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| NOGRR Number | [162](http://www.ercot.com/mktrules/issues/NOGRR162) | NOGRR Title | Process for Resolving Real-Time Data Discrepancies |

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| Submitter’s Information |
| Name | Stephen Solis |
| E-mail Address | Stephen.Solis@ercot.com |
| Company | ERCOT  |
| Phone Number | 512-248-6772 |
| Cell Number | 512-426-4721 |
| Market Segment | Not applicable |

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| Comments |

ERCOT offers the following comments and edits on top of Luminant’s proposed edits. ERCOT’s proposed edits are also based on feedback received from OWG and NRWG discussions.

ERCOT is restoring Sections 7.3.3 (4) and (5) to better capture a delineation of expectations relative to more common telemetry data issues that do not affect ERCOT Network Security Analysis (NSA) from those that do which are addressed in proposed Section 7.3.4. The suggested edits also clarify appropriate entities involved and follow a similar structure to proposed section 7.3.4 without the 10 minute requirements. This helps to clarify upon the more general “mutually agreeable process for resolving data conflicts” as required per IRO-01002 R3.2 and TOP-003-3 R5.2.

By keeping Section 7.3.4 to the more uncommon telemetry data issues to affect ERCOT NSA, clarity is provided as to when the “mutually agreeable process for resolving data conflicts” contains additional provisions (i.e. the 10 min requirements). This aligns with the instances identified in NERC BOT approved IRO-018-1 R1.3 “Actions to address Real-time data quality issues with the entity(ies) responsible for providing the data when data quality affects Real-time Assessments.”

While ERCOT understands the tight time requirements of 10 minutes can be challenging, newly approved NERC Reliability Standard TOP-001-3 Requirement 13 requires that a Real-time Assessment is performed at least once every 30 minutes. Furthermore, the definition of Real-time Assessment (RTA) requires the evaluation to be for “existing (pre-Contingency) and potential (post-Contingency) operating conditions” for which ERCOT NSA regularly assesses.

Typically the State Estimator and Real Time Contingency Analysis (RTCA) applications run every 5 minutes so ERCOT is not aware of issues until 5 minutes into the 30 minute window. After typical troubleshooting occurs, the QSE or TO may not be made aware until another 5 min have passed putting the clock at 10 minutes into the 30 minute window. If the QSE or TO take all of the allotted 10 minutes to provide their best assumed data value to ERCOT, ERCOT only has 10 minutes remaining to conduct the RTA. The RTA may be completed in less than 5 minutes if manually replaced, however if verbally communicated, it may take additional time to enter the data into to the study application.

ERCOT noted other comments of how to prevent getting into the uncommon scenario where NSA is affected by a telemetry data issue. ERCOT has not attempted to address those comments in this NOGRR but reiterates that provision of all telemetry identified in the ERCOT Protocols and Operating Guides in addition to available telemetry (e.g. flow on both side of a line) for example, can maximize the ERCOT State Estimator’s availability and robustness. Regular telemetry calibration and timely corrective actions for more common telemetry data issue are also actions that can be taken to prevent getting into the uncommon scenario where NSA is affected by a telemetry data issue.

Section 7.3.5 and 7.3.6 have been restored since the language upon review was not redundant in all instances.

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| Revised Cover Page Language |

None

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| Revised Proposed Guide Language |

### 7.3.3 Data from QSEs and TSPs to ERCOT

(1) Each TSP and QSE shall provide telemetered measurements on modeled Transmission Elements as required by the Protocols and the ERCOT Nodal ICCP Communications Handbook.

(2) QSEs and TSPs shall provide Real-Time monitoring of power system quantities to ERCOT as defined in the Protocols and the ERCOT Nodal ICCP Communications Handbook. ERCOT shall work with TSPs and QSEs to determine the required data using the methodology presented in the Protocols. Transmission Element status and analog measurements that the TSPs and QSEs define in the Network Operations Model shall, at a minimum, be provided to ERCOT. Ultimately, it is the responsibility of the TSPs and QSEs to provide all data requested by ERCOT.

(3) Real-Time telemetry data from QSEs used to supply power or Ancillary Services shall be integrated by ERCOT and checked against settlement meter values on a monthly basis.

(4) Each QSE and TO shall notify ERCOT as soon as practicable when there are known telemetry data issues (telemetry data will not be available or is unreliable for operational purposes). Each QSE or TO shall address the telemetry data issue with either a manual telemetry data replacement or a correction of the telemetry data issue as soon as practicable. The report, as outlined in Section 9.2.2, Real-Time Data Monitor, will contain unavailability data associated with Planned Outages of RTUs.

(5) If the QSE or TO cannot resolve the telemetry data issue within 48 hours, it shall provide an estimated time of resolution. Each QSE and TO shall notify ERCOT as soon as practicable when telemetry data issue is resolved.

***7.3.4 Resolving Real-Time Data Issues that affect ERCOT Network Security Analysis***

 (1) Real-Time telemetry data issues that affect ERCOT’s Network Security Analysis (NSA) are issues that cause unacceptable NSA results such as but not limited to invalid State Estimator solutions, unsolved contingencies, and or partially solved contingencies. Manual telemetry data replacement is understood to be data entered by a QSE or TO on their systems that is transmitted to ERCOT via ICCP over the normal points established for the particular data points experiencing an issue.

(2) ERCOT will notify the QSE or TO responsible for the telemetry data when a Real-Time telemetry data issue affects ERCOT Network Security Analysis (NSA). Each QSE or TO shall address the Real-Time telemetry data issue with either a manual telemetry data replacement or a correction of the telemetry data issue as soon as practicable. If the QSE or TO cannot address the issue within 10 minutes of notification, the QSE or TO shall verbally communicate the best assumed data value(s) to ERCOT within 10 minutes (this may include confirming that the last known values are reasonably accurate). Verbally communicated data shall be updated to reflect the best assumed data value(s) at least every 10 minutes until the QSE or TO can manually replace the data or corrects the data issue. Manually replaced data shall be updated to reflect the best assumed data value(s) at least every 10 minutes until the Real-Time data issue is resolved.

(3) If the QSE or TO cannot resolve the Real-Time telemetry data issue that is affecting ERCOT NSA within 48 hours, it shall provide an estimated time of resolution. Each QSE or TO shall notify ERCOT when the Real-Time telemetry data issue that was affecting ERCOT NSA is resolved.

### 7.3.5 TSP and QSE Telemetry Restoration

Real-Time telemetry data shall be restored using criteria and procedures as established by the Telemetry Standards.

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### 7.3.6 TSP and QSE Telemetry Restoration

Real-Time telemetry data shall be restored using criteria and procedures as established by the Telemetry Standards.