



**TEXAS  
REGIONAL  
ENTITY™**

*An Independent Division of ERCOT*

# Texas Regional Entity Compliance Report

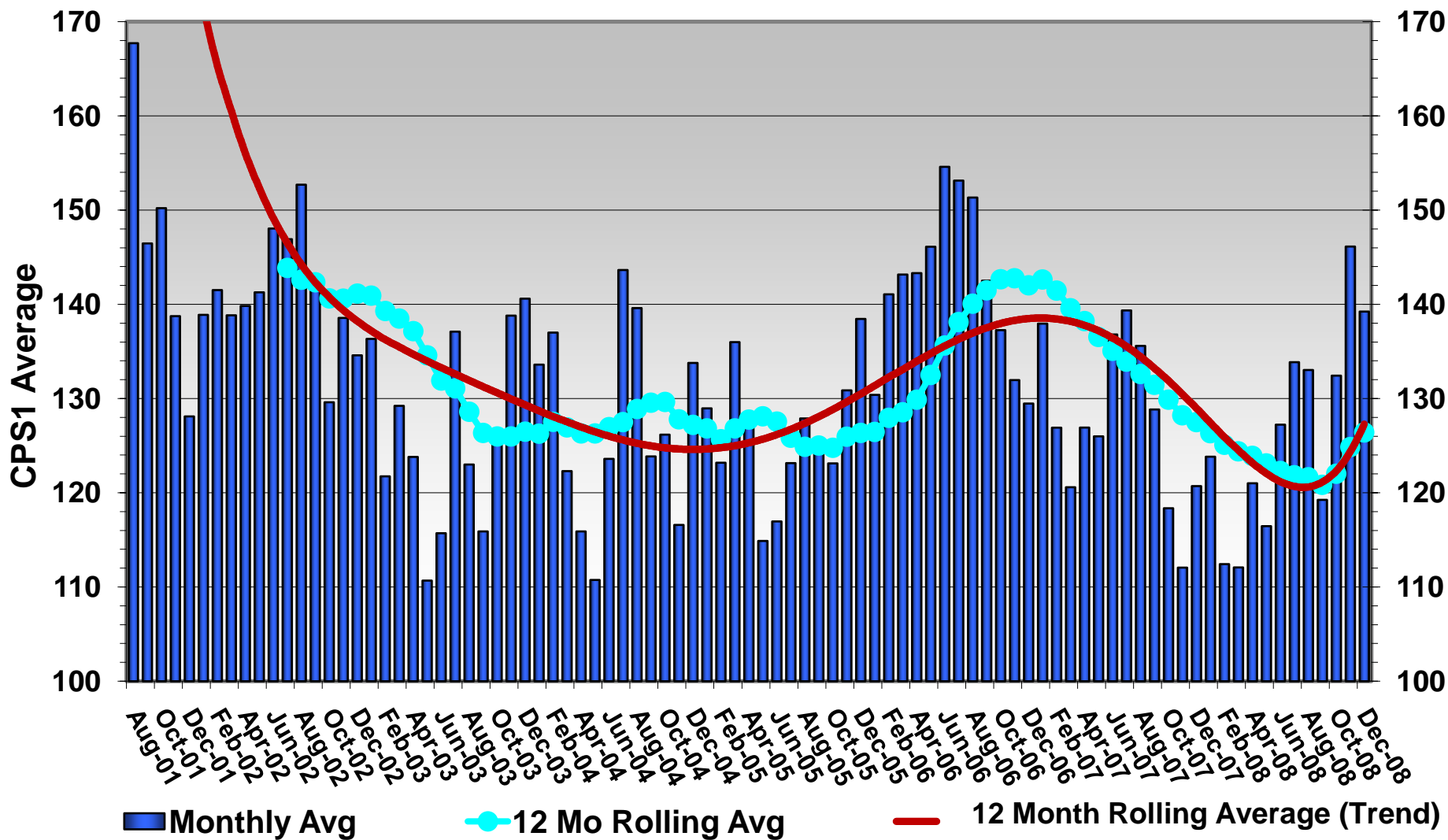
January 19, 2009

# Overview

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- **December 2008 ERCOT's CPS1 Monthly Performance**
- **December 2008 SCPS2 Scores for Non-Wind and Wind Only QSEs**
- **November 2008 Resource Plan Performance Metrics for Non-Wind and Wind Only QSEs**
- **December 2008 Compliance Progress**
- **Update on Key Issues**

# December 2008 ERCOT's CPS1 Monthly Performance



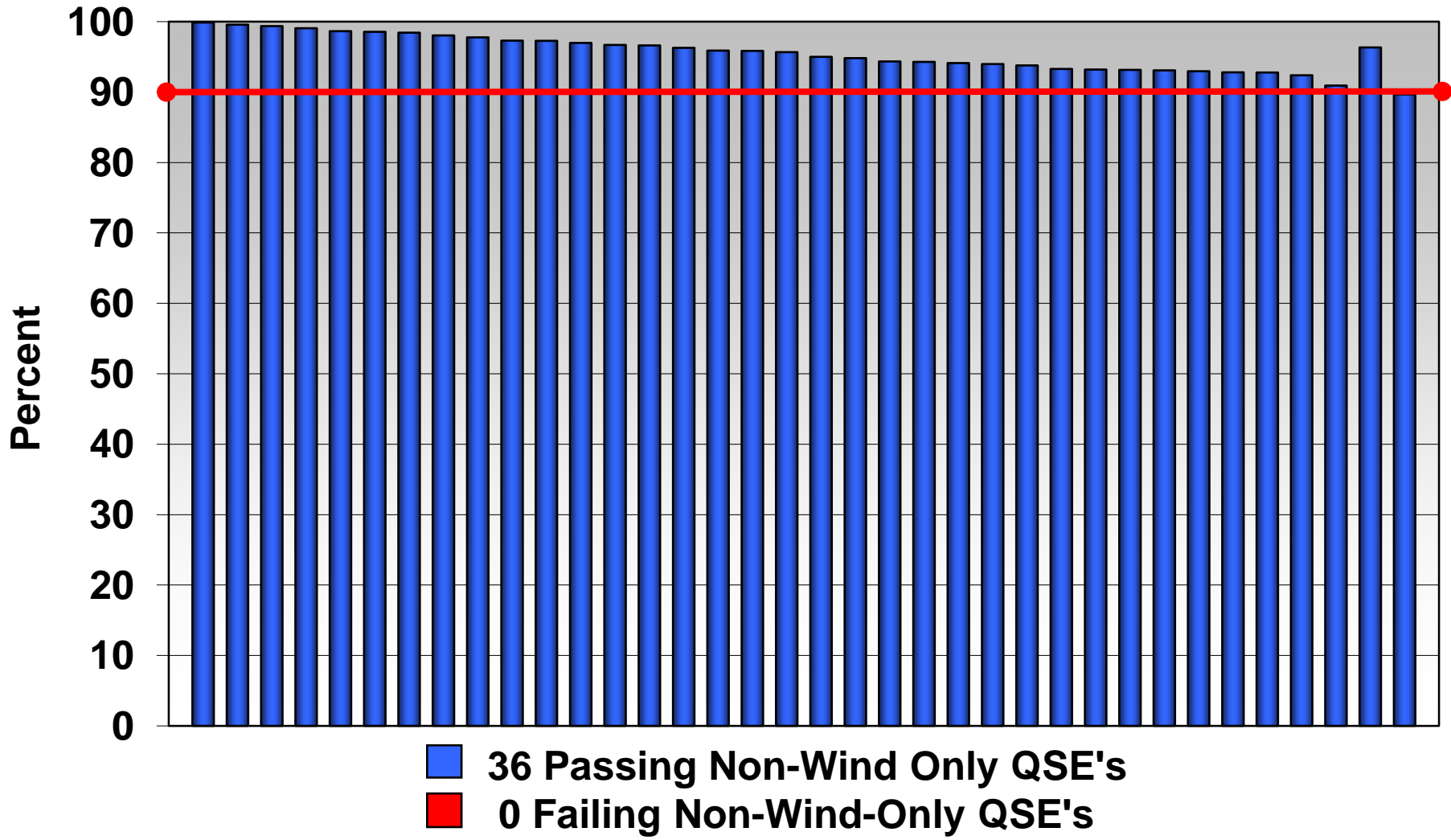
# Analysis of CPS1 Monthly Performance

- **Purpose**: To maintain Interconnection steady-state frequency within defined limits by balancing real power demand and supply in real-time
- **CPS1 is one reliability measure of how well the ERCOT region managed the BPS**
- **The measure is based on a rolling 12 month average**
- **ERCOT region's frequency performance is determined by NERC Control Performance Standard 1 (CPS1)**

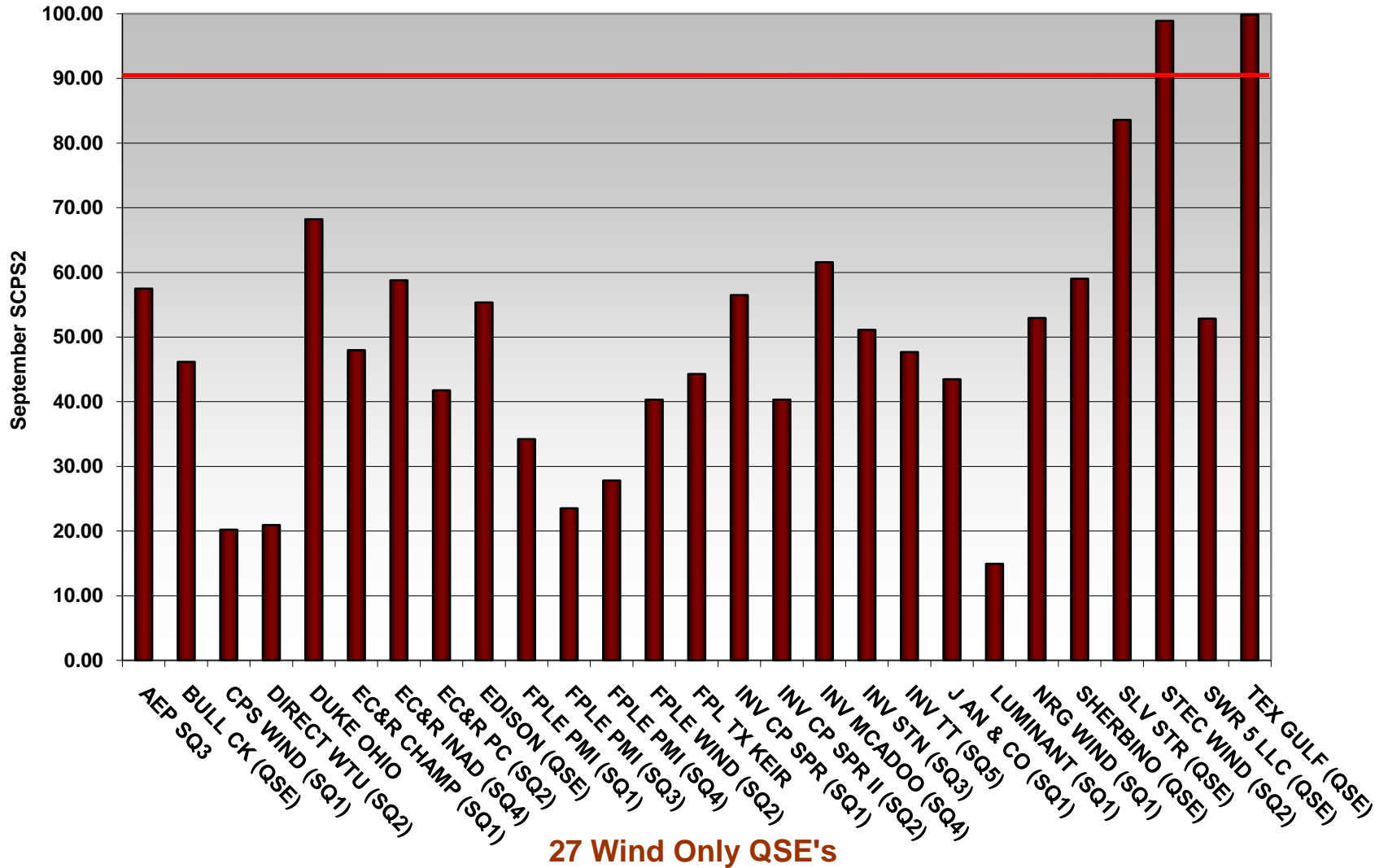
## Analysis of CPS1 Monthly Performance (cont.)

- **Seasonal fluctuation is expected**
- **Scores for individual months can be adversely affected by events (such as hurricanes)**
- **A detailed formula can be found in NERC Reliability Standard BAL-001-0a**
- **There was a sharp decrease in September 2008 due to Hurricane Ike and a recovery in October 2008**

# December 2008 SCPS2 Scores for Non-Wind Only QSEs



# December 2008 SCPS2 Scores for Wind Only QSEs



# Analysis of December 2008 SCPS2 Scores

- **This is a schedule focused metric**
- **Calculations are Portfolio Based by QSE**
- **Because of variations in the wind, it is more difficult for wind generators to match their scheduled generation to their actual output**
- **A detailed formula can be found in Protocol 6.10.5.3**
- **4<sup>th</sup> Straight month that all non-wind only QSEs passed**
- **The wide variation on SCPS2 wind scores for wind only QSEs should be analyzed to determine what is driving the wide variation between QSEs' performance**
  - **Identify useful wind only metrics**



# November 2008 Resource Plan Performance Metrics for Non-Wind Only QSEs

Resource Plan Performance Metric	ID																			
	FW	DK	DE	IP	AP	AO	HA	BY	BC	JA	AY	AM	AR	BR	DF	CI	AD	BJ	BH	JD
Resource Status	-	100	100	100	99	100	100	100	100	100	98	99	100	100	100	100	100	99	-	100
LSL as % of HSL	-	99	96	100	96	94	93	99	100	100	100	100	99	98	99	84	-	99	-	99
DA Zonal Schedule	100	99	100	100	100	100	100	100	100	100	93	99	100	100	100	100	-	100	100	99
AP Zonal Schedule	-	99	100	100	100	99	98	100	99	100	95	100	100	99	100	98	-	98	98	100
Down Bid & Obligation	-	99	97	100	99	99	99	98	99	100	96	90	97	93	94	92	-	94	100	96
Total Up AS Scheduled	-	-	99	-	99	99	100	98	99	100	99	99	100	97	85	-	-	100	-	99

Resource Plan Performance Metric	ID																			
	CF	ET	JO	DA	DP	BG	CX	FK	HW	IN	IZ	BX	CC	CD	AC	IE	CQ	EO	IO	FY
Resource Status	100	100	100	100	100	100	100	100	99	100	100	100	100	96	100	99	100	-	100	-
LSL as % of HSL	100	100	100	100	100	99	99	100	97	100	-	99	100	98	100	100	96	-	100	-
DA Zonal Schedule	100	-	100	100	100	100	100	98	100	100	-	100	100	100	100	100	100	100	95	-
AP Zonal Schedule	99	-	100	98	100	99	99	99	98	99	-	100	100	100	100	98	100	-	85	-
Down Bid & Obligation	98	-	98	97	96	99	95	100	95	98	-	98	98	98	91	100	90	-	90	-
Total Up AS Scheduled	100	-	100	94	100	100	96	93	96	100	-	93	99	92	-	98	100	-	-	100

 4 Consecutive Failing Scores

 3 Consecutive Failing Scores

 2 Consecutive Failing Scores

 1 Failing Score

# Analysis of November 2008 Resource Plan Performance Metrics for Non-Wind Only QSEs

- **CI – Coral Power LLC**

- First time failing “Resource Low Sustainable Limit as a Percentage of High Sustainable Limit Measure”. Coral was informed by email about their score and did not provide a response contesting their failing score.

- **IO – Westar (SQ1)**

- This is their Fourth consecutive failing score of “Adjustment Period Zonal Schedule Measure”. Westar has been issued a possible violation notice of ERCOT Protocols 4.10.2 “Scoring Review” and 4.10.6 “Adjustment Period Zonal Schedule Measure”.

- **DF – Constellation Energy Commodities Group Inc**
  - First time failing “Total Up AS Schedule Obligation Measure”. Constellation was informed by email about their score and did provide a response contesting the failing score. Further analysis of Constellation submitted data will be needed and may change their score.

# November 2008 Resource Plan Performance Metrics for Wind Only QSEs

Resource Plan Performance Metric	ID																						
	JG	BT	HJ	JM	JL	GR	GS	HS	BF	BE	FX	JH	JI	JN	JJ	JC	HE	CY	JQ	JP	JK	JE	IV
DA Zonal Schedule	100	86	100	100	99	100	100	96	99	100	100	100	100	100	100	99	100	100	100	100	96	100	100
AP Zonal Schedule	100	82	100	100	99	100	100	99	99	100	99	100	99	87	100	100	-	-	38	100	100	100	100
Down Bid & Obligation	100	83	100	99	100	100	100	100	99	100	100	100	99	100	100	100	-	-	100	100	100	100	94



4 Consecutive Failing Scores



3 Consecutive Failing Scores



2 Consecutive Failing Scores



1 Failing Score

Note: Wind only QSE do not have Resource Status, LSL as a percentage of HSL and Total Aup AS Schedules scores.

# Analysis of November 2008 Resource Plan Performance Metrics for Wind Only QSEs

- **BT – American Electric Power Service Corp (AEP)**
  - First time failing all three scores, AEP was informed by email about their score and did not provide a response contesting the failing scores.
- **JN – Invenergy Macadoo (SQ4)**
  - First time failing the “Adjustment Period Zonal Schedule Measure”. Invenergy reported that their operators cut and pasted the values into their spread sheet and did not notice that the data was off by an hour. They have since corrected their procedure for data submittal.

# Analysis of November 2008 Resource Plan Performance Metrics for Wind Only QSEs (cont.)

- **JQ – NRG Texas Wind (SQ1)**
  - First time failing the “Adjustment Period Zonal Schedule Measure”. NRG was informed by email about their score and did not provide a response contesting the failing score.
  - This is the first month that NRG Texas Wind has been scored.

# December Compliance Progress

- **Issued 2 NERC Preliminary Notices of Alleged Violation**
- **4 SPS events occurred during the month of December (2 events happened on December 30<sup>th</sup>)**
  - Each of these events are being analyzed to determine if mis-operation has occurred
- **3 pre-December SPS Event Analyses are still pending**
  - Texas RE will conduct Spot Checks

## December Compliance Progress (cont.)

- **Loss of large amount of Generation on December 16, 2008**
  - Analysis of this event is underway by Texas RE. Reports are pending from ERCOT ISO and other entities involved.
- **2 Multiple loss of Elements**
  - ERCOT ISO is currently investigating and has not yet reported their findings.
- **All pre-June 18, 2007 Mitigation Plans have been completed**



# Update on Key Issues

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- **Six entities are in settlement discussions representing 18 violations**
- **Entity “D”’s mitigation plan was approved by Texas RE in December 2008 and settlement discussions are ongoing**