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| SCR Number | 760 | SCR Title | Recommended Changes Needed for Information Model Manager and Topology Processor for Planning Models |

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| Date | December 8, 2010 |

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| Comments |

**ERCOT submits these comments in an effort to provide ERCOT’s position on System Change Request (SCR) 760.**  ERCOT believes that the Planning Model Go-Live date is not at risk without the implementation of SCR760. The current system functionality meets or exceeds Protocol language, meets or exceeds industry standards, and is in-line with the Protocol requirements and TAC-approved procedures for consistency between the Operating and Planning models.

In addition, ERCOT believes that the burden placed on Transmission Service Providers (TSPs) without the implementation of SCR760 is not substantial and that the implementation of the changes described in SCR760 will not significantly reduce the number of standard Planning Model Change Requests (PMCRs) still required in completing the annual Planning cases.

ERCOT understands the rationale that TSPs have for requesting the changes in SCR760 to be a reduction in the overall number of PMCRs that these entities will be required to submit into the MOD system and the possible reduction in errors resulting from the decreased amount of data. ERCOT supports the reduction of PMCR data entries for TSPs.

ERCOT’s position concerning SCR760 is driven by two main factors. First, ERCOT wants to preserve the April 1, 2011 Planning Go-live date that will use the Topology Processed (TP) case as the starting point for the Data Set A Planning cases. Protocols require consistency in all operational models produced by ERCOT (Section 3.10). The Nodal suite of systems was designed to facilitate this consistency and ERCOT believes there is intrinsic value to both ERCOT and Market Participants in moving to a process to accomplish this consistency as soon as possible. Secondly, there is a need to coordinate the development of the Common Information Model (CIM) used by ERCOT with the industry standard for CIM. ERCOT CIM Schema additions and modifications should be evaluated in light of the industry standard in order to minimize differences and reduce risks and long-term maintenance costs. Some of the changes requested in SCR760 move the ERCOT CIM away from the industry standard.

ERCOT completed an Impact Analysis (IA) for each of the items in SCR 760 which estimates the cost of changing the ERCOT systems as required by SCR760. ERCOT has also completed an estimation of the Benefits that the TSPs will experience for each part of the SCR. The Benefit analysis contains details and assumptions concerning how the estimate was derived. The Benefit analysis is only an estimate and is subject to being updated by the affected TSPs. Based on this Cost versus Benefit analysis,

ERCOT believes that the most efficient process for building consistent planning cases is to forego implementation of any of the changes proposed in SCR760. Instead, the MOD software should be used as designed, to implement changes consistent with the TAC-approved TAC20060907 -- Principles Of Consistency document. ERCOT is aware that implementation of this process will require TSPs to create or manually enter the necessary Planning data in the form of standard PMCRs in the MOD. However, in ERCOT’s opinion, this entry of standard PMCRs does not put an unreasonable burden on individual TSPs or the market segment as a whole. ERCOT will review the PMCR’s submitted and assist TSPs with streamlining the representation of their changes in the NMMS database in an effort to eliminate the need for as many PMCR’s as possible.

TSP updates to the Benefit analysis may make the ERCOT Alternative that was detailed in the IA feasible. ERCOT will continue to offer assistance for the entry and maintenance of standard PMCRs required for Planning model case building.

**Background:**  To meet the requirements of Protocols, ERCOT designed a single database system, Network Model Management System (NMMS), which houses the modeling data used to build the Network Operations Model and the Annual Planning Models. For the Annual Planning Models, this system consists of two parts; Topology Processor (TP), and Model on Demand (MOD). The MOD software was designed to receive the TP processed data and serve as a staging area for TSPs to add data necessary to create planning models. SCR760 proposes changes to the NMMS schema, and in some cases data found in NMMS, as well as modifications to the TP, in order to reduce the number of data changes required by TSPs in the MOD.



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| Revised Business Case for Proposed System Change |

None.