



**TEXAS
REGIONAL
ENTITY™**

An Independent Division of ERCOT

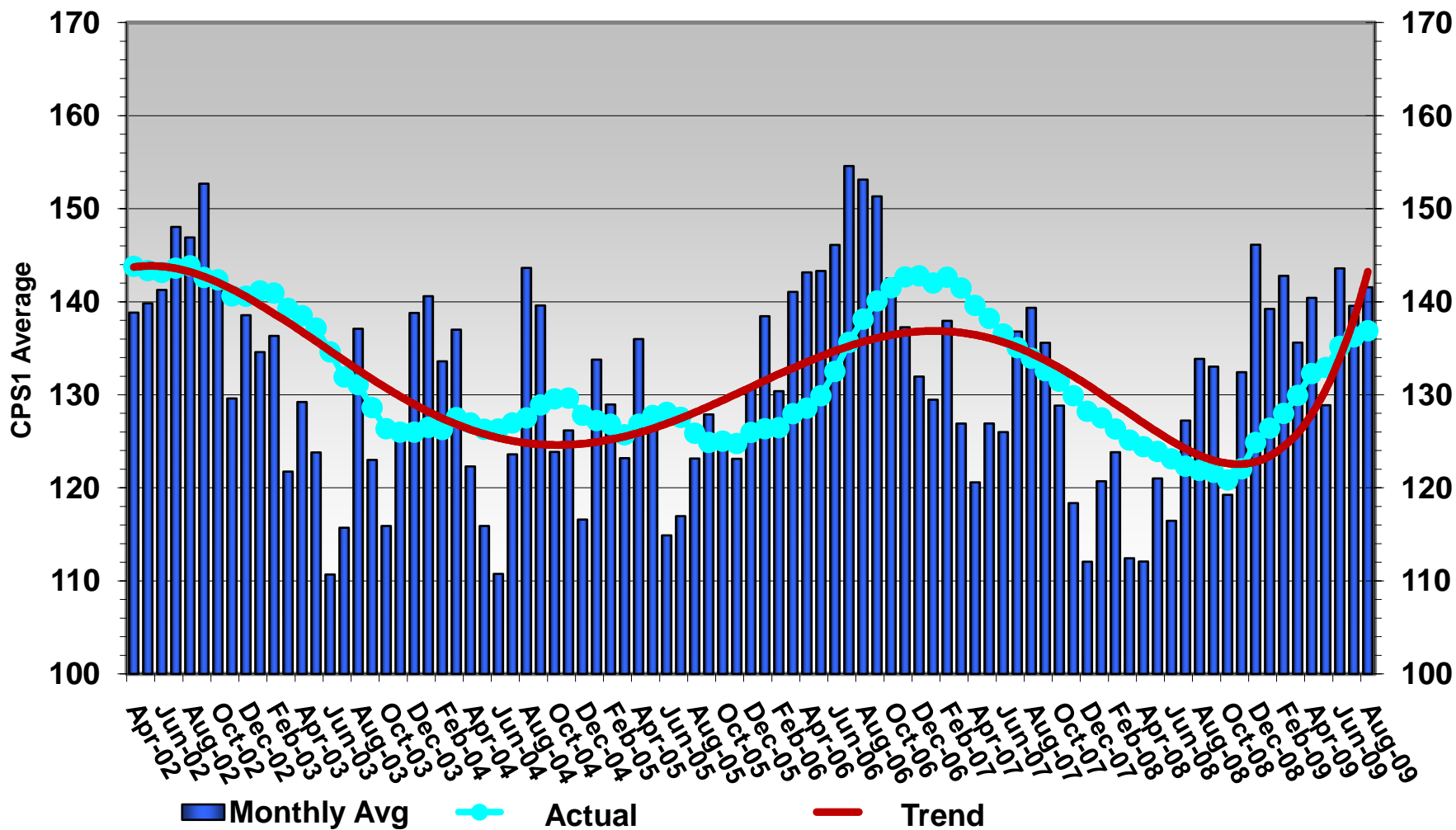
Texas Regional Entity Compliance Report

Board of Directors
September 14, 2009

Overview

- **August 2009 ERCOT CPS1 Monthly Performance**
- **August 2009 Resource Plan Performance Metrics for Non-Wind and Wind Only QSEs**
- **Texas RE Upcoming Workshops**
- **Texas RE Stakeholder Outreach**
- **NERC Standards Self-Certification Update**
- **Nodal Regulatory Requirements**
- **PRR – 822 Removing Access to Restricted Computer Systems, Control Systems and Facilities**

August 2009 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**
- **ERCOT region's frequency performance is determined by NERC Control Performance Standard 1 (CPS1)**
- **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**

July 2009 Resource Plan Performance Metrics for Non-Wind Only QSEs

Resource Plan Performance Metric Scores	ID																				
	DK	DE	IP	AP	BY	BC	AY	AM	AR	KC	BR	DF	CI	AD	BJ	KD	KE	CF	ET	DA	DP
Resource Status	100	100	99	100	100	100	100	99	100	100	100	100	100	100	100	100	99	100	97	100	100
LSL HSL Percent	98	100	100	---	99	100	100	100	95	94	97	99	99	100	98	100	---	95	100	100	94
DA Zonal Schedule	100	100	100	97	100	100	94	100	100	99	100	100	100	100	100	100	100	99	---	98	100
AP Adjustment	100	100	100	98	100	100	98	100	100	99	100	100	100	100	100	99	96	99	---	98	100
Down Bid & Obligation	99	96	100	98	96	99	100	98	98	90	96	99	99	100	99	100	90	100	---	93	98
Total Up Ancillary Service	---	100	---	100	97	98	98	97	99	97	95	98	---	---	---	---	97	99	100	95	100
Resource Plan Performance Metric Scores	ID																				
	BG	CQ	KI	JV	JU	CX	KH	FK	HW	JD	KF	KB	KA	IN	IZ	KG	BX	CC	CD	AC	IO
Resource Status	99	99	100	100	100	100	99	99	100	100	99	100	100	99	100	100	99	100	100	100	99
LSL HSL Percent	99	98	100	100	100	96	100	96	97	100	91	98	96	100	100	96	100	94	99	100	100
DA Zonal Schedule	98	100	100	100	100	100	100	100	99	100	100	100	99	100	100	100	100	98	100	100	100
AP Adjustment	99	98	100	100	100	99	96	100	100	100	99	100	98	95	100	100	99	98	100	100	---
Down Bid & Obligation	99	100	---	---	---	98	100	100	99	100	96	90	90	97	99	90	99	94	100	100	99
Total Up Ancillary Service	100	99	---	98	100	98	---	97	100	100	97	99	98	96	99	97	98	98	100	---	100

July 2009 Resource Plan Performance Metrics for Wind Only QSEs

	ID														
Resource Plan Performance Metric Scores	JG	BT	JF	JS	HJ	BH	DI	JY	JM	KJ	JW	JL	GR	GS	HS
DA Zonal Schedule	100	97	100	100	97	100	100	100	100	100	100	99	98	98	98
AP Adjustment	100	97	99	100	99	100	100	100	100	100	100	97	100	100	100
Down Bid & Obligation	100	94	100	100	100	100	43	100	100	93	100	99	100	100	100

	ID															
Resource Plan Performance Metric Scores	BF	BE	FX	JH	JI	JN	JJ	JT	JC	IV	JQ	JP	JK	JE	JR	JX
DA Zonal Schedule	98	98	100	100	100	100	100	100	100	98	100	100	100	100	100	100
AP Adjustment	100	100	100	100	100	100	100	100	100	91	99	100	100	100	100	97
Down Bid & Obligation	100	99	100	100	100	100	100	100	100	96	100	100	100	100	100	100

 4 Consecutive Failing Scores

 3 Consecutive Failing Scores

 2 Consecutive Failing Scores

 1 Failing Score

Analysis of July 2009 Resource Plan Performance Metrics for Wind Only QSEs

- **DI – Second consecutive time failing the Down Bid & Obligation Resource Plan Performance Measure**
 - **Actions:** This QSE was notified of the failure by Texas RE in July.
 - **Reason:** Failed intervals resulted from QSE's Resource Plan and scheduling methods used to submit their Resource Plans. Problem with software resulted in the incorrect entry of their generation into their Resource Plan.
 - **Solution:** QSE implemented changes to their internal system and Resource Plan submittal methods, **effective July 28**. Problem is not expected to reoccur in August's metric scores.

Texas RE Upcoming Workshops

- **September Texas RE Workshops:**

- Standards and Compliance Workshop will be on September 23rd at the MET Center
- Critical Infrastructure Protection (CIP) Workshop will be on September 24th at the MET Center

- **Registration has begun for each workshop**

- The Standards and Compliance Workshop is currently 60% full (as of 9/2)
- The CIP Workshop is currently 57% full (as of 9/2)

Texas RE Stakeholder Outreach

- **Texas RE Compliance staff participated in LCRA's annual meeting with their Distribution Providers (DPs) at Buchanan Dam**
- **Texas RE staff discussed the audit requirements and impact on DPs that will become LSEs once the registration project is complete and the required entities are registered as LSEs**
- **Texas RE staff also provided DPs information on general audit expectations and lessons learned from previous audits performed**

NERC Standards Self-Certification Update

- **July CIP Self-Certification resulted in 41 entities declaring Critical Assets:**
 - 13 GOs
 - 12 GOPs
 - 16 TOs
 - This reflects a reduction of 14 entities reporting Critical Assets since the January 2009 Self-Certification. Texas RE is reviewing the entities that are no longer claiming they have CIP Critical Assets
- **Self-Certifications for non-CIP standards for:**
Distribution Provider (DP), Purchasing-Selling Entity (PSE), Transmission Owner (TO) and Transmission Planner (TP) entities were received on September 3rd
- **All Self-Certification submissions were via the Texas RE Portal**

Nodal Regulatory Requirements Update

- **NPRR 192 establishes performance measures and criteria for ancillary service capacity and energy deployments**
 - Defines minimum performance criteria requirements for the Nodal Market
 - Updates Nodal Protocol Section 8 (Performance Monitoring) criteria
 - Requires monitoring programs be included in the Nodal Operating Guides
 - Jointly authored by ERCOT ISO, PUCT and Texas RE
 - Modifications to Generation Resource Energy Deployment Performance (GREDP) failure criteria were made by stakeholders in August PRS meeting
 - Next step – TAC review and vote on September 3rd

Nodal Regulatory Requirements Update- (Continued)

- **NOGRR 025 requires reporting and performance monitoring programs in the Nodal Operating Guides**
 - Identifies formats and data needed to comply with Nodal Protocol Section 8 performance monitoring and compliance requirements
 - ERCOT CEO revision request review determined that 16 of 37 reports can be delivered within the current schedule and budget of the nodal program
 - Texas RE committed to confirming key Protocol & Operating Guide performance reports will be ready for use on the date the Nodal Market begins
 - Texas RE will continue to work with ERCOT ISO on the design, development and testing of reports necessary for Nodal Protocol Compliance Monitoring

PRR – 822 Removing Access to Restricted Computer Systems, Control Systems and Facilities

- **PRR-822 was granted urgent status in July by the Protocol Revision Subcommittee (PRS)**
- **PRS unanimously voted to refer the Protocol Revision Request (PRR) to the Reliability and Operations Subcommittee (ROS)**
- **ROS referred PRR to the Critical Infrastructure Protection Working Group (CIPWG)**
- **CIPWG Revised PRR significantly**
 - All language submitted by Texas RE removed- title also changed
 - Duplicates NERC Standard CIP-008
 - Exempts all entities that identify that they have no critical cyber assets (~180 entities exempted in ERCOT)
 - Reports made to Texas RE “shall be considered informational in nature and shall not constitute an admission of legal liability.”
- **CIPWG sent recommended language back to ROS at August 31 meeting**