ERCOT Opinions to 3/24/21 TAC

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| **REV REQ NO.** | **DESCRIPTION** | **URGENT** | **ERCOT Opinion** |
| **1045NPRR** | **Transmission Operator Definition and Designation.** This Nodal Protocol Revision Request (NPRR) moves the definition of Transmission Operator (TO) from the Nodal Operating Guide to Section 2.1, Definitions, of the ERCOT Protocols, revises this definition, and adds new Section 16.19, Designation of Transmission Operators, that clarifies the designation process and basic qualifications for TOs.  This NPRR also replaces references to “designated agent” in Section 6.5.7.8, Dispatch Procedures, with the term “TO.”  [ERCOT] | N | ERCOT supports approval of NPRR1045 |
| **1057NPRR** | **Modification to Real-Time Hub Price Formulas for Fully De-Energized Hubs.** This Nodal Protocol Revision Request (NPRR) revises paragraph (2) of Section 6.6.1.5, Hub LMPs, to apply the Hub Locational Marginal Price (LMP) formulas to the Panhandle 345 kV Hub and the Lower Rio Grande Valley 138/345 kV Hub.  In the case of the Lower Rio Grande Valley 138/345 kV Hub, this proposed change would only apply after implementation of NPRR941, Create a Lower Rio Grande Valley Hub.  The proposed revisions also eliminate the portions of Hub Real-Time Settlement Point Prices (SPPs) formulas that are designed to address the condition of all Hub Buses within a Hub being de-energized.  The SPP logic is redundant with what occurs in the calculation of LMPs and the formulas are unclear regarding how to manage the case in which all the Hub Buses are de-energized for only a portion of a 15-minute Settlement Interval.  [ERCOT] | N | ERCOT supports approval of NPRR1057 |
| **1059NPRR** | **Ability for MOUs and ECs to Send Non-BUSIDRRQ Interval Data.** This Nodal Protocol Revision Request (NPRR) creates the ability to send interval readings for non-Interval Data Recorder (IDR) Meters, such as residential accounts with consumption under 700 kW, to be able to settle on actual usage/generation instead of the Load Profile.  [Nueces] | N | ERCOT supports approval of NPRR1059 |
| **026OBDRR** | **Change Shadow Price Caps to Curves and Remove Shift Factor Threshold.** This Other Binding Document Revision Request (OBDRR) makes certain congestion management changes for contingency constraints. No base case or Generic Transmission Constraint (GTC) pricing is affected by this OBDRR. This OBDRR 1) Changes the default Shadow Price caps to curves. The change lowers the value for small violations and raises the value for large violations; and 2) Removes the Shift Factor threshold as a factor for determining eligibility for Security-Constrained Economic Dispatch (SCED) consideration. Currently, a constraint is only eligible for resolution by SCED if at least one Resource exists that has a Shift Factor of greater than 2% or less than negative 2%. This OBDRR also proposes minor cleanup items and simplifications to Section 3, Elements for Methodology for Setting the Network Transmission System-Wide Shadow Price Caps.  [ERCOT] | N | ERCOT supports approval of OBDRR026 |
| **027OBDRR** | **Clarify Implementation Timeline for OBDRR023.**  This OBDRR clarifies the implementation timeline for OBDRR023.  As originally approved, the effective date for OBDRR023 was stated as “February 1, 2021 and upon system implementation of NPRR984.”  NPRR984 will be implemented on October 1, 2021; accordingly, the effective date stated in OBDRR023 lacked clarity as it referenced two different dates.  This clarifies that OBDRR023 will be implemented over two separate dates: a partial implementation on February 1, 2021, and implementation of the remaining language on October 1, 2021.  Additionally, this OBDRR further clarifies that the footnote added by OBDRR023 in Section E, ERS Expenditure Limit, which is applicable only to the 2021 Emergency Reserve Service (ERS) budget year, will be deleted as of December 1, 2021, the start of the 2022 ERS budget year.  [ERCOT] | N | ERCOT supports approval of OBDRR027 |
| **219NOGRR** | **Related to NPRR1045, Transmission Operator Definition and Designation.** This Nodal Operating Guide Revision Request (NOGRR) removes the definition of Transmission Operator (TO) from the Nodal Operating Guide because it is being moved to the ERCOT Protocols by NPRR1045.  This NOGRR also clarifies existing language relating to Load shed obligations and removes the Load Shed Table from the Nodal Operating Guide.  Instead, the Load Shed Table will be posted on the ERCOT Website.  [ERCOT] | N | ERCOT supports approval of NOGRR219 |
| **1069NPRR** | **Align Ancillary Service Responsibility for ESRs with NPRR987.** This Nodal Protocol Revision Request (NPRR) provides clarification to Settlement billing determinants to ensure that the capacity for an Energy Storage Resource (ESR) is not counted in the Off-Line Reserve Imbalance of the Real-Time Ancillary Service Imbalance Payment or Charge.  [ERCOT] | Y | ERCOT supports approval of NPRR1069 |
| **028OBDRR** | **Related to NPRR1069, Align Ancillary Service Responsibility for ESRs with NPRR987.** This Other Binding Document Revision Request (OBDRR) clarifies Operating Reserve treatment of Energy Storage Resource (ESR) capacity.  [ERCOT] | N | ERCOT supports approval of OBDRR028 |
| **1023NPRR** | **Change to CRR Repossession Process.** This Nodal Protocol Revision Request (NPRR) modifies the way that ERCOT handles the repossession of a Congestion Revenue Right (CRR) portfolio resulting from a Market Participant default.  The current process of offering the repossessed CRRs in a one-time auction may not fully realize the potential value of the repossessed CRR portfolio, which can in turn result in increased uplift to the market.  This NPRR establishes a means for liquidating a repossessed CRR portfolio over time by utilizing the Financial Security held by ERCOT for the Defaulting CRR Account Holder for Settlement purposes.  This NPRR also modifies the process for forfeiture of CRRs resulting from non-payment or late payment of an Invoice by a CRR Account Holder, and proposes liquidating forfeited CRRs in the same manner as repossessed CRRs.  [ERCOT] | N | ERCOT supports approval of NPRR1023 |
| **1060NPRR** | **Improvements to ERS Testing Requirements and Other ERS Items.** This Nodal Protocol Revision Request (NPRR) makes a number of revisions pertaining to Emergency Response Service (ERS), including: 1) Modifying and adding language related to the testing of ERS Resources, sites that participate in more than one ERS Resource, and availability determinations; 2) Simplifying the process for notifying ERCOT of planned maintenance and self-testing for ERS Generators, in order to align the process with requirements for ERS Loads; 3) Clarifying language related to metering requirements for ERS Generators; 4) Clarifying language related to the performance of co-located ERS Generators; and 5) Adding language to address how ERCOT will treat ERS Resources with missing meter data for purposes of availability calculations.  [ERCOT] | N | ERCOT supports approval of NPRR1060 |
| **1065NPRR** | **Implementation Adjustment for NPRR917.**  This Nodal Protocol Revision Request (NPRR) strikes a sentence from Section 6.6.3.9 that describes the energy volumes for a Settlement Only Generator (SOG) subject to nodal vs. zonal pricing and replaces that sentence with a formula; revises the name and definition of a related billing determinant, from “OFSOG” to “MEBSOG”, to more accurately describe the data it represents; and adjusts the Default Uplift Settlement described in paragraph (2) of Section 9.19.1 to combine SOG generation with other generation for the Counter-Party.  [ERCOT] | N | ERCOT supports approval of NPRR1065 |
| **1066NPRR** | **Interconnection of Existing Generation Owned by a Municipally Owned Utility (MOU) or Electric Cooperative (EC) Transferring Load into the ERCOT System.** This Nodal Protocol Revision Request (NPRR) grants ERCOT the discretion to apply existing standards that are applicable to older Generation Resources registered with ERCOT (a “grandfathered” standard) to an existing generation unit owned by a Municipally Owned Utility (MOU) or Electric Cooperative (EC) that is transferring Load into ERCOT and seeks to interconnect the existing generation unit to the ERCOT Transmission Grid in conjunction with the Load transfer. ERCOT will only apply a grandfathered standard if the MOU or EC provides a written explanation as to why it cannot comply with the standard imposed on new Generation Resources, and demonstrates to ERCOT’s satisfaction that allowing the generation unit to comply with the grandfathered standard is reasonable and will not create a risk to reliability of the ERCOT System. This NPRR also clarifies that, should an MOU or EC interconnect an older generation unit to the ERCOT Transmission System as part of a Load integration, the unit will not qualify the MOU or EC to receive Pre-Assigned Congestion Revenue Rights (PCRRs).  [ERCOT] | N | ERCOT supports approval of NPRR1066 |
| **164RMGRR** | **Related to NPRR1062, Modify IDR Meter Requirement and Eliminate IDR Meter Requirement Report.** This Retail Market Guide Revision Request (RMGRR) eliminates the entirety of Section 7.13 and all associated language from Section 9, Appendix H1 and Appendix H2.  [ERCOT] | N | ERCOT supports approval of RMGRR164 |