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| NPRR Number | [1096](http://www.ercot.com/mktrules/issues/NPRR1096) | NPRR Title | Require Sustained Six Hour Capability for ECRS and Non-Spin |
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| Date | November 11, 2021 |
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| Submitter’s Information |
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| Market Segment | Consumer, Small Commercial  |

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| Comments |

Sierra Club is in general agreement with Hunt Energy Network (HEN) that a Resource should only be required to provide an Ancillary Service for the time period it has the responsibility and is being compensated for providing that service. As HEN point out in their 11/10/21 comments, a Resource that does not have Non-Spinning Reserve (Non-Spin) responsibility for more than a single hour consecutively should not be expected to provide four hours of Non-Spin. However, it is reasonable for a Resource that has Non-Spin responsibility for four or more hours consecutively to be expected to provide at least four consecutive hours of Non-Spin. Similarly, a Resource that does not have ERCOT Contingency Reserve Service (ECRS) responsibility for more than a single hour consecutively should not be expected to provide two hours of ECRS. However, it is reasonable for a Resource that has ECRS responsibility for two or more hours consecutively to be expected to provide at least two consecutive hours of Non-Spin. With these changes, an Energy Storage Resource (ESR) with one-hour storage capability may provide its full capacity as Non-Spin or ECRS for every alternate hour throughout the day since the ESR is capable of meeting such Ancillary Service responsibility.

However, we also wanted to suggest as a potential compromise between the 11/3/21 ERCOT comments and the 11/10/21 HEN comments that ERCOT could consider creating multiple ECRS duration obligation products and multiple Non-Spin duration obligation products that could range from 15 minutes to four hours depending on system needs. As an example, rather than requiring a two-hour duration ECRS product, ERCOT could have a one-hour and two-hour ECRS obligation product and depending on conditions, require either one-hour or two-hour ECRS in the amounts needed to ensure reliability for that day. Similarly, for Non-Spin, ERCOT could create different requirements, such as a 15-minute, one-hour, two-hour and four-hour duration obligation and then ask for bids depending on system needs.

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| Revised Cover Page Language |

None

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| Revised Proposed Protocol Language |

None