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| NOGRR Number | [237](http://www.ercot.com/mktrules/issues/NOGRR237) | NOGRR Title | Related to NPRR1106, Deployment of Emergency Response Service (ERS) Prior to Declaration of Energy Emergency Alert (EEA) |
| Date Posted | November 4, 2021 |
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| Requested Resolution  | Urgent. Urgent status is requested so that the revisions to the ERS deployment process can be in place in time for the winter season.  |
| Nodal Operating Guide Sections Requiring Revision  | Section 4.5.3.1, General Procedures Prior to EEA Operations |
| Related Documents Requiring Revision/Related Revision Requests | Nodal Protocol Revision Request (NPRR) 1106, Deployment of Emergency Response Service (ERS) Prior to Declaration of Energy Emergency Alert (EEA)Nodal Operating Guide Section 4.5.3.3, EEA LevelsERCOT Operating Procedures – Real-Time DeskERCOT Operating Procedures – Resource DeskERCOT Operating Procedures – Scripts Emergency Response Service Procurement MethodologyEmergency Response Service Technical Requirements and Scope of Work |
| Revision Description | This Nodal Operating Guide Revision Request (NOGRR) aligns the Nodal Operating Guide with Protocol changes proposed by NPRR1106, allowing ERCOT to deploy Emergency Response Service (ERS) prior to an Energy Emergency Alert (EEA). |
| 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 | In Public Utility Commission (Commission) Docket No. 52373, *Review of Wholesale Market Design*, Commission Staff filed a Motion for Good Cause Exception that requested the Commission grant ERCOT a good cause exception pursuant to PUC Subst R. 20.3(b), “so that ERCOT may procure ERS that may be used prior to the declaration of an EEA, rather than being limited to use of the ERS during an EEA, as allowed by 16 TAC § 25.507(a).” The Commission voted to grant this exception at its Open Meeting held on October 28, 2021. To effectuate the Commission’s direction, ERCOT has proposed NPRR, Deployment of Emergency Response Service (ERS) Prior to Declaration of Energy Emergency Alert (EEA). This NOGRR aligns the Nodal Operating Guide with Protocol changes proposed by NPRR1106. |

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| Market Segment | Not Applicable |

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| **Market Rules Notes** |

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

* NOGRR236, Related to NPRR1105, Option to Deploy Distribution Voltage Reduction Measures Prior to Energy Emergency Alert (EEA)
	+ Section 4.5.3.1

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| Proposed Guide Language Revision |

4.5.3.1 General Procedures Prior to EEA Operations

(1) Prior to declaring EEA Level 1 detailed in Section 4.5.3.3, EEA Levels, ERCOT may perform the following operations consistent with Good Utility Practice:

(a) Provide Dispatch Instructions to QSEs for specific Resources to operate at an Emergency Base Point to maximize Resource deployment so as to increase Responsive Reserve (RRS) levels on other Resources;

(b) Commit specific available Resources as necessary that can respond in the timeframe of the emergency. Such commitments will be settled using the Hourly Reliability Unit Commitment (HRUC) process;

(c) Start Reliability Must-Run (RMR) Units available in the time frame of the emergency. RMR Units should be loaded to full capability;

(d) Utilize available Resources providing Non-Spinning Reserve (Non-Spin) services as required; and

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| ***[NPRR863: Replace item (d) above with the following upon system implementation:]***(d) Utilize available Resources providing RRS, ERCOT Contingency Reserve Service (ECRS), and Non-Spin services as required; and |

(e) ERCOT shall use the PRC and system frequency to determine the appropriate Emergency Notice and EEA levels.

(2) When PRC falls below 3,000 MW and is not projected to be recovered above 3,000 MW within 30 minutes following the deployment of Non-Spin, ERCOT may deploy available contracted ERS-10 and ERS-30 via an XML message followed by a VDI to the QSE Hotline. The ERS-10 and ERS-30 ramp periods shall begin at the completion of the VDI.

(a) ERS-10 and ERS-30 may be deployed at any time in a Settlement Interval. ERS-10 and ERS-30 may be deployed either simultaneously or separately, and in any order, at the discretion of ERCOT operators.

(b) Upon deployment, QSEs shall instruct their ERS Resources in ERS-10 and ERS-30 to perform at contracted levels consistent with the criteria described in Section 8.1.3.1.4, Event Performance Criteria for Emergency Response Service Resources, until either ERCOT releases the ERS-10 and ERS-30 deployment or the ERS-10 and ERS-30 Resources have reached their maximum deployment time.

(c) ERCOT shall notify QSEs of the release of ERS-10 and ERS-30 via an XML message followed by VDI to the QSE Hotline. The VDI shall represent the official notice of ERS-10 and ERS-30 release.

(d) Upon release, an ERS Resource shall return to a condition such that it is capable of meeting its ERS performance requirements as soon as practical, but no later than ten hours following the release.