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| NPRR Number | [969](http://www.ercot.com/mktrules/issues/NPRR969) | NPRR Title | Clean-up of Protocol 19.8, Retail Market Testing |
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| Date | September 23, 2019 |
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| Submitter’s Information |
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| Cell Number |  |
| Market Segment | Investor Owned Utility (IOU) |

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| Comments |

American Electric Power (AEP) Texas respectfully submits these comments to clarify that as the Flight Administrator, ERCOT is the final authority on all levels of retail business process qualification related to Retail Market Flight Testing for Market Participants and Trading Partners.

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| Revised Cover Page Language |

None

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| Revised Proposed Protocol Language |

19.8 Retail Market Testing

(1) The Texas Standard Electronic Transaction (TX SET) Working Group works with the ERCOT flight administrator to develop and maintain a test plan and related testing standards for all retail transactional changes within the ERCOT market. Testing of these changes is scheduled to allow ERCOT and all Market Participants adequate time to modify their systems and participate in the testing process. Testing processes, procedures, schedules and success criteria are defined in the Texas Market Test Plan (TMTP) Guide and on the ERCOT website. The ERCOT flight administrator is the final authority on all levels of retail business process qualification among trading partners.

(2) ERCOT may enlist the services of an Independent Third Party Testing Administrator (ITPTA) for this testing process.