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| PGRR Number | [124](https://www.ercot.com/mktrules/issues/PGRR124) | PGRR Title | ESR Maintenance Exception to Modifications |
| Date of Decision | | March 6, 2025 | |
| Action | | Tabled | |
| Timeline | | Normal | |
| Proposed Effective Date | | To be determined | |
| Priority and Rank Assigned | | To be determined | |
| Planning Guide Sections Requiring Revision | | 5.2.1.1, ESR Maintenance Exception (new) | |
| Related Documents Requiring Revision/Related Revision Requests | | None | |
| Revision Description | | This Planning Guide Revision Request (PGRR) adds an exemption to the Generator Interconnection or Modification (GIM) process for Energy Storage Resources (ESR)s adding rather than replacing equipment while maintaining the facility’s High Sustained Limit (HSL). | |
| Reason for Revision | | [Strategic Plan](https://www.ercot.com/files/docs/2023/08/25/ERCOT-Strategic-Plan-2024-2028.pdf) Objective 1 – Be an industry leader for grid reliability and resilience  [Strategic Plan](https://www.ercot.com/files/docs/2023/08/25/ERCOT-Strategic-Plan-2024-2028.pdf) Objective 2 - Enhance the ERCOT region’s economic competitiveness with respect to trends in wholesale power rates and retail electricity prices to consumers  [Strategic Plan](https://www.ercot.com/files/docs/2023/08/25/ERCOT-Strategic-Plan-2024-2028.pdf) Objective 3 - Advance ERCOT, Inc. as an independent leading industry expert and an employer of choice by fostering innovation, investing in our people, and emphasizing the importance of our mission  General system and/or process improvement(s)  Regulatory requirements  ERCOT Board/PUCT Directive  *(please select ONLY ONE – if more than one apply, please select the ONE that is most relevant)* | |
| Justification of Reason for Revision and Market Impacts | | Thermal generators routinely perform maintenance that involves replacing equipment to maintain the facility’s ability to operate at its expected level. The storage industry can do this well, but Tesla has found that it is ultimately more efficient to add more Megapacks to a site rather than modifying existing Megapacks on site, allowing the Resource Entity take advantage of new equipment and maintain the energy capacity of the generator at expected levels. However, adding new equipment to the site rather than swapping out in-kind equipment triggers a GIM process. Paragraph (c) of Section 5.2.1 is too restrictive for situations where the Resource Entity adds equipment instead of replacing it but maintains the HSL. | |
| ROS Decision | | On 3/6/25, ROS voted unanimously to table PGRR124 and refer the issue to Planning Working Group (PLWG) and Dynamics Working Group (DWG). All Market Segments participated in the vote. | |
| Summary of ROS Discussion | | On 3/6/25, the sponsor presented PGRR124; participants requested further review by the PLWG and DWG. | |

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| **Opinions** | |
| Credit Review | Not applicable |
| Independent Market Monitor Opinion | To be determined |
| ERCOT Opinion | To be determined |
| ERCOT Market Impact Statement | To be determined |

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| Company | Tesla |
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| Market Segment | Independent Generator |

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| **Comments Received** | |
| **Comment Author** | **Comment Summary** |
| None |  |

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| Market Rules Notes |

None

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| Proposed Guide Language Revision |

**5.2.1.1 Energy Storage Maintenance Exception**

(1) Hardware or software updates to an ESR are not a modification, as described in Section 5.2.1, Applicability, if:

(a) The changes are made to maintain the Facility’s original energy capacity and/or increase duration but not increase the High Sustained Limit (HSL) of the ESR;

(b) The Resource Entity provides unit type test results at least 35 days prior to beginning work on the Facility that show no change to MVA, short circuit fault contribution, dynamic response, or frequency ride-through capability or voltage ride-through capability; and

(2) The Resource Entity must conduct this work during an approved Resource Outage.