**Date:** September 24, 2009

**To:** TAC Representatives

**From:** Sandy Morris, Protocol Revision Subcommittee (PRS) Chair

**Re:** Consideration of Protocol Revision Requests (PRRs) and Nodal Protocol Revision Requests (NPRRs)

The PRS met and discussed several revision requests and presents the following PRRs and NPRRs to the Technical Advisory Committee (TAC) for consideration this month.

***Unless indicated otherwise, all Market Segments were present for the vote. In addition, unless stated otherwise, the ERCOT Credit Staff and the Credit Work Group (Credit WG) have reviewed the revision requests and do not believe they require changes to credit monitoring activity or the calculation of liability.***

# PRRs Recommended for Approval:

* + ***PRR811, Real Time Production Potential [Wind Coalition].***

**Proposed Effective Date:** December 1, 2009

**CEO Determination:** No opinion on whether or not PRR811 is necessary prior to the Texas Nodal Market Implementation Date.

**ERCOT Impact Analysis:** No budgetary impact; no additional full-time equivalents needed; no system changes required; no impact to ERCOT business processes or functions; no impact to grid operations or practices.

**Revision Description:** This PRR establishes a requirement for Wind-powered Generation Resources (WGRs) to telemeter a Real Time signal indicating the Real Time Production Potential (RTPP) which will be a function of wind and turbine availability at the time.

**Procedural History:** PRR811 was posted on 4/17/09. On 5/21/09, PRS unanimously voted to table PRR811 until the 6/18/09 PRS meeting. On 6/18/09, PRS voted to table PRR811. There was one opposing vote from the Independent Retail Electric Provider (IREP) Market Segment. On 7/23/09, PRS unanimously voted to recommend approval of PRR811 as amended by the 7/22/09 Wholesale Market Subcommittee (WMS) comments. On 8/25/09, PRS voted to recommend approval of PRR811 as revised by PRS. There was one opposing vote from the Independent Generator Market Segment. On 9/17/09, PRS unanimously voted to endorse and forward the 8/25/09 PRS Recommendation Report and Impact Analysis for PRR811 to TAC.

* ***PRR822, Removing Access to Restricted Computer Systems, Control Systems and Facilities – Urgent [TRE]***

**Proposed Effective Date:**  To be determined.

**CEO Determination:** No opinion on whether or not PRR822 is necessary prior to the Texas Nodal Market Implementation Date.

**ERCOT Impact Analysis:** No budgetary impact; no additional full-time equivalents needed; no system changes required; minor modifications to ERCOT business processes regarding identify and access management; no impact to grid operations or practices.

**Revision Description:** This PRR defines the requirement for all Market Participants and ERCOT to have processes in place for removing access to restricted computer systems, control systems, and Facilities upon termination. This PRR also defines the reporting requirement for incidents where improper access by terminated employees, contractors, consultants and affiliates has occurred.

**Procedural History:** PRR822 was posted on 7/14/09. On 7/16/09, the motion to grant PRR822 Urgent status failed via PRS email vote. On 7/23/09, PRS unanimously voted to grant PRR822 Urgent status and to refer PRR822 to the ROS. On 9/22/09, PRS voted to recommend approval of PRR822 as amended by the 9/21/09 Luminant comments and as revised by PRS with two abstentions from the Independent Generator Market Segment. *Credit Review is pending.*

* ***PRR823, Clarifying Language for Resource 12-Month Rolling Planned Outage Schedule Format and Reporting Requirement [Calpine].***

**Proposed Effective Date:** December 1, 2009

**CEO Determination:** No opinion on whether or not PRR823 is necessary prior to the Texas Nodal Market Implementation Date.

**ERCOT Impact Analysis:** No budgetary impact; no additional full-time equivalents needed; no system changes required; no impact to ERCOT business processes or functions; no impact to grid operations or practices.

**Revision Description:** This PRR clarifies language regarding the requirement for Resource Entities to input a 12-month rolling schedule for Outages in the Outage Scheduler application.

**Procedural History:** PRR823 was posted on 7/14/09. On 8/25/09, PRS unanimously voted to recommend approval of PRR823 as amended by the 7/17/09 CenterPoint Energy comments. On 9/17/09, PRS unanimously voted to endorse and forward the 8/25/09 PRS Recommendation Report and Impact Analysis for PRR823 to TAC.

* ***PRR829, Total Transmission Capacity Correction [ERCOT] – Urgent.***

**Proposed Effective Date:** November 1, 2009

**CEO Determination:** No opinion on whether or not PRR829 is necessary prior to the Texas Nodal Market Implementation Date.

**ERCOT Impact Analysis:** No budgetary impact; no additional full-time equivalents needed; no system changes required; no impact to ERCOT business processes or functions; no impact to grid operations or practices.

**Revision Description:** This PRR replaces the acronym Total Transfer Capability (TTC) with Total Transmission Capacity (TTC), defined in Section 2.2, Acronyms.

**Procedural History:** PRR829 was posted on 9/3/09. On 9/10/09, PRS voted to grant Urgent status to PRR829 via PRS email vote. On 9/17/09, PRS voted to recommend approval of PRR829 as submitted with one abstention from the Municipal Market Segment. *Credit review is pending.*

* ***PRR831, Annual Transmission Congestion Rights (TCR) Auction Amount – Urgent.***

**Proposed Effective Date:** November 1, 2009

**CEO Determination:** No opinion on whether or not PRR831 is necessary prior to the Texas Nodal Market Implementation Date.

**ERCOT Impact Analysis:**  No budgetary impact; no additional full-time equivalents needed; no system changes required; existing business processes can accommodate this revision request; no impact to grid operations or practices.

**Revision Description:** This PRR revises the amount of TCRs sold in the annual TCR auction from 40% to 30%.

**Procedural History:** PRR831 was posted on 9/9/09. On 9/11/09, PRS voted to grant Urgent status to PRR831 via PRS email vote. On 9/17/09, PRS voted to recommend approval of PRR831 as revised by PRS with two opposing votes from the Independent Generator and Independent Power Marketer (IPM) Market Segments and three abstentions from the Investor Owned Utility (IOU), IPM, and Consumer Market Segments. *Credit review is pending.*

**NPRRs Recommended for Approval**

* ***NPRR189, Ancillary Service Deployment Clarification [ERCOT].***

**Proposed Effective Date:** Upon Texas Nodal Market Implementation.

**CEO Determination:** Necessary prior to the Texas Nodal Market Implementation Date.

**ERCOT Impact Analysis:** No budgetary impact; no staffing impacts; no system changes required; no impacts to business functions; no impact to grid operations and practices.

**Revision Description:** This NPRR clarifies the difference between Ancillary Service capacity deployment and energy deployment and how it affects Security Constrained Economic Dispatch (SCED).

**Procedural History:** NPRR189 was posted on 7/24/09. On 8/25/09, PRS unanimously voted to recommend approval of NPRR189 as submitted. On 9/17/09, PRS unanimously voted to endorse and forward the 8/25/09 PRS Recommendation Report as amended by the 9/17/09 ERCOT comments and Impact Analysis for NPRR189 to TAC.

* ***NPRR191, Synchronization of PRR819, Changes to Support Revisions to the PUCT POLR and Expedited Switch Rules [TX SET].***

**Proposed Effective Date:** Upon Texas Nodal Market Implementation.

**CEO Determination:** Necessary prior to the Texas Nodal Market Implementation Date.

**ERCOT Impact Analysis:** No budgetary impact; no staffing impacts; no system changes required; no impacts to business functions; no impact to grid operations and practices.

**Revision Description:** This NPRR synchronizes the Nodal Protocols with PRR819 which provides that ERCOT shall identify, for 60 days, Electric Service Identifiers (ESI IDs) acquired in a Mass Transition to a Provider of Last Resort (POLR) so that Customers that switch from the POLR are not charged for an out-of-cycle meter read and it will also implement changes necessary to expedite the customer switching process.

**Procedural History:** NPRR191 was posted on 7/30/09. On 8/25/09, PRS unanimously voted to recommend approval of NPRR191 as submitted. On 9/17/09, PRS unanimously voted to endorse and forward the 8/25/09 PRS Recommendation Report and Impact Analysis for NPRR191 to TAC.

* ***NPRR193, Application of Nodal Implementation Surcharge in Verifiable Costs [WMS].***

**Proposed Effective Date:** Upon Texas Nodal Market Implementation.

**CEO Determination:** No opinion on whether or not NPRR193 is necessary prior to the Texas Nodal Market Implementation Date.

**ERCOT Impact Analysis:** No budgetary impact; no additional full time equivalents needed; no system changes required; existing business functions can accommodate this revision request; no impact to grid operations and practices.

**Revision Description:** This NPRR allows Resources to include in their verifiable costs the Nodal Implementation Surcharge for periods while ramping up from breaker close to Low Sustained Limit (LSL).

**Procedural History:** NPRR193 was posted on 8/17/09. On 8/25/09, PRS unanimously voted to recommend approval of NPRR193 as submitted. On 9/17/09, PRS unanimously voted to endorse and forward the 8/25/09 PRS Recommendation Report and Impact Analysis for NPRR193 to TAC.

* ***NPRR195, Removal of McCamey Congestion Management from Nodal Protocols [ERCOT].***

**Proposed Effective Date:** Upon Texas Nodal Market Implementation.

**CEO Determination:** Necessary prior to the Texas Nodal Market Implementation Date.

**ERCOT Impact Analysis:** No budgetary impact; no staffing impacts; no system changes required; no impacts to business functions; no impact to grid operations and practices.

**Revision Description:** This NPRR removes the unique congestion management procedures for the McCamey Area from the Nodal Protocols, consistent with zonal Protocol revisions made pursuant to PRR810, Remove McCamey Congestion Management, which was approved by the ERCOT Board on August 18, 2009. This NPRR removes all mention of McCamey Flowgate Rights (MCFRIs) while leaving intact the description of Flowgate Rights (FGRs) and related Settlement equations.

**Procedural History:** NPRR195 was posted on 8/19/09. On 8/25/09, PRS unanimously voted to recommend approval of NPRR195 as submitted. On 9/17/09, PRS unanimously voted to endorse and forward the 8/25/09 PRS Recommendation Report and Impact Analysis for NPRR195 to TAC.

**Revision Requests Rejected and Failed Motions**

* ***PRR828, Remove QSE SCE Performance Exemption for QSEs with only Uncontrollable Renewable Resources On-line [Calpine] – Urgent.***

**Proposed Effective Date:** Not applicable.

**CEO Determination:** Not applicable.

**ERCOT Impact Analysis:**  No budgetary impact; no additional full-time equivalents needed; no system changes required; existing business processes can accommodate this revision request; no impact to grid operations or practices.

**Revision Description:** This PRR would eliminate that exemption and place WGR-only Qualified Scheduling Entities (QSEs) on an even playing field with other technologies based on their impact to the system’s reliability and Ancillary Services procured and in recognition of the maturity of the technology to date as evidenced in select white papers promoting WGR provision of Ancillary Services.

**Procedural History:** PRR828 was posted on 9/1/09. On 9/3/09, PRS voted to grant Urgent status to PRR828 via email vote. On 9/17/09, PRS voted to recommend approval of PRR828 as submitted via roll call vote. The motion to reconsider the vote to recommend approval of PRR828 as submitted, passed, via roll call vote. Upon reconsideration, the vote to recommend approval of PRR828 as submitted failed via roll call vote. PRS then voted to recommend to TAC that it establish a task force to consider the issue of assigning Ancillary Service costs to WGRs. There was one abstention from the IOU Market Segment. No credit review was completed on PRR828.

**Revision Requests Withdrawn (no TAC action required)**

None.

*Status of Pending Revision Requests (For Information Purposes Only):*

**Revision Requests Scheduled for Impact Analysis Review at the October 22, 2009 PRS Meeting**

* ***PRR821, Update of Section 21, Process for Protocol Revision [ERCOT].***

**Proposed Effective Date:** To be determined.

**CEO Determination:** No opinion on whether or not PRR821 is necessary prior to the Texas Nodal Market Implementation Date.

**ERCOT Impact Analysis:** No budgetary impact; no additional full-time equivalents needed; no system changes required; existing business processes can accommodate this PRR; no impact to grid operations.

**Revision Description:** This PRR updates Section 21, Process for Protocol Revision, to more effectively align with the current stakeholder process.

**Procedural History:** PRR821 was posted on 7/13/09. On 8/25/09, PRS unanimously voted to table PRR821 for one month. On 9/17/09, PRS unanimously voted to recommend approval of PRR821 as submitted. *Credit Review is pending.*

* ***PRR824, Primary Frequency Response from WGRs [Reliability Operations Subcommittee (ROS)]***

**Proposed Effective Date:** To be determined.

**CEO Determination:** Pending.

**ERCOT Impact Analysis:** Pending.

**Revision Description:** This PRR adds a requirement for wind generator control systems to be programmed to respond to frequency deviations by controlling WGR real power output in a way that is similar to governor response for conventional generators.

**Procedural History:** PRR824 was posted on 7/21/09. On 8/25/09, PRS unanimously voted to table PRR824 for one month. On 9/17/09, PRS voted to recommend approval of PRR824 as amended by the 9/16/09 CPS Energy comments and as revised by PRS with one abstention from the Independent Generator Market Segment. *Credit review is pending.*

* + ***PRR827, Find Transaction and Find ESI ID Functions on the MIS [ERCOT].***

**Proposed Effective Date:** To be determined.

**CEO Determination:** No opinion on whether or not PRR827 is necessary prior to the Texas Nodal Market Implementation Date.

**ERCOT Impact Analysis:** No budgetary impact; no additional full-time equivalents needed; no system changes required; existing business processes can accommodate this PRR; no impact to grid operations.

**Revision Description:** This PRR updates the Protocols to reflect current options that Market Participants have to obtain information from ERCOT in order to determine or to verify the ESI ID for a Service Delivery Point (SDP).

**Procedural History:** PRR827 was posted on 8/20/09. On 9/17/09, PRS unanimously voted to recommend approval of PRR827 as amended by the 9/2/09 Texas SET Working Group comments. *Credit review is pending.*

* + ***NPRR196, Synchronization of Nodal Protocols with PRR827, Find Transaction and Find ESI ID Functions on the MIS [ERCOT].***

**Proposed Effective Date:** To be determined.

**CEO Determination:** Necessary prior to the Texas Nodal Market Implementation Date.

**ERCOT Impact Analysis:** Pending.

**Revision Description:** This NPRR synchronizes the Nodal Protocols with PRR827, Find Transaction and Find ESI ID functions on the MIS.

**Procedural History:** NPRR196 was posted on 8/20/09. On 9/17/09, PRS unanimously voted to recommend approval of NPRR196 as amended by the 9/2/09 Texas SET Working Group comments. *Credit review is pending.*

**Revision Requests Deferred or Tabled**

* ***PRR754, Resource Settlement Due to Forced Transmission Outage [FPL Energy].***

**Proposed Effective Date:** To be determined.

**CEO Determination:** Pending

**ERCOT Impact Analysis:** Pending

**Revision Description:** This PRR clarifies that QSEs scheduling Generation Resources will receive Out of Merit Energy (OOME) Down to zero Verbal Dispatch Instructions (VDIs) when a Transmission Facility Forced Outage trips a generation unit offline.

**Procedural History:** PRR754 was posted on 2/4/08. On 3/20/08, PRS voted to refer PRR754 to the WMS. There was one abstention from the Consumer Market Segment. On 5/22/08, PRS unanimously voted to table PRR754 until the 6/19/08 PRS meeting. On 8/21/08, PRS unanimously voted to table PRR754 until the September 18th PRS meeting. On 9/24/08, the motion to recommend approval of PRR754 as amended by ERCOT comments and as revised by PRS, failed by roll call vote. On 9/17/09, PRS voted to table PRR754 for one month with one abstention from the Consumer Market Segment. *Credit review is pending.*

* ***PRR826, Clarification of Resource Definitions and Resource Registration of Self-Serve Generators for Reliability Purposes [ERCOT]***

**Proposed Effective Date:** To be determined.

**CEO Determination:** The ERCOT CEO has determined that the PRR826 should proceed through the stakeholder review process.

**ERCOT Impact Analysis:** No budgetary impact; no additional full-time equivalents needed; no system changes required; existing business processes can accommodate this PRR; no impact to grid operations.

**Revision Description:** This PRR adds language to acknowledge the existence of Generation Resources that have no or minimal injection onto the ERCOT System that qualify either as distributed generation or are registered with the Public Utility Commission of Texas (PUCT) according to P.U.C. Subst. R. 25.109, Registration of Power Generation Companies and Self-Generators, as a self-generator but yet are required to participate with ERCOT for reliability purposes.

**Procedural History:** PRR826 was posted on 7/26/09. On 8/25/09, PRS unanimously voted to table PRR826 for one month. On 9/17/09, PRS unanimously voted to table PRR826 for one month. *Credit review is pending.*

* ***PRR830, Reactive Power Capability Requirement [ERCOT] – Urgent.***

**Proposed Effective Date:** To be determined.

**CEO Determination:** No opinion on whether or not PRR830 is necessary prior to the Texas Nodal Market Implementation Date

**ERCOT Impact Analysis:** No budgetary impact; no additional full-time equivalents needed; minor changes to ERCOT databases to incorporate additional Substation Control and Data Acquisition (SCADA) points, which will be managed under the operational and management (O&M) budgets of affected departments; existing business processes can accommodate this PRR; no impact to grid operations or practices.

**Revision Description:** This PRR clarifies the Reactive Power capability requirement for all Generation Resources, including existing WGRs who are not able to meet the 0.95 lead/lag requirement with the Generation Resource’s Unit Reactive Limit (URL).

**Procedural History:** PRR830 was posted on 9/8/09. On 9/10/09, PRS voted to grant Urgent status to PRR830 via PRS email vote. On 9/17/09, PRS unanimously voted to table PRR830 for one month. *Credit review is pending.*

* ***NPRR190, Clarification of Resource Definitions and Resource Registration of Self-Serve Generators for Reliability Purposes [ERCOT].***

**Proposed Effective Date:** To be determined.

**CEO Determination:** The ERCOT CEO has determined that the NPRR190 should proceed through the stakeholder review process.

**ERCOT Impact Analysis:** Pending.

**Revision Description:** This NPRR adds language to acknowledge the existence of Generation Resources that have no or minimal injection onto the ERCOT System that qualify either as distributed generation or are registered with the PUCT according to P.U.C. Subst. R. 25.109, Registration of Power Generation Companies and Self-Generators, as a self-generator but yet are required to participate with ERCOT for reliability purposes.

**Procedural History:** NPRR190 was posted on 7/24/09. On 8/25/09, PRS unanimously voted to table NPRR190 for one month. On 9/17/09, PRS unanimously voted to table NPRR190 for one month. *Credit review is pending.*

**Revision Requests Designated for Post Go-Live**

* ***NPRR131, Ancillary Service Trades with ERCOT [NRG Texas].***
* ***NPRR153, Generation Resource Fixed Quantity Block [TPTF].***
* ***NPRR156, Transparency for PSS and Full Interconnection Studies [PSEG Texas].***
* ***NPRR164, Resubmitting Ancillary Service Offers in SASM [TPTF].***
* ***NPRR169, Clarify the Calculation and Posting of LMPs the Load Zone and LMPs for each Hub [TPTF]****.*
* ***NPRR181, FIP Definition Revision [Luminant].***

**Revision Requests Pending Input from Another Subcommittee/Task Force**

* + ***NPRR147, DAM Short Pay Changes [WMS].***

**Proposed Effective Date:** To be determined.

**CEO Determination:** To be determined.

**ERCOT Impact Analysis:** Pending.

**Revision Description:** This NPRR changes the way short pays to the Day Ahead Market (DAM) are handled. This NPRR reallocates short payments using a procedure that draws from the Congestion Revenue Right (CRR) Auction revenue account first and then draws any additional shortfalls from the CRR Balancing Account.

**Procedural History:** NPRR147 was posted on 8/13/08. On 8/21/08, PRS unanimously voted to refer NPRR147 to the Transition Plan Task Force (TPTF) for review. On 9/24/08, PRS voted to refer NPRR147 to WMS to consider Reliant’s comments made at TPTF as well as subsequent comments made in response to NPRR147. There was one opposing vote from the IPM Market Segment. On 10/23/08, PRS unanimously voted to table NPRR147 until the 11/20/08 PRS meeting. There was one abstention from the IOU Market Segment. On 11/20/08, PRS unanimously voted to refer NPRR147 to the WMS and Credit WG for consideration. *Credit review is pending.*

* ***NPRR194, Synchronization of Zonal Unannounced Generation Capacity Testing Process [ERCOT].***

**Proposed Effective Date:** Pending.

**CEO Determination:** Necessary prior to the Texas Nodal Market Implementation Date.

**ERCOT Impact Analysis:** Pending.

**Revision Description:** This NPRR replaces the seasonal testing requirement with unannounced Generation Resource testing and adds a requirement for QSEs to seasonally update their Resources’ High Sustainable Limits (HSLs). The NPRR also leverages existing emergency operations Settlement functionality to provide a mechanism to compensate a Generation Resource for the additional energy above the pre-test SCED Base Point during the unannounced Generation Resource test period. This NPRR synchronizes the Nodal Protocols with the process added to the zonal Protocols pursuant to PRR750, Unannounced Generation Capacity Testing.

**Procedural History:** NPRR194 was posted on 8/18/09. On 8/25/09, PRS unanimously voted to refer NPRR194 to ROS. *Credit review is pending.*

**New Revision Requests Scheduled for Consideration at the October 22, 2009 PRS Meeting**

* ***PRR832, Deletion of Schedule Control Error (SCE) Posting Requirement [ERCOT].***

**Proposed Effective Date:** Pending.

**CEO Determination:** No opinion on whether or not PRR832 is necessary prior to the Texas Nodal Market Implementation Date.

**ERCOT Impact Analysis:** No budgetary impact; no additional full-time equivalents needed; no system changes required; no impacts to business functions; no impact to grid operations or practices.

**Revision Description:** This PRR removes the language that requires ERCOT to post the Schedule Control Error (SCE) report seven days after the Operating Day to the MIS.

**Procedural History:** PRR832 was posted on 9/15/09. *Credit review is pending.*