# Summary of Comments from Stakeholder’s on FFSS RFP

***Comments received either during the May 26 FFSS review session***

1. Allow for alternate Resources to replace a primary FFSSR.
2. Address emission credits issue where credits may not align with obligation periods (straddling two years or when we start procuring for multiple obligation periods in an RFP)
3. Add Back-up authorized representative to identification page on the FFSS Offer Submission form
4. Add the 6-hour start-up requirement will begin with the issuance of the watch.
5. Accept updates to offers up until the September 1 cutoff date.

## ***Follow-up comments from Lowe Colorado River Authority (LCRA)***

1. Startup requirement – LCRA recommends the following change:
   1. Any Generation Resource offered to provide FFSS ~~must have a startup time no greater  than 6 hours with the reserve fuel and~~ must be capable of providing the full amount of offered MW within 6 hours of receiving a Verbal Dispatch Instruction (VDI) from ERCOT.
   2. Additionally, recommend that ERCOT provide advance notice (ERCOT watch notification, OCN, etc.) to FFSSRs and will not issue a VDI sooner than 6 hours of the notice.
2. Recommends allowing for multiple bids for the same resource.
3. Requests the ability to designate alternative/backup resources to substitute in the event that the primary resource has an operational issue and ERCOT approves the diversion of gas to the alternative/backup resource.
4. Allow for QSE Authorized Backup Rep to apply in addition to the authorized Rep (See tab ‘Identification’)

## ***Follow-up Comments from Luminant***

Luminant strongly agrees with LCRA on their submission of points 1,3 and 4 and is neutral on 2. Luminant offers the following as a clarification on LCRA’s 1b. “ERCOT shall provide advance notice (ERCOT watch notification, OCN, etc.) to FFSSRs and will not issue a VDI sooner than 6 hours after the notice.”

Additional edits: FFSS Offer Submission Form

“Identification” Tab

1. ERCOT needs to define what they are looking for in a “Business Contact” and a “Technical Contact”

“Offer” Tab

1. ERCOT should add a question related to time to switch fuels:

“If applicable, Switch Time (hours): maximum lead time needed for switching reserve fuel source if the unit is online, including time to start up or shut down the Generation Resource, if needed, and transition to its reserve fuel source.”

1. Relabel Column P “Emission Hours available for FFSS”
2. Relabel Column Q “Emission Hours reserved for providing FFSS”

## ***Follow-up Comments from CPS***

We have identified a risk that seems to be outside of a QSE’s control related to emissions and availability.

In section 2.5.(D) of the RFP there is a requirement to identify emissions hours and if those emissions hours are exhausted then a claw back is applied.  We believe this policy is not appropriate when a generator experiences a high volume of RUC instructions that effectively use up the allotted emissions hours.  More specifically, if a site’s environmental limitations are met due to no fault of the QSE or generator owner (such as a frequent set of RUC instructions), then there is no reason to claw back the standby payment.  We also believe that ERCOT should consider a way to track and respect the environmental limitations of our generation fleet to ensure availability when the system needs it most.