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| NPRR Number | [1053](http://www.ercot.com/mktrules/issues/nprr1053) | NPRR Title | BESTF-9 Exemption from Ancillary Service Supply Compliance Requirements for Energy Storage Resources Affected by EEA Level 3 Charging Suspensions |
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| Date | | December 8, 2020 | |
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| Submitter’s Information | | | |
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| Company | | ERCOT | |
| Phone Number | | 512-248-4298; 512-248-4219 | |
| Cell Number | |  | |
| Market Segment | | Not applicable | |

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| Comments |

ERCOT submits these comments to Nodal Protocol Revision Request (NPRR) 1053 to clarify when a Qualified Scheduling Entity (QSE) must inform ERCOT of its inability to comply with its Ancillary Service Resource Responsibility in order to qualify for the compliance exemption.

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| Revised Cover Page Language |

None at this time.

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| Revised Proposed Protocol Language |

8.1.1.3 Ancillary Service Capacity Compliance Criteria

(1) ERCOT shall provide each QSE representing Resources a capacity summary containing as a minimum the same general information required in Section 6.5.7.5, Ancillary Services Capacity Monitor, except specific to only the QSE. The summary shall be updated with calculations every ten seconds by ERCOT and then provided to the QSE every five minutes using the MIS Certified Area.

(2) ERCOT shall continuously measure the overall performance of each QSE in providing each Ancillary Service by comparing the sum of each of the QSE’s Resources’ telemetered Ancillary Services Resource Responsibility with the QSE’s total Ancillary Service responsibility. If the comparison indicates the QSE is not providing sufficient capacity to meet its Ancillary Services responsibility, ERCOT shall notify the QSE via the MIS Certified Area.

(3) The QSE, within ten minutes of receiving the insufficient capacity notification from ERCOT, the QSE must:

(a) If due to a telemetry issue, correct the telemetered Ancillary Services Resource Responsibility to provide sufficient capacity; or

(b) Must provide both appropriate justification for not satisfying their Ancillary Service Obligation and a plan to correct the shortfall that is acceptable with the ERCOT operator. ERCOT shall report non-compliance of Ancillary Service capacity requirements to the Reliability Monitor for review.

(4) A QSE for an Energy Storage Resource (ESR) that is, was, or will be unable to meet its Ancillary Service Resource Responsibility due to a charging restriction during an EEA Level 3 event shall inform ERCOT of this inability no later than one hour after the end of the EEA Level 3 event. Upon providing such notification, the QSE shall be deemed to have complied with its Ancillary Service Supply Responsibility for a time period following the EEA Level 3 event that is equal to the duration of the suspended charging period during the EEA Level 3 event. However, nothing in this paragraph exempts the QSE from any charge under Section 6.7.3, Charges for Ancillary Service Capacity Replaced Due to Failure to Provide, or any other Settlement consequence due to the Ancillary Service insufficiency.

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| [NPRR1053: Delete paragraph (4) above upon system implementation of the Real-Time Co-optimization (RTC) Project:] |