**Date:** October 29, 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:

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

**Proposed Effective Date:** January 1, 2010

**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. On 10/22/09, PRS unanimously voted to endorse and forward the 9/17/09 PRS Recommendation Report as amended by the 9/29/09 ERCOT comments and Impact Analysis to TAC.

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

**Proposed Effective Date:** January 1, 2010

**CEO Determination:** No opinion on whether or not PRR824 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 business processes or functions; no impact to grid operations or practices.

**Revision Description:** This PRR adds a requirement for wind generator control systems to be programmed to respond to frequency deviations by controlling Wind-powered Generation Resource (WGR) real power output in a way that is similar to governor response for conventional steam 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. On 10/22/09, PRS unanimously voted to endorse and forward the 9/17/09 PRS Recommendation Report as revised by PRS and Impact Analysis to TAC.

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

**Proposed Effective Date:** January 1, 2010

**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 Electric Service Identifier (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. On 10/22/09, PRS unanimously voted to endorse and forward the 9/17/09 PRS Recommendation Report as revised by PRS and Impact Analysis to TAC.

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

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

**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. On 10/22/09, PRS voted to recommend approval of PRR830 as endorsed in the 10/19/09 ROS comments via roll call vote. *Credit review is pending.*

* ***PRR836, Revised Minimum Ramp Rate for Balancing Energy Service Down to Comport with PRR803 [Luminant] – Urgent.***

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

**CEO Determination:** No opinion on whether or not PRR836 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; no impact to business processes or functionality; no impact to grid operations or practices.

**Revision Description:** This PRR changes the divisor for the minimum ramp rate required for a Balancing Energy Service Down bid from 40 to 56 to reflect the change resulting from the implementation of PRR803, Revised Implementation Approach for PRR 601, as it relates to the number of minutes of Balancing Energy Service ramping over a one-hour time period.

**Procedural History:** PRR836 was posted on 10/14/09. On 10/16/09, PRS voted to grant Urgent status to PRR836 via PRS email vote. On 10/22/09, PRS unanimously voted to recommend approval of PRR836 as submitted. *Credit review is pending.*

**NPRRs Recommended for Approval**

* + ***NPRR196, Synchronization of Nodal Protocols with PRR827, Find Transaction and Find ESI ID Functions on the MIS [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 ERCOT staffing impacts; no impacts to ERCOT computer systems; no impacts to ERCOT business functions; no impacts to ERCOT grid operations and practices.

**Revision Description:** This NPRR synchronizes the Nodal Protocols with PRR827, Find Transaction and Find ESI ID functions on the Market Information System (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 9/02/09 Texas SET Working Group comments. On 10/22/09, PRS unanimously voted to endorse and forward the 9/17/09 PRS Recommendation Report and Impact Analysis to TAC.

**Revision Requests Rejected and Failed Motions**

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

**Proposed Effective Date:** Not applicable.

**CEO Determination:** Not applicable.

**ERCOT Impact Analysis:** Not applicable.

**Revision Description:** This PRR clarifies that Qualified Scheduling Entities (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. On 10/22/09, PRS voted to reject PRR754. The motion passed with one opposing vote from the Independent Generator Market Segment and four abstentions from the Independent Generator, Investor Owned Utility (IOU) (2), and Independent Power Marketer (IPM) Market Segments. *Credit review not applicable.*

* ***PRR835, Reactive Capability Requirement [NextEra Energy Resources].***

**Proposed Effective Date:** Not applicable.

**CEO Determination:** Not applicable.

**ERCOT Impact Analysis:** Not applicable.

**Revision Description:** This PRR clarifies the Reactive Power capability requirement for WGRs by specifying +/- 0.95 power factor criteria as the minimum requirement, and the Generation Resource’s URL criteria as the maximum requirement contingent upon a System Impact Study by the Transmission Service Provider (TSP).

**Procedural History:** PRR835 was posted on 9/30/09. On 10/22/09, PRS voted to reject PRR835 via roll call vote. *Credit review not applicable.*

**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 November 19, 2009 PRS Meeting**

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

**Proposed Effective Date:** February 1, 2010.

**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. On 10/22/09, PRS voted to recommend approval of PRR832 as submitted. There was one abstention from the Independent Generator Market Segment. *Credit review is pending.*

* ***PRR833, Primary Frequency Response Requirement from Existing WGRs [CPS Energy].***

**Proposed Effective Date:** Pending.

**CEO Determination:** Pending.

**ERCOT Impact Analysis:** Pending.

**Revision Description:** This PRR places a Primary Frequency Response requirement on WGRs that were not covered by PRR824, Primary Frequency Response from WGRs. On 10/22/09, PRS voted to recommend approval of PRR833 as submitted via roll call vote. *Credit review is pending.*

**Revision Requests Deferred or Tabled**

* ***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. On 10/22/09, PRS unanimously voted to table PRR826 for one month. *Credit review is pending.*

* ***PRR834, ERCOT Load Forecast Accuracy [Luminant, CPS, NRG] – Urgent.***

**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 proposes revisions that are intended to monitor and establish performance standards for ERCOT’s Load forecasting of the ERCOT Region and ERCOT Congestion Zones.

**Procedural History:** PRR834 was posted on 9/24/09. On 9/30/09, PRS voted to grant PRR834 Urgent status via PRS email vote. On 10/22/09, PRS voted to table PRR834 for one month with one abstention from the Independent Generator Market Segment. *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. On 10/22/09, PRS unanimously voted to table NPRR190 for one month. *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 Security-Constrained Economic Dispatch (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. On 10/22/09, PRS unanimously voted to table NPRR194 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.*

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

* ***PRR837, Load Used in RMR Studies [PSEG TX].***

**Proposed Effective Date:** Pending.

**CEO Determination:** Pending.

**ERCOT Impact Analysis:** Pending.

**Revision Description:** This PRR would provide guidance to ERCOT to use the peak Load forecast posted pursuant to P.U.C. SUBST. R. 25.505, Resource Adequacy in the Electric Reliability Council of Texas Power Region, for the next 12 months for the Reliability Must-Run (RMR) study. This aligns the Load forecast period with the RMR contract period and ensures that the Load forecast used for the analysis is one with a reasonable probability of occurrence.

**Procedural History:** PRR837 was posted on 10/16/09. *Credit review is pending.*

* ***PRR838, Fast Response Distributed Energy Resource (DER) [Enchanted Rock].***

**Proposed Effective Date:** Pending.

**CEO Determination:** Pending.

**ERCOT Impact Analysis:** Pending.

**Revision Description:** This PRR allows for participation of Distributed Energy Resources (DERs) in Responsive Reserve Service (RRS) on an equivalent basis with synchronous condenser fast-response hydro.

**Procedural History:** PRR838 was posted on 10/22/09. *Credit review is pending.*

* ***PRR839, Revised Resource Category Generic Fuel Costs [AEP] – Urgent.***

**Proposed Effective Date:** Pending.

**CEO Determination:** Pending.

**ERCOT Impact Analysis:** Pending.

**Revision Description:** This PRR revises the Resource Category Generic Fuel Cost (RCGFC) for Direct Current (DC) Tie with non-ERCOT Control Area and Block Load Transfer (BLT) Resources to synchronize with the Nodal Protocols and to allow cost recovery for supplying this service.

**Procedural History:** PRR839 was posted on 10/23/09. *Credit review is pending.*