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| NPRR Number | 685 | NPRR Title | Change Criteria for Resource Opportunity Outages |
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| Date | May 21, 2015 |
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| Submitter’s Information |
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| Market Segment | N/A |

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| Comments |

This NPRR desires to allow Resources to start their Planned Outages early, even if they do not have a Forced Outage, if that accelerated start to the Planned Outage is approved by ERCOT. ERCOT files these comments to note that this acceleration is already allowed, if the desire to accelerate the Planned Outage is known as little as 48 hours in advance. In addition, ERCOT notes that ERCOT’s review of the acceleration of Planned Outages that are not known this far in advance will have a significant implementation cost which has not yet been quantified but is mentioned here to inform the Stakeholder discussion on this request.

Opportunity Outages for Resources were designed to allow a Resource to start a Planned Outage early if a Forced Outage on that same Resource occurs within 8-days of the start of the Planned Outage.   If a unit has a Forced Outage, and this causes potential reliability problems, ERCOT has processes in place to determine solutions to these potential reliability problems, such as the development of Mitigation Plans. In most cases, allowing a Resource that has experienced a Forced Outage to begin its Planned Outage early requires minimal incremental analysis since the unit has already been forced off line and any solutions that were developed to maintain reliability during the Forced Outage will likely still be valid if needed during the interim period between the Forced Outage and the Planned Outage.

For instances where the early start request of a Planned Outage is submitted with more than 48-hours’ notice, a Resource owner can currently submit a new Planned Outage providing the same early start capability found in this NPRR.  The ability to analyze these Planned Outages is already included in ERCOT’s staffing and processes. There is no need to change the current definition of an Opportunity Outage to allow the Planned Outage to be started early, if the desire to do so is submitted more than 48 hours prior to the new start time.

For instances where the early start request of a Planned Outage is submitted within 48-hours under the provisions of this NPRR, ERCOT will be required to perform an additional analysis each day, similar to what it currently performs in its current three day process, in order to determine whether to approve these near-term Planned Resource Outage accelerations. This analysis and process is different from that used in the Day-Ahead and Real-time processes for Forced Outages in this timeframe, which are focused on developing any solutions that may be necessary to maintain reliability due to the Forced Outages. This additional analysis will require changes in ERCOT systems, staffing, and processes.  These changes are anticipated because of the potential increase in the number of occurrences (there are ~2500 Planned Resource Outages per year that could potentially be accelerated) compared to the relatively small number of Opportunity Outages (~15) that have occurred annually since the start of Nodal.

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| Revised Proposed Protocol Language |

None at this time.