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| NPRR Number | [933](http://www.ercot.com/mktrules/issues/NPRR933) | NPRR Title | Reporting of Demand Response by Retail Electric Providers and Non-Opt-In Entities |
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| Date | July 9, 2019 |
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| Submitter’s Information |
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| Market Segment | Cooperative |

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| Comments |

The Joint Non-Opt-In Entity (NOIE) Commenters[[1]](#footnote-1) appreciate the opportunity to provide comments on this proposal, and strongly support ERCOT’s effort to provide transparency into Demand response capability in the ERCOT region.

The Joint NOIE Commenters strongly agree with the Retail Electric Provider (REP) Coalition comments regarding the high amount of effort necessary to complete Demand response reporting on a quarterly basis and fully support the concept of an annual data submittal process as advocated by the REP Coalition. However, the process identified in the REP Coalition comments must be modified to capture the nuances that exist for NOIEs. As indicated by ERCOT at the June 4, 2019 RMS meeting and at the June 5, 2019 WMS meeting, the lack of premise level data in NOIE territories necessitates a process that is different from the one prescribed by the REP Coalition comments. A process must exist that allows ERCOT to analyze NOIE data based on the aggregate load of the NOIE as measured by the NOIE’s boundary meters. As such, Joint NOIE Commenters offer language that codifies the practice used by ERCOT in the Demand response survey process employed for NOIEs in early 2019.

In early 2019, ERCOT requested that the largest 33 NOIEs respond to a Demand response survey to provide information on Demand response activities in certain NOIE areas, thereby providing a representative sample that encompassed a high percentage of the NOIE load in ERCOT. Joint NOIE Commenters believe that this representative sample approach should continue. A uniform reporting requirement applicable to all NOIEs is inappropriate because of the low customer density that characterizes many of these systems. Similar to unregistered Distributed Generation reporting by NOIEs in ERCOT, Demand response product availability is much more prevalent in certain NOIE territories. Therefore, adding of a MW threshold for the size of the NOIE to trigger annual reporting of Demand response would be appropriate. Joint NOIE Commenters believe the annual reporting should apply to those whose peak demand in the summer Peak Load Season is greater than 100 MW. This threshold is roughly equivalent to the subset of NOIEs selected by ERCOT for the initial 2019 Demand response survey.

We look forward to discussing these comments with ERCOT, Market Participants, and the Public Utility Commission of Texas (PUCT) to ensure all viewpoints are considered in achieving the most efficient process in ERCOT’s review and analysis of dynamic pricing and Demand response products and programs.

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| Revised Cover Page Language |

None

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| Revised Proposed Protocol Language |

***3.10.7.2.1 Reporting of Demand Response***

(1) ERCOT shall post on the MIS Public Area by the fifth Business Day after the start of a calendar month a report of the MW of Demand response that is participating in the past month in Emergency Response Service (ERS), Ancillary Service as a Load Resource, or any pilot project permitted by subsection (k) of P.U.C. Subst. R. 25.361, Electric Reliability Council of Texas (ERCOT). The data shall be aggregated according to the corresponding 2003 ERCOT Congestion Management Zone (CMZ). Data for participation in ERS shall be based on contracted amounts for each type of service for that calendar month. ERCOT shall set out separately MW contracted from both ERS Generators and generators that are participating by offsetting ERS Loads (with aggregated and non-aggregated ERS Generators set forth separately) and MW of ERS Loads. To the extent that a participating generator is not registered with ERCOT, information about the nameplate rating of the generator and the maximum deliverable to the ERCOT Transmission Grid or to serve native load shall be collected through the ERS contracting process. The report shall include these values for each ERS Contract Period broken down by ERS Time Period. Data for Ancillary Services shall be based on the Ancillary Service Resource Responsibility contained in the Current Operating Plan (COP) as of the start of the Adjustment Period for each Operating Day. ERCOT’s posting of Ancillary Service and pilot project participation data shall include the average MW capacity by service type by hour (or by another time period, if a pilot project service is not procured hourly).

(2) On an annual basis, ERCOT shall work with Market Participants to produce a report summarizing Demand response programs, and MWs enrolled in Demand response in the ERCOT Region. This report shall be posted to the MIS Public Area no later than November 30th of each calendar year.

(a) Non-Opt-In Entities (NOIEs) with ERCOT peak demand above 100 MW in the summer Peak Load Season and Retail Electric Providers (REPs) shall submit reports to ERCOT detailing their Customers’ participation in Demand and/or price response programs. ERCOT shall provide a reporting requirement notice to the NOIEs with peak demand above 100 MW in the summer Peak Load Season by December 31 of each year.

(b) Required NOIEs shall provide by October 15 of each year the number of Customers subscribed to economic Demand response programs, by category, as described in the document “Demand Response Data Definitions and Technical Specifications”, in their respective territories effective on September 1 of each year.

 (c) In conjunction with this reporting, REPs shall also report on specific deployment events they have initiated during the reporting period as follows:

(i) Enrollment in Demand response product categories as described in the document “Demand Response Data Definitions and Technical Specifications” on the ERCOT website for the relevant reporting period. A filing is not required if the REP has no Customers enrolled in Demand response products during the reporting period.

(ii) REPs shall create the file based upon the snapshot from September 1 of each year, and submit to ERCOT a Comma Separated Value (CSV) file via North American Energy Standards Board (NAESB) by October 1 of each year.

(iii) If a Customer is enrolled in a product that spans multiple categories, the REP must list the Premise once for each category.

(iv) REPs who submit a file related to Premises on Demand response programs shall respond to an ERCOT survey. Responses to the survey are due by October 15 of each year.

(d) ERCOT shall validate the submitted reports and indicate any errors and inconsistencies that require correction to the REP or NOIE within two Business Days of the submission. REPs and/or NOIEs shall address the errors and inconsistencies and submit corrected reports to ERCOT as soon as practicable.

(e) Information provided will be treated as Protected Information in accordance with Section 1.3, Confidentiality.

1. The Joint Non-Opt-In Entity Commenters (“Joint NOIE Commenters”) consists of Austin Energy, Brazos Electric Cooperative, CPS Energy, Golden Spread Electric Cooperative, Pedernales Electric Cooperative, South Texas Electric Cooperative, and Texas Electric Cooperatives, Inc. [↑](#footnote-ref-1)