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| NPRR Number | [1081](http://www.ercot.com/mktrules/issues/NPRR1081) | NPRR Title | Revisions to Real-Time Reliability Deployment Price Adder to Consider Firm Load Shed |
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| Date | June 23, 2021 |
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| Submitter’s Information |
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| Market Segment | Independent Generator |

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| Comments |

RWE and Invenergy appreciate ERCOT’s and the Independent Market Monitor’s (IMM’s) efforts to try to address certain issues related to scarcity pricing. Nodal Protocol Revision Request (NPRR) 1081 would require ERCOT to administratively set the Real-Time Market (RTM) price at the System-Wide Offer Cap (SWCAP) when ERCOT is directing firm Load shed during Energy Emergency Alert (EEA) Level 3.

ERCOT and the IMM state that they are proposing NPRR1081 consistent with the Public Utility Commission of Texas’s (PUCT’s) *Second Order Directing ERCOT to Take Action and Granting ‎Exception to Commission Rules*, Project 51617 (Feb. 16, 2021). However, that order and the issue of whether the PUCT (or ERCOT) has legal authority to administratively set prices is currently being challenged at the Third Court of Appeals and Travis County District ‎Court‎. Accordingly, until the determination is made by the courts as to whether the PUCT or ERCOT has legal authority to set a regulatory fixed price during certain circumstances (i.e. firm Load shed), it would be improper to make such changes in the Protocols.

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| Revised Cover Page Language |

None

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| Revised Proposed Protocol Language |

None