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| NPRR Number | [995](http://www.ercot.com/mktrules/issues/nprr995) | NPRR Title | RTF-6 Create Definition and Terms for Settlement Only Storage |
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| Date | January 12, 2021 |
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| Submitter’s Information |
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| Company | ERCOT |
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| Cell Number |  |
| Market Segment | Not applicable |

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| Comments |

With the approval of all Passport Nodal Protocol Revision Requests (NPRRs) in December 2020, ERCOT will be providing feedback and analysis on Revision Requests that overlap with Passport scope and/or resources and could impact Passport delivery in 2024. While ERCOT supports NPRR995 in terms of market design and policy direction, the cost and time to implement NPRR995 (estimated at $800k-1.2M and 20-30 months) is significant and will have an impact on Passport delivery. The project work would rely heavily on the ERCOT staff and systems that are involved in pre-Passport and Passport work. As such, ERCOT does not see a path to implement NPRR995 prior to Passport delivery in 2024.

As such, ERCOT recommends that the Protocol Revision Subcommittee (PRS) table consideration of any additional comments and/or the Impact Analysis for NPRR995 to allow development of an appropriate framework for handling Revision Requests that should be potentially considered and approved by stakeholders pre-Passport delivery but implemented post Passport delivery.

ERCOT offers to work with the Technical Advisory Committee (TAC) and, if necessary, PRS on how this and other future Revision Requests should be considered when implementation is expected after Passport delivery in 2024.

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| Revised Cover Page Language |

None

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| Revised Proposed Protocol Language |

None