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| NOGRR Number | [149](http://www.ercot.com/mktrules/issues/NOGRR149) | NOGRR Title | Revision to Definition of Transmission Operator |
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| Date | December 9, 2015 |
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| Submitter’s Information |
| Name | Doug Fohn |
| E-mail Address | Douglas.fohn@ercot.com |
| Company | ERCOT |
| Phone Number | 512-275-7447 |
| Cell Number |  |
| Market Segment | Not applicable |

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| Comments |

**NOGRR 149 Comments**

ERCOT provides the following comments to assist stakeholders in the review of Nodal Operating Guide Revision Request (NOGRR) 149. At this time, ERCOT does not take a formal position on whether NOGRR149 should be approved or not.

NOGRR149 seeks to exempt Distribution Service Providers (DSPs) with a total peak load of less than 25 MW from their current obligation under the ERCOT Protocols (including Nodal Operating Guides) to designate a Transmission Operator (TO). The proposed exemption would not apply to a DSP that is registered with the North American Electric Reliability Corporation (NERC) – regardless of its total peak load -- because the DSP has obligations under the NERC reliability standards (COM-001-2.1) to maintain certain communication abilities with ERCOT, which are currently achieved through its respective TO.

At this time, there are approximately ten (10) DSPs that are out of compliance with the Protocols because they have not designated a TO. If a DSP has not designated a TO, ERCOT is not able to assign any load shed obligation to that DSP in the ERCOT Load Shed Table[[1]](#footnote-1) because ERCOT does not have a means of communicating load shed instructions to that DSP. As a result, the load shed obligation that would be assigned to these approximately ten (10) non-compliant DSPs (if they had designated a TO) is currently spread proportionately across the ERCOT Load Shed Table amongst compliant DSPs that have designated a TO.

Under the proposed language in NOGRR149, there are approximately fifty-three (53) DSPs in the ERCOT region with total peak loads that would fall beneath the 25 MW cutoff that would ultimately be eligible for the exemption. The cumulative peak load of all fifty-three (53) DSPs that would potentially be exempt under NOGRR149 from the obligation to designate a TO is approximately 600 MW.

If NOGRR149 is adopted, any of the fifty-three (53) eligible DSPs that elected to take advantage of the exemption would have their current load shed obligation removed from the ERCOT Load Shed Table. The exclusion of these DSPs from the ERCOT Load Shed Table would not in itself cause a risk to ERCOT’s ability to maintain reliability. However, to account for the lost load shed obligation of any eligible DSP that chose not to designate a TO, ERCOT would be required to proportionately increase the potential load shed obligations under the ERCOT Load Shed Table to other DSPs that remain subject to the TO obligation.

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| Revised Cover Page Language |

**None**

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| Revised Proposed Protocol Language |

**None**

1. *See* Nodal Operating Guide Section 4.5.3.4, *Load Shed Obligation*. [↑](#footnote-ref-1)