide Section(s) with which the Resource cannot comply (4000 Character Limit):

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

(e) Current frequency ride-through capability in a format similar to the table in Nodal Operating Guide (NOG) Section 2.6.2.1(1):

Instructions:
Use 99999 to indicate “continuous”
Use 88888 to indicate “Will Trip”
Use 77777 for “Not Known”

If you need to use any other generic numbers, be sure to indicate the definition of the numbers here:



If the Resource has different capabilities than the Point of Interconnection Bus (POIB) frequency in the first column of the table, provide the additional capabilities in an attachment.

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

(f) Known frequency ride-through limitations of the Resource as compared to the requirements in NOG Sections 2.6.2.1(1)-(5) [**NOTE**: Be specific] (4000 Character Limit):

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

(g) A **detailed** description of the technical limitation preventing the Resource from meeting the ride-through requirement(s), **including a letter** signed by an officer or executive of the original equipment manufacturer (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm verifying the limitations [**NOTE**: Be specific and be sure to attach the required letter] (4000 Character Limit):

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

If you cannot address the entire plant design with a letter required in item (g), you **must** supplement the letter from the original equipment manufacturer for its equipment (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm by providing a **notarized attestation sworn to by the Resource Entity's highest-ranking representative, official, or officer with binding authority over the entity** attesting to: (i) the efforts made to obtain the letter, (ii) why those efforts failed, and (iii) which parts of the plant design is attested to. The attestation **must also include** a ***detailed description*** of the technical limitation(s) preventing the Resource from meeting the ride-through requirement, including any information on technical limitations on all or part of the Resource the Resource Entity is able to obtain from original equipment manufacturers or an engineering consulting firm under item (g) above (4000 Character Limit):

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

(h) Available software, firmware, settings or parameterization modifications the Resource Entity will implement to maximize the frequency ride-through capability of the Resource within known equipment limitations, to the greatest extent possible (4000 Character Limit):

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

(i) To the extent the Resource Entity chooses to implement changes to existing equipment ***other than*** software, firmware, settings or parameterization modifications that increase the frequency ride-through capability, identify those equipment modifications (4000 Character Limit):

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

(j) Expected **post-modification** Resource capability in a format similar to the table in Section 2.6.2.1(1) and **documentation of** any expected remaining limitation(s) following implementation of such modifications:

Instructions:
Use 99999 to indicate “continuous”
Use 88888 to indicate “Will Trip”
Use 77777 for “Not Known”

If you need to use any other generic numbers, be sure to indicate the definition of the numbers here:



If your Resource has different capabilities than the POIB frequency in the first column of the table, please provide the additional capabilities in an attachment.

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

(k) A schedule for implementing the modification(s) (4000 Character Limit):

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

(l) **A model accurately representing expected performance reflecting all technical limitations** or a statement there are no new models available because the Resource is requesting an exemption and the current model submitted to ERCOT already reflects all technical limitations in frequency ride-through capability (4000 Character Limit) :

[**NOTE**: Submit via ERCOT's Resource Integration and Ongoing Operations (RIOO) System and provide the RIOO Change Request number here]

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

(m) A description of any limitation that cannot be accurately represented in a model (4000 Character Limit):

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

Voltage Ride-Through

VRT-1. If you are requesting an Extension or Exemption for the **Voltage** Ride-Through requirements, select yes and complete the following questions.

Yes

(a) RE/IE Data Universal Numbering System (DUNS) Number: 0797475733000

(b) and (c)

NOTE: For Resources synchronized or with a Production Load Date, provide the following information as it appears in the ERCOT Network Operations Model.

NOTE: For Resources that have not received a Production Load Date, provide the following information as entered in ERCOT's Resource Integration and Ongoing Operations (RIOO) system.

IBR/WGR Site Name: SALTFORK

IBR/WGR Resource Name: SALTFORK_UNIT2

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

(d) Nodal Operating Guide Section(s) with which the Resource cannot comply (4000 Character Limit):

[redacted]

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

(e) Current voltage ride-through capability in a format similar to the table in NOG Section 2.9.1.2(1):

Instructions:
Use 99999 to indicate “continuous”
Use 88888 to indicate “Will Trip”
Use 77777 for “Not Known”

If you need to use any other generic numbers, be sure to indicate the definition of the numbers here:



If your Resource has different capabilities than the Point of Interconnection Bus (POIB) voltage in the first column of the table, please provide the additional capabilities in an attachment.

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

(f) Known voltage ride-through limitations of the IBR, Type 1 WGR or Type 2 WGR as compared to the requirements in Sections 2.9.1.2(1)-(7) [**NOTE**: Be specific] (4000 Character Limit):



Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

(g) A **detailed** description of the technical limitation preventing the Resource from meeting the ride-through requirement(s), **including a letter** signed by an officer or executive of the original equipment manufacturer (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm verifying the limitations [**NOTE**: Be specific and be sure to attach the required letter] (4000 Character Limit):

[redacted]

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

If you cannot address the entire plant design with a letter required in item (g), you **must** supplement the letter from the original equipment manufacturer for its equipment (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm by providing a **notarized attestation sworn to by the Resource Entity's highest-ranking representative, official, or officer with binding authority over the entity** attesting to: (i) the efforts made to obtain the letter, (ii) why those efforts failed, and (iii) which parts of the plant design is attested to. The attestation **must also include** a ***detailed description*** of the technical limitation(s) preventing the Resource from meeting the ride-through requirement, including any information on technical limitations on all or part of the Resource the Resource Entity is able to obtain from original equipment manufacturers or an engineering consulting firm under item (g) above (4000 Character Limit):

[redacted]

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

(h) Available software, firmware, settings, or parameterization modifications the Resource Entity will implement to maximize the voltage ride-through capability of the Resource to approach or meet the voltage ride-through requirements in NOG Sections 2.9.1.2(1)-(7) within known equipment limitations, to the greatest extent possible (4000 Character Limit):

[redacted]

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

(i) To the extent the Resource Entity chooses to implement changes to existing equipment ***other than*** software, firmware, settings or parameterization modifications that increase the voltage ride-through capability, identify those equipment modifications (4000 Character Limit):

[redacted]

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

(j) Expected **post-modification** Resource capability in a format similar to the table in Section 2.9.1.2(1) and **documentation of** any expected remaining limitation(s) following implementation of such modifications:

Instructions:
Use 99999 for “Continuous”
Use 88888 for “Will Trip”
Use 77777 for “Not Known”

If you need to use any other generic numbers, be sure to indicate the definition of the numbers here:



If your Resource has different capabilities than the POIB voltage in the first column of the table, please provide the additional capabilities in an attachment.

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

(k) A schedule for implementing the modification(s) (4000 Character Limit):

[redacted]

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

(l) **A model accurately representing expected performance reflecting all technical limitations** or a statement there are no new models available because the Resource is requesting an exemption and the current model submitted to ERCOT already reflects all technical limitations in voltage ride-through capability (4000 Character Limit):

[**NOTE**: Submit via ERCOT's Resource Integration and Ongoing Operations (RIOO) System and provide the RIOO Change Request number here]

[redacted]

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

(m) A description of any limitation that cannot be accurately represented in a model (4000 Character Limit):

[redacted]

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

Misc

Other Attachments (if any):



Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

Request for Exemption

This Request for Exemption form constitutes a formal request for exemption[1] under 16 Texas Administrative Code § 25.517(c) from one or more requirements of the following Nodal Operating Guides Sections:

- 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); and
- 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.

The Resource Entity/Interconnecting Entity (Requesting Entity) must ***complete all sections*** and submit the form, ***including all information noted below***, to ERCOT via DocuSign on or before **September 15, 2025**. Information submitted as part of this Request for Exemption shall be treated as Protected Information in accordance with the ERCOT Protocols.

NOTE: If you, as the Requesting Entity, did not submit a Notice of Intent to Request an Exemption for the Resource on or before April 15, 2025, you may *not* request an exemption now.

RE/IE NAME: Salt Fork Wind LLC

RE/IE DUNS NUMBER: 0797475733000

*For Resources synchronized or with a Production Load Date, provide the following information **as it appears in the ERCOT Network Operations Model**:*

SUBSTATION ACRONYM: SALTFORK

RESOURCE NAME: SALTFORK_UNIT2

*For Resources that have **not** received a Production Load Date, provide the following information **as entered in ERCOT's Resource Integration and Ongoing Operations (RIOO) system**:*

INR NUMBER:

PROJECT NAME:

As the Requesting Entity, I request the above-referenced Resource be exempted from the following Nodal Operating Guides requirement(s)[2] *[check all that apply]*:

Frequency Ride-Through

- ☐ Section 2.6.2.1(1)
- ☐ Section 2.6.2.1(3)
- ☐ Section 2.6.2.1(4)
- ☐ Section 2.6.2.1(5)

Voltage Ride-Through

- ☐ Section 2.9.1(5) [Type 3 WGRs only]
- ☐ Section 2.9.1.2(1)
- ☐ Section 2.9.1.2(3)
- ☒ Section 2.9.1.2(4)
- ☒ Section 2.9.1.2(5)
- ☒ Section 2.9.1.2(6)
- ☐ Section 2.9.1.2(7)

The following items are required unless otherwise indicated:

[1] *See*, 16 Texas Administrative Code (TAC) § 25.517(c)(9).

[2] Include cross-references to ERCOT Protocols where the applicable reliability requirement is contained. *See*, 16 TAC § 25.517(c)(1).

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☒ Provide a succinct description, with supporting documentation, of the Requesting Entity's efforts to comply with the applicable reliability requirement and an explanation of the Requesting Entity's inability to comply.[3]

☒ Provide documentation describing all feasible modifications, replacements, or upgrades the Requesting Entity could implement, but has not yet implemented, to improve the performance of the Resource toward meeting the requirement(s) from which an exemption is requested.[4]

☒ Provide a schedule for implementing modifications the Requesting Entity provided as part of the Initial Frequency Ride-Through Capability Report (IFRTCR) and/or Initial Voltage Ride-Through Capability Report (IVRTCR), as appropriate, including the following information:

(A) a proposed completion deadline for each proposed modification, replacement, or upgrade;

(B) proposed dates for the Requesting Entity to provide updates to ERCOT on the plan's progress;

(C) any supporting documentation relevant to plan implementation; and

(D) potential mitigation options, if applicable.[5]

SELECT ONLY ONE: Requesting Entity has ☐ / has not ☒ submitted any other exemption requests for the Resource made the subject of this exemption request.[6]

☐ **(REQUIRED IF *HAS* WAS MARKED IN RESPONSE TO THE PREVIOUS QUESTION)** Attach a description of the outcome of all other exemption requests submitted for the Resource made the subject of this exemption request.

☒ Resource Energization Date (*i.e.*, the Initial Energization date as defined in Section 2 of the ERCOT Protocols):[7] 9/23/2016

☒ Provide copies of the Resource's Standard Generation Interconnection Agreement (SGIA) and any amendments not already submitted to ERCOT.[8] If the Requesting Entity already provided the SGIA to ERCOT, mark this box: ☐

[3] *See*, 16 TAC § 25.517(c)(2).
[4] *See*, 16 TAC § 25.517(c)(3).
[5] *See*, 16 TAC § 25.517(c)(5).
[6] *See*, 16 TAC § 25.517(c)(6).
[7] *See*, 16 TAC § 25.517(c)(8). **NOTE**: For projects that have not yet reached the Initial Energization step in the Generation Interconnection and Modification (GIM) process, enter the projected Initial Energization date currently in RIOO.
[8] *Id.*

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☒ Requesting Entity understands that, in support of this request, it must submit a ***complete and accurate*** IFRTCR and/or IVRTCR, as appropriate, ***with emphasis on a model accurately representing expected Resource performance reflecting all technical limitations***.[9]

Signature of Authorized Representative: Chase Smith

AR Printed Name: _B. Chase Smith

Date: 9/14/2025

[9] *See*, 16 TAC § 25.517(c)(4).

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

Request for Extension – Salt Fork Wind LLC

Any response contained in this document should be considered Protected Information in accordance with the ERCOT Protocols.

Required Information pursuant to Nodal Operating Guide Section 2.12.1.2 (2):

(a) **Requesting Entity Name:** SALT FORK WIND LLC

(b) **Requesting Entity DUNS Number:** 0797475733000

(c) **IBR/WGR Site Name:** Salt Fork Wind (SALTFORK)

(d) **IBR/WGR Unit Name(s):** SALTFORK_UNIT1, SALTFORK_UNIT2

(e) **Nodal Operating Guide Section(s) under which the extension is requested:**

[redacted]

(f) **A detailed description of the grounds for the extension and the basis for each request:**

[redacted]

(g) **Documentation from the equipment manufacturer describing any known limitations associated with the extension request, a description of proposed modifications, and a schedule for implementing modifications:**

Known Limitations

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

[redacted]

Description of Proposed Modifications

Modification #1 [redacted]

[redacted]

Modification #2: [redacted]

[redacted]

[redacted]

PROTECTED INFORMATION

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

[redacted]

Schedule for Implementing Modifications

[redacted]

Proposed Modification Implementation Tasks	Schedule
[redacted]	

[redacted]

PROTECTED INFORMATION

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

Proposed dates for RE to provide updates to ERCOT on its progress	
[redacted]	

(h) **Other information specified in this Section.** None.

PROTECTED INFORMATION

Vestas

T[04]

DOCUMENT:
[0130-2808]

DESCRIPTION:
Salt Fork Protection Settings

Original Instruction: T05 0130-2808 VER 00

Salt Fork Protection Settings
V100 Mk10B BV2020.04.129



T05 0130-2808 Ver 00 - Approved- Exported from DMS: 2022-08-03 by THANR

DISCLAIMER

[redacted]

COPYRIGHT NOTICE

[redacted]

Original Instruction: T05 0130-2808 VER 00
T05 0130-2808 Ver 00 - Approved- Exported from DMS: 2022-08-03 by THANR

Version History

Version no.	Date	Initials	Description of changes
00	Aug-01-2022	THANR	First edition.

Table of Contents

[redacted]

Original Instruction: T05 0130-2808 VER 00
T05 0130-2808 Ver 00 - Approved- Exported from DMS: 2022-08-03 by THANR

1 Introduction

[redacted]

Original Instruction: T05 0130-2808 VER 00
T05 0130-2808 Ver 00 - Approved- Exported from DMS: 2022-08-03 by THANR

2 Settings

2.1 Voltage Settings



2.2 Frequency Protection



Original Instruction: T05 0130-2808 VER 00
T05 0130-2808 Ver 00 - Approved- Exported from DMS: 2022-08-03 by THANR

Date: February 27, 2025

From: Vestas – Power Plant Solutions AME

RE: 245NOGRR-112 PUCT Report 092624 Clarifications

Frequency and Voltage Ride-Through Capabilities

[redacted]

[redacted]

Power Plant Soultions
Vestas American Wind Technology

1417 NW Everett St, Portland, OR 97211, USA
Tel: +1 503 327 2000, vestas-americas@vestas.com, www.vestas.com

Original Instruction: T05 0204-3263 VER 00

T05 0204-3263 Ver 00 - Approved- Exported from DMS: 2025-02-27 by SCLEA

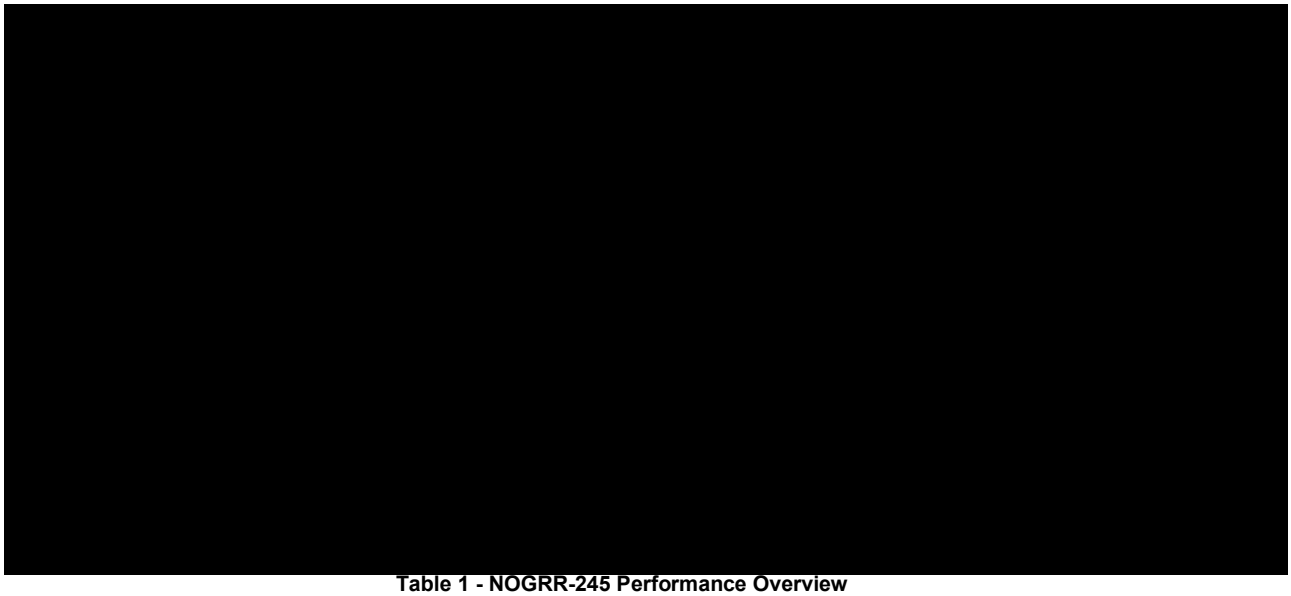


Table 1 - NOGRR-245 Performance Overview

In addition to Table 1. The following table describes the wind turbine Mk versions included in the evaluation.



Table 2 – Current Overview



Original Instruction: T05 0204-3263 VER 00
T05 0204-3263 Ver 00 - Approved- Exported from DMS: 2025-02-27 by SCLEA

Original Instruction: T05 0204-3263 VER 00

[redacted]

NOGRR-245 Questions:

The following section is based on the NOGRR245 Workshop I which occurred on February 10, 2025. The answers are to be considered for current Type 3 and Type 4 technologies and not discontinued products.

Frequency and Voltage Ride-through:

1. **Is the Resource frequency `and voltage ride-through capability (i.e., software, settings, firmware, and parameterization) set to the maximum level the equipment allows?**

[redacted]

2. **Will the Resource owner implement changes to existing equipment other than software, firmware, settings or parameterization changes to increase the Resource's voltage ride-through capability?**

[redacted]

Voltage Ride-through:

3. **Do all instantaneous over-current or over-voltage protection systems installed and activated to trip the Resource use filtered quantities or time delays sufficient to prevent**

T05 0204-3263 Ver 00 - Approved- Exported from DMS: 2025-02-27 by SCLEA

misoperation while providing the desired equipment protection?

[redacted]

4. **Does all alternating current instantaneous over-voltage protection that could disrupt power output use a measurement period of at least one cycle (of fundamental frequency)?**

[redacted]

5. **Does the Resource use Rate of Change of Frequency measurement quantities to reduce power output or trip offline during fault conditions and subsequent recovery to a steady-state operating point within the applicable ride-through profiles in NOG Section 2.9.1.1(1) or 2.9.1.2(1)?**

[redacted]

6. **Does the Resource use phase angle jump measurement quantities to reduce power output or trip offline during fault conditions and subsequent recovery to a steady-state operating point within the applicable ride-through profiles in NOG Section 2.9.1.1(1) or 2.9.1.2(1)?**

[redacted]

IEEE 2800-2022

7. **Has the Resource owner maximized the Resource's capabilities with respect to the requirements in IEEE 2800-2022 Sections 5, 7, and 9 to the fullest extent the equipment allows?**

[redacted]

8. **Will the IBR be configured to inject negative sequence current for unbalanced faults (in addition to increased positive-sequence reactive current) as described in IEEE 2800 Section 7.2.2.3.4?**

[redacted]

9. **IBR Performance Specifications per IEEE 2800-2022 Section 7.2.2.3.5, Table 13.**

[redacted]

10. **Does the Resource use current blocking (IEEE 2800-2022 Section 7.2.3)?**

[redacted]

Original Instruction: T05 0204-3263 VER 00
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Original Instruction: T05 0204-3263 VER 00

11. **Provide the Rate of Change of Frequency ride-through capability in the following table (See IEEE 2800-2022 Section 7.3.2.3.5):**

[redacted]

12. **Provide the phase angle jump (change) ride-through capability in the following table (See IEEE 2800-2022 Section 7.3.2.4):**

[redacted]

13. **Provide consecutive voltage deviations ride-through data (See, IEEE 2800-2022 Section 7.2.2.4):**

[redacted]

T05 0204-3263 Ver 00 - Approved- Exported from DMS: 2025-02-27 by SCLEA

Date: March 19, 2025

From: Vestas – Power Plant Solutions AME

RE: 245NOGRR-112 PUCT Report 092624 Clarifications Addendum

[redacted]

Frequency Ride-Through

FRT-1 [redacted].

FRT-2 [redacted].

FRT-3 [redacted].

FRT-4 [redacted].

FRT-5 [redacted].

FRT-6 [redacted].

Original Instruction: T05 0204-3263 VER 01

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Original Instruction: T05 0204-3263 VER 01

Voltage Ride-Through

VRT-1 [redacted].

VRT-2 [redacted].

VRT-3 [redacted].

VRT-4 [redacted].

VRT-5 [redacted].

VRT-6 [redacted].

VRT-7 [redacted]

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[redacted]

[redacted].

VRT-8 [redacted]

[redacted].

VRT-9 [redacted]

[redacted].

IEEE 2800-2022

IEEE-1 [redacted]

[redacted].

IEEE-2 [redacted]

[redacted].

IEEE-3 [redacted]

[redacted].

IEEE-4 [redacted]

[redacted]

Original Instruction: T05 0204-3263 VER 01

T05 0204-3263 Ver 01 - Approved- Exported from DMS: 2025-03-19 by THANR

[redacted]

IEEE-5 [redacted]

[redacted]

IEEE-6 [redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Original Instruction: T05 0204-3263 VER 01
T05 0204-3263 Ver 01 - Approved- Exported from DMS: 2025-03-19 by THANR



IEEE-7

IEEE-8

Original Instruction: T05 0204-3263 VER 01
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[redacted]

[redacted]

Original Instruction: T05 0204-3263 VER 01

T05 0204-3263 Ver 01 - Approved- Exported from DMS: 2025-03-19 by THANR

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

Smith, Chase (SPC)

From: Cook, Kristin (SPC)
Sent: Tuesday, August 19, 2025 2:11 PM
To: Moore, Ava
Cc: Event Analysis; SPC ERCOT (SPC); Smith, Chase (SPC)
Subject: RE: 04/14/2025 Panhandle Event: SALTFORK
Attachments: RCA and CAP - Salt Fork April 14 2025 Event.docx

Good afternoon Ava,

[redacted]

Thank you,

Kristin Cook
Market Compliance & Policy | Southern Power
krcook@southernco.com | C: 678.453.3623

From: Smith, Chase (SPC) <BCSMI@southernco.com>
Sent: Wednesday, May 21, 2025 11:46 AM
To: Moore, Ava <Ava.Moore@ercot.com>; Cook, Kristin (SPC) <KRCOOK@SOUTHERNCO.COM>; SPC ERCOT (SPC) <G2SPCERCOT@southernco.com>
Cc: Event Analysis <EventAnalysis@ercot.com>
Subject: RE: 04/14/2025 Panhandle Event: SALTFORK

Hi Ava,

[redacted]

Thank You,

B. Chase Smith
Market Compliance & Policy Manager
Commercial Optimization, Trading & Transmission
Southern Power Company
Tel 205.992.0145, Mobile 850.509.0500
Email bcsmi@southernco.com
southernpowercompany.com

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

Root Cause Analysis & Corrective Action Plan

Facility: Salt Fork Wind LLC ("Salt Fork Wind")

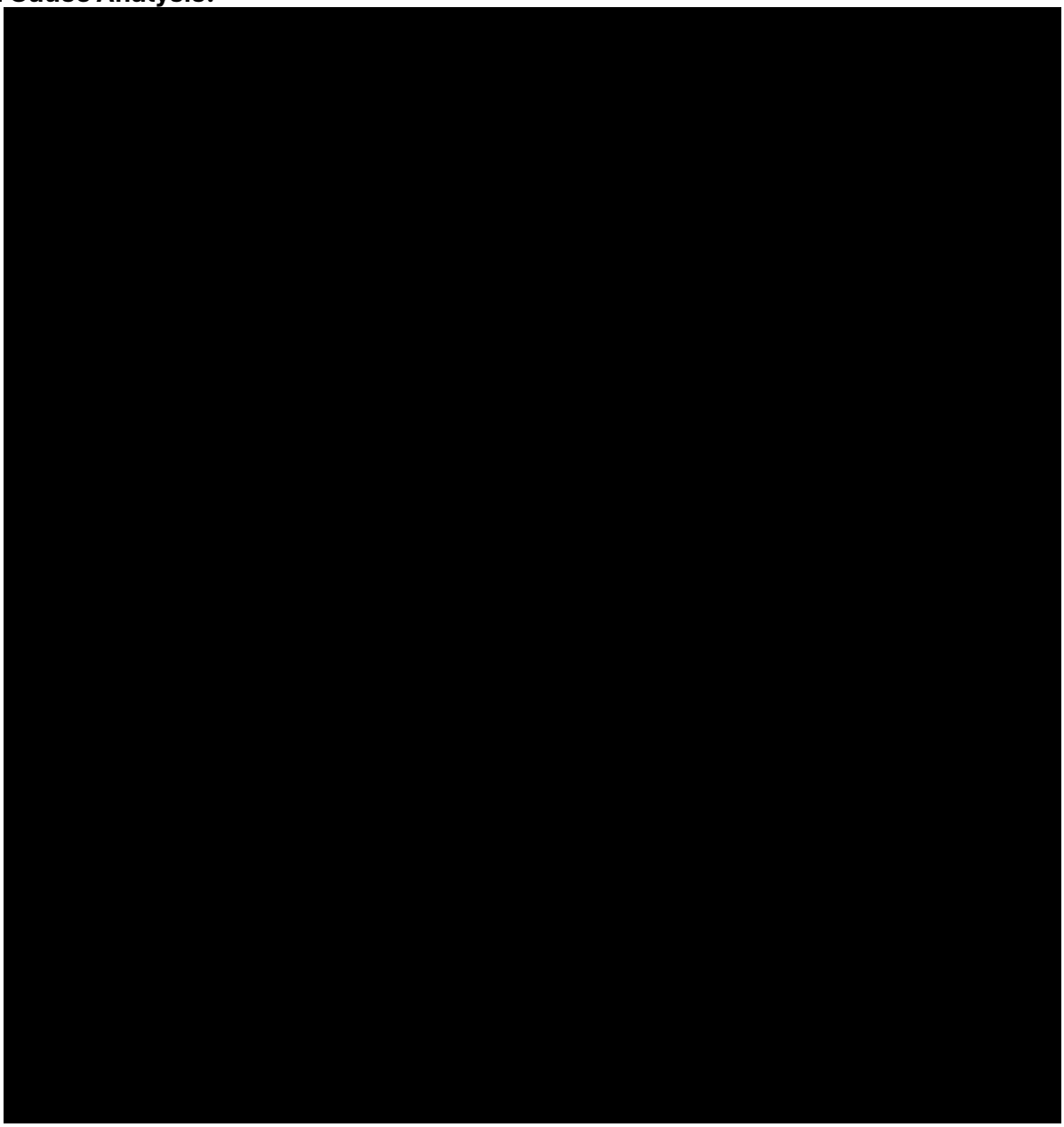
Event Date: April 14, 2025, 12:05 pm CST

Apparent Performance Failure Notification Date: May 21, 2025

Response Deadline: August 19, 2025 (within 90 days of notification)

Submitter: Southern Power Company (Southern Power")

Root Cause Analysis:



Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

[redacted]

Corrective Action Plan:

[redacted]

Modification #1: [redacted]

[redacted]

Modification #2: [redacted]

[redacted]

Implementation Timeline

[redacted]

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A



Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

Smith, Chase (SPC)

From: Rose, Jonathan <Jonathan.Rose@ercot.com>
Sent: Tuesday, March 11, 2025 5:46 AM
To: Smith, Chase (SPC); Davarikia, Hamzeh
Cc: Keith, Kerri Michelle (SPC); SPC ERCOT (SPC); Zieba, Cezary
Subject: RE: ACTION REQUIRED: SALTFORK pscad model update

CAUTION: This email originated from the Internet. Do not click links or open attachments unless you trust the sender and know the content is safe. If in doubt, report this email using the PhishAlarm button.

Good morning Chase,

Thank you for the package upload. Two initial questions:

1. [redacted]
2. [redacted]
3. [redacted]

Observation:1

[redacted]

[redacted]

Thanks,

Jonathan Rose
ERCOT Transmission Planning

From: Smith, Chase (SPC) <BCSMI@southernco.com>
Sent: Monday, March 10, 2025 3:09 PM
To: Davarikia, Hamzeh <Hamzeh.Davarikia@ercot.com>; Rose, Jonathan <Jonathan.Rose@ercot.com>
Cc: Keith, Kerri Michelle (SPC) <KMKEITH@southernco.com>; G2SPCERCOT <G2SPCERCOT@southernco.com>; Zieba, Cezary <CZIEBA@southernco.com>
Subject: RE: ACTION REQUIRED: SALTFORK pscad model update

***** EXTERNAL Email *****

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

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[redacted]

Thanks,

B. Chase Smith
Market Compliance & Policy Manager
Commercial Optimization, Trading & Transmission
Southern Power Company
Tel 205.992.0145, Mobile 850.509.0500
Email bcsmi@southernco.com
southernpowercompany.com

Southern Power

From: Davarikia, Hamzeh <Hamzeh.Davarikia@ercot.com>
Sent: Monday, March 10, 2025 1:41 PM
To: Smith, Chase (SPC) <BCSMI@southernco.com>; Rose, Jonathan <Jonathan.Rose@ercot.com>
Cc: Keith, Kerri Michelle (SPC) <KMKEITH@southernco.com>; SPC ERCOT (SPC) <G2SPCERCOT@southernco.com>; Zieba, Cezary <CZIEBA@southernco.com>
Subject: RE: ACTION REQUIRED: SALTFORK pscad model update

Hi Chase,
Please try the following link, and let me know if there is any issues.

Southern Power2 [ercot.sharepoint.com]

Regards,
Hamzeh

From: Smith, Chase (SPC) <BCSMI@southernco.com>
Sent: Monday, March 10, 2025 1:30 PM
To: Davarikia, Hamzeh <Hamzeh.Davarikia@ercot.com>; Rose, Jonathan <Jonathan.Rose@ercot.com>
Cc: Keith, Kerri Michelle (SPC) <KMKEITH@southernco.com>; G2SPCERCOT <G2SPCERCOT@southernco.com>; Zieba, Cezary <CZIEBA@southernco.com>
Subject: RE: ACTION REQUIRED: SALTFORK pscad model update

***** EXTERNAL Email *****

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Any response contained in this document should be considered Protected Information in accordance with the ERCOT Protocols.

Provide a succinct description, with supporting documentation, of the Requesting Entity's efforts to comply with the applicable reliability requirement and an explanation of the Requesting Entity's inability to comply.

[redacted]

Inability to Comply:

- [redacted]

[redacted]

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IEEE-5 Does the Resource use current blocking?

[redacted]

- [redacted]

VR [redacted]

Efforts to Comply:

[2] Please see the response to Question VRT-7 from the document titled "ERCOT NOGRR245 Memo Addendum_Vestas_2025-3-19.pdf".

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[redacted]

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

Provide documentation describing all feasible modifications, replacements, or upgrades the resource entity could implement, but has not yet implemented, to improve the performance of the resource toward meeting the applicable reliability requirement.

[redacted]

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Modification #2: [redacted]

[redacted]

Modification #3: [redacted]

[redacted]

Modification #4 [redacted]

[redacted]

[redacted]

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

[redacted]

[redacted]

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

Schedule for implementing modifications the Requesting Entity provided as part of the Initial Frequency Ride-Through Capability Report (IFRTCR) and/or Initial Voltage Ride-Through Capability Report (IVRTCR).

[redacted]

Proposed Modification Implementation Tasks	Schedule
[redacted]	
Proposed dates for RE to provide updates to ERCOT on its progress	

[redacted]

[7] Southern Power previously requested an extension until October 1, 2027. This revised filing reduces the necessary timeframe by 9 months. This is primarily based on a faster-than-anticipated development of the OEM-provided turbine dynamic models reflecting proposed modifications.

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[redacted]

a.	Proposed completion deadline
b.	Proposed dates for the RE to provide updates to ERCOT on its progress
c.	Supporting documentation
d.	Potential mitigation options

[redacted]

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Attachments / Technical Documentation:

[redacted]

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Smith, Chase (SPC)

From:	Zieba, Cezary
Sent:	Friday, September 5, 2025 2:40 PM
To:	Smith, Chase (SPC)
Cc:	Humphreys, Craig; Melton, Christopher Daniel; Cook, Kristin (SPC); Hale, Joshua A. (SPC)
Subject:	RE: Roserock NOGRR 245 Evaluation and Proposed Ride Through Settings 9-5-2025
Attachments:	NOGRR245_Wake_Wind.xlsx; NOGRR245_Cactus_Flats.xlsx; NOGRR245_East_Pecos.xlsx; NOGRR245_Lamesa.xlsx; NOGRR245_Roserock.xlsx; NOGRR245_Salt_Fork.xlsx; NOGRR245_Tyler_Bluff.xlsx

Chase,

[redacted]

Thanks,

Cezary

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

[redacted]

Subject: NOGRR 245 Verification of Technical Limitation – Need for Exemption or Extension

[redacted]

[redacted]

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

Attachment 1: Detailed Description of Technical Limitation

Resource Entity Name: Salt Fork Wind LLC
Resource Name (Unit): saltfork_unit1, saltfork_unit2

Detailed Description of the Technical Limitation:

Applicable Nodal Operating Guide Requirement(s):

[redacted]

Description of Technical Limitation:

[redacted]

Need for Extension:

[redacted]

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

[redacted]

Modification #1: [redacted]

Modification #2: [redacted]

[1] Southern Power previously requested an extension until October 1, 2027. This revised filing reduces the necessary timeframe by 9 months. This is primarily based on a faster-than-anticipated development of the OEM-provided turbine dynamic models reflecting proposed modifications.

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[redacted]

Proposed Modification Implementation Tasks	Schedule
[redacted]	
Proposed dates for RE to provide updates to ERCOT on its progress	

[redacted]

Need for Exemption:

[redacted]

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Initial Voltage Ride-Through Capability Report

Resource Entity or Interconnecting Entity Name: Salt Fork Wind LLC

(a) **Resource Entity or Interconnecting Entity Data Universal Numbering System (DUNS) Number:** 0797475733000

(b) **IBR/WGR Site Name:** Salt Fork Wind (SALTFORK)

(c) **IBR/WGR Unit Name(s):** saltfork_unit1, saltfork_unit2

(d) **Nodal Operating Guide Section(s) with which the Resource cannot comply:**

[redacted]

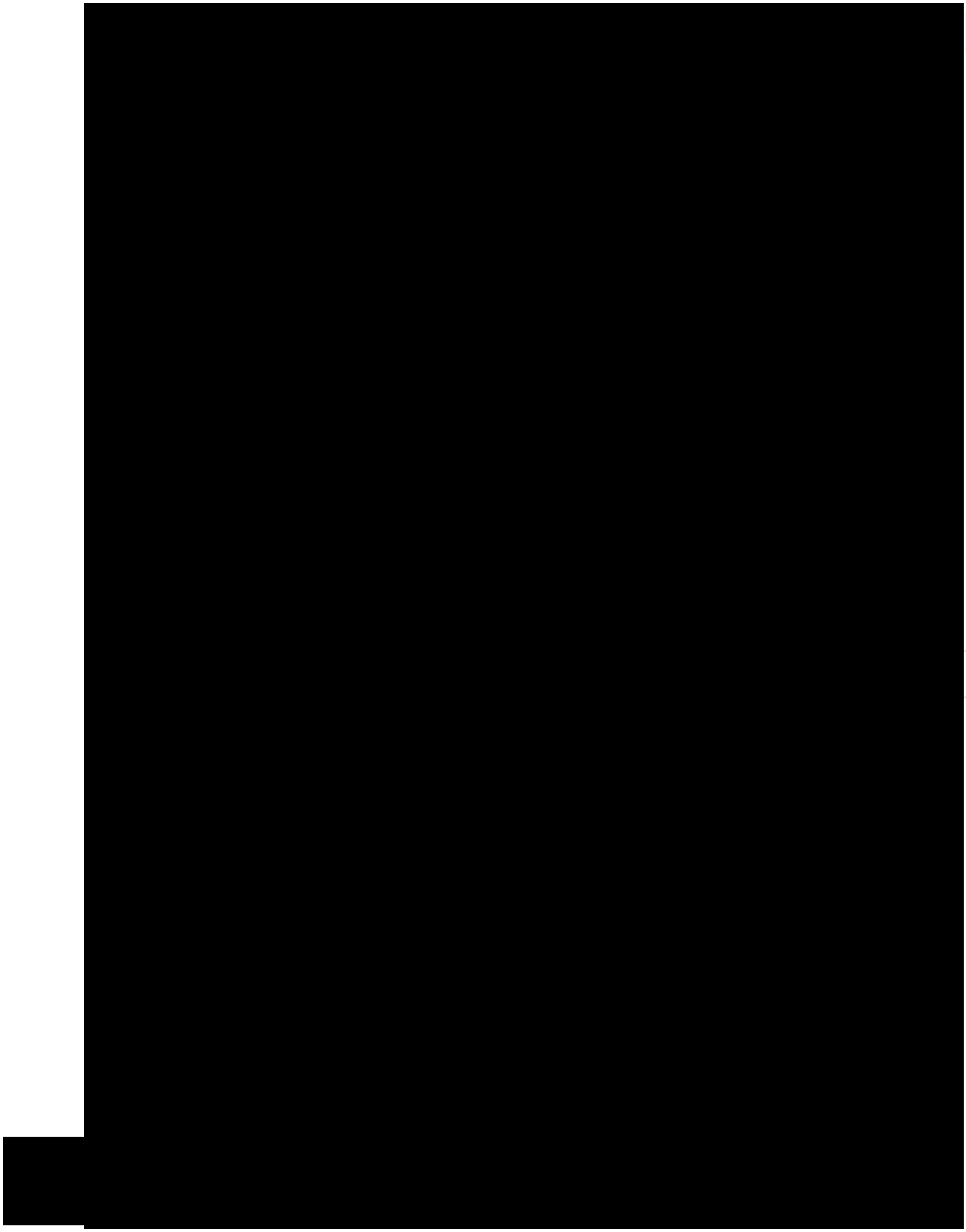
(e) **Current voltage ride-through capability in a format similar to the table in Section 2.9.1.2(1):**

[redacted]

[1] See section 2.1 of "0130-2808_V00 - Salt Fork - V100 Mk10B - PRC-024 Settings.pdf" which shows the as-left ride-through capability.

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Salt Fork



PROTECTED INFORMATION

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(f) Known voltage ride-through limitations of the IBR, Type 1 WGR or Type 2 WGR as compared to the requirements in Sections 2.9.1.2(1)-(7):

[redacted]

IEEE-5 Does the Resource use current blocking?

[redacted]

[redacted]

[redacted]

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[redacted]

(g) A detailed description of the technical limitation preventing the Resource from meeting the ride-through requirement(s), including a letter signed by an officer or executive of the original equipment manufacturer (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm verifying the limitations:

[redacted]

[redacted]o

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[redacted]

[redacted]

(i) If a Resource Entity cannot address the entire plant design with a letter required in Section 2.11.1(1)(g), the Resource Entity must supplement a letter from the original equipment manufacturer for its equipment (or subsequent support company if the original equipment manufacturer is no longer in business) or an engineering consulting firm by providing a notarized attestation sworn to by the Resource Entity's highest-ranking representative, official, or officer with binding authority over the entity attesting to the efforts made to obtain the letter, why those efforts failed, and which parts of the plant design is attested to. The attestation shall also include a detailed description of the technical limitation(s) preventing the Resource from meeting the ride-through requirement, including any information on technical limitations on all or part of the Resource which the Resource Entity is able to obtain from original

Docusign Envelope ID: 27ECCF17-5D18-497B-83FB-6A9F67618D9A

equipment manufacturers or an engineering consulting firm under Section (g) above.

[redacted]

(h) Available software, firmware, settings, or parameterization modifications the Resource Entity will implement to maximize the voltage ride-through capability of the IBR, Type 1 WGR or Type 2 WGR to approach or meet the voltage ride-through requirements in Sections 2.9.1.2(1)-(7) within known equipment limitations, to the greatest extent possible:

[redacted]

Modification #1: [redacted]

[redacted]

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[redacted]

Modification #2: [redacted]

[redacted]

(i) To the extent the Resource Entity chooses to implement changes to existing equipment other than software, firmware, settings or parameterization modifications that increase the voltage ride-through capability, identification of any such equipment modifications:

[redacted]

[redacted]

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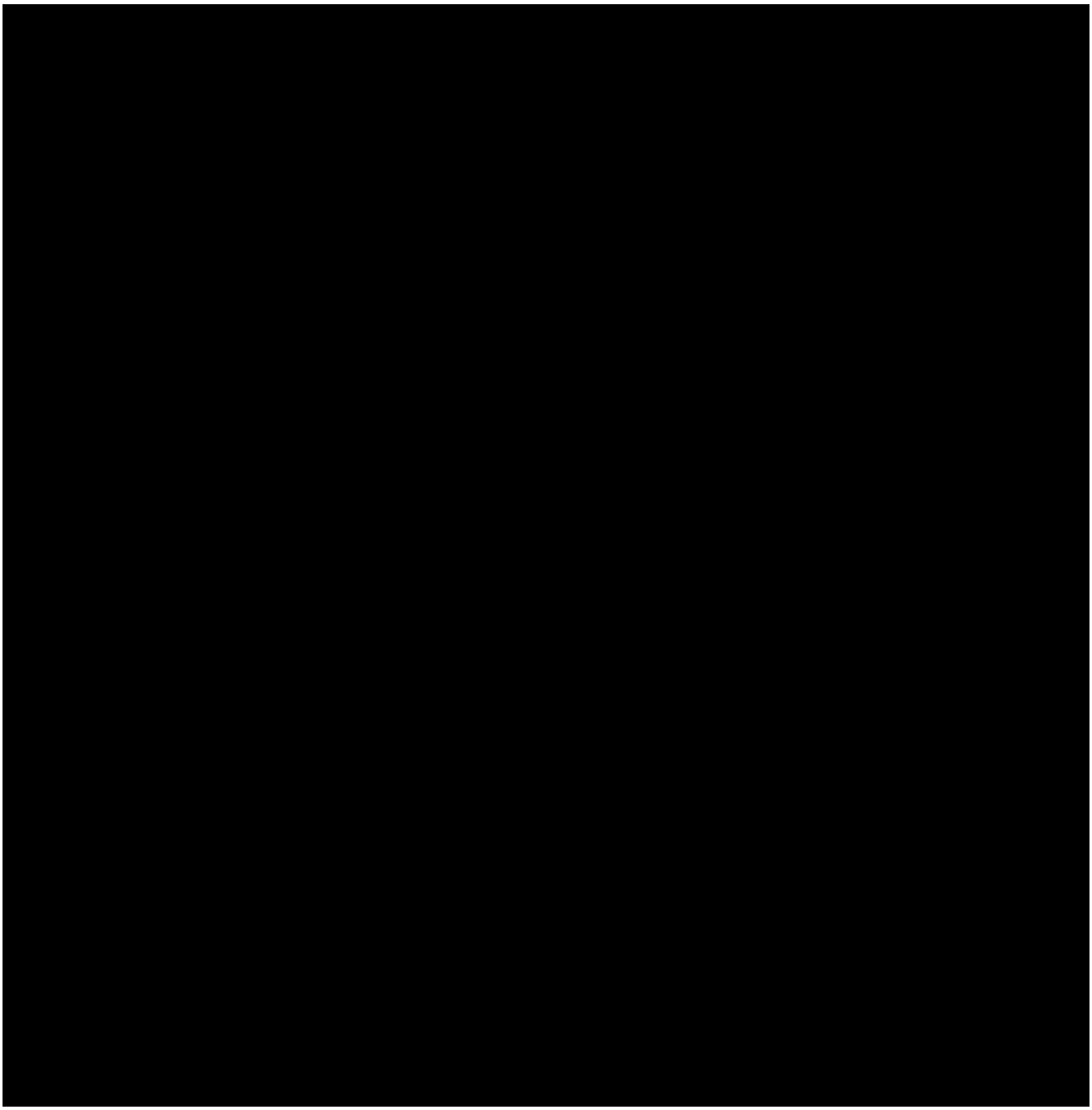
[redacted]

(j) Expected post-modification Resource capability in a format similar to the table in Section 2.9.1.2(1) and documentation of any expected remaining limitation(s) following implementation of such modifications:

[redacted]

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Salt Fork



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[redacted]

[redacted]

(k) A schedule for implementing the modification(s):

[redacted]

[redacted]

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[redacted]

Proposed Modification Implementation Tasks	Schedule
[redacted]	
Proposed dates for RE to provide updates to ERCOT on its progress	

[10] Southern Power previously requested an extension until October 1, 2027. This revised filing reduces the necessary timeframe by 9 months. This is primarily based on a faster-than-anticipated development of the OEM-provided turbine dynamic models reflecting proposed modifications.

[redacted]

(l) A model accurately representing expected performance reflecting all technical limitations or a statement there are no new models available because the Resource is requesting an exemption and the current model submitted to ERCOT already reflects all technical limitations in voltage ride-through capability:

[redacted]

[redacted]

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(m) A description of any limitation that cannot be accurately represented in a model:





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ATTACHMENT C

Correspondence

From: Burney, Umar <Umar.Burney@ercot.com>
Sent: Thursday, March 12, 2026 10:59 PM
To: Smith, Chase (SPC) <BCSMI@southernco.com>
Subject: Re: NOGRR245 Extension and Exemption Request for SALTFORK_UNIT2 – Missing Information

CAUTION: This email originated from the Internet. Do not click links or open attachments unless you trust the sender and know the content is safe. If in doubt, report this email using the PhishAlarm button.

Hello Chase,

Give me a bit to check internally, but I will see what I can do for you regarding this situation.

Thanks,

Umar Arif Burney
Dynamic Studies Engineer
2705 West Lake Drive | Taylor, Texas, 76574

From: Smith, Chase (SPC) <BCSMI@southernco.com>
Sent: Thursday, March 12, 2026 8:18 AM
To: Burney, Umar <Umar.Burney@ercot.com>
Subject: RE: NOGRR245 Extension and Exemption Request for SALTFORK_UNIT2 – Missing Information

******* EXTERNAL Email *******

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Hi Umar,

I hope all is well. I have a question on Salt Fork – from ERCOT's perspective, would you like Southern Power to address the PSSE model vs. RIOO registration mismatch prior to submitting a PGRR109 submission and moving ahead with implementation of site modifications to enhance the ride-through capability of Salt Fork Wind (we plan to implement two software modifications in the turbines), or can Southern Power submit a PGRR109 submission for ERCOT's review now while in parallel we continue to investigate the best path forward for addressing the PSSE

model vs. RIOO issue? I ask because I believe the current dynamic models are an accurate representation of Salt Fork's dynamic performance, so perhaps we could move forward on making progress on implementing the field modifications to improve this Resource's capability while we further investigate the best approach to address your feedback on PSSE model. Southern can also wait to move forward on implementation until after the PSSE and RIOO item is addressed, but I wanted to check with you and see if you have any feedback.

Please let me know if you have any comments or questions.

Thanks,

Chase

From: Burney, Umar <Umar.Burney@ercot.com>
Sent: Wednesday, January 14, 2026 7:04 PM
To: Smith, Chase (SPC) <BCSMI@southernco.com>; Harris, Jack <Jack.Harris@ercot.com>; SPC ERCOT (SPC) <G2SPCERCOT@southernco.com>
Cc: NOGRR245 <NOGRR245@ercot.com>; DynamicModels <DynamicModels@ercot.com>
Subject: RE: NOGRR245 Extension and Exemption Request for SALTFORK_UNIT2 – Missing Information

Hello Chase,

Needed to check a few things internally. I think we have two options here depending on what you want is feasible for y'all.

Either y'all can provide a PSSE model that only has two units that can still accurately model the dynamics, or change the RIOO registration to match [redacted]. The PSCAD model needs no changes (since it is not required to match with registration).

Please let me know if you would like to have a call to talk about this further.

Thanks,

Umar Arif Burney
Dynamic Studies Engineer
2705 West Lake Drive | Taylor, Texas, 76574

From: Smith, Chase (SPC) <BCSMI@southernco.com>
Sent: Tuesday, January 13, 2026 4:47 PM
To: Burney, Umar <Umar.Burney@ercot.com>; Harris, Jack <Jack.Harris@ercot.com>; G2SPCERCOT <G2SPCERCOT@southernco.com>
Cc: NOGRR245 <NOGRR245@ercot.com>; DynamicModels <DynamicModels@ercot.com>
Subject: RE: NOGRR245 Extension and Exemption Request for SALTFORK_UNIT2 – Missing Information

******* EXTERNAL Email *******

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Thanks Umar. On RIOO, Salt Fork [redacted]:

- [redacted]

[redacted] The unit information entered into the PSSE model template reflects the individual turbine platforms behind each MPT:

- [redacted]
- [redacted]

Can you please clarify what changes you are looking to be made? Is there a different way that ERCOT is looking for the model information to be inputted into the PSSE model template, or would changes to RIOO registration be appropriate to reflect the wind turbine distribution at the site?

Southern Power can be available for a phone call to discuss if that would be helpful.

Thank You,

B. Chase Smith
Market Compliance & Policy Manager
Commercial Optimization, Trading & Transmission
Southern Power Company
Tel 205.992.0145, [redacted]
Email bcsmi@southernco.com
southernpowercompany.com

Southern Power

From: Burney, Umar <Umar.Burney@ercot.com>
Sent: Tuesday, January 13, 2026 4:19 PM
To: Smith, Chase (SPC) <BCSMI@southernco.com>; Harris, Jack <Jack.Harris@ercot.com>; SPC ERCOT (SPC) <G2SPCERCOT@southernco.com>
Cc: NOGRR245 <NOGRR245@ercot.com>; DynamicModels <DynamicModels@ercot.com>
Subject: RE: NOGRR245 Extension and Exemption Request for SALTFORK_UNIT2 – Missing Information

Hello Chase,

I just noticed that the unit aggregation is different between the PSSE model/Template and RIOO. RIOO only has [redacted]. Can this discrepancy be reconciled?

Thanks,

Umar Arif Burney
Dynamic Studies Engineer
2705 West Lake Drive | Taylor, Texas, 76574

From: Burney, Umar
Sent: Tuesday, January 13, 2026 3:56 PM
To: 'Smith, Chase (SPC)' <BCSMI@southernco.com>; Harris, Jack <Jack.Harris@ercot.com>; G2SPCERCOT <G2SPCERCOT@southernco.com>
Cc: NOGRR245 <NOGRR245@ercot.com>; DynamicModels <DynamicModels@ercot.com>
Subject: RE: NOGRR245 Extension and Exemption Request for SALTFORK_UNIT2 – Missing Information

Hello Chase,

Thanks for sending that to me. No need to resubmit. I approve the modification. Please note that a Plant Verification Report is required within 30 days of implementing the modification.

Thanks,

Umar Arif Burney
Dynamic Studies Engineer
2705 West Lake Drive | Taylor, Texas, 76574

From: Smith, Chase (SPC) <BCSMI@southernco.com>
Sent: Tuesday, January 13, 2026 3:10 PM
To: Burney, Umar <Umar.Burney@ercot.com>; Harris, Jack <Jack.Harris@ercot.com>; G2SPCERCOT <G2SPCERCOT@southernco.com>
Cc: NOGRR245 <NOGRR245@ercot.com>; DynamicModels <DynamicModels@ercot.com>
Subject: RE: NOGRR245 Extension and Exemption Request for SALTFORK_UNIT2 – Missing Information

Hi Umar,

Please see attached the PSSE model template for the Salt Fork PSSE model. I apologize that I forgot to attach this file to the RIOO submission. Would you like to return RIOO change request 12939 to me and I can upload the PSSE template on RIOO?

Please let me know if you have any comments or questions on the template file.

Thanks,

B. Chase Smith
Market Compliance & Policy Manager
Commercial Optimization, Trading & Transmission
Southern Power Company
Tel 205.992.0145, [redacted]
Email bcsmi@southernco.com
southernpowercompany.com

Southern Power

From: Burney, Umar <Umar.Burney@ercot.com>
Sent: Tuesday, January 13, 2026 1:04 PM
To: Smith, Chase (SPC) <BCSMI@southernco.com>; Harris, Jack <Jack.Harris@ercot.com>; SPC ERCOT (SPC) <G2SPCERCOT@southernco.com>
Cc: NOGRR245 <NOGRR245@ercot.com>; DynamicModels <DynamicModels@ercot.com>
Subject: RE: NOGRR245 Extension and Exemption Request for SALTFORK_UNIT2 – Missing Information

Hello Chase,

Can you please submit the PSSE model in the ERCOT Template. Afterwards, I can approve the submission.

Thanks,

Umar Arif Burney
Dynamic Studies Engineer
2705 West Lake Drive | Taylor, Texas, 76574

From: Smith, Chase (SPC) <BCSMI@southernco.com>
Sent: Tuesday, December 16, 2025 1:08 PM
To: Harris, Jack <Jack.Harris@ercot.com>; G2SPCERCOT <G2SPCERCOT@southernco.com>
Cc: NOGRR245 <NOGRR245@ercot.com>; DynamicModels <DynamicModels@ercot.com>
Subject: RE: NOGRR245 Extension and Exemption Request for SALTFORK_UNIT2 – Missing Information

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Good Afternoon ERCOT Staff,

Please see attached response for SALTFORK_UNIT2 with requested information.

Additionally, a post-maximized dynamic model package has been submitted on RIOO via change request 12939. Please see attached the PSCAD checklist document, which we were unable to upload to RIOO.

Please confirm receipt of this response and let us know if you have any questions.

Thank You,

B. Chase Smith
Market Compliance & Policy Manager
Commercial Optimization, Trading & Transmission
Southern Power Company

Tel 205.992.0145, [redacted]
Email bcsmi@southernco.com
southernpowercompany.com

Southern Power

From: Smith, Chase (SPC)
Sent: Wednesday, December 3, 2025 2:14 PM
To: 'Harris, Jack' <Jack.Harris@ercot.com>; SPC ERCOT (SPC) <G2SPCERCOT@southernco.com>
Cc: NOGRR245 <NOGRR245@ercot.com>
Subject: RE: NOGRR245 Extension and Exemption Request for SALTFORK_UNIT2 – Missing Information

Thank you Jack, we appreciate the flexibility and will provide a response by December 16th.

B. Chase Smith
Market Compliance & Policy Manager
Commercial Optimization, Trading & Transmission
Southern Power Company
Tel 205.992.0145, [redacted]
Email bcsmi@southernco.com
southernpowercompany.com

Southern Power

From: Harris, Jack <Jack.Harris@ercot.com>
Sent: Wednesday, December 3, 2025 10:56 AM
To: Smith, Chase (SPC) <BCSMI@southernco.com>; SPC ERCOT (SPC) <G2SPCERCOT@southernco.com>
Cc: NOGRR245 <NOGRR245@ercot.com>
Subject: Re: NOGRR245 Extension and Exemption Request for SALTFORK_UNIT2 – Missing Information

Apologies for the confusion, the new return date is **December 16th, 2025.**

Best,
Jack Harris

From: Harris, Jack <Jack.Harris@ercot.com>
Sent: Wednesday, December 3, 2025 10:53 AM
To: Smith, Chase (SPC) <BCSMI@southernco.com>; G2SPCERCOT <G2SPCERCOT@southernco.com>
Cc: NOGRR245 <NOGRR245@ercot.com>
Subject: Re: NOGRR245 Extension and Exemption Request for SALTFORK_UNIT2 – Missing Information

Hey Chase,

Your request for a new response day has been approved, and the new return date is set to **December 9th, 2025**.

Thank you for reaching out proactively, we look forward to your response.

Best,

Jack Harris

Generation Integration Engineer

Taylor, TX

From: Smith, Chase (SPC) <BCSMI@southernco.com>
Sent: Friday, November 21, 2025 8:53 AM
To: Harris, Jack <Jack.Harris@ercot.com>; G2SPCERCOT <G2SPCERCOT@southernco.com>
Cc: NOGRR245 <NOGRR245@ercot.com>
Subject: RE: NOGRR245 Extension and Exemption Request for SALTFORK_UNIT2 – Missing Information

******* EXTERNAL Email *******

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Hi Jack,

Southern Power confirms receipt of this request for additional information for Salt Fork_UNIT2 and will provide an updated response by December 9th. We will follow up if we have any questions.

Thank You,

B. Chase Smith

Market Compliance & Policy Manager

Commercial Optimization, Trading & Transmission

Southern Power Company

Tel 205.992.0145, [redacted]

Email bcsmi@southernco.com

[southernpowercompany.com]southernpowercompany.com

Southern Power

From: Harris, Jack <Jack.Harris@ercot.com>
Sent: Friday, November 21, 2025 8:00 AM
To: SPC ERCOT (SPC) <G2SPCERCOT@southernco.com>
Cc: NOGRR245 <NOGRR245@ercot.com>
Subject: NOGRR245 Extension and Exemption Request for SALTFORK_UNIT2 – Missing Information
Importance: High

Dear Chase Smith,

Pursuant to Nodal Operating Guide (NOG) Section 2.12.1.3(1), ERCOT has completed its review of the information submitted by September 15th in connection with NOG Revision Request 245 for SALTFORK_UNIT2.

ERCOT has determined the submittal is not complete. See, NOG Section 2.12.1.3(1)(a). Accordingly, in the attached Ride-Through Submission Status Report, ERCOT has identified the missing information and provides instructions for submitting the missing information. See, NOG Section 2.12.1.3(1)(b).

The Ride-Through Submission Status Report contains the following tabs:

Tab	Description of Contents
Instructions	Instructions on how to complete the Report
Resource Info	Market Participant name, Resource name, current date and response due date
FRT Exemptions	Missing information related to exemptions for Frequency Ride-Through

VRT Exemptions	Missing information related to exemptions for Voltage Ride-Through
FRT Exemption Request Form	Missing information related to the Exemption Request Form for Frequency Ride-Through
VRT Exemption Request Form	Missing information related to the Exemption Request Form for Voltage Ride-Through
FRT Extensions	Missing information related to extensions for Frequency Ride-Through
VRT Extensions	Missing information related to extensions for Voltage Ride-Through
For Reference Capability Curves	Any relevant information related to the ride-through capability curves submitted for the Resource

By 12/9/2025, you must send the missing information via email to NOGRR245@ercot.com. Importantly, if you do not provide the required information timely, ERCOT may have no choice other than to reject your Extension and Exemption request.

Should you have any questions or require assistance, please do not hesitate to reach out.

Best regards,

Jack Harris

Generation Integration Engineer

Taylor, TX

From: Smith, Chase <BCSMI@southernco.com>
Sent: Wednesday, February 25, 2026 2:10 PM
To: umar.burney; Harris, Jack; SPC ERCOT (SPC)
Cc: NOGRR245; DynamicModels; Zieba, Cezary; Zhang, Allen Sheng Yao
Subject: RE: NOGRR245 Extension and Exemption Request for SALTFORK_UNIT2 – Missing Information

Hi Umar,

Earlier today, Southern Power discussed the dynamic performance of the different Salt Fork turbine platforms with Vestas, and needs some additional time to assess if there are PSSE model changes that can be made to align with the Resource's current RIOO registration while still accurately representing the Resource's dynamic performance.

In parallel, I will reach out to Southern Power's ERCOT Client Services representative to understand the process of revising [redacted], so that Southern is prepared if we decide that is the best option.

We are working to address this item as soon as possible and I will provide an update when I have more information.

Thank You,

B. Chase Smith
Market Compliance & Policy Manager
Commercial Optimization, Trading & Transmission
Southern Power Company
Tel 205.992.0145, [redacted]
Email bcsmi@southernco.com
southernpowercompany.com



From: Burney, Umar <Umar.Burney@ercot.com>
Sent: Wednesday, February 25, 2026 1:58 PM
To: Smith, Chase (SPC) <BCSMI@southernco.com>; Harris, Jack <Jack.Harris@ercot.com>; SPC ERCOT (SPC) <G2SPCERCOT@southernco.com>
Cc: NOGRR245 <NOGRR245@ercot.com>; DynamicModels <DynamicModels@ercot.com>
Subject: Re: NOGRR245 Extension and Exemption Request for SALTFORK_UNIT2 – Missing Information

CAUTION: This email originated from the Internet. Do not click links or open attachments unless you trust the sender and know the content is safe. If in doubt, report this email using the PhishAlarm button.

Hello Chase,

Was there any update to this by chance?

Thanks,

Umar Arif Burney
Dynamic Studies Engineer
2705 West Lake Drive | Taylor, Texas, 76574

From: Burney, Umar
Sent: Wednesday, January 14, 2026 7:04 PM
To: Smith, Chase (SPC) <BCSMI@southernco.com>; Harris, Jack <Jack.Harris@ercot.com>; G2SPCERCOT <G2SPCERCOT@southernco.com>
Cc: NOGRR245 <NOGRR245@ercot.com>; DynamicModels <DynamicModels@ercot.com>
Subject: RE: NOGRR245 Extension and Exemption Request for SALTFORK_UNIT2 – Missing Information

Hello Chase,

Needed to check a few things internally. I think we have two options here depending on what you want is feasible for y'all.

Either y'all can provide a PSSE model that [redacted]. I would recommend looking into that first option with vestas. It doesn't need to be an exact match, but a model that can still match with the PSCAD model reasonably. The PSCAD model needs no changes (since it is not required to match with registration).

Please let me know if you would like to have a call to talk about this further.

Thanks,

Umar Arif Burney
Dynamic Studies Engineer
2705 West Lake Drive | Taylor, Texas, 76574

From: Smith, Chase (SPC) <BCSMI@southernco.com>
Sent: Tuesday, January 13, 2026 4:47 PM
To: Burney, Umar <Umar.Burney@ercot.com>; Harris, Jack <Jack.Harris@ercot.com>; G2SPCERCOT <G2SPCERCOT@southernco.com>
Cc: NOGRR245 <NOGRR245@ercot.com>; DynamicModels <DynamicModels@ercot.com>
Subject: RE: NOGRR245 Extension and Exemption Request for SALTFORK_UNIT2 – Missing Information

******* EXTERNAL Email *******

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Thanks Umar. On RIOO, [redacted]

[redacted]

However, there are actually [redacted]. The unit information entered into the PSSE model template reflects the individual turbine platforms behind each MPT:

[redacted]

Can you please clarify what changes you are looking to be made? Is there a different way that ERCOT is looking for the model information to be inputted into the PSSE model template, or would changes to RIOO registration be appropriate to reflect the wind turbine distribution at the site?

Southern Power can be available for a phone call to discuss if that would be helpful.

Thank You,

B. Chase Smith
Market Compliance & Policy Manager
Commercial Optimization, Trading & Transmission
Southern Power Company
Tel 205.992.0145, [redacted]
Email bcsmi@southernco.com
southernpowercompany.com

Southern Power

From: Burney, Umar <Umar.Burney@ercot.com>
Sent: Tuesday, January 13, 2026 4:19 PM
To: Smith, Chase (SPC) <BCSMI@southernco.com>; Harris, Jack <Jack.Harris@ercot.com>; SPC ERCOT (SPC) <G2SPCERCOT@southernco.com>
Cc: NOGRR245 <NOGRR245@ercot.com>; DynamicModels <DynamicModels@ercot.com>
Subject: RE: NOGRR245 Extension and Exemption Request for SALTFORK_UNIT2 – Missing Information

Hello Chase,

I just noticed that the unit aggregation is different between the PSSE model/Template and RIOO. RIOO only has [redacted]. Can this discrepancy be reconciled?

Thanks,

Umar Arif Burney
Dynamic Studies Engineer
2705 West Lake Drive | Taylor, Texas, 76574

From: Burney, Umar
Sent: Tuesday, January 13, 2026 3:56 PM
To: 'Smith, Chase (SPC)' <BCSMI@southernco.com>; Harris, Jack <Jack.Harris@ercot.com>; G2SPCERCOT <G2SPCERCOT@southernco.com>
Cc: NOGRR245 <NOGRR245@ercot.com>; DynamicModels <DynamicModels@ercot.com>
Subject: RE: NOGRR245 Extension and Exemption Request for SALTFORK_UNIT2 – Missing Information

Hello Chase,

Thanks for sending that to me. No need to resubmit. I approve the modification. Please note that a Plant Verification Report is required within 30 days of implementing the modification.

Thanks,

Umar Arif Burney
Dynamic Studies Engineer
2705 West Lake Drive | Taylor, Texas, 76574

From: Smith, Chase (SPC) <BCSMI@southernco.com>
Sent: Tuesday, January 13, 2026 3:10 PM
To: Burney, Umar <Umar.Burney@ercot.com>; Harris, Jack <Jack.Harris@ercot.com>; G2SPCERCOT <G2SPCERCOT@southernco.com>
Cc: NOGRR245 <NOGRR245@ercot.com>; DynamicModels <DynamicModels@ercot.com>
Subject: RE: NOGRR245 Extension and Exemption Request for SALTFORK_UNIT2 – Missing Information

Hi Umar,

Please see attached the PSSE model template for the Salt Fork PSSE model. I apologize that I forgot to attach this file to the RIOO submission. Would you like to return RIOO change request 12939 to me and I can upload the PSSE template on RIOO?

Please let me know if you have any comments or questions on the template file.

Thanks,

B. Chase Smith
Market Compliance & Policy Manager
Commercial Optimization, Trading & Transmission
Southern Power Company
Tel 205.992.0145, [redacted]
Email bcsmi@southernco.com
southernpowercompany.com

Southern Power

From: Burney, Umar <Umar.Burney@ercot.com>
Sent: Tuesday, January 13, 2026 1:04 PM
To: Smith, Chase (SPC) <BCSMI@southernco.com>; Harris, Jack <Jack.Harris@ercot.com>; SPC ERCOT (SPC) <G2SPCERCOT@southernco.com>
Cc: NOGRR245 <NOGRR245@ercot.com>; DynamicModels <DynamicModels@ercot.com>
Subject: RE: NOGRR245 Extension and Exemption Request for SALTFORK_UNIT2 – Missing Information

Hello Chase,

Can you please submit the PSSE model in the ERCOT Template. Afterwards, I can approve the submission.

Thanks,

Umar Arif Burney
Dynamic Studies Engineer
2705 West Lake Drive | Taylor, Texas, 76574

From: Smith, Chase (SPC) <BCSMI@southernco.com>
Sent: Tuesday, December 16, 2025 1:08 PM
To: Harris, Jack <Jack.Harris@ercot.com>; G2SPCERCOT <G2SPCERCOT@southernco.com>
Cc: NOGRR245 <NOGRR245@ercot.com>; DynamicModels <DynamicModels@ercot.com>
Subject: RE: NOGRR245 Extension and Exemption Request for SALTFORK_UNIT2 – Missing Information

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Good Afternoon ERCOT Staff,

Please see attached response for SALTFORK_UNIT2 with requested information.

Additionally, a post-maximized dynamic model package has been submitted on RIOO via change request 12939. Please see attached the PSCAD checklist document, which we were unable to upload to RIOO.

Please confirm receipt of this response and let us know if you have any questions.

Thank You,

B. Chase Smith
Market Compliance & Policy Manager
Commercial Optimization, Trading & Transmission
Southern Power Company

Tel 205.992.0145, [redacted]
Email bcsmi@southernco.com
southernpowercompany.com

Southern Power

From: Smith, Chase (SPC)
Sent: Wednesday, December 3, 2025 2:14 PM
To: 'Harris, Jack' <Jack.Harris@ercot.com>; SPC ERCOT (SPC) <G2SPCERCOT@southernco.com>
Cc: NOGRR245 <NOGRR245@ercot.com>
Subject: RE: NOGRR245 Extension and Exemption Request for SALTFORK_UNIT2 – Missing Information

Thank you Jack, we appreciate the flexibility and will provide a response by December 16th.

B. Chase Smith
Market Compliance & Policy Manager
Commercial Optimization, Trading & Transmission
Southern Power Company
Tel 205.992.0145, Mobile 850.509.0500
Email bcsmi@southernco.com
southernpowercompany.com

Southern Power

From: Harris, Jack <Jack.Harris@ercot.com>
Sent: Wednesday, December 3, 2025 10:56 AM
To: Smith, Chase (SPC) <BCSMI@southernco.com>; SPC ERCOT (SPC) <G2SPCERCOT@southernco.com>
Cc: NOGRR245 <NOGRR245@ercot.com>
Subject: Re: NOGRR245 Extension and Exemption Request for SALTFORK_UNIT2 – Missing Information

Apologies for the confusion, the new return date is **December 16th, 2025.**

Best,
Jack Harris

From: Harris, Jack <Jack.Harris@ercot.com>
Sent: Wednesday, December 3, 2025 10:53 AM
To: Smith, Chase (SPC) <BCSMI@southernco.com>; G2SPCERCOT <G2SPCERCOT@southernco.com>
Cc: NOGRR245 <NOGRR245@ercot.com>
Subject: Re: NOGRR245 Extension and Exemption Request for SALTFORK_UNIT2 – Missing Information

Hey Chase,

Your request for a new response day has been approved, and the new return date is set to **December 9th, 2025**.

Thank you for reaching out proactively, we look forward to your response.

Best,

Jack Harris

Generation Integration Engineer

Taylor, TX

From: Smith, Chase (SPC) <BCSMI@southernco.com>
Sent: Friday, November 21, 2025 8:53 AM
To: Harris, Jack <Jack.Harris@ercot.com>; G2SPCERCOT <G2SPCERCOT@southernco.com>
Cc: NOGRR245 <NOGRR245@ercot.com>
Subject: RE: NOGRR245 Extension and Exemption Request for SALTFORK_UNIT2 – Missing Information

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Hi Jack,

Southern Power confirms receipt of this request for additional information for Salt Fork_UNIT2 and will provide an updated response by December 9th. We will follow up if we have any questions.

Thank You,

B. Chase Smith

Market Compliance & Policy Manager

Commercial Optimization, Trading & Transmission

Southern Power Company

Tel 205.992.0145, [redacted]

Email bcsmi@southernco.com

[southernpowercompany.com]southernpowercompany.com



From: Harris, Jack <Jack.Harris@ercot.com>
Sent: Friday, November 21, 2025 8:00 AM
To: SPC ERCOT (SPC) <G2SPCERCOT@southernco.com>
Cc: NOGRR245 <NOGRR245@ercot.com>
Subject: NOGRR245 Extension and Exemption Request for SALTFORK_UNIT2 – Missing Information
Importance: High

Dear Chase Smith,

Pursuant to Nodal Operating Guide (NOG) Section 2.12.1.3(1), ERCOT has completed its review of the information submitted by September 15th in connection with NOG Revision Request 245 for SALTFORK_UNIT2.

ERCOT has determined the submittal is not complete. See, NOG Section 2.12.1.3(1)(a). Accordingly, in the attached Ride-Through Submission Status Report, ERCOT has identified the missing information and provides instructions for submitting the missing information. See, NOG Section 2.12.1.3(1)(b).

The Ride-Through Submission Status Report contains the following tabs:

Tab	Description of Contents
Instructions	Instructions on how to complete the Report
Resource Info	Market Participant name, Resource name, current date and response due date
FRT Exemptions	Missing information related to exemptions for Frequency Ride-Through

VRT Exemptions	Missing information related to exemptions for Voltage Ride-Through
FRT Exemption Request Form	Missing information related to the Exemption Request Form for Frequency Ride-Through
VRT Exemption Request Form	Missing information related to the Exemption Request Form for Voltage Ride-Through
FRT Extensions	Missing information related to extensions for Frequency Ride-Through
VRT Extensions	Missing information related to extensions for Voltage Ride-Through
For Reference Capability Curves	Any relevant information related to the ride-through capability curves submitted for the Resource

By 12/9/2025, you must send the missing information via email to NOGRR245@ercot.com. Importantly, if you do not provide the required information timely, ERCOT may have no choice other than to reject your Extension and Exemption request.

Should you have any questions or require assistance, please do not hesitate to reach out.

Best regards,

Jack Harris

Generation Integration Engineer

Taylor, TX

From: Olayinka, Abi <Abisola.Olayinka@ercot.com>
Sent: Monday, March 9, 2026 10:52 AM
To: Smith, Chase
Cc: SPC ERCOT (SPC); Pickle, Brandon E. (SPC); umar.burney
Subject: RE: ERCOT RIOO Question - Salt Fork Wind LLC

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Hi Chase –

I am looking into this, and will let you know what I find.

Abi

Best Wishes,



Abisola Olayinka
Senior Client Services Account Manager
Desk: 512.248.4177 | Mobile: 346.515.8089
Email: Abisola.Olayinka@ercot.com

"Carpe Diem"

From: Smith, Chase (SPC) <BCSMI@southernco.com>
Sent: Monday, March 2, 2026 4:44 PM
To: Olayinka, Abi <Abisola.Olayinka@ercot.com>
Cc: G2SPCERCOT <G2SPCERCOT@southernco.com>; Pickle, Brandon E. (SPC) <BEPICKLE@SOUTHERNCO.COM>; Burney, Umar <Umar.Burney@ercot.com>
Subject: ERCOT RIOO Question - Salt Fork Wind LLC

***** EXTERNAL Email *****

Please be cautious and evaluate before you click on links, open attachments, or provide credentials. As a reminder, please report phishing emails via the Report Phishing button. If the button is not available, then please forward to 'ReportPhishing@ercot.com'

Good Afternoon Abi,

I hope all is well. Southern Power is evaluating revising the number of Units for Salt Fork Wind LLC registered on RIOO to address recent feedback from the ERCOT Dynamic Modeling team (I've copied Umar on this email for

awareness) on a Salt Fork dynamic model package. ERCOT Staff noted a difference in the Generating Units modeled on RIOO vs. what was submitted in a PSSE model template file:

[redacted]

ERCOT Staff communicated that Southern Power needs to align the Units between RIOO and the PSSE model and template file.

Southern Power is currently investigating if revisions can be made to the PSSE model and template file to align with the current RIOO registration while still accurately representing the dynamic performance of the Salt Fork facility. In parallel, we wanted to better understand the process and timeline to revise the Units on RIOO if necessary. Can you please help answer the following questions?

- What is the process and expected timeline to revise [redacted])?
- For dispatch purposes:
  - Southern Power's understanding is that a Generating Unit has its own unique base point instruction. For example, if Salt Fork's registration was revised to [redacted] Is this correct?
  - Alternatively, is it possible to have [redacted] Using the above example, could Salt Fork receive [redacted]?

Please let me know if you have any comments or questions. The Southern Power team is available to discuss on the phone if that would be helpful.

Thank You,

B. Chase Smith
Market Compliance & Policy Manager
Commercial Optimization, Trading & Transmission
Southern Power Company
Tel 205.992.0145, [redacted]
Email bcsmi@southernco.com
southernpowercompany.com

Southern Power

From: Cook, Kristin (SPC) <KRCOOK@SOUTHERNCO.COM>
Sent: Wednesday, June 3, 2026 12:32 PM
To: de la Garza, Mario
Cc: Zicarelli, Philip (SPC); Thomas, Preston (SPC); NOGRR245
Subject: Southern Power NOGRR245 Exemption & Extension Request Status

Good afternoon Mario,

Would you be able to provide a status update for Southern Power's NOGRR245 Extension & Exemption requests? I have located emails with an Acknowledgments of Complete Submission for two of our resources. Are our other sites' submissions also considered complete? It's possible that we missed some emails due to staffing changes.

Resource	Complete Submission Acknowledgment
BOOTLEG_UNIT1	22-Apr
LMESASLR_UNIT1	
REROCK_U1; REROCK_U2	
SALTFORK_U1, SALTFORK_U2	
TYLRWIND_UNIT1	23-Apr

Thank you,

Kristin Cook
Market Compliance & Policy | Southern Power
krcook@southernco.com | [redacted]
Southern Power

ATTACHMENT D

Missing Information Request

The Public Utility Commission of Texas (PUCT) approved Nodal Operating Guide (NOG) ride-through requirements effective October 1, 2024 with an April 1, 2025 deadline (extended to April 15, 2025) to submit all information for Resources requesting an extension or submitting a notice of intent to seek an exemption. Additionally, PUCT Electric Substantive Rule § 25.517 eliminated the need for a subsequent NOG revision request to establish standards to address exemption requests. Thereafter, the deadline to submit all information for Resources requesting an extension was extended to, and the deadline for Resources seeking an exemption was established as, September 15, 2025.

The NOG and PUCT Rule 25.517 require Resource Entities to submit certain information in support of an extension or exemption request. ERCOT reviewed your September 2025 submittal and, pursuant to NOG § 2.12.1.3(1)(b), notifies you your submission was incomplete. In this spreadsheet, ERCOT identifies the missing information and instructions to submit the information via email at NOGRR245@ercot.com

NOTE: If you do not timely provide the requirement information, ERCOT may have no choice other than to reject your extension or exemption request

ercot	**Ride-Through Submission Status Report**
Market Participant (MP) Name:	SALT FORK WIND LLC
Resource Name:	SALTFORK_UNIT1
Current Date:	11/21/2025
Response Due By:	12/16/2025
Submission Instructions	Submit missing information via an email to NOGRR245@ercot.com

ercot	Request for Exemption Missing Information and Instructions							
Item	Missing Information	Instructions to submit Missing Information	Response					
[redacted]								

Exemption Request Form				
Question ID	Question	Missing Information	Instructions to submit Missing Information	Response
16 TAC § 25.517(c)(1)	A description of the reliability requirement from which the Resource Entity (RE) seeks an exemption, including cross-references to ERCOT protocols where the applicable reliability requirement is contained	[redacted]		
16 TAC § 25.517(c)(2)	A succinct description, with supporting documentation, of the RE's efforts to comply with the applicable reliability requirement and an explanation of the RE's inability to comply			
16 TAC § 25.517(c)(3)	Documentation describing all feasible modifications, replacements, or upgrades the RE could implement, but has not yet implemented, to improve the performance of the Resource toward meeting the requirement(s) from which an exemption is requested			
16 TAC § 25.517(c)(4)	A model accurately representing the expected Resource performance and reflecting the actual, as-build resource equipment and settings, with all technical limitations, before and after maximizing the Resource's operational capability if not already submitted to ERCOT. Each model must include a description of any technical limitation the RE cannot accurately represent in that model			
16 TAC § 25.517(c)(5)	A plan to comply with each specific element of the applicable reliability requirement to the maximum extent possible, which must include: (A) a proposed completion deadline for each proposed modification, replacement, or upgrade; (B) proposed dates for the Requesting Entity to provide updates to ERCOT on the plan's progress; (C) any supporting documentation relevant to plan implementation; and (D) potential mitigation options, if applicable			
16 TAC § 25.517(c)(6)	Whether any other exemption request was submitted for the Resource, including the outcome of each request			
16 TAC § 25.517(c)(6)	If the prior answer is "yes," a description of the outcome of all other exemption requests submitted for the Resource			
16 TAC § 25.517(c)(8)	The Resource's interconnection date (*i.e.*, the Initial Energization date as defined in Section 2 of the ERCOT Protocols)			
16 TAC § 25.517(c)(8)	A copy of the Resource's Standard Generation Interconnection Agreement (SGIA) and any amendments not already submitted to ERCOT.			
16 TAC § 25.517(c)(8)	If the Requesting Entity already provided the SGIA to ERCOT, respond "Yes" and provide information regarding the previously-submitted SGIA			



The Public Utility Commission of Texas (PUCT) approved Nodal Operating Guide (NOG) ride-through requirements effective October 1, 2024 with an April 1, 2025 deadline (extended to April 15, 2025) to submit all information for Resources requesting an extension or submitting a notice of intent to seek an exemption. Additionally, PUCT Electric Substantive Rule § 25.517 eliminated the need for a subsequent NOG revision request to establish standards to address exemption requests. Thereafter, the deadline to submit all information for Resources requesting an extension was extended to, and the deadline for Resources seeking an exemption was established as, September 15, 2025.

The NOG and PUCT Rule 25.517 require Resource Entities to submit certain information in support of an extension or exemption request. ERCOT reviewed your September 2025 submittal and, pursuant to NOG § 2.12.1.3(1)(b), notifies you your submission was incomplete. In this spreadsheet, ERCOT identifies the missing information and instructions to submit the information via email at NOGRR245@ercot.com

NOTE: If you do not timely provide the requirement information, ERCOT may have no choice other than to reject your extension or exemption request

ercot	**Ride-Through Submission Status Report**
Market Participant (MP) Name:	SALT FORK WIND LLC
Resource Name:	SALTFORK_UNIT2
Current Date:	11/21/2025
Response Due By:	12/16/2025
Submission Instructions	Submit missing information via an email to NOGRR245@ercot.com

ercot	Request for Exemption Missing Information and Instructions							
Item	Missing Information	Instructions to submit Missing Information	Response					
[redacted]								

Exemption Request Form				
Question ID	Question	Missing Information	Instructions to submit Missing Information	Response
16 TAC § 25.517(c)(1)	A description of the reliability requirement from which the Resource Entity (RE) seeks an exemption, including cross-references to ERCOT protocols where the applicable reliability requirement is contained			
16 TAC § 25.517(c)(2)	A succinct description, with supporting documentation, of the RE's efforts to comply with the applicable reliability requirement and an explanation of the RE's inability to comply			
16 TAC § 25.517(c)(3)	Documentation describing all feasible modifications, replacements, or upgrades the RE could implement, but has not yet implemented, to improve the performance of the Resource toward meeting the requirement(s) from which an exemption is requested			
16 TAC § 25.517(c)(4)	A model accurately representing the expected Resource performance and reflecting the actual, as-build resource equipment and settings, with all technical limitations, before and after maximizing the Resource's operational capability if not already submitted to ERCOT. Each model must include a description of any technical limitation the RE cannot accurately represent in that model			
16 TAC § 25.517(c)(5)	A plan to comply with each specific element of the applicable reliability requirement to the maximum extent possible, which must include: (A) a proposed completion deadline for each proposed modification, replacement, or upgrade; (B) proposed dates for the Requesting Entity to provide updates to ERCOT on the plan's progress; (C) any supporting documentation relevant to plan implementation; and (D) potential mitigation options, if applicable			
16 TAC § 25.517(c)(6)	Whether any other exemption request was submitted for the Resource, including the outcome of each request			
16 TAC § 25.517(c)(6)	If the prior answer is "yes," a description of the outcome of all other exemption requests submitted for the Resource			
16 TAC § 25.517(c)(8)	The Resource's interconnection date (*i.e.*, the Initial Energization date as defined in Section 2 of the ERCOT Protocols)			
16 TAC § 25.517(c)(8)	A copy of the Resource's Standard Generation Interconnection Agreement (SGIA) and any amendments not already submitted to ERCOT.			
16 TAC § 25.517(c)(8)	If the Requesting Entity already provided the SGIA to ERCOT, respond "Yes" and provide information regarding the previously-submitted SGIA			



ATTACHMENT E

Denial

Re: Notice of Extension Request Rejection and Exemption Denial - SALTFORK_UNIT1 and SALTFORK_UNIT2

Date: August 26, 2026

On September 26, 2024, the Public Utility Commission of Texas (PUCT) approved Nodal Operating Guide (NOG) Revision Request 245 (NOGRR245), Inverter-Based Resource (IBR) Ride-Through Requirements, to be effective October 1, 2024. NOGRR245 required Resource Entities (REs) to submit extension requests and notices of intent to request an exemption from a frequency or voltage ride-through requirement, along with supporting documentation, by April 1, 2025. *See* NOG §§ 2.11.1(1), 2.11.2(1), 2.12.1(1). Subsequently, ERCOT extended that deadline to April 15, 2025. *See* Market Notice M-A010825-05.

On June 20, 2025, the Public Utility Commission of Texas (Commission) entered its Order Adopting New 16 TAC § 25.517, with that Rule becoming effective July 10, 2025. Substantive Rule § 25.517 requires, among other things, a RE requesting an exemption "must . . . at a minimum" provide "models that accurately represent expected resource performance and reflect the actual, as-built resource equipment and settings, with all technical limitations, before and after maximizing the resource's operational capability, if applicable, and if not already submitted to ERCOT. Each model must include a description of any technical limitation the resource entity cannot accurately represent in that model."

After receiving initial submissions not containing the minimum level of information required by the NOG, ERCOT allowed REs to submit all the required information for a Resource by September 15, 2025. *See* Market Notice M-A010825-06. The Market Notice highlighted the importance of submitting "**a model accurately representing post-modification expected performance reflecting all technical limitations."** *Id*. The Market Notice also advised REs that had previously submitted a notice of intent to request an exemption they "must provide ERCOT *official notice* in compliance with PUCT Substantive Rule Section 25.517(c) that it is requesting an exemption to one or more of the ride-through requirements by completing a form that ERCOT will distribute in a subsequent Market Notice." *Id*. ERCOT further notified REs exemption requests must include the information required by PUC Substantive Rule § 25.517(c)(1)-(9) by September 15, 2025. *Id*. ERCOT subsequently provided REs with a link to the Exemption Request Form. *See* Market Notice M-A010825-07. ERCOT has since worked with REs to identify missing information so the RE could provide that missing information.

Salt Fork Wind LLC (Salt Fork) has requested the following for the Salt Fork Wind Farm Resources (SALTFORK_UNIT1, SALTFORK_UNIT2):

- Extension for NOG § 2.9.1.2(3)
- Exemption for NOG § 2.9.1.2(4), (5), (6).

ERCOT reviewed Salt Fork's September 2025 extension and exemption request and information submission and found it incomplete. Consequently, ERCOT sent a Missing Information Request (MIR) to Salt Fork on 11/21/25 pursuant to NOG § 2.12.1.3(1)(b) indicating the submission was missing information related to voltage ride-through item (j) and Public Utility Commission of Texas Electric Substantive Rule § 25.517(c)(3), (4) and (8). ERCOT also instructed Salt Fork to submit a model pursuant to Commission Rule § 25.517(c)(4) and the NOG.

Salt Fork responded to the MIR on 12/16/25 by, among other things, stating it submitted a model (RIOO RSCR #12939). ERCOT's records show the ERCOT Dynamics group returned RSCR #12939 on 1/13/26 because the submitted model was not in the required template. Additionally, on 1/14/26, ERCOT instructed Salt Fork to submit a PSS/e model matching the Resource's registration information because the submitted model included 4 units and the Resource's registration data shows only 2 units or to update the Resource registration data. On 2/25/26, ERCOT requested an update from Salt Fork on the status of the model and, to date, Salt Fork has not remedied the issues associated with its model.

Commission Rule § 25.517(d) requires ERCOT to perform a reliability assessment to determine whether granting an exemption would result in a threshold reliability risk to the ERCOT System. As a prerequisite, and in order for ERCOT to perform that assessment, § 25.517(c)(4) of that Rule requires a RE requesting an exemption to provide models accurately representing expected Resource performance and reflecting the actual, as-built Resource equipment and settings, with all technical limitations, before and after maximizing the Resource's operational capability. The ERCOT NOG also requires timely submitting a model. ERCOT cannot perform the reliability assessment required by Commission Rule § 25.517(d) without that model. Because Salt Fork did not submit the information required in the NOG and Commission Rule § 25.517(c)(4), ERCOT hereby denies the exemption requests.

Additionally, because Salt Fork did not submit the information required in the NOG, including NOG § 2.12.1(3)(c), ERCOT is unable to grant the extension and hereby rejects the extension request.

Pursuant to NOG §2.12.1.3(6) and Commission Rule § 25.517(f), Salt Fork may appeal this decision directly to the PUCT without the need to comply with the Alternative Dispute Resolution Procedure in Protocol § 20.

Please note, even though ERCOT has rejected the extension requests and denied the exemption requests, the NOG still requires Salt Fork to: (i) ensure the Resource's frequency ride-through capability is set to the maximum level the equipment allows to meet or exceed the requirements of NOG § 2.6.2.1(1) - (5); and (ii) maximize the performance of the Resource's protection systems, controls, and other plant equipment to meet and, if possible, exceed the performance requirements in NOG § 2.9.1.2(1) - (7).

ATTACHMENT F

Protective Order

DOCKET NO. _____

COMPLAINT OF SALT FORK WIND LLC AGAINST ERCOT AND REQUEST FOR AN EXEMPTION FROM AN ERCOT RELIABILITY REQUIREMENT UNDER 16 TAC § 22.251(R).	**§**	**PUBLIC UTILITY COMMISSION OF TEXAS**

PROTECTIVE ORDER

This Protective Order governs the use of all information deemed confidential, including information for which the confidentiality designation is in dispute, by a party providing information to the Public Utility Commission of Texas (Commission) or to any other party to this proceeding. Under this Protective Order, "Protected Materials" are any information designated by a party as confidential. Within Protected Materials is a subset of highly confidential information designated as "Highly Sensitive Protected Materials." Unless otherwise noted, references in this Protective Order to Protected Materials include Highly Sensitive Protected Materials, and the provisions of this Protective Order pertaining to Protected Materials also apply to Highly Sensitive Protected Materials, except where this Protective Order provides additional protections or requirements for Highly Sensitive Protected Materials..

It is ORDERED that:

1. **Designation of Protected Materials**. When producing or filing a document, regardless of the format, the producing party may designate that document, or any portion of it, as confidential pursuant to this Protective Order by labeling the document as "PROTECTED MATERIAL PURSUANT TO PROTECTIVE ORDER ISSUED IN DOCKET NO. _____" and consecutively Bates Stamping each page. Protected Materials include the documents so designated, as well as the substance of the information contained in the documents and any description, report, summary, or statement about the substance of the information contained in the documents. Parties should ensure compliance with 16 Texas Administrative Code (TAC) § 22.71 regarding the filing of confidential documents.

2. **Materials Excluded from Protected Materials Designation**. Protected Materials may not include any information or documents (a) contained in the public files of the Commission or

any other federal or state agency, court, or local governmental authority subject to the Public Information Act;[1] or (b) which at the time of disclosure in this proceeding are public knowledge or which later become public knowledge other than through disclosure in violation of this Protective Order.

3. **Reviewing Party**. A Reviewing Party is any party provided Protected Materials in the course of this proceeding.

4. **Designation of Protected Materials**. When Protected Materials are filed with the Commission, the producing party must comply with the requirements of 16 TAC § 22.71(j) and must identify, if applicable: (a) any exceptions to the Public Information Act claimed to apply to the Protected Materials; (b) the reasons supporting a claim the information is excepted from disclosure under the Public Information Act; and (c) that counsel for the producing party, if any, has reviewed the information sufficiently to state in good faith that the information is excepted from disclosure under the Public Information Act and merits the Protected Materials designation.

5. **Persons Permitted Access to Protected Materials**. Except as otherwise provided in this Protective Order, a Reviewing Party may access Protected Materials only through its Reviewing Representatives who have signed the Protective Order Certification Form (see Attachment A) and filed the signed Protective Order Certification Form in this proceeding. The Reviewing Representatives consist of the Reviewing Party, if not represented by counsel, or the Reviewing Party's counsel of record in this proceeding and any associated attorneys, staff, consultants, and other persons employed or retained by the Reviewing Party or the Reviewing Party's counsel of record and directly engaged in this proceeding. Commission Staff will not provide copies of another party's Protected Materials to Reviewing Representatives. Reviewing Representatives may request copies of Protected Materials directly from the producing party. Reviewing Representative may also view, but not receive copies of, Protected Materials in person in the offices of the Commission. At all times, the presiding officer and the presiding officer's staff shall have access to Protected Materials for purposes of this proceeding, in compliance with 16 TAC § 22.71(j)(6).

[1] Tex. Gov't Code §§ 552.001–.407.

6. **Highly Sensitive Protected Material**. Highly Sensitive Protected Materials are a subset of Protected Materials and include documents or information that a producing party claims are of such a highly sensitive nature that making copies of such documents or information or providing access to such information, except as specified herein, would expose a producing party to unreasonable risk of harm. Under this Protective Order, Highly Sensitive Protected Materials include but are not limited to: (a) customer-specific information protected by PURA[2] § 32.101(c) or Texas Utilities Code § 182.052; (b) contractual information pertaining to contracts that specify that their terms are confidential or that are confidential pursuant to an order entered in litigation to which the producing party is a party; (c) market-sensitive fuel price forecasts, wholesale transaction information, and/or market-sensitive marketing plans; and (d) business operations or financial information that is commercially sensitive. Documents or information so classified by a producing party must bear the designation "HIGHLY SENSITIVE PROTECTED MATERIALS PROVIDED PURSUANT TO PROTECTIVE ORDER ISSUED IN DOCKET NO. _____" and must be consecutively Bates Stamped. Any notes made from Highly Sensitive Protected Materials must also be treated as Highly Sensitive Protected Materials unless such notes contain only a description of the document and a general characterization that does not reveal any substantive information from the document. Parties should ensure compliance with 16 TAC § 22.71 regarding the filing of confidential documents.

7. **Persons Who May Have Access to Highly Sensitive Protected Material**. Access to Highly Sensitive Protected Material is limited to those persons authorized by 16 TAC § 22.71(j)(6) and Reviewing Representatives who have signed the Protective Order Certification Form (see Attachment A) and filed the signed Protective Order Certification Form in this proceeding. Permitted Reviewing Representatives consist of the Reviewing Party, if not represented by counsel, or the Reviewing Party's counsel of record in this proceeding and any associated attorneys, staff, consultants, and other persons employed or retained by the Reviewing Party or the Reviewing Party's counsel of record and directly engaged in this proceeding. Commission Staff will not provide copies of another party's Highly Sensitive Protected Materials to Reviewing Representatives. Reviewing Representatives may request copies of Highly Sensitive Protected Materials directly from the producing party as specified herein. Reviewing Representative may also view, but not receive copies of, Highly Sensitive

[2] Public Utility Regulatory Act, Tex. Util. Code §§ 11.001–66.017.

Protected Materials in person in the offices of the Commission. At all times, the presiding officer and the presiding officer's staff shall have access to Highly Sensitive Protected Materials for purposes of this proceeding, in compliance with 16 TAC § 22.71(j)(6).

8. **Copies of Highly Sensitive Protected Material**. A producing party must provide at least one copy of Highly Sensitive Protected Materials to a Reviewing Party. Any Highly Sensitive Protected Materials provided to a Reviewing Party may not be copied by the Reviewing Party except for the following reasons: (a) for admission into the evidentiary record; (b) upon order by the presiding officer, after a finding of good cause; or (c) by agreement of the producing party. The Reviewing Party is required to maintain a record of any copies made of Highly Sensitive Protected Materials and must timely provide such record to the producing party. The record must specify the location and person(s) possessing a copy.

9. **Public Information Requests**. If a request is made for Protected Materials under the Public Information Act, a copy of the requested Protected Materials may be furnished to the Open Records Division at the Office of the Texas Attorney General (OAG) in compliance with applicable law.

10. **Required Certification**. Prior to reviewing Protected Materials, a Reviewing Party, including any applicable Reviewing Representative, must agree in writing to the following certification found in Attachment A to this Protective Order:

> I certify my understanding that the Protected Materials are provided to me under the terms of the Protective Order in this proceeding, which I have read and hereby agree to be bound by. I understand that the contents of the Protected Materials, including any information derived from them, must not be disclosed to anyone except in accordance with the Protective Order and, unless I am an employee of the Commission or the Office of Public Utility Counsel (OPUC), will be used only for the purpose of the proceeding in Docket No. _____. I acknowledge that the obligations imposed by this certification are pursuant to such Protective Order..

Prior to reviewing Highly Sensitive Protected Materials, a Reviewing Party, including any applicable Reviewing Representative, must agree in writing to the following certification found in Attachment A to this Protective Order:

> I certify that I am eligible to review Highly Sensitive Protected Materials under the Protective Order in this proceeding. I further certify my understanding that the Highly Sensitive Protected Materials provided to me may include information designated as critical energy infrastructure information (CEII), and I agree to treat such CEII confidentially in accordance with the terms of the Protective Order..

The Reviewing Party is required to file a copy of each signed certification in this proceeding before being granted access to any confidential materials.

11. **Disclosures between Reviewing Representatives and Continuation of Restrictions**. A Reviewing Representative may disclose Protected Materials to another Reviewing Representative who has executed the signed certification required by Paragraph 10 appropriate for the materials disclosed. If a Reviewing Representative to whom Protected Materials have been disclosed stops participating in this proceeding, that person's right to review Protected Materials is terminated and all notes or other information derived from the Protected Materials must be destroyed or given to another Reviewing Representative authorized to review Protected Materials. Any person who has executed a certification under Paragraph 10 is bound by this Protective Order as long as it is in effect, even if that person no longer participates in this proceeding.

12. **Procedures Regarding Voluminous Protected Materials**. 16 TAC § 22.144(h) governs production of voluminous Protected Materials. Voluminous Protected Materials will be made available by the producing party in Austin, Texas, or at a mutually agreed upon location, Monday through Friday, 9:00 a.m. to 5:00 p.m. (except on state or Federal holidays), and at other mutually convenient times upon reasonable request. If requested, copies of voluminous Protected Materials may be made available to a requesting party, at the party's expense, provided however that Commission Staff, OPUC, the Electric Reliability Council of Texas,

Inc. (ERCOT), and the OAG are not required to pay for copies of voluminous Protected Materials.

13. **Reviewing Period Defined**. Protected Materials may be reviewed only until the Commission's plenary jurisdiction over this proceeding expires, which may be reopened if the Commission regains jurisdiction due to a remand as provided by law. Protected Materials admitted into the evidentiary record or accompanying the evidentiary record as offers of proof may be reviewed through the pendency of this proceeding and any appeals.

14. **Use of Protected Materials**. Protected Materials are made available solely for use in this proceeding and access to Protected Materials may not be used in furtherance of any other purpose, including, without limitation: (a) any other pending or potential proceeding involving any claim, complaint, or other grievance of whatever nature, except appellate review proceedings that may arise from or be subject to these proceedings; or (b) any business or competitive endeavor of whatever nature. Because of their statutory regulatory obligations, these restrictions do not apply to Commission Staff or OPUC.

15. **Confidential Treatment of Protected Materials and Information Derived from Those Materials**. A Reviewing Party's notes, memoranda, or other information regarding or derived from Protected Materials are to be treated confidentially by the Reviewing Party and must not be disclosed or used by the Reviewing Party except as permitted and provided in this Protective Order. Information derived from or describing the Protected Materials must be maintained in a secure place and must not be placed in the public or general files of the Reviewing Party except in accordance with the provisions of this Protective Order. A Reviewing Party must take all reasonable precautions to ensure that the Protected Materials, including notes and analyses made therefrom that also constitute Protected Materials, are not viewed or taken by any person other than a Reviewing Representative of a Reviewing Party.

16. **Procedures for Submission of Protected Materials**. A party submitting to the Commission any filing, testimony, exhibit, or other document containing or disclosing any Protected Materials must comply with 16 TAC § 22.71(j). The presiding officer may subsequently remove or modify the filing's confidential designation, as provided under 16 TAC § 22.71(j)(2). If filing before a judicial body, the filing party: (a) must notify the party that

provided the information within sufficient time to allow that party to seek a temporary sealing order; and (b) must otherwise follow the procedures in Rule 76a, Texas Rules of Civil Procedure.

17. **Protected Materials during Pendency of Appeal Regarding Confidential Designation**. If at any time the presiding officer orders that all or part of the Protected Materials do not merit designation as confidential, or that materials claimed to be Highly Sensitive Protected Materials are only Protected Materials, those materials will nevertheless be subject to the protection afforded by this Protective Order for three working days, unless otherwise ordered, from the date the party asserting confidentiality receives written notice of the presiding officer's order. If an appeal to the Commissioners is filed within that three working-day time period, the Protected Materials will be afforded the confidential treatment and status provided in this Protective Order during the pendency of such appeal.

18. **Notice of Intent to Use Protected Materials or Change Materials Designation**. Parties must notify all other parties prior to offering Protected Materials into evidence or otherwise disclosing such information in the record. During the pendency of this proceeding at the Commission, a Reviewing Party wishing to disclose Protected Materials to any person to whom disclosure is not authorized by this Protective Order or wishing to change the designation of Protected Materials must first file and serve on all parties written notice of such proposed disclosure or request for change in designation, identifying with particularity the affected Protected Materials. A Reviewing Party may challenge the designation of Protected Materials at any time.

19. **Procedures to Contest Disclosure or Change in Designation**. If a party contests a proposed disclosure or request for change in designation, that party must file with the presiding officer its objection, with supporting affidavits (if any) within five working days after receiving the notice of the proposed disclosure or change in designation. If the party asserting confidentiality does not file such an objection within this time period, that party will be deemed to have waived any objection to the proposed disclosure or request for change in designation. Within five working days after an objection and supporting materials are filed, any responsive pleadings or documents by any other party must be filed. Any party seeking disclosure or change in designation must support its request with a statement verifying that the party has

reviewed all portions of the materials in dispute and providing the reason the Protected Materials should not be confidential under applicable legal standards.

20. **Presiding Officer Determination Regarding Disclosure or Change in Designation**. If a proposed disclosure or change in designation is contested, the presiding officer will rule on the request without a hearing, although the presiding officer may conduct a prehearing conference to determine the matter. The burden is on the party asserting confidentiality to show that disclosure or change in designation should not occur. If the presiding officer determines that the proposed disclosure or change in designation should occur, disclosure must not take place earlier than three working days after such determination unless otherwise ordered.

21. **Maintenance of Protected Status during Challenge Periods**. This paragraph identifies the time periods during which protection will continue to be afforded under this Protective Order for Protected Materials pending appeal. A party has ten days from either (a) the date of an unfavorable Commission order or (b) the date an appeal of an interim order to the Commission is overruled by operation of law, to file a challenge in the courts of this state to an order allowing disclosure or change in designation. Similarly, a party challenging a state district court determination allowing disclosure or change in designation shall have ten days to file an appeal of such order. Finally, a party challenging a determination of a state appeals court allowing disclosure or change in designation will have ten days from the date of the appellate court order to file a challenge to the order. During these time periods, all Protected Materials will be afforded the confidential treatment and status provided for in this Protective Order.

22. **Return of Copies of Protected Materials and Destruction of Information Derived from Protected Materials**. Following the conclusion of this proceeding, each Reviewing Party must, no later than 30 days following receipt of the notice described below, return to the party asserting confidentiality all copies of the Protected Materials provided by that party pursuant to this Protective Order and all copies reproduced by a Reviewing Party. Further, within that same time period, counsel for each Reviewing Party must provide to the party asserting confidentiality a letter by counsel representing that any Protected Materials (including copies of notes, memoranda, and other documents regarding or derived from the Protected Materials) that have not been returned have been destroyed. Promptly following the conclusion of this

proceeding, counsel for the party asserting confidentiality must send a written notice to all other parties reminding them of their obligations under this Paragraph. In this Protective Order, "conclusion of this proceeding" means the exhaustion of available appeals, or the expiration of the time for making such appeals, as provided by applicable law. If, following any appeal, the Commission conducts a remand proceeding, then the "conclusion of this proceeding" is extended by the remand to the exhaustion of available appeals of the remand, or the expiration of the time for making such appeals, as provided by applicable law. Nothing in this Paragraph prohibits counsel for each Reviewing Party from retaining two copies of any filed testimony, brief, application for rehearing, hearing exhibit or other pleading which refers to Protected Materials, provided that any such Protected Materials retained by counsel will remain subject to the provisions of this Protective Order.

23. **Applicability of Other Law**. This Protective Order is subject to the requirements of the Public Information Act, the Open Meetings Act,3 the Texas Securities Act,4 and any other applicable law. However, if possible, any party subject to those acts must notify the party asserting confidentiality prior to disclosing Protected Materials under those acts as specified herein. Notwithstanding any other provision herein, such notice is not required where the Protected Materials are sought by governmental officials authorized to conduct a criminal or civil investigation that relates to or involves the Protected Materials, and those governmental officials indicate in writing that such notice could compromise the investigation and that the governmental entity involved will maintain the confidentiality of the Protected Materials.

24. **Procedures for Release of Information Under Order**. Notwithstanding any other provision herein, if required by order of a governmental or judicial body, the Reviewing Party may release confidential information as required by such order. However, the Reviewing Party must (a) notify the producing party of the order requiring the release of such information within five days of the date the Reviewing Party has notice of the order; (b) notify the producing party at least five days in advance of the release of the information to allow the producing party to contest release of the confidential information; and (c) use its best efforts to prevent such materials from being disclosed to the public. This Protective Order does not preclude the Reviewing Party from complying with any valid and enforceable order of a state or federal court with competent jurisdiction specifically requiring disclosure of Protected Materials earlier than contemplated herein. The notice specified in this paragraph is not

required where the Protected Materials are sought by governmental officials authorized to conduct a criminal or civil investigation that relates to or involves the Protected Materials, and those governmental officials indicate in writing that such notice could compromise the investigation and that the governmental entity involved will maintain the confidentiality of the Protected Materials.

25. **Best Efforts Defined**. The term "best efforts" as used in the preceding paragraph requires that the Reviewing Party attempt to ensure that disclosure is not made unless such disclosure is pursuant to a final order of a Texas governmental or judicial body, the written opinion of the Texas Attorney General sought in compliance with the Public Information Act, or the request of governmental officials authorized to conduct a criminal or civil investigation that relates to or involves the Protected Materials. The Reviewing Party is not required to delay compliance with a lawful order to disclose such information but is required to timely notify the party asserting confidentiality, or its counsel, that it has received a challenge to the confidentiality of the information and that the Reviewing Party will either proceed under the provisions of § 552.301 of the Public Information Act, or intends to comply with the final governmental or court order.

26. **Sanctions**. If the presiding officer finds that a party unreasonably designated materials as Protected Materials or Highly Sensitive Protected Materials, unreasonably attempted to prevent disclosure, or otherwise breached this Protective Order, the presiding officer may sanction the party under 16 TAC § 22.161.