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| NOGRR Number | [239](http://www.ercot.com/mktrules/issues/NOGRR239) | NOGRR Title | WAN Data Protection Responsibilities |
| Impact Analysis Date | January 19, 2022 |
| Estimated Cost/Budgetary Impact | None.See Comments |
| Estimated Time Requirements | No project required. This Nodal Operating Guide Revision Request (NOGRR) can take effect following Public Utility Commission of Texas (PUCT) approval.See Comments. |
| ERCOT Staffing Impacts (across all areas) | Ongoing Requirements: No impacts to ERCOT staffing. |
| ERCOT Computer System Impacts | No impacts to ERCOT computer systems.  |
| ERCOT Business Function Impacts | ERCOT will update its business processes to implement this NOGRR. |
| Grid Operations & Practices Impacts | No impacts to ERCOT grid operations and practices. |

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| Evaluation of Interim Solutions or Alternatives for a More Efficient Implementation |
| None offered. |

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| Comments |
| This NOGRR will be effective upon the effective date of CIP-012-1, – Cyber Security – Communications between Control Centers (July 1, 2022). Market Notices have been sent to Market Participants connected to the ERCOT WAN over the past several months to share details of the upcoming implementation of WAN data protection responsibilities. WAN setup costs related to this NOGRR will be passed on to WAN participants. These costs are expected to be <$1k per WAN router. |