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| NOGRR Number | [272](https://www.ercot.com/mktrules/issues/NOGRR272) | NOGRR Title | Advanced Grid Support Requirements for Inverter-Based ESRs |

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| Date | February 5, 2025 |

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| Submitter’s Information |
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| Cell Number |  |
| Market Segment | Independent Generator |

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| Comments |

Engie NA and Jupiter Power LLC (“Joint Commenters”) appreciate the opportunity to file comments on Nodal Operating Guide Revision Request (NOGRR) 272. Joint Commenters understand ERCOT’s efforts in raising this issue and in proactively proposing an advanced grid support specification to benefit the ERCOT Region.

However, as other owners and operators of Energy Storage Resources (ESRs) in ERCOT (Jupiter Power, Plus Power, and Spearmint Renewables) have pointed out in written comments to this NOGRR, there remains a policy concern around mandating that one subset of Resources in ERCOT be mandated to pay for (without any rate of return, long-term contract guarantee, or any other compensation mechanism) a service that results in significant stability benefits to the ERCOT System, including to other non-paying Resources. Therefore, Joint Commenters, as developers, owners, and operators of ESRs) in the ERCOT market, do not support the proposed Advanced Gird Support requirements for ESRs as described in this NOGRR.

As a proposal to remedy the policy conflict, Joint Commenters are in the final stages of drafting and filing a Nodal Protocol Revision Request (NPRR) that would define performance standards, set out settlement terms and provide a new standard contract for a new Advanced Grid Support Ancillary Service. At a high level, the “Advanced Grid Support Service” would be a contracted service, much like Black Start Service (BSS). The requirements of the service could be adjusted as time moves forward and ERCOT identifies additional grid support, such as Black Start or inertia.

Therefore, Joint Commenters request that the Reliability and Operations Subcommittee (ROS) continue to table NOGRR272 at the subcommittee level, until the above described NPRR is filed, so that stakeholders can have a meaningful policy discussion on both the NOGRR and the soon to be filed NPRR on Advanced Grid Support Service, after which referral to working group (s) for specific language consideration would be more productive in reaching an end goal. Joint Commenters believe that this is a key issue going forward -- on whether new services that benefit the grid should be mandated rather than procured though the competitive market.

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| Revised Cover Page Language |

None

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| Revised Proposed Guide Language |

None