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| PGRR Number | [119](https://www.ercot.com/mktrules/issues/PGRR119) | PGRR Title | Stability Constraint Modeling Assumptions in the Regional Transmission Plan |

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| Date | December 2, 2024 |

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| Submitter’s Information |
| Name | Alexandra Miller; Ajay Pappu; Kat Patrick (Joint Commenters) |
| E-mail Address | alexandra.miller@edf-re.com;apappu@invenergy.com;kat.patrick@patternenergy.com |
| Company | EDF Renewables; Invenergy; Pattern Energy |
| Phone Number | Alexandra Miller 615-420-0471Ajay Pappu 312-582-1772Kat Patrick 973-906-4275 |
| Cell Number |  |
| Market Segment | Independent Generator  |

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| Comments |

EDF Renewables, Invenergy, and Pattern Energy (“Joint Commenters”) appreciate the opportunity to comment on Planning Guide Revision Request (PGRR) 119.

Joint Commenters acknowledge the intentions of ERCOT Staff to codify the current practice of modeling the limits of stability constraints to be consistent with expected operational limits. Joint Commenters also appreciate ERCOT Staff’s recent verbal clarification that PGRR119 is intended to reflect one of the requested changes in Nodal Protocol Revision Request (NPRR)1070, Planning Criteria for GTC Exit Solutions. Joint Commenters concur with ERCOT Staff that editing Section 3.1.4.1.1, Regional Transmission Plan Cases, is a better choice than adding this detail to the Protocols.

Joint Commenters acknowledge the comments by the Office of Public Utility Counsel (OPUC) on November 6, 2024, which express concern that the language needs further clarification and the “reliability margin” that is referenced is undefined. While the proposed PGRR revisions do mention consistency with operational procedures, the Revision Description does not fully capture this intent and appears to lack specificity when mentioning “a reliability margin.”

Joint Commenters propose the following edits to PGRR119:

* Revise the Revision Description to clarify that operational practice is the source of the reliability margin to be used.
* Removing “base” in reference to cases as both base and change cases should reflect appropriate margins in economic evaluations.
* Changing the proposed guide language to add more of the language proposed for this item in NPRR1070, which had already been vetted to be clear and specific, incorporating input from ERCOT Staff and other stakeholders.

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| Market Rules Notes |

Please note that the following PGRR(s) also propose revisions to the following section(s):

* PGRR118, Related to NPRR1246, Energy Storage Resource Terminology Alignment for the Single-Model Era
	+ Section 3.1.4.1.1

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| Revised Cover Page Language |

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| Revision Description | This Planning Guide Revision Request (PGRR) revises the Planning Guide to codify that a reliability margin consistent with expected operations procedures for the study period will be utilized when limits associated with a stability constraint are modeled in the Regional Transmission Plan reliability and economic base cases. |

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| Revised Proposed Guide Language |

**3.1.4.1.1 Regional Transmission Plan Cases**

(1) The starting base cases for the Regional Transmission Plan development are created by removing all Tier 1, 2, and 3 projects that have not received RPG acceptance or, if applicable, ERCOT endorsement from the most recent SSWG base cases.

(2) ERCOT shall set all non-seasonal Mothballed Generation Resources to out of service in the Regional Transmission Plan reliability base cases. ERCOT shall add proposed Generation Resources that have met the criteria for inclusion in Section 6.9, Addition of Proposed Generation to the Planning Models, to the Regional Transmission Plan base cases.

(3) ERCOT shall update the Regional Transmission Plan reliability and economic base cases to reflect any updates to the amount of Switchable Generation Resource (SWGR) capacity available to the ERCOT Region.

(4) ERCOT may, in its discretion, set a Generation Resource to out of service in the Regional Transmission Plan base cases prior to receiving a Notification of Suspension of Operations (NSO) if the Resource Entity notifies ERCOT of its intent to retire/mothball the Generation Resource and/or makes a public statement of its intent to retire/mothball the Generation Resource. ERCOT must provide reasonable advance notice to the RPG of any proposed Generation Resource retirements/mothballs and allow an opportunity for stakeholder comments.

(a) ERCOT will post and maintain the current list of Generation Resources that will be set to out of service pursuant to paragraph (4) above on the ERCOT website.

(5) In its Regional Transmission Plan studies, ERCOT shall first consider transmission needs without Remedial Action Scheme (RAS) actions. After evaluating these needs, ERCOT may model a RAS in the Regional Transmission Plan cases only if ERCOT’s initial studies did not identify a transmission project to exit the RAS or if a transmission project to exit the RAS is not expected to be in service by the season and year the case represents.

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| ***[PGRR113: Replace paragraph (5) above with the following upon system implementation of NPRR1198:]***(5) In its Regional Transmission Plan studies, ERCOT shall first consider transmission needs without Remedial Action Scheme (RAS) or Constraint Management Plan (CMP) actions. After evaluating these needs, ERCOT may model a RAS or CMP in the Regional Transmission Plan cases only if ERCOT’s initial studies did not identify a transmission project to exit the RAS or CMP, or if a transmission project to exit the RAS or CMP is not expected to be in service by the season and year the case represents. |

(6) ERCOT may, in its discretion, make other adjustments to any Regional Transmission Plan base case to ensure that the case reaches a solution. ERCOT must provide reasonable advance notice to the RPG of any proposed adjustments and an opportunity for stakeholder comment on them.

(7) ERCOT shall apply a reliability margin on applicable Interconnection Reliability Operating Limits (IROLs) and/or stability-related System Operating Limits (SOLs), consistent with the ERCOT operating procedures when such limits are modeled in the Regional Transmission Plan reliability and economic cases. The future expected operational reliability margins for Generic Transmission Limits (GTLs) shall be used.  The GTLs modeled in planning cases shall reflect the most likely operational limit for the future year being evaluated, including reliability margin discounts for System Operating Limit (SOL) and Interconnection Reliability Operating Limit (IROL) required margins or other likely reductions.  In the absence of specific and quantifiable planned system changes that would increase or decrease a GTC limit in the planning horizon, the appropriate reliability margin discount shall be applied to the GTL as it is in operations at the time of study.