**NPGRTF Summary and Future Actions**

**Protocols/OGs Transmission Operator Inconsistency**

1. The term TO, as used in the Op Guides, refers to an ERCOT Transmission Operator.  To help distinguish this term from the NERC TOP (Transmission Operator) function, the team suggests changing the term to **TDSO (Transmission and/or Distribution System Operator)**.  Note that the second sentence of the definition was also changed slightly as shown below (see the highlighted portions).  Per the Transmission Operator Designation Form, since a TO is “designated”, not registered, the language was changed accordingly.
   1. The current definition for TO, as shown in the Op Guides, is:  “Entity responsible for the safe and reliable operation of its own portion or designated portion of the ERCOT Transmission System.  Every Transmission Service Provider (TSP) or Distribution Service Provider (DSP) in the ERCOT Region shall either register as a TO, or designate a TO as its representative and with the authority to act on its behalf.”
   2. The new, proposed definition for TDSO is:  “Entity responsible for the safe and reliable operation of its own portion or designated portion of the ERCOT Transmission System.  Every Transmission Service Provider (TSP) or Distribution Service Provider (DSP) in the ERCOT Region shall either designate itself as a TDSO or designate an agent as its TDSO with the authority to act on its behalf.”
2. Note that the first sentence in each of these definitions is the “definition” portion.  The last sentence is a directive (“shall” statement), which probably shouldn’t be part of the definition.
3. The second sentence of the definition states that a DSP must register itself as a TO or designate a TO.  This implies that the TO may operate distribution systems (less than 60kV).  Therefore, the team decided that the TO term should reflect what they actually do…they can operate both transmission and distribution.  Hence the expanded name TDSO.  Perhaps the actual “definition” part (first sentence), should be modified to include “…or designated portions of the ERCOT Transmission or Distribution System” to keep it consistent with the last sentence.
4. The Standard Form Market Participant Agreement (from the Protocols) does not have a registration option for a TO.  The designation of a TO is done via the Transmission Operator Designation Form which, as the name implies, is used by a Market Participant (a TSP or DSP) to designate itself as a TO or designate another TSP or DSP as its TO.  This form is available on the ERCOT Web site and the designation of TOs is tracked by ERCOT Legal/Client Relations.  Ideally this designation should be in Siebel.  The form is at:

[Home](http://www.ercot.com/)  >  [Services](http://www.ercot.com/services/index.html)  >  [Registration and Qualification](http://www.ercot.com/services/rq/index.html)  >  Transmission / Distribution Service Providers

1. Possible future actions for ROS to consider:
   1. Clean up Protocol and OG language (or do a subset of these):
      1. Make the changes to the OG definition (term and definition).
      2. Change all occurrences of TO in the OGs and in the Transmission Operator Designation Form to TDSO.
      3. Continue to use the Transmission Operator Designation Form to “designate” TDSOs and put this designation information in Siebel.
      4. Follow up with all TSPs and DSPs to ensure they have a designated TDSO.  Fundamentally this is a reliability concern, because there should not be any gaps in the ERCOT Interconnection.  ERCOT must be confident that all portions of the Interconnection are covered by a TDSO.
      5. Consider moving the TDSO definition to the Protocols and then review every instance of TSP, DSP and TDSP in the Protocols to decide whether it should be changed to TDSO.
   2. Do a subset of option “a” above (for instance 1-4)
   3. Do nothing