YOUR NOGRR 255 DEADLINE: THE THREE CASES.

ERCOT Nodal Operating Guide (NOG) Section 6.1.4, adopted by NOGRR 255 and amended by NOGRR 279, requires transmission-connected inverter-based resource (IBR) facilities to install and configure fault recording, sequence of events recording and phasor measurement unit equipment. NOGRR 279 (approved by the PUCT January 15, 2026, effective February 1, 2026) removed the August 1, 2026 interim milestone for IBR facilities under Section 6.1.4 and replaced it with three cases that turn on two dates: the execution date of the facility's **original** Standard Generation Interconnection Agreement (SGIA) and its **Resource Commissioning Date** (RCD). Which case applies decides whether the deadline is a fixed date, a date set by commissioning, or commissioning itself.

CASE (A) · COMMISSIONED BEFORE THE RULE

RCD before July 25, 2024: August 1, 2028

- NOG 6.1.4(2)(a): "IBRs with a Resource Commissioning Date prior to July 25, 2024 shall install and configure fault recording, sequence of events recording, and phasor measurement unit equipment no later than August 1, 2028."
- One fixed date for the operating fleet. The 50 percent interim milestone of August 1, 2026 that NOGRR 255 carried for IBR facilities is gone from Section 6.1.4; nothing is due before August 1, 2028 for a case (a) facility.
- Relay settings work and disturbance-monitoring work share the same outages. Where a PRC-028-1 program is already scheduled for a site, plan the NOG 6.1.4 equipment into that program rather than a second outage.

CASE (B) · AGREEMENT BEFORE, COMMISSIONING AFTER

SGIA on or before July 25, 2024 and RCD after: RCD plus 365 days

- NOG 6.1.4(2)(b): "IBRs with an original Standard Generation Interconnection Agreement (SGIA) executed on or before July 25, 2024 and a Resource Commissioning Date after July 25, 2024 shall install and configure fault recording, sequence of events recording, and phasor measurement unit equipment within 365 days of the IBR's Resource Commissioning Date."
- The clock starts at the RCD, not at the project's commercial operation date and not at the SGIA. A facility commissioned in December 2025 under a 2023 SGIA is already inside its 365 days.
- A facility that has an SGIA but no RCD yet has no fixed deadline; the deadline is set the day ERCOT declares the Resource approved for market operations.

CASE (C) · AGREEMENT AFTER THE RULE

SGIA after July 25, 2024: by the RCD

NOG 6.1.4(2)(c): "IBRs with an original SGIA executed after July 25, 2024 shall install and configure fault recording, sequence of events recording, and phasor measurement unit equipment no later than the IBR's Resource Commissioning Date."

- The equipment is a commissioning prerequisite. Specify it in the procurement package and the commissioning checklist, because there is no period after the RCD in which to install it.
- **Read the dates right.** GridStrong reads "original" SGIA as the first executed agreement, not a later amendment; the Guides use the phrase the same way in Section 2.9.1. The RCD is defined in Protocols Section 2 as "The date on which ERCOT declares that a Resource has completed all qualification testing administered by ERCOT as part of the Resource Interconnection process so that a Resource is approved for participation in ERCOT market operations." It is not the developer's commercial operation date; using COD can mark a facility past due that is not, or on time when it is not. An RCD of exactly July 25, 2024 falls in neither (a) nor (b) as written; confirm the case with ERCOT.
- **Who is in scope.** NOG 6.1.4(1): "All transmission-connected IBR facilities operating at 60 kV with gross aggregated nameplate capacity of 20 MVA at a single site must meet all requirements in this section." GridStrong reads 60 kV as 60 kV and above, consistent with NOG 6.1.3.2.2(1)(c), and 20 MVA as 20 MVA and above, more conservative than that clause's "over 20 MVA". The maintenance and testing (6.1.5) and equipment reporting (6.1.6) obligations attach to the installed equipment; Section 6.1.7 places review duties on ERCOT and Transmission Facility owners.

Jul 25, 2024
PUCT approves NOGRR 255. The SGIA and RCD cutoff date the three cases turn on.

Feb 1, 2026
NOGRR 279 effective (PUCT approval Jan 15). The Aug 1, 2026 interim milestone is removed; cases (a) to (c) apply.

RCD + 365 days / at RCD
Case (b) and case (c) deadlines, set by each facility's own commissioning date.

Aug 1, 2028
Case (a) deadline for every IBR facility commissioned before Jul 25, 2024.

Sources (quotations verbatim): ERCOT Nodal Operating Guide, Section 6.1 (Disturbance Monitoring), text effective August 1, 2026 · NOGRR 255, High Resolution Data Requirements (PUCT approval July 25, 2024; effective August 1, 2024) · NOGRR 279, Deadline Extensions for Recording Equipment Installation (ERCOT Board December 8, 2025; PUCT approval January 15, 2026; effective February 1, 2026) · ERCOT Nodal Protocols Section 2, Definitions and Acronyms (Resource Commissioning Date). Educational material, not compliance advice.

GridStrong, Inc.
gridstrong.ai · help@gridstrong.ai