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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 of Decision | November 29, 2021 |
| Action | Recommended Approval |
| Timeline  | Urgent – to implement revisions to the Emergency Response Service (ERS) deployment process in time for the winter season. |
| Proposed Effective Date | Upon implementation of Nodal Protocol Revision Request (NPRR) 1106, Deployment of Emergency Response Service (ERS) Prior to Declaration of Energy Emergency Alert (EEA) |
| Priority and Rank Assigned | Not Applicable |
| Nodal Operating Guide Sections Requiring Revision  | 4.5.3.1, General Procedures Prior to EEA Operations |
| Related Documents Requiring Revision/Related Revision Requests | NPRR1106Nodal Operating Guide Section 4.5.3.3, EEA LevelsOther Binding Document Revision Request (OBDRR) 036, Related to NPRR1106, Deployment of Emergency Response Service (ERS) Prior to Declaration of EEAERCOT Operating Procedures – Real-Time DeskERCOT Operating Procedures – Resource DeskERCOT Operating Procedures – Scripts Emergency Response Service Procurement MethodologyEmergency Response Service Technical Requirements & 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 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 of Texas (PUCT) Docket No. 52373, Review of Wholesale Electric Market Design, PUCT Staff filed a Motion for Good Cause Exception that requested the PUCT grant ERCOT a good cause exception pursuant to P.U.C. Subst. R. 25.507, Electric Reliability Council of Texas (ERCOT) Emergency Response Service (ERS), “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 PUCT voted to grant this exception at its October 28, 2021 Open Meeting. To effectuate the PUCT’s direction, ERCOT has proposed NPRR1106. This NOGRR aligns the Nodal Operating Guide with Protocol changes proposed by NPRR1106. |
| ROS Decision | On 11/17/21, ROS voted via email to grant NOGRR237 Urgent status; to recommend approval of NOGRR237 as submitted; and to forward to TAC NOGRR237 and the Impact Analysis. There were two abstentions from the Consumer (OPUC) and Independent Retail Electric Provider (IREP) (Demand Control 2) Market Segments. All Market Segments participated in the vote. |
| Summary of ROS Discussion | On 11/17/21, there was no discussion. |
| TAC Decision | On 11/29/21, TAC voted via roll call to recommend approval of NOGRR237 as recommended by ROS in the 11/17/21 ROS Report. There was one opposing vote from the Independent Power Marketer (IPM) (Morgan Stanley) Market Segment, and one abstention from the Municipal (Garland) Market Segment. All Market Segments participated in the vote. |
| Summary of TAC Discussion | On 11/29/21, TAC reviewed the ERCOT Opinion and ERCOT Market Impact Statement for NOGRR237. |
| ERCOT Opinion | ERCOT supports approval of NOGRR237. |
| ERCOT Market Impact Statement | ERCOT Staff has reviewed NOGRR237 and believes the market impact for NOGRR237 enhances ERCOT’s operational tools to address potential reliability outcomes by granting ERCOT operators the discretion to deploy ERS when Physical Responsive Capability (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-Spinning Reserve (Non-Spin). |

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| Market Segment | Not Applicable |

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| **Comments Received** |
| **Comment Author** | **Comment Summary** |
| None |  |

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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.