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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 | January 12, 2022 |
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| Submitter’s Information |
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| Market Segment | Not applicable |

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| Comments |

TAEBA supports changes to the Nodal Protocol Revision Request (NPPR) 1096 that will allow shorter-duration Resources to provide Non-Spinning Reserve (Non-Spin) and ERCOT Contingency Reserve Service (ECRS). However, more can be done to ensure that duration requirements align with system needs and competitive market principles.

TAEBA shares concerns with Enel and other stakeholders regarding the currently proposed four-hour duration requirement for Non-Spin and two-hour duration requirement for ECRS. Duration requirements should not be imposed ad hoc; instead, ERCOT should share data to justify any proposed duration requirement to participate in Non-Spin and ECRS.

Secondly, deployments should not extend outside offer windows. For example, Resources should not be expected to provide four hours of Non-Spin capability when its responsibility for that same service is only one hour.

We also agree that the creation of multiple products with tiered duration obligations is a viable solution to meet system needs.

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| Revised Cover Page Language |

None

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| Revised Proposed Protocol Language |

None