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| NPRR Number | [885](http://www.ercot.com/mktrules/issues/NPRR885) | NPRR Title | Must-Run Alternative (MRA) Details and Revisions Resulting from PUCT Project No. 46369, Rulemaking Relating to Reliability Must-Run Service |
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| Date | February 13, 2019 |
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| Submitter’s Information |
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| Market Segment | Not applicable |

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| Comments |

ERCOT appreciates the time and effort that WMS has spent in its review of Nodal Protocol Revision Request (NPRR) 885. ERCOT files these comments to note that the recommendation made by WMS at its February 6, 2019 meeting to give NPRR885 a priority and rank that prioritizes Real-Time Co-optimization (RTC) could inappropriately delay ERCOT’s efforts to comply with subsection (e)(7) of P.U.C. Subst. R. 25.502, Pricing Safeguards in Markets Operated by the Electric Reliability Council of Texas, which mandates that ERCOT “establish protocols and procedures to implement” subsection (e) of P.U.C. Subst. R. 25.502.

NPRR885 implements amendments to subsection (e) of P.U.C. Subst. R. 25.502 that require ERCOT to consider whether a Must-Run Alternative (MRA) is a cost-effective solution to a reliability need that is identified when a Generation Resource suspends operations. Among other things, NPRR885 establishes procedures for the submission of MRA offers and details how ERCOT will Dispatch, test, and settle MRAs. The amendments to subsection (e) of P.U.C. Subst. R. 25.502 concerning MRAs went into effect on January 1, 2018. ERCOT must comply with the amended rule regardless of whether the processes in NPRR885 are implemented. Unduly delaying the changes incorporated in NPRR885 would mean that ERCOT’s procurement of MRAs prior to the NPRR885’s implementation would follow *ad hoc*, ERCOT-determined procedures to comply with the rule, and that any MRAs procured by ERCOT before NPRR885’s implementation would be Dispatched and settled using manual processes that would be insufficient to cover the scope of potential MRA submissions. Furthermore, prior to system implementation ERCOT would be unable to settle procured MRAs on a daily basis.

Accordingly, ERCOT requests that PRS adopt a priority for NPRR885 of 2019, which will allow ERCOT the discretion to place NPRR885 into the project work plan as appropriate. Assigning NPRR885 this priority should not negatively impact implementation of RTC, because projects related to that effort do not yet exist and the budgeted funds for RTC are separate from the funds used to implement projects such as NPRR885.

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| Revised Cover Page Language |

None

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| Revised Proposed Protocol Language |

None