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| NOGRR Number | [188](http://www.ercot.com/mktrules/issues/NOGRR188) | NOGRR Title | WAN Technology Updates |

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| Date | May 17, 2019 |

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| Market Segment | Cooperative |

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| Comments |

GSEC files these comments to recognize the many benefits that will be gained once NOGRR188 is implemented, allowing the use of Voice over Internet Protocol (VOIP).  One such benefit is the ability to more easily incorporate multipath diversity for operational voice communication.

Before the full benefits of VoIP can be realized, GSEC will need clarification on ERCOT’s intention to allow or disallow extending ERCOT VoIP service within a Market Participant’s private network. If approved by ERCOT, GSEC intends to install one ERCOT VoIP circuit in a primary location and another ERCOT VoIP circuit in a secondary location. The private network will be compliant with all requirements and expectations of NOGRR154, Alignment with NPRR755 and Requirements for ERCOT WAN Installation and Exchange of Resource-Specific XML Data, (scheduled for implementation June 15, 2019) for extending resource specific Inter-Control Center Communications Protocol (ICCP), Extensible Markup Language (XML), and operational voice data and has the added benefit of redundancy. This configuration allows for quick recovery of common communication failures such as line cuts, equipment failures, misconfiguration, and unscheduled outages.

The current language is silent on the ability to extend service, but GSEC anticipates other Market Participants will want to avail themselves of this option.

Therefore, GSEC would respectfully request that until the issue of extending operational voice data over a Market Participant’s secure private network can be vetted and discussed among the Market Participants and ERCOT, NOGRR188 remain tabled at the Technical Advisory Committee (TAC) and be referred to the Reliability and Operations Subcommittee (ROS).

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| Revised Cover Page Language |

None

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| Revised Proposed Guide Language |

None