**From:** Eric Woelfel/ FPC Energy Management Department [ewoelfel@fpcusa.com]  
**Sent:** Monday, November 28, 2011 4:39 PM  
**To:** Seely, Chad  
**Cc:** Ricaud, Leon  
**Subject:** FW: M-B112111-01 Notice of Draft Amendments to P.U.C. Subst. R. 25.507 and Request for Comments

Dear Mr. Chad V. Seely:

            I reviewed the EILS (ERS) proposed P.U.C. Rule 25.507 change per ERCOT request and I have some comments.

1. The changes are rather extensive and maybe too broad and leave too much to ERCOT’s discretion especially in regards to time period.  The time period could be as short as daily or one full year or more, in theory or it can be inconsistent in time interval.  This may make it confusing to a QSE on how to plan and make offers.

2. What is Dispatchable Distributed Generation?  Is this like Response Reserve Ancillary Service?   We need some definitions and limits here. What is the ratio of Load Resource to Dispatchable distributed generation?   ERCOT could have it all Dispatchable Distributed Generation and it would have no Load Resource or vice versa. In Response Reserve 50% is from Generation and 50% is from Load Resource. This is fairly open ended and I am not sure what to make of it.

3. Section c (7) offers a limit on 8 hours, but says the ERS provider must continue to provide ERS service until expiration of the instruction.  This could be more than a day and basically negates the eight hour rule. Would it be possible to put a limit on this too, let us say eight hours?

4. Section d (3) why change settlement date from 70 days to 80 days.  70 days should be sufficient.

5. When will the Protocols and Guidelines be revised and what is the time line for implementation of this change?

These are some of my comments from a QSE perspective.  In general we will continue to offer daily LaaR services and most likely will not provide ERS under the proposed rule since it is too undefined at this time.

Thank you very much for your understanding in this matter.

Eric Woelfel

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