Control Number: 52682

Item Number: 8

Filing Receipt

Received - 2021-09-22 03:27:31 PM
Control Number - 51617
ItemNumber - 27

Electric Transmission Texas, LLC
400 West 15th Street, Suite 800
Austin, TX 78701-1677
ETTexas.com
September 22, 2021

Commissioner Lori Cobos
Public Utility Commission of Texas
PO Box 13326
Austin, Texas 78711-3326

Re: Submission in Project No. 51617

Commissioner Cobos:

ETT would like to bring to your attention the Lower Rio Grande Valley (LRGV) Reliability Assessment Results – With System Improvements analysis performed by ERCOT on the impact of line loss and generator loss in the LRGV as shown in the attached slide from the September 15th RPG meeting. The slide shows the additional base case contingency conditions beyond business as usual (BAU case). These additional scenarios are shown as Base Case 2 through 5 in the attached table.

The LRGV is a unique area in many ways as discussed in the July 26th workshop, including the fact there is no redundant supporting infrastructure east, south or west to rely upon in the event of a downed line or generator off line. The ability to import power from an additional source from the north is critically important to ensure reliability of service to customers in the LRGV. More independent paths are needed from north to south as developed in Option 2 as proposed by ERCOT. While stringing the second circuit from San Miguel to Palmito provides some incremental increase in import capability under some contingency conditions, the double circuit remains a single contingency event from an operational perspective. There are three 345kV sources supporting the LRGV today. After stringing the second circuit, there will still only be three 345kV sources.

The Base Cases studied (which are very credible given the LRGV characteristics) indicate that there is an urgent reliability need today, and stringing the second circuits will not change the need to move forward immediately with Option 2 as proposed by ERCOT to resolve the reliability and generation import and export issues in the LRGV. We strongly endorse ERCOT's Option 2 as a good first step in developing the infrastructure needed to meet the long-term needs in the LRGV. While stringing the second circuits can provide a little more capability out of the existing system, it should not replace, defer, or otherwise impact the need to move forward immediately with ERCOT's recommended Option 2.

Thank you for the opportunity to provide this information. If you have any questions, please feel free to contact me at kmfox@aep.com.

Sincerely,

Kip M. Fox
President, Electric Transmission Texas, LLC

LRGV Reliability Assessment Results – Existing System

#	Base Case	System Events	Reliability Need Year
			Existing System
1	No Outages (Business as Usual, BAU)	NERC and ERCOT Planning Events[4]	2027[1]
2	Outage of one 345-kV import circuit		Current[2]
3	Outage of two 345-kV import circuits		Current[2]
4	Outage of two conventional plants in LRGV		Current[2]
5	Very Low Wind Conditions[3]		Current[2]

(1). System improvements are needed prior to 2027
(2). Reliability issues are identified based on the existing system conditions
(3). Nodal Protocol Section 3.15(4)(e) …For Intermittent Renewable Resources (IRRs), the Reactive Power requirements shall be available at all MW output levels at or above 10% of the IRR's nameplate capacity
(4). Including major single and multiple contingencies, e.g., N1(circuit outage), G1(plant outage), and/or combination of N1 and G1