

June 11, 2024

**Sent via email**

Chad Seeley  
General Counsel  
ERCOT  
8000 Metropolis Drive, Building E  
Austin, Texas 78744  
chad.seeley@ercot.com

Re: *TAC Recommendation Oppositions Related to TAC-Approved Version of NOGRR  
245 Adopted at the June 7, 2024 TAC Meeting*

Dear Mr. Seeley:

On June 10, 2024, Invenergy Renewables LLC (“IRL”) and Invenergy Energy Management LLC (“IEM”) submitted TAC Recommendation Oppositions requesting the ERCOT Board of Directors (the “Board”) reject the TAC-approved version of NOGRR 245 adopted on June 7, 2024. Affiliated Invenergy power generation companies (“Invenergy PGCs”, collectively with IRL and IEM, “Invenergy”) submitted identical TAC Recommendation Oppositions:

- Delilah Solar Energy LLC
- Delilah Solar Energy II LLC
- Desert Sky Wind Farm LLC
- Goldwaite Wind Energy LLC
- Gunsight Mountain Wind Energy LLC
- McAdoo Wind Energy LLC
- Miami Wind LLC
- Samson Solar Energy II LLC
- Samson Solar Energy III LLC
- Santa Rita East Wind LLC
- Scurry County Wind LP
- Scurry County Wind II LLC
- Stanton Wind Energy LLC
- Trent Mesa Energy Farm
- Turkey Track Wind Energy LLC

Invenergy filed individual comments out of an abundance of caution to preserve legal error and to identify for the Board the number of impacted Invenergy PGCs. The Invenergy PGCs are IBRs with standard generation agreements executed before August 1, 2024. As such, each is exposed to the risks imposed by the TAC-approved version of NOGRR 245, including but not limited to the risks and potential costs imposed by Section 2.12.1 Exemptions and Extensions Process.

Invenergy appreciates the need for efficiencies, and agrees to consolidate its presentation to the Board on behalf of all Invenergy companies.

Invenergy also respectfully urges the Board to adopt the Joint Commenters' June 6, 2024 Comments and grant the request for relief set forth in Invenergy's and Joint Commenters' TAC Recommendation Oppositions.

Respectfully,



Meghan E. Griffiths  
Counsel for Invenergy