**ERCOT Opinions for TAC – November 20, 2014**

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| **REV REQ NO.** | **DESCRIPTION** | **URGENT** | **ERCOT Opinion** |
| **560NPRR** | **Caps and Floors for Energy Storage Resources.** This Nodal Protocol Revision Request (NPRR) creates a definition of Energy Storage Resource and specifies values for the various caps and floors used in the mitigation and make-whole calculation processes for such Resources.  [ETWG] | N | ERCOT supports Market Participants decision on NPRR560 as it is an approach that leverages an existing Resource type category to accommodate energy storage resources, and adjusts the Minimum and Maximum Resource Price used in CRR settlement accordingly, until such time that further disaggregation of Resource types is taken on as a longer term solution |
| **639NPRR** | **Corrections to Minimum Current Exposure.** The Minimum Current Exposure (MCE) calculation, which is part of the Total Potential Exposure (TPE) credit evaluation, fails to recognize net purchases of firm physical power, which is a crucial and widely utilized means to fulfill Load serving obligations.  Not recognizing net purchases of firm physical power causes the MCE to inaccurately overstate the actual credit risk posed to the market and unfairly penalizes Market Participants who prudently hedge their Load positions.  [Reliant] | N | ERCOT supports approval of NPRR639 as it more accurately aligns credit exposure and respective collateral with actual risk |
| **646NPRR** | **Emergency Operations Settlement for CFC Testing.** This Nodal Protocol Revision Request (NPRR) addresses how Qualified Scheduling Entities (QSEs) will be Settled during unannounced CFC testing and adds the CFC definition to the Protocols. [ERCOT] | N | ERCOT supports approval of NPRR646 (ERCOT submitted NPRR) |
| **651NPRR** | **Clarify DC Tie Data Request Timeline and Content.** This Nodal Protocol Revision Request (NPRR) clarifies the timeline and content of reporting Direct Current Tie (DC Tie) schedule requests from Transmission Service Providers (TSPs) and Distribution Service Provider (DSPs) by measuring ERCOT’s response time from the date of the request, rather than the last day of the previous month.  This NPRR also removes paragraph (1)(c) of Section 9.17.2 as these fields are not available in the application which stores Electronic Tag (e-Tag) data. [ERCOT] | N | ERCOT supports approval of NPRR651 (ERCOT submitted NPRR) |
| **652NPRR** | **Posting of Information Under NERC Reliability Standards to the MIS.** This Nodal Protocol Revision Request (NPRR) allows for the posting of information under North American Electric Reliability Corporation (NERC) Reliability Standards to the Market Information System (MIS). [ERCOT] | N | ERCOT supports approval of NPRR652 (ERCOT submitted NPRR) |
| **653NPRR** | **Removal of Reasonable Contribution Language For Market Participant Data Requests.** This Nodal Protocol Revision Request (NPRR) removes Protocol language that refers to a “reasonable contribution” for data requests from Market Participants when such data request imposes a burden or an expense to ERCOT.  ERCOT does not believe a contribution is necessary for Market Participant data requests.  ERCOT is able to manage all requests within a time frame that does not impose resource constraints. [ERCOT] | N | ERCOT supports approval of NPRR653 (ERCOT submitted NPRR) |
| **664NPRR** | **Index Fuel Price. This Nodal Protocol Revision Request (NPRR) introduces an Index Fuel Price (IFP).** Resources may designate an IFP based on the Gas Daily’s Waha index price, or the weighted price of the Gas Daily Houston Ship Channel index price and the Gas Daily Waha index price.  The default IFP shall be the Fuel Index Price (FIP).  Resources that designate an IFP based on Waha index price or the weighted price must submit documentation to ERCOT indicating such designation and provide proof of physical delivery from such areas, as described in the Verifiable Cost Manual.  In addition, a Real-Time Make-Whole Payment provision is included to address exceptional fuel cost events that are not resolved by the change to an IFP. [RCWG] | Y | ERCOT supports approval of NPRR664 as the change proposed will more accurately reflect Resource actual fuel cost in Settlement |
| **666NPRR** | **Clarification for the CRR Balancing Account.** This NPRR provides clarification of the process for the monthly CRR Balancing Account in accordance with NPRR580, approved by the ERCOT Board of Directors on 2/11/2014. [ERCOT] | Y | ERCOT supports approval of NPRR666 (ERCOT submitted NPRR) |
| **039PGRR** | **Generation Data for Resource Adequacy and Reliability Reporting.** This Planning Guide Revision Request (PGRR) requires Interconnecting Entities (IEs) to provide certain information required for ERCOT’s Resource adequacy reports, Capacity, Demand and Reserves Report and the Seasonal Assessment of Resource Adequacy (SARA) Report, as well as for annual North American Electric Reliability Corporation (NERC) reliability assessment data requests; and ensures that ERCOT is a party to a decision by an IE and Transmission Service Provider (TSP) to execute a Standard Generation Interconnection Agreement (SGIA) before all interconnection studies have been completed and reviewed by the parties. [ERCOT] | N | ERCOT supports approval of PGRR039  (ERCOT submitted PGRR) |