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Received - 2022-06-23 02:16:08 PM
Control Number - 53401
ItemNumber - 22

PROJECT NO. 53401

RULEMAKING TO ESTABLISH ELECTRIC WEATHER PREPAREDNESS STANDARDS – PHASE II	**§**	**PUBLIC UTILITY COMMISSION OF TEXAS**

ENBRIDGE INC. COMMENTS

Enbridge, Inc. ("Enbridge") appreciates the opportunity to respond to the request for comments relating to the Proposal for Publication (PFP) filed by the Public Utility Commission of Texas (the Commission) that repeals 16 Texas Administrative Code ("TAC") § 25.55 and adds a new 16 TAC § 25.55 in Project 53401: *Rulemaking to Establish Electric Weather Preparedness Standards – Phase II*. Enbridge is a leading energy infrastructure entity in Texas. We have over 1,400 Houston-based employees and provisioned contractors, and we own and operate significant oil and gas assets in Texas, as well as three wind generation facilities we operate with our partners (Chapman Ranch Wind I, Keechi Wind and Magic Valley Wind). Enbridge would be directly impacted by the proposed regulations.

I. EXECUTIVE SUMMARY

Enbridge herein proposes edits to the draft rule that that would clarify that the weather emergency preparedness standard requires generators take reasonable measures to be able to operate as designed during weather emergencies, in keeping with Senate Bill 3. This will ensure that generation resources invest in meaningful weather preparations, where appropriate for the resource type, including training, and monitoring, without requiring resources to operate beyond design parameters, which would be detrimental to grid reliability and could be unsafe. We have provided recommended, minor changes and clarifications to the sections below as detailed herein:

- **16 TAC § 25.55 (b)(5)** - so the rule captures major outages from a single event
- **16 TAC § 25.55 (b)(6)** – so the rule does not penalize or cause unnecessary administrative work for ERCOT and generation resources that are weather-dependent
- **16 TAC § 25.55 (b)(10)** – so equipment is required to perform as designed and not outside design parameters
- **16 TAC § 25.55 (c)(1)** and **16 TAC § 25.55 (c)(2)** – to avoid establishing a performance standard, the compliance with which could damage equipment and safety issues
- **16 TAC § 25.55 (c)(1)(B)** and **16 TAC § 25.55 (c)(2)(B)** – to ensure equipment is required to perform as designed and not outside design parameters

II. INTRODUCTION

Enbridge supports the ongoing success of the Electric Reliability Council of Texas (ERCOT) market and the establishment of electricity weather preparedness standards, as set out in Senate Bill 3 (SB 3) of the 87th Texas Legislature, which will help foster a more resilient grid. We supported the Commission's Phase I rules which focused on establishing weather preparedness standards, as opposed to performance standards, and provided generation resources the flexibility to implement preparedness measures that were appropriate for their resource type, geographical location, and equipment. We urge the Commission to take the same approach in Phase II to ensure that preparedness standards help foster a more resilient grid without inadvertently preventing existing generation resources from participating fully in the ERCOT market, which would create more reliability challenges for the grid.

We agree with Advance Power Alliance (APA) and American Clean Power (ACP) comments,

Renewable generation asset owners and operators have little to no ability to change capabilities, specifications, or characteristics without voiding Original Equipment Manufacturer (OEM) warranties…

Wind turbine and solar generators and battery energy storage units are engineered and constructed to operate under a specific range of conditions depending on the OEM design specifications. When ice accumulation levels and/or ambient temperatures exceed design parameters, generation components are designed to cease operations..[1]

We herein request that the Commission adopt minor changes to the draft rule that would clarify that the weather emergency preparedness standard requires generators take reasonable preparation measures that are asset-specific, with consideration for commercially available technology and original design parameters, to help resources perform as designed during weather emergencies.

Enbridge below provides more detailed comments on the proposed TAC (all suggested changes are in red).

III. SECTION REVIEW

Enbridge believes the Commission's intent with the definitions of "Major weather-related forced interruption of service" was to capture significant unplanned outages from a single weather event, which we would support with the proposed edits below to help clarify the intent.

16 TAC § 25.55 (b)(5) ***Major weather-related forced interruption of service*** *– the loss of 7,500 megawatt-hours of dispatchable generation service or transmission capability occurring as a result of a single weather emergency*

Enbridge believes the Commission is attempting to address repeated unplanned outages and/or derates to help ensure the grid performs as forecast and dispatched by ERCOT, and not to

[1] See APA-ACP Comments under Docket 53401 (filed for the June 23, 2022 comment date)

impose performance requirements on weather resource-dependent resources during planned and/or expected periods of low wind and/or solar resources, for example. As a result, we suggest the following updates for non-dispatchable resources.

16 TAC § 25.55 (b)(6) ***Repeated weather-related forced interruption of service*** – *Three or more of any combination of the following occurrences as a result of a weather emergency within any three-year period: a failure to start, a forced outage, or a deration of more than fifty percent of the nameplate capacity of a dispatchable generation resource or transmission facility. Six or more of any combination of the following occurrences as a result of a weather emergency within any three-year period: a failure to start, a forced outage, or an unexpected deration of more than fifty percent of the expected capacity based on available resources and equipment design parameters of a non-dispatchable generation resource on a facility-wide basis.*

Enbridge reiterates ACP and APA's comments above that, when ice accumulation and/or ambient temperature exceed the design parameters for generation equipment, the equipment is designed to cease operations for protection and reliability of the equipment and for the safety of personnel and the public. Equipment should not be required to operate outside design parameters.

We also reiterate comments filed by GE Renewable North America,[2] Vestas American Wind Technology,[3] and Siemens Gamesa Renewable Energy[4] that they do not offer hardware retrofit technology to prevent ice from forming on turbine blades (anti-icing) or to remove ice build-up once it occurs (de-icing), nor do they provide blade coatings. This means that icing is unavoidable in certain extreme conditions and will lead to certain equipment temporarily ceasing operations.

As a result, we recommend that the definition below be updated to focus on ensuring components function as design instead of protecting against potentially necessary operational

[2] See GE Renewable Energy North America's comments under Docket 51840 (dated June 23, 2021)

[3] See Vestas American Wind Technology's comments under Docket 51840 (dated June 23, 2021)

[4] See Siemens Gamesa Renewable Energy's comments under Docket 51840 (dated June 23, 2021)

interruptions.

16 TAC § 25.55 (b)(10) ***Weather critical component*** *– Any component of a resource or transmission facility that is susceptible to fail during a weather emergency, the occurrence of which failure is likely to significantly hinder the ability of the resource or transmission facility to function as designed ~~intended or, for a resource, is likely to lead to a trip, derate, or failure to start~~.*

Given that occasional derates and/or forced outages are expected during certain kinds of weather emergencies for safety and reliability reasons, the Commission should generally avoid the phrasing proposed in **16 TAC § 25.55 (c)(1),** i.e., the proposal to replace "intended to" with "reasonably expected to" with respect to "ensur[ing] the sustained operation" of certain critical components. Enbridge recommends that the Commission retain the "intended to" phrasing throughout **16 TAC § 25.55 (c)(1)** and **16 TAC § 25.55 (c)(2)** when aiming to "ensure the sustained operation" within design parameters to keep the preparedness standards focused on preparing to operate during weather emergencies without establishing a performance standard that would not be feasible and/or in the interest of grid reliability and public safety.

Along these lines, we further support APA and ACP's recommended changes to **16 TAC § 25.55 (c)(1)(B)** and **16 TAC § 25.55 (c)(2)(B).**[5] These recommended changes will ensure that equipment is not required to perform beyond design parameters regardless of ERCOT weather study thresholds.

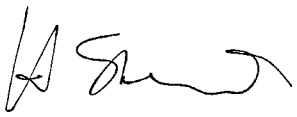
IV. CONCLUSION

Enbridge appreciates the opportunity to submit these comments for the Commission's

[5] See APA-ACP Comments under Docket 53401 (filed for the June 23, 2022 comment date)

consideration and we look forward to continuing to work with all stakeholders in this Project.

Respectfully Submitted,



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