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| NOGRR Number | [245](https://www.ercot.com/mktrules/issues/NOGRR245) | NOGRR Title | Inverter-Based Resource (IBR) Ride-Through Requirements |

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| Date | August 16, 2024 |

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| Submitter’s Information | |
| Name | Joint Commenters  (David Azari; Carrie Bivens; Chase Smith; Thresa Allen; Hannah Muller) |
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| Cell Number | N/A |
| Market Segment | Independent Generators |

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| Comments |

NextEra Energy Resources, Invenergy Energy Management LLC, Southern Power Company, Avangrid Renewables, LLC, and Clearway Renew, LLC (collectively, Joint Commenters) appreciate the opportunity to submit these comments regarding Nodal Operating Guide Revision Request (NOGRR) 245 in anticipation of consideration by the ERCOT Board of Directors (ERCOT Board) on August 19 and 20, 2024. Joint Commenters continue to strongly and actively support efforts to ensure the reliability and adequacy of the Texas grid,[[1]](#footnote-2) and recognize the value in securing a degree of regulatory certainty by having in place the software, firmware, settings and parameterization modification requirements for Inverter-Based Resources (IBRs) and certain types of Wind Generation Resources (WGRs) (collectively, IBRs/WGRs).

Joint Commenters do not oppose ERCOT’s most recent comments filed on August 16, 2024. To that end, these comments are intended to memorialize the extensive collaboration between Joint Commenters and ERCOT that has occurred particularly since the Board’s action to table NOGRR245 to allow for the bifurcation of the hardware modification requirements and exemption standards and processes into a subsequent NOGRR (*i.e.*, Phase II), among other things. Additionally, as further detailed below, Joint Commenters note some key concerns that carry significant impacts to IBRs/WGRs as the development and implementation of new IBR/WGR ride through standards continues, including with respect to the bifurcated Phase II.

***Joint Commenters’ Good Faith Efforts in Collaborating with ERCOT***

Over the last several months, ERCOT and Joint Commenters have collaborated on key issues regarding both new and existing IBR/WGR Resources. We thank ERCOT for its leadership during this time and believe that a reasonable compromise has been obtained in this NOGRR. We look forward to working together with ERCOT and other interested stakeholders on future NOGRRs.

***Timing for Reporting and Submitting Models***

It will be a significant undertaking for IBRs/WGRs to meet the April 1, 2025, deadline specified in the NOGRR. Despite their best efforts to ensure models are updated, Resource owners do not have control in timely obtaining all services, data, and input from third-party Original Equipment Manufacturers (OEMs) and external consultants needed in order to develop and complete an updated model. The Joint Commenters will endeavor to work with ERCOT and third parties to accomplish the necessary modeling updates. Joint Commenters anticipate it may be necessary to consider more specifications regarding updated model submissions in Phase II.

***Transient Overvoltage Requirements Could Damage Equipment***

Additionally, OEMs have indicated that the transient overvoltage protection requirement in NOGRR245, which could be construed as being at the inverter/turbine level (as opposed to plant level), could result in equipment damage. To the extent this language is determined to apply at the inverter level for some resources it differs from the IEEE 2800 standards and/or conflicts with PUC Subst. R. § 25.503(f)(2)(C). These specifications may need to be reconsidered in Phase II.

***Resource Entity’s Officers or Executives Will Be Able to Provide Necessary Attestations***

Joint Commenters will use best efforts to obtain OEM and/or engineering consultant attestations and appreciate ERCOT’s inclusion of language that allows a Resource Entity to attest to its Resource’s equipment capabilities if it is unable to obtain a third-party attestation. Resource Entities, as Market Participants bound by ERCOT Protocols and PUCT rules, are in the best position to attest to the VRT and FRT capabilities of their Resources. Requiring attestations from non-Market Participants contravenes extensive precedent in the ERCOT Protocols and PUCT Substantive Rules.

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In conclusion, Joint Commenters appreciate the collaborative efforts with ERCOT on new IBR/WGR ride through standards and look forward to continuing the work in Phase II.

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| Revised Cover Page Language |

None

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| Revised Proposed Guide Language |

None

1. *See, e.g*., NOGRR245, Joint Commenters Comments (Jan. 23, 2024) (“Joint Commenters support the adoption of a more robust Inverter-Based Resource (“IBR”) performance standard to improve equipment technical capabilities and mitigate the reliability risk of grid disturbance events.”); Joint Commenters Comments (Mar. 22, 2024) (“The JC Proposal requires prompt implementation of available software and parameter changes to increase ride-through performance.”); Joint Commenters Comments (Apr. 15, 2024) (“For over a year, Joint Commenters have worked with each other, original equipment manufacturers (“OEMs”), and extensively over the past two months with ERCOT Staff, to develop new frequency and voltage ride-through standards in NOGRR245.”). [↑](#footnote-ref-2)