

BAL-001-TRE-2 Primary Frequency Response (PFR)

Responsibility Exclusion Process

Part 9.3 of Requirement R9 and Part 10.3 of Requirement R10 in the BAL-001-TRE-2 NERC Reliability Standard allow the Balancing Authority to exclude a generating unit’s initial and sustained PFR performance during a Frequency Measurable Event (FME) from the rolling average calculation due to a legitimate operating condition that prevented normal PFR performance. This process details the steps that a Generator Owner’s designated Market Participant needs to follow to submit an exclusion request and the process that ERCOT will use to evaluate exclusion requests.

Exemption request submission

* Per paragraph 2 of ERCOT Nodal Operating Guide section 2.2.8, a Market Participant must submit an exemption request for their unit to be excluded **within 30 days** of the Market Information System (MIS)[[1]](#footnote-2) posting date of the [“Initial and Sustained Frequency Response Unit Performance” report](https://mis.ercot.com/secure/data-products/group-reports/pdcwg?id=NP12-262-M). The request should be sent to the Market Participant’s Client Services Representative or ERCOT Compliance at compliance@ercot.com.
* The Market Participant should submit the request using the attached “***ERCOT BAL-001-TRE-2 Primary Frequency Response (PFR) Responsibility Exclusion Request Form***”.
* The Market Participant must submit adequate evidence documenting the legitimate operating condition that prevented normal PFR performance and supporting the merits of the exemption request.

ERCOT Evaluation Process

* ERCOT may make a determination on the exclusion based on the request and accompanying evidence, or ERCOT may request additional documentation, if necessary.
* ERCOT may also ask the Performance, Disturbance, Compliance Working Group (PDCWG) to review the exclusion request and make a recommendation. However, PDCWG’s recommendation is not binding; ERCOT will make the final determination on whether to approve the exclusion request.
* ERCOT Operations Planning will notify the Market Participant whether the exclusion request is approved or denied.

Examples of reasonable operating conditions

The table below provides a non-exhaustive list of examples of ordinarily experienced legitimate operating conditions that may prevent a generating unit from exhibiting normal PFR performance during an FME. The conditions listed in the table below are merely examples; the presence of one or more conditions listed in the table below does not guarantee that ERCOT will approve an exclusion request, as ERCOT evaluates each exclusion request on its own merits based on the evidence provided. ERCOT retains the discretion to make a final determination on each exclusion request based on evidence provided to support the request.

|  |  |
| --- | --- |
| Operating Condition | Response Limitation |
| Operation at or near auxiliary equipment operating limits | Boiler feed pumps transitions, condensate pumps, pulverizer operating limits or transition points, and forced draft fans limiting steam flow  |
| Data telemetry failure | Due to a telemetry failure, actual generator response data was not communicated to ERCOT |
| External system conditions impacting generator performance | Ambient Conditions* This should not include unit limitations due to seasonal ambient conditions as an alternative to updating the telemetered HSL sent to ERCOT
* Temperature control overrides to protect against mechanical damage
* Environmental constraints
 |
| Combined Cycle Configuration Transitions | Transition to or from different combined cycle configurations, such as 1x1 to 2x1 or vice-versa, as well as other combined cycle configurations if there are more units. |
| Unit ramping transition points affecting Ramp Magnitude Calculations | * Unit did not continue to ramp in the gradient level of the pre-perturbation period after the event
* Reached base load or lower ramping transition output levels prior to or during the event.
 |
| Other operating conditions | * Governor off/out of service (with evidence ERCOT was notified)
* System stability limits
* Control logic issues
* Specific design conditions limiting responses
* Issues caused by adverse weather-related conditions
 |

**ERCOT BAL-001-TRE-2 Primary Frequency Response (PFR) Responsibility Exclusion**

**Request Form**

* A Market Participant must submit an exemption request for their unit to be excluded **within 30 days** of the MIS posting date of the [“Initial and Sustained Frequency Response Unit Performance” report](https://mis.ercot.com/secure/data-products/group-reports/pdcwg?id=NP12-262-M). The request should be sent to the Market Participant’s Client Services Representative or ERCOT Compliance at compliance@ercot.com.
* The Market Participant will submit the request using this “***ERCOT BAL-001-TRE-2 Primary Frequency Response (PFR) Responsibility Exclusion Request Form*.**” Please submit one form per exclusion requested.
* The Market Participant must submit adequate evidence documenting the legitimate operating condition that prevented normal PFR performance and supporting the merits of the exemption request.

**Part I- Entity Information**

Please enter information for the Market Participant requesting the exemption below.

|  |  |
| --- | --- |
| **Date of Request** |  |
| **Name of Submitter** |  |
| **Market Participant** |  |
| **Unit Name(s)** |  |

**Part II- FME Information**

Please enter the applicable FME and constraint information below.

|  |  |
| --- | --- |
| **Date of FME** |  |
| **Date FME posted to MIS** |  |
| **Description of Operating Condition** |  |
| **Description of Response Limitation** |  |
| **Please provide any additional information that may help ERCOT review the exclusion request** |  |

**Part III- Evidence and Additional Required Information**

Attach supporting evidence documents, as applicable, that support the exclusion request (PI data, screenshots, Plant documentation, emails, Operator logs, etc.). The Market Participant should organize all evidence for initial submittal in a single .zip file for review.

1. The *Initial and Sustained Frequency Response Unit Performance report* is a certified report, and a QSE digital certificate with an appropriate role is needed to access it. ERCOT recommends that Market Participants subscribe to the *PDCWG Distribution list,* so they are aware when a report is posted to the MIS. [↑](#footnote-ref-2)