



Item 8.1.3: TAC Advocate Presentation of TAC  
Action

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TAC Vice Chair

Board of Directors Meeting

ERCOT Public

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# NOGRR 149 Overview

- Today, **every** Distribution Service Provider (DSP) in the ERCOT Region is required to either register as a Transmission Operator (TO) or designate a TO to act as its representative with the authority to act on its behalf **regardless of its annual peak load**.
- NOGRR149 would revise the definition of a TO to establish a “Bright Line” threshold, or annual peak MW, below which a DSP owning no transmission or generation facilities, and who is not provided or offered TO services from their incumbent TSP or wholesale power supplier, would be exempt from having to procure designated TO services from a third-party provider.
- The “Bright Line” proposal by the Small Public Power Group of Texas (SPPG), representing seven individual Municipally Owned Utilities (MOUs), is 25 MW.

# NOGRR 149 Overview

- Implementing NOGRR149 would settle an ongoing PUCT non-compliant status of seven MOUs that range in size from 9 MW to 21 MW. The non-compliance arose from their inability to procure the services of a designated TO at a reasonable price after being turned down by their existing TSP.
- SPPG has been given exemption from PUCT non-compliance while discussions continue at the ERCOT Stakeholder meetings during the last two years.

# Stakeholder Review

- NOGRR149 has been reviewed 12 times at various levels of the ERCOT stakeholder process.
- The Operations Working Group tabled the issue for one month and rejected NOGRR149 on January 26, 2016.
- The Reliability and Operations Subcommittee rejected the first appeal and rejected NOGRR149 on March 3, 2016.
- The Technical Advisory Committee tabled the proposal eight times from March 31, 2016 – August 24, 2017; rejected NOGRR149 on February 22, 2018.

# Conclusion

- SPPG members are still pursuing potential market solutions with no definitive end date.
- ERCOT stakeholder process has not been a successful forum for SPPG to find permanent market solutions.
- TAC recommends rejecting SPPG's appeal.