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| NOGRR Number | [215](http://www.ercot.com/mktrules/issues/NOGRR215) | NOGRR Title | Limit Use of Remedial Action Schemes |

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| Date | January 11, 2021 |

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| Submitter’s Information |
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| Market Segment | Municipally Owned Utility (MOU) |

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| Comments |

The City of Denton appreciates the opportunity to comment on NOGRR215. Denton supports the January 8, 2021 Joint Commenters comments, and recommends that NOGRR215 should be rejected.

In 2018, our city council passed the Denton Renewable Resource Resource Plan which calls for 100% renewable energy to serve our customers. Denton like other municipalities, Retail Electric Providers (REPs), and end use customers, desire to purchase as much energy from renewable resources as possible. Remedial Action Schemes (RASs) allow resources (of all types) access to the ERCOT Grid, while waiting on transmission construction. As a community that relies upon sales of contracted renewable Power Purchase Agreements (PPA) to the market to offset purchases from the market to serve Load, the elimination of RASs has the real potential to increase the congestion costs that DME must pass on to customers. Further, if properly evaluated and approved, RASs should increase overall grid reliability and lower overall wholesale price in the market by permitting resources to have access to the transmission grid during qualifying periods.

Denton appreciates the complexity of managing a network with numerous RASs; however, as pointed out in the Joint Commenters comments ERCOT has managed this before. There are clearly both environmental and financial advantages to allowing more renewable resources to interconnect to the grid.

If ERCOT needs additional resources to effectively manage those resources perhaps increasing the interconnection fee would provide sufficient budget to procure those resources. We believe increasing the Interconnect Fee is the approate funding mechanism, because the interconnecting entity is often the entity receiving the most benefit from the RAS.

If increasing the Interconnect Fee is not workable; we would be willing to support a small increase the ERCOT Admin Fee. Loads pay the ERCOT Admin Fee and Loads benefit from reduced congestion charges. A small increase in the ERCOT Admin Fee would likely be more than offset by a reduction in congestion charges.

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| Revised Cover Page Language |

None

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| Revised Proposed Guide Language |

None