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| **NPRR Number** | [**1014**](http://www.ercot.com/mktrules/issues/NPRR1014) | **NPRR Title** | **BESTF-4 Energy Storage Resource Single Model** |
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| **Date** | October 9, 2020 |
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| **Submitter’s Information** |
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| **Cell Number** |  |
| **Market Segment** | Independent Generator  |

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| **Comments** |

The Lone Star Chapter is opposed to the current version of Nodal Protocol Revision Request (NPRR) 1014, as long as it requires Energy Storage Resources (ESRs) to share individual state of charge (“SOC”) 60-day disclosure information, but does not require thermal Resources’ equivalent data, such as their gas nominations.

If the ERCOT market is interested in transparency and full disclosure than we believe it would be appropriate for gas and coal Resources to be required to disclose such information, which would be equivalent to batteries sharing their SOC on an individual resource basis.

If ERCOT were to require disclosure for thermal Resources, then heat input information and the efficiency of thermal Resources could be determined which would be of interest to many Market Participants and to organizations like the Sierra Club, which have an interest in assuring that air pollution requirements are met.

If, however, Market Participants are unwilling to open up such disclosure for Security-Constrained Economic Dispatch (SCED) runs of thermal Resources, then as an alternative Sierra Club would be supportive of the 10/8/20 Joint Commenters comments by various companies representing battery technologies.

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| **Revised Cover Page Language** |

None

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| **Revised Proposed Protocol Language** |

None