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| NPRR Number | [1085](http://www.ercot.com/mktrules/issues/NPRR1085) | NPRR Title | Ensuring Continuous Validity of Physical Responsive Capability (PRC) and Dispatch through Timely Changes to Resource Telemetry and Current Operating Plans (COPs) |
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| Date | July 14, 2021 |
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| Submitter’s Information |
| Name | Michele Richmond |
| E-mail Address | michele@competitivepower.org |
| Company | TCPA |
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| Market Segment | Not Applicable |

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| Comments |

TCPA appreciates the opportunity to provide comment on Nodal Protocol Revision Request (NPRR) 1085.  While these are initial comments, our member companies are continuing to get feedback from their Real-Time desks, operations managers, and control rooms regarding the impact this NPRR would have on their ability to optimally operate their facilities. We respectfully request this NPRR be tabled at the July 15, 2021 Protocol Revision Subcommittee (PRS) meeting and referred to the Reliability Operations Subcommittee (ROS) to allow for additional vetting of the real-world impacts to Resource operations. We are concerned that the timelines in this NPRR are not possible to meet without diverting focus from operating the Resource and addressing the Outage or derate in a manner that is inconsistent with enhancing reliability. Therefore, we would appreciate a thoughtful and fact-driven process to ensure Resources are not forced to choose between responsible operating practices and violating a Protocol – those should not be mutually exclusive, and it is critically important that this NPRR be properly vetted.

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| Revised Cover Page Language |

None

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| Revised Proposed Protocol Language |

None