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| NPRR Number | [1080](http://www.ercot.com/mktrules/issues/NPRR1080) | NPRR Title | Limiting Ancillary Service Price to System-Wide Offer Cap |
| Date of Decision | | June 23, 2021 | |
| Action | | Recommended Approval | |
| Timeline | | Urgent – Urgent status is necessary to limit Ancillary Service prices to the effective System-Wide Offer Cap (SWCAP) as quickly as possible. | |
| Proposed Effective Date | | July 1, 2021 | |
| Priority and Rank Assigned | | Not applicable | |
| Nodal Protocol Sections Requiring Revision | | 4.5.1, DAM Clearing Process,  6.4.9.2.2, SASM Clearing Process | |
| Related Documents Requiring Revision/Related Revision Requests | | Other Binding Document Revision Request (OBDRR) 030, Related to NPRR1080, Limiting Ancillary Service Price to System-Wide Offer Cap | |
| Revision Description | | This Nodal Protocol Revision Request (NPRR) limits the Ancillary Service Market Clearing Prices for Capacity (MCPCs) to the effective SWCAP. This limitation will be achieved by reducing the Ancillary Service penalty factors used in Day-Ahead Market (DAM) and Supplemental Ancillary Services Market (SASM) to values equal to or immediately below the SWCAP. | |
| Reason for Revision | | Addresses current operational issues.  Meets Strategic goals (tied to the [ERCOT Strategic Plan](http://www.ercot.com/content/wcm/lists/144926/ERCOT_Strategic_Plan_2019-2023.pdf) or directed by the ERCOT Board).  Market efficiencies or enhancements  Administrative  Regulatory requirements  Other: (explain)  *(please select all that apply)* | |
| Business Case | | During the February 2021 extreme winter weather event, Ancillary Service MCPCs reached record highs well above the $9,000/MW per hour SWCAP in effect at the time. This occurred for two reasons. First, the DAM clearing algorithm considers Resources’ opportunity cost of providing other services that they would otherwise be able to provide, and the opportunity costs were higher than had previously been encountered. Second, the Ancillary Service penalty factors for not awarding Ancillary Service are significantly higher than the SWCAP, so the DAM algorithm was willing to clear the Ancillary Service Offers despite the resulting MCPCs being above the SWCAP.  In this NPRR and the accompanying OBDRR030, ERCOT and the Independent Market Monitor (IMM) propose to limit Ancillary Service MCPCs to the SWCAP. This limitation is achieved by reducing the Ancillary Service penalty factors to values equal to or immediately below the SWCAP, which will prevent Ancillary Service Shadow Prices, and in turn, MCPCs, from exceeding the SWCAP.  The changes proposed in this NPRR are consistent with economic market design principles. Since Ancillary Service is procured to reduce the probability of losing Load, such principles dictate that the value of reserves should not exceed the Value of Lost Load (VOLL), which is equal to the SWCAP. However, reducing Ancillary Service penalty factors to the SWCAP increases the likelihood of Ancillary Service insufficiency during tight conditions because the DAM algorithm will have the option of forgoing an Ancillary Service Offer at a lower cost. | |
| Credit Work Group Review | | See 6/16/21 Credit WG comments | |
| PRS Decision | | On 6/10/21, PRS voted via roll call to grant NPRR1080 Urgent status. There was one opposing vote from the Independent Generator (Exelon) Market Segment. PRS then voted via roll call to recommend approval of NPRR1080 as revised by PRS; and to forward to TAC NPRR1080 and the Impact Analysis with a recommended effective date of upon ERCOT Board approval. There were four abstentions from the Consumer (Occidental Chemical), Cooperative (STEC), Independent Generator (Luminant), and Independent Power Marketer (IPM) (Tenaska) Market Segments. All Market Segments participated in both votes. | |
| Summary of PRS Discussion | | On 6/10/21, the sponsors provided an overview of NPRR1080, the Impact Analysis, and the request for Urgent status. Participants discussed the mechanics of NPRR1080’s changes, its implementation timeline, and proposed desktop edits to NPRR1080’s title. Some participants questioned the capping of Ancillary Service prices as an out-of-market action which may disincentivize Resources to provide Ancillary Services. The sponsors reiterated that this change is already contemplated in the ERCOT Board-approved Real-Time Co-Optimization (RTC) NPRRs, and NPRR1080 merely accelerates implementation of this component. | |
| TAC Decision | | On 6/23/21, TAC voted via roll call to recommend approval of NPRR1080 as recommended by PRS in the 6/10/21 PRS Report with a recommended effective date of July 1, 2021. There were three abstentions from the Cooperative (STEC) and Independent Generator (2) (Luminant and Calpine) Market Segments. All Market Segments participated in the vote. | |
| Summary of TAC Discussion | | On 6/23/21, participants reviewed comments filed for NPRR1080. Some participants questioned the capping of Ancillary Service prices as an out-of-market action which may disincentivize Resources to provide Ancillary Services, and expressed concern that the changes within NPRR1080 may be misaligned with Public Utility Commission of Texas (PUCT) rules regarding Ancillary Services. | |
| ERCOT Opinion | | ERCOT supports approval of NPRR1080. | |

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| Sponsor | |
| Name | Kenan Ögelman / Carrie Bivens |
| E-mail Address | [Kenan.Ogelman@ercot.com](mailto:Kenan.Ogelman@ercot.com) / [cbivens@potomaceconomics.com](mailto:cbivens@potomaceconomics.com) |
| Company | ERCOT / Potomac Economics - ERCOT IMM |
| Phone Number | 512-248-6707 / 512-879-7971 |
| Cell Number |  |
| Market Segment | Not applicable |

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| **Market Rules Staff Contact** | |
| **Name** | Cory Phillips |
| **E-Mail Address** | [Cory.phillips@ercot.com](mailto:Cory.phillips@ercot.com) |
| **Phone Number** | 512-248-6464 |

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| **Comments Received** | |
| Comment Author | **Comment Summary** |
| Payless Power 060921 | Highlighted recent changes to the Public Utility Regulatory Act (PURA) and pending PUCT rulemakings which would override the changes proposed by NPRR1080 |
| Credit WG 061621 | Endorsed NPRR1080 noting positive credit impacts as it better aligns pricing outcomes with market expectations, and the current credit calculations take into account the changes of this NPRR |
| Hunt Energy Network 062221 | Expressed support for NPRR1080 as a short-term solution, but urged TAC and its subcommittees to investigate several related items in pursuit of a long-term solution |
| PUCT Staff 062221 | Endorsed NPRR1080 as submitted |

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| **Market Rules Notes** |

Please note that the following NPRR(s) also propose revisions to the following section(s):

* NPRR981, Day-Ahead Market Price Correction Process
  + Section 4.5.1

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| Proposed Protocol Language Revision |

***4.5.1*** ***DAM Clearing Process***

(1) At 1000 in the Day-Ahead, ERCOT shall start the Day-Ahead Market (DAM) clearing process. If the processing of DAM bids and offers after 0900 is significantly delayed or impacted by a failure of ERCOT software or systems that directly impacts the DAM, ERCOT shall post a Notice as soon as practicable on the ERCOT website, in accordance with paragraph (1) of Section 4.1.2, Day-Ahead Process and Timing Deviations, extending the start time of the execution of the DAM clearing process by an amount of time at least as long as the duration of the processing delay plus ten minutes. In no event shall the extension exceed more than one hour from when the processing delay is resolved.

(2) ERCOT shall complete a Day-Ahead Simultaneous Feasibility Test (SFT). This test uses the Day-Ahead Updated Network Model topology and evaluates all Congestion Revenue Rights (CRRs) for feasibility to determine hourly oversold quantities.

(3) The purpose of the DAM is to economically and simultaneously clear offers and bids described in Section 4.4, Inputs into DAM and Other Trades.

(4) The DAM uses a multi-hour mixed integer programming algorithm to maximize bid-based revenues minus the offer-based costs over the Operating Day, subject to security and other constraints, and ERCOT Ancillary Service procurement requirements.

(a) The bid-based revenues include revenues from DAM Energy Bids and Point-to-Point (PTP) Obligation bids.

(b) The offer-based costs include costs from the Startup Offer, Minimum Energy Offer, and Energy Offer Curve of any Resource that submitted a Three-Part Supply Offer, DAM Energy-Only Offers and Ancillary Service Offers.

(c) Security constraints specified to prevent DAM solutions that would overload the elements of the ERCOT Transmission Grid include the following:

(i) Transmission constraints – transfer limits on energy flows through the ERCOT Transmission Grid, e.g., thermal or stability limits. These limits must be satisfied by the intact network and for certain specified contingencies. These constraints may represent:

(A) Thermal constraints – protect Transmission Facilities against thermal overload.

(B) Generic constraints – protect the ERCOT Transmission Grid against transient instability, dynamic stability or voltage collapse.

(C) Power flow constraints – the energy balance at required Electrical Buses in the ERCOT Transmission Grid must be maintained.

(ii) Resource constraints – the physical and security limits on Resources that submit Three-Part Supply Offers:

(A) Resource output constraints – the Low Sustained Limit (LSL) and High Sustained Limit (HSL) of each Resource; and

(B) Resource operational constraints – includes minimum run time, minimum down time, and configuration constraints.

(iii) Other constraints –

(A) Linked offers – the DAM may not select any one part of that Resource capacity to provide more than one Ancillary Service or to provide both energy and an Ancillary Service in the same Operating Hour. The DAM may, however, select part of that Resource capacity to provide one Ancillary Service and another part of that capacity to provide a different Ancillary Service or energy in the same Operating Hour, provided that linked Energy and Off-Line Non-Spinning Reserve (Non-Spin) Ancillary Service Offers are not awarded in the same Operating Hour.

(B) The sum of the awarded Ancillary Service capacities for each Resource must be within the Resource limits specified in the Current Operating Plan (COP) and Section 3.18, Resource Limits in Providing Ancillary Service, and the Resource Parameters as described in Section 3.7, Resource Parameters.

(C) Block Ancillary Service Offers for a Load Resource – blocks will not be cleared unless the entire quantity block can be awarded. Because block Ancillary Service Offers cannot set the Market Clearing Price for Capacity (MCPC), a block Ancillary Service Offer may clear below the Ancillary Service Offer price for that block.

(D) Block DAM Energy Bids, DAM Energy-Only Offers, and PTP Obligation bids – blocks will not be cleared unless the entire time and/or quantity block can be awarded. Because quantity block bids and offers cannot set the Settlement Point Price, a quantity block bid or offer may clear in a manner inconsistent with the bid or offer price for that block.

(E) Combined Cycle Generation Resources – The DAM may commit a Combined Cycle Generation Resource in a time period that includes the last hour of the Operating Day only if that Combined Cycle Generation Resource can transition to a shutdown condition in the DAM Operating Day.

(d) Ancillary Service needs for each Ancillary Service include the needs specified in the Ancillary Service Plan that are not part of the Self-Arranged Ancillary Service Quantity and that must be met from available DAM Ancillary Service Offers while co-optimizing with DAM Energy Offers. ERCOT may not buy more of one Ancillary Service in place of the quantity of a different service. See Section 4.5.2, Ancillary Service Insufficiency, for what happens if insufficient Ancillary Service Offers are received in the DAM.

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| ***[NPRR1008 and NPRR1014: Replace applicable portions of paragraph (4) above with the following upon system implementation of the Real-Time Co-Optimization (RTC) project for NPRR1008; or upon system implementation for NPRR1014:]***  (4) The DAM uses a multi-hour mixed integer programming algorithm to maximize bid-based revenues, including revenues based on Ancillary Service Demand Curves (ASDCs), minus the offer-based costs over the Operating Day, subject to security and other constraints.  (a) The bid-based revenues include revenues from ASDCs, DAM Energy Bids, bid portions of Energy Bid/Offer Curves, and Point-to-Point (PTP) Obligation bids.  (b) The offer-based costs include costs from the Startup Offer, Minimum Energy Offer, and Energy Offer Curve of any Resource that submitted a Three-Part Supply Offer, DAM Energy-Only Offers, offer portions of Energy Bid/Offer Curves, Ancillary Service Only Offers, and Ancillary Service Offers.  (c) Security constraints specified to prevent DAM solutions that would overload the elements of the ERCOT Transmission Grid include the following:  (i) Transmission constraints – transfer limits on energy flows through the ERCOT Transmission Grid, e.g., thermal or stability limits. These limits must be satisfied by the intact network and for certain specified contingencies. These constraints may represent:  (A) Thermal constraints – protect Transmission Facilities against thermal overload.  (B) Generic constraints – protect the ERCOT Transmission Grid against transient instability, dynamic stability or voltage collapse.  (C) Power flow constraints – the energy balance at required Electrical Buses in the ERCOT Transmission Grid must be maintained.  (ii) Resource constraints – the physical and security limits on Resources that submit Three-Part Supply Offers or Energy Bid/Offer Curves:  (A) Resource output constraints – the Low Sustained Limit (LSL) and High Sustained Limit (HSL) of each Resource; and  (B) Resource operational constraints – includes minimum run time, minimum down time, and configuration constraints.  (iii) Other constraints –  (A) Linked offers – the DAM may not select any one part of that Resource capacity to provide more than one Ancillary Service or to provide both energy and an Ancillary Service in the same Operating Hour. The DAM may, however, select part of that Resource capacity to provide one Ancillary Service and another part of that capacity to provide a different Ancillary Service or energy in the same Operating Hour, provided that linked Energy and Off-Line Non-Spinning Reserve (Non-Spin) Resource-Specific Ancillary Service Offers are not awarded in the same Operating Hour.  (B) The sum of the awarded Resource-Specific Ancillary Service Offer capacities for each Resource must be within the Resource limits specified in the Current Operating Plan (COP) and Section 3.18, Resource Limits in Providing Ancillary Service, and the Resource Parameters as described in Section 3.7, Resource Parameters.  (C) Block Resource-Specific Ancillary Service Offers for a Load Resource – blocks will not be cleared unless the entire quantity block can be awarded. Because block Resource-Specific Ancillary Service Offers cannot set the Market Clearing Price for Capacity (MCPC), a block Ancillary Service Offer may clear below the Ancillary Service Offer price for that block.  (D) Block DAM Energy Bids, DAM Energy-Only Offers, and PTP Obligation bids – blocks will not be cleared unless the entire time and/or quantity block can be awarded. Because quantity block bids and offers cannot set the Settlement Point Price, a quantity block bid or offer may clear in a manner inconsistent with the bid or offer price for that block.  (E) Combined Cycle Generation Resources – The DAM may commit a Combined Cycle Generation Resource in a time period that includes the last hour of the Operating Day only if that Combined Cycle Generation Resource can transition to a shutdown condition in the DAM Operating Day.  (F) Energy Storage Resources (ESRs) – The energy cleared for an ESR may be negative, indicating purchase of energy, or positive, indicating sale of energy.  (d) Ancillary Service needs will be reflected in ASDCs for each Ancillary Service. Self-Arranged Ancillary Service Quantities will first be used to meet the ASDCs, and the remaining Ancillary Service needs are met from Ancillary Service Offers, as long as the costs do not exceed the ASDC value. ERCOT may not buy more of one Ancillary Service in place of the quantity of a different service. |

(5) ERCOT shall determine the appropriate Load distribution factors to allocate offers, bids, and source and sink of CRRs at a Load Zone across the energized power flow buses that are modeled with Load in that Load Zone. The non-Private Use Network Load distribution factors are based on historical State Estimator (SE) hourly distribution using a proxy day methodology representing anticipated weather conditions. The Private Use Network Load distribution factors are based on an estimated Load value considering historical net consumption at all Private Use Networks. If ERCOT decides, in its sole discretion, to change the Load distribution factors for reasons such as anticipated weather events or holidays, ERCOT shall select an SE hourly distribution from a proxy day reasonably reflecting the anticipated Load in the Operating Day. ERCOT may also modify the Load distribution factors to account for predicted differences in network topology between the proxy day and Operating Day. ERCOT shall develop a methodology, subject to Technical Advisory Committee (TAC) approval, to describe the modification of the proxy day bus-load distribution for this purpose.

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| ***[NPRR1004: Replace paragraph (5) above with the following upon system implementation:]***  (5) ERCOT shall determine the appropriate Load distribution factors to allocate offers, bids, and source and sink of PTP Obligations at a Load Zone across the energized power flow buses that are modeled with Load in that Load Zone. ERCOT shall derive DAM Load distribution factors with the set of Load distribution factors constructed in accordance with the ERCOT Load distribution factor methodology specified in paragraph (c) of Section 3.12, Load Forecasting. In the event the Load distribution factors are not available, the Load distribution factors for the most recent preceding Operating Day will be used. |

(6) ERCOT shall allocate offers, bids, and source and sink of CRRs at a Hub using the distribution factors specified in the definition of that Hub in Section 3.5.2, Hub Definitions.

(7) A Resource that has a Three-Part Supply Offer cleared in the DAM may be eligible for Make-Whole Payment of the Startup Offer and Minimum Energy Offer submitted by the Qualified Scheduling Entity (QSE) representing the Resource under Section 4.6, DAM Settlement.

(8) The DAM Settlement is based on hourly MW awards and on Day-Ahead hourly Settlement Point Prices. All PTP Options settled in the DAM are settled based on the Day-Ahead Settlement Point Prices (DASPPs). ERCOT shall assign a Locational Marginal Price (LMP) to de-energized Electrical Buses for use in the calculation of the DASPPs by using heuristic rules applied in the following order:

(a) Use an appropriate LMP predetermined by ERCOT as applicable to a specific Electrical Bus; or if not so specified

(b) Use the following rules in order:

(i) Use average LMP for Electrical Buses within the same station having the same voltage level as the de-energized Electrical Bus, if any exist.

(ii) Use average LMP for all Electrical Buses within the same station, if any exist.

(iii) Use System Lambda.

(9) The Day-Ahead MCPC for each hour for each Ancillary Service is the Shadow Price for that Ancillary Service for the hour as determined by the DAM algorithm.

(10) Day-Ahead MCPCs shall not exceed the SWCAP. Ancillary Service Offers higher than corresponding Ancillary Service penalty factors, as defined in Appendix 2 of the Other Binding Document titled “Methodology for Setting Maximum Shadow Prices for Network and Power Balance Constraints,” will not be awarded.

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| ***[NPRR1080: Delete paragraph (10) above upon system implementation of the Real-Time Co-Optimization (RTC) project for NPRR1008; or upon system implementation for NPRR1014; and renumber accordingly.]*** |

(11) If the Day-Ahead MCPC cannot be calculated by ERCOT, the Day-Ahead MCPC for the particular Ancillary Service is equal to the Day-Ahead MCPC for that Ancillary Service in the same Settlement Interval of the preceding Operating Day.

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| ***[NPRR1008 and NPR1014: Delete paragraph (11) above upon system implementation of the Real-Time Co-Optimization (RTC) project for NPRR1008; or upon system implementation for NPRR1014; and renumber accordingly.]*** |

(12) If the DASPPs cannot be calculated by ERCOT, all CRRs shall be settled based on Real-Time prices. Settlements for all CRRs shall be reflected on the Real-Time Settlement Statement.

(13) Constraints can exist between the generator’s Resource Connectivity Node and the Resource Node, in which case the awarded quantity of energy may be inconsistent with the clearing price when the constraint between the Resource Connectivity Node and the Resource Node is binding.

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| ***[NPRR1014: Replace paragraph (13) above with the following upon system implementation:]***  (13) Constraints can exist between a Resource’s Resource Connectivity Node and its Resource Node, in which case the awarded quantity of energy may be inconsistent with the clearing price when the constraint between the Resource Connectivity Node and the Resource Node is binding. |

(14) PTP Obligation bids shall not be awarded where the DAM clearing price for the PTP Obligation is greater than the PTP Obligation bid price plus $0.01/MW per hour.

***6.4.9.2.2 SASM Clearing Process***

(1) SASM procurement requirements are:

(a) ERCOT shall procure the additional quantity required of each Ancillary Service, less the quantity self-arranged, if applicable. ERCOT may not buy more of one Ancillary Service in place of the quantity of a different service.

(b) ERCOT shall select Ancillary Service Offers submitted by QSEs, such that:

(i) For each Ancillary Service being procured, other than Reg-Down, ERCOT shall select offers that minimize the overall offer-based cost of these Ancillary Services. For each of these Ancillary Services, if selection of the Resource offer exceeds ERCOT’s required Ancillary Service quantity, then ERCOT shall select a portion of the Resource offer to meet the Ancillary Service quantity required. For Load Resources offering a block of capacity, ERCOT shall ignore the offer unless the entire block can be accepted.

(ii) For Reg-Down, ERCOT shall procure required quantities by selecting capacity in ascending order starting from the lowest-priced offer. ERCOT shall continue this selection process until the required quantity of Reg-Down is obtained. If selection of the Resource offer exceeds ERCOT’s required Ancillary Service quantity, then ERCOT shall select a portion of the Resource offer to meet the Ancillary Service quantity required. For Load Resources offering a block of capacity, ERCOT shall ignore the offer unless the entire block can be accepted.

(iii) For each Ancillary Service Offer from an Off-Line Resource considered in a SASM, the offer will be awarded only if it can meet the start-up time of the Resource based on the current and the historical operational state of the Resource. If the start-up time cannot be met for the first hour of a block offer, then the whole block offer shall not be considered.

(c) If a QSE has submitted offers of the same Resource capacity for more than one Ancillary Service (sometimes called linked offers), ERCOT may not select any one part of that Resource capacity to provide more than one Ancillary Service in the same Operating Hour. ERCOT may, however, select part of that Resource capacity to provide one Ancillary Service and another part of that capacity to provide a different Ancillary Service in the same Operating Hour.

(d) The SASM MCPC for each hour for each service is the Shadow Price for the corresponding Ancillary Service constraint for the hour as determined by the SASM algorithm.

(e) SASM MCPCs for any Ancillary Service shall not exceed the SWCAP. Ancillary Service Offers higher than corresponding Ancillary Service penalty factors, as defined in Appendix 2 of the Other Binding Document titled “Methodology for Setting Maximum Shadow Prices for Network and Power Balance Constraints,” will not be awarded.

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| [NPRR1010: Delete Section 6.4.9.2.2 above upon system implementation of the Real-Time Co-Optimization (RTC) project.] |