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| NPRR Number | [1128](https://www.ercot.com/mktrules/issues/NPRR1128) | NPRR Title | Allow FFR Procurement up to FFR Limit Without Proration |
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| Date | | May 27, 2022 | |
|  | |  | |
| Submitter’s Information | | | |
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| Market Segment | | Not applicable | |

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| Comments |

ERCOT appreciates all the discussion that has been had so far on Nodal Protocol Revision Request (NPRR) 1128. As has been shown[[1]](#footnote-1) in ERCOT’s presentations on Fast Frequency Response (FFR), there are reliability benefits to having FFR available in Real-Time, specifically during certain times of the year and Operating Hours when it has become more common to see lower levels of inertia on the ERCOT System. NPRR1128, as currently written, favors Resources providing FFR over other Resources offering to provide other sub-types of Responsive Reserve (RRS) during all Operating Hours, even though the specific reliability benefits of FFR over other sub-types of RRS may not necessarily exist.

If stakeholders desire to move forward with NPRR1128, ERCOT recommends an approach where a preference for FFR be limited to the hours/months wherein FFR is most effective in meeting reliability needs. Further, ERCOT recognizes that, while the proposed offer floor-based mechanism in the current version of NPRR1128 is a simple way to implement a systematic preference for FFR over other sub-types when procuring RRS, this approach may not be the best approach to adopt, particularly if prioritization of FFR is limited to only certain Operating Hours. Hence, ERCOT also recommends that NPRR1128 continue to remain tabled so that further options on implementing a solution that targets FFR’s prioritization during Operating Hours when there are clear reliability benefits in doing so can be discussed with stakeholders at the upcoming Performance, Disturbance, Compliance Working Group (PDCWG) and Wholesale Market Working Group (WMWG) meetings.

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| Revised Cover Page Language |

None

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| Revised Proposed Protocol Language |

None

1. PDCWG | Aug 11, 2021 | [Presentation Link](https://www.ercot.com/files/docs/2021/08/12/Winter_Event_2021_PDCWG_08112021_v2.pptx)

   PDCWG | May 18, 2022 | [Presentation Link](https://www.ercot.com/files/docs/2022/05/18/NPRR_1128_PDCWG_Discussion_v1_PostMeeting.pptx)

   WMWG | May 20, 2022 | [Presentation Link](https://www.ercot.com/files/docs/2022/05/19/NPRR_1128_WMWG_Discussion_v1.pptx) [↑](#footnote-ref-1)