**Date:** February 25, 2010

**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:

* + ***PRR841, Revise Total ERCOT Wind Power Forecast (TEWPF) [Luminant].***

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

**CEO Determination:** No opinion on whether or not PRR841 is 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 processes or functions; no impacts to ERCOT grid operations or practices.

**Revision Description:** This PRR revises the probability of exceedance percentage applicable to the Total ERCOT Wind Power Forecast (TEWPF) from 80% to 50% to better reflect the total ERCOT Wind-powered Generation Resource (WGR) production that has been historically experienced.

**Procedural History:** PRR841 was posted on 11/30/09. On 1/21/10, PRS unanimously voted to recommend approval of PRR841 as amended by the 12/22/09 ERCOT comments. On 2/18/10, PRS unanimously voted to endorse and forward the 1/21/10 PRS Report and Impact Analysis for PRR841 to TAC.

**NPRRs Recommended for Approval**

* + ***NPRR203, Amend Telemetry Bus Accuracy Requirements [NDSWG].***

**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 proposes a new term, State Estimator Bus, and proposes language changes to Section 3.10.7.5.2, Continuous Telemetry of the Real-Time Measurements of Bus Load, Voltages, Tap Position, and Flows.

**Procedural History:** NPRR203 was posted on 12/22/09. On 1/21/10, PRS unanimously voted to recommend approval of NPRR203 as submitted. On 2/18/10, PRS unanimously voted to endorse and forward the 1/21/10 PRS Report and Impact Analysis for NPRR203 to TAC.

* + ***NPRR204, Update Generic Startup Cost for Reciprocating Engines [STEC].***

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

**CEO Determination:** No opinion on whether or not NPRR204 is 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 adds an Operations and Maintenance (O&M) cost for the “Reciprocating Engines” Resource category to the Resource Category Startup Offer Generic Cap determination.

**Procedural History:** NPRR204 was posted on 12/22/09. On 1/21/10, PRS voted to recommend approval of NPRR204 as submitted. There were two opposing votes from the Independent Generator and the Consumer Market Segments and one abstention from the Independent Power Marketer (IPM) Market Segment. On 2/18/10, PRS voted to endorse and forward the 1/21/10 PRS Report and Impact Analysis for NPRR204 to TAC. There was one opposing vote from the Consumer Market Segment.

**Revision Requests Recommended for Approval and Inclusion in the Parking Deck**

* ***NPRR156, Transparency for PSS and Full Interconnection Studies [PSEG Texas].***

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

**CEO Determination:** Not necessary prior to the Texas Nodal Market Implementation Date.

**ERCOT Impact Analysis:** To be determined - Due to “Not Needed for Go-Live” designation by the ERCOT CEO, the Impact Analysis for this item will be conducted at a future date.

**Revision Description:** This NPRR proposes updates to Section 1, Overview, to provide transparency to status of Power System Stabilizer (PSS) equipment and interconnection requests.

**Procedural History:** NPRR156 was posted on 9/19/08. On 10/23/08, PRS unanimously voted to table NPRR156. The Cooperative Market Segment was not present for the vote. On 11/20/08, PRS unanimously voted to table NPRR156. On 12/18/08, PRS unanimously voted to table NPRR156 until the 1/22/09 PRS meeting. The Independent Generator Market Segment was not present for the vote. On 1/22/09, PRS voted to recommend approval of NPRR156 as amended by the 12/11/08 PSEG comments. There were three abstentions from the Consumer, Independent Generator and IPM Market Segments. On 4/23/09, PRS unanimously voted to recommend approval of NPRR156 as amended by the 4/22/09 PSEG Texas comments. On 5/21/09, PRS unanimously voted to table NPRR156. On 11/19/09, PRS unanimously voted to table NPRR156. On 12/17/09, PRS unanimously voted to table NPRR156. On 1/21/10, PRS unanimously voted to table NPRR156. On 2/18/10, PRS unanimously voted to endorse and forward the 4/23/09 PRS Recommendation Report as amended by the 2/11/10 Luminant comments and as revised by PRS to TAC and to recommend a priority of Medium.

* + ***NPRR207, Hour Start Unit Deselection and Half Hour Start Unit RUC Clawback [WMS].***

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

**CEO Determination:** Not necessary prior to the Texas Nodal Market Implementation Date.

**ERCOT Impact Analysis:** To be determined - Due to “Not Needed for Go-Live” designation by the ERCOT CEO, the Impact Analysis for this item will be conducted at a future date.

**Revision Description:** This NPRR would accomplish three objectives: 1) The NPRR creates definitions for Half-Hour Start Units and Hour Start Units; 2) The NPRR deselects Hour Start Units from Reliability Unit Commitment (RUC) processes except the final Hourly Reliability Unit Commitment (HRUC) before the Operating Hour; and 3) The NPRR removes RUC Clawback on all Half-Hour Start Units (a) that participate in the Day-Ahead Market (DAM) and (b) during Energy Emergency Alert (EEA) events.  The NPRR also changes the RUC Clawback on all Half-Hour Start Units that did not participate in the DAM to 50%.

**Procedural History:** NPRR207 was posted on 1/22/10. On 2/18/10, PRS voted to recommend approval of NPRR207 as submitted, to forward NPRR207 to TAC, and to recommend a priority of High. There was one abstention from the Consumer Market Segment. *Credit review is pending.*

**Revision Requests Rejected and Failed Motions**

None.

**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 March 25, 2010 PRS Meeting**

* + ***PRR844, Transmission and/or Distribution Service Provider (TDSP) Definition Revision [ERCOT].***

**Proposed Effective Date:** Pending.

**CEO Determination:** No opinion on whether or not PRR844 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 ERCOT business functions; no impact to grid operations.

**Revision Description:** This PRR revises the definition of Transmission and/or Distribution Service Provider (TDSP) to include Entities that have been selected to own and operate Transmission Facilities and have a code of conduct approved by the Public Utility Commission of Texas (PUCT).

**Procedural History:** PRR844 was posted on 1/15/10. On 2/18/10, PRS unanimously voted to recommend approval of PRR844 as amended by the 1/22/10 CenterPoint Energy comments. *Credit review is pending.*

* + ***PRR845, Definition for IDR Meters and Optional Removal of IDR Meters at a Premise Where an Advanced Meter Can be Provisioned [RMWG].***

**Proposed Effective Date:** Pending.

**CEO Determination:** Pending.

**ERCOT Impact Analysis:** Pending.

**Revision Description:** This PRR clarifies the meaning of Interval Data Recorder (IDR) Meter and provides for optional removal of IDR Meters under certain conditions for Premises where an Advanced Meter can be provisioned by the TDSP. In addition, due to the proposed definition of an IDR Meter, Protocol references to IDR and/or IDR Meter are being updated to ensure appropriate understanding and usage of the terms.

**Procedural History:** PRR845 was posted on 1/22/10. On 2/18/10, PRS unanimously voted to recommend approval of PRR845 as amended by the 2/9/10 ERCOT comments. *Credit review is pending.*

* + ***NPRR205, Transmission and/or Distribution Service Provider (TDSP) Definition Revision [ERCOT].***

**Proposed Effective Date:** Pending.

**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 revises the definition of TDSP to include Entities that have been selected to own and operate Transmission Facilities and have a code of conduct approved by the PUCT.

**Procedural History:** NPRR205 was posted on 1/15/10. On 2/18/10, PRS unanimously voted to recommend approval of NPRR205 as amended by the 1/22/10 CenterPoint Energy comments. *Credit review is pending.*

* + ***NPRR208, Registration and Settlement of Distributed Generation (DG) Less Than One MW [NOIE DRG TF].***

**Proposed Effective Date:** Pending.

**CEO Determination:** No opinion on whether or not NPRR208 is necessary prior to the Texas Nodal Market Implementation Date.

**ERCOT Impact Analysis:** Pending.

**Revision Description:** This NPRR includes proposed language changes by the Non-Opt-In-Entity (NOIE) Distributed Renewable Generation (DRG) Taskforce in regards to the registration requirements for Distributed Generation (DG) greater than 50 kW and less than or equal to one MW. In addition this NPRR synchronizes language approved through PRR756, Distributed Renewable Generation Modifications, with some recommended revisions consistent with the NOIE DRG Taskforce discussions. PRR756 was approved by the ERCOT Board on 5/20/08 and was implemented on 11/21/09.

**Procedural History:** NPRR208 was posted on 1/25/10. On 2/18/10, PRS voted to recommend approval of NPRR208 as amended by the 1/29/10 PWG comments. There were two abstentions from the Consumer and Independent Generator Market Segments. *Credit review is pending.*

* + ***NPRR210, Wind Forecasting Change to P50, Synchronization with PRR841 [Morgan Stanley].***

**Proposed Effective Date:** Pending.

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

**ERCOT Impact Analysis:** Pending.

**Revision Description:** This NPRR changes the wind forecasting methodology to use a 50% probability of exceedance calculation instead of an 80% for RUC considerations. This NPRR would align the Nodal Protocols with changes made to the zonal Protocols pursuant to PRR841, Revise Total ERCOT Wind Power Forecast (TEWPF), which is proceeding through the stakeholder process.

**Procedural History:** NPRR210 was posted on 2/9/10. On 2/18/10, PRS voted to recommend approval of NPRR210 as amended by the 2/11/10 Luminant comments and as revised by PRS. There was one opposing vote from the Independent Generator Market Segment and three abstentions from the Municipal, Investor Owned Utility (IOU), and Independent Retail Electric Provider (IREP) Market Segments. *Credit review is pending.*

* ***NPRR212, Disputing Fuel Oil Price (FOP) Costs [CPS Energy].***

**Proposed Effective Date:** Pending.

**CEO Determination:** No opinion on whether or not NPRR212 is necessary prior to the Texas Nodal Market Implementation Date.

**ERCOT Impact Analysis:** Pending.

**Revision Description:** This NPRR allows for disputes of Fuel Oil Price (FOP).

**Procedural History:** NPRR212 was posted on 2/11/10. On 2/18/10, PRS unanimously voted to recommend approval of NPRR212 as amended by the 2/17/10 WMS comments. *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:** Pending.

**CEO Determination:** The ERCOT CEO has determined that 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 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 7/24/09. 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. On 11/19/09, PRS unanimously voted to table PRR826. On 12/17/09, PRS unanimously voted to table PRR826 indefinitely. *Credit review is pending.*

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

**Proposed Effective Date:** Pending.

**CEO Determination:** Pending.

**ERCOT Impact Analysis:** Pending.

**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. On 11/19/09, PRS unanimously voted to table PRR834 for one month. On 12/17/09, PRS unanimously voted to table PRR834 until after the Load forecasting workshop. *Credit review is pending.*

* + ***PRR843, Add Regional Planning Section to Protocols [ERCOT].***

**Proposed Effective Date:** Pending.

**CEO Determination:** No opinion on whether or not PRR843 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 ERCOT business functions; no impact to grid operations.

**Revision Description:** This PRR adds the entirety of the Regional Planning Group (RPG) Charter and Procedures (Charter) document, as it was recently approved by the ERCOT Board, to the Protocols.

**Procedural History:** PRR843 was posted on 12/18/09. On 1/21/10, PRS unanimously voted to create a task force to discuss the policy issues relating to PRR843, to refer PRR843 to the task force, and to instruct the task force report back at the February 2010 PRS meeting. On 2/18/10, PRS unanimously voted to table PRR843 indefinitely. *Credit review is pending.*

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

**Proposed Effective Date:** Pending.

**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. On 11/19/09, PRS unanimously voted to table NPRR190. On 12/17/09, PRS unanimously voted to table NPRR190 indefinitely. *Credit review is pending.*

* ***NPRR209, Data Posting Changes to Comply with P.U.C. Subst. R. 25.505 [NRG Texas and Calpine].***

**Proposed Effective Date:** Pending.

**CEO Determination:** No opinion on whether or not NPRR209 is necessary prior to the Texas Nodal Market Implementation Date.

**ERCOT Impact Analysis:** Pending.

**Revision Description:** This Nodal Protocol Revision Request (NPRR) removes a requirement to post certain State Estimator information that can be used to determine Resource status, which is confidential information as per PUCT rules.

**Procedural History:** NPRR209 was posted on 2/5/10. On 2/18/10, the motion to recommend approval of NPRR209 as submitted failed via roll call vote. PRS then voted to table NPRR209. There were two abstentions from the Cooperative and IOU Market Segments. *Credit review is pending.*

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

* ***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. On 11/19/09, PRS unanimously voted to refer PRR838 to ROS with instruction to have the Performance, Disturbance and Compliance Working Group (PDCWG) assist in constructing the DER operational prototype test, to provide transparency to Market Participants on the type of the test and to report the results to ROS. *Credit review is pending.*

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

**Proposed Effective Date:** Pending.

**CEO Determination:** Pending.

**ERCOT Impact Analysis:** Pending.

**Revision Description:** This NPRR changes the way short pays to the 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 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.*

* + ***NPRR211, Modify RUC Capacity Short Charge to Use Final Energy Trades [J. Aron].***

**Proposed Effective Date:** Pending.

**CEO Determination:** Not necessary prior to the Texas Nodal Market Implementation Date.

**ERCOT Impact Analysis:** Pending.

**Revision Description:** This NPRR removes the Energy Trade snapshot mechanism from the RUC capacity shortfall assessment, which captures the Energy Trades submitted to ERCOT prior to the execution of each RUC process for use in the RUC Capacity Short-Charge. This NPRR revises the RUC capacity shortfall assessment to consider the Energy Trades that are submitted to ERCOT by the final Energy Trade submission deadline of 1430 following the Operating Day.

**Procedural History:** NPRR212 was posted on 2/11/10. On 2/18/10, PRS unanimously voted to refer NPRR211 to WMS. *Credit review is pending.*

**New Revision Requests Scheduled for Consideration at the March 25, 2010 PRS Meeting**

* + ***PRR846, Deadlines for Initiating Alternative Dispute Resolution [Horizon Wind Energy].***

**Proposed Effective Date:** Pending.

**CEO Determination:** Pending.

**ERCOT Impact Analysis:** Pending.

**Revision Description:** This PRR amends Section 20.3, Informal Dispute Resolution, to establish deadlines for the Alternative Dispute Resolution (ADR) procedures.

**Procedural History:** PRR846 was posted on 2/15/10. On 2/17/10, the motion to grant PRR846 Urgent status failed, via PRS email vote. On 2/18/10, the motion to re-urge Urgency for PRR846 failed, via PRS roll call vote. *Credit review is pending.*