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| NPRR Number | [1141](https://www.ercot.com/mktrules/issues/NPRR1141) | NPRR Title | Require Notary Public for NCI and Notice of Change of Banking Information Forms |
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| Date | August 9, 2022 |
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| Submitter’s Information |
| Name | Amy Loera / Brandon Gleason |
| E-mail Address | amy.loera@ercot.com / brandon.gleason@ercot.com  |
| Company | ERCOT |
| Phone Number | 512-275-7026 / 512-275-7442 |
| Cell Number | 512-825-1047 / 512-587-7327 |
| Market Segment | Not applicable |

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| Comments |

Nodal Protocol Revision Request (NPRR) 1141 seeks to require the signatory to use a notary public when completing a Notice of Change of Information (NCI) form or Notice of Change of Banking Information (“NCBI”) form to update, amend, and/or correct previously provided information. ERCOT expresses no opinion as to whether NCI and NCBI forms should be required to be notarized. ERCOT submits these comments to (1) outline existing NCI and NCBI processes and (2) address Luminant Generation Company LLC’s (Luminant) proposal that Market Participants shall have five Business Days to correct proposed changes.

As required by the Protocols, Market Participants submit NCIs to update registration information. NCIs are signed by the Authorized Representative (“AR”), Backup AR, or officer on file with ERCOT. When ERCOT receives an NCI, ERCOT acknowledges receipt and copies the AR at the email address on file to ensure the AR is aware of the changes when an NCI is processed. Requiring the NCI be notarized would not materially change ERCOT’s current process because the AR, Backup AR, or officer on file with ERCOT would still be required to sign the NCI, regardless of whether the submission is notarized.

ERCOT has processes in place that require Market Participants submit NCBIs via the Market Information System (MIS). To access the MIS, Market Participants must have a Digital Certificate. To further prevent potential fraud, ERCOT also verifies requested banking information changes over the phone with the AR who signs the NCBI before processing the NCBI. Requiring the NCBI be notarized would not materially change ERCOT’s current process of handling NCBIs because the AR on file with ERCOT would still be required to sign the NCBI, regardless of whether the submission is notarized.

ERCOT further notes that it has reviewed the comments regarding NPRR1141 submitted by Luminant. ERCOT believes the proposed requirement in Luminant’s comments that “[i]t shall be the responsibility of the Market Participant to notify ERCOT in writing, within five Business Days, if any or all of the proposed changes are incorrect[]” is unnecessary because a Market Participant may simply submit a new NCI in the event of an incorrect proposed change. In addition, the Protocols already require an ongoing obligation that Market Participants timely update information that was originally provided in the application process. ERCOT is concerned that permitting Market Participants five days to review proposed changes could delay ERCOT’s implementation of proposed changes and/or require ERCOT to take action to reverse changes after the implementation process has already been initiated, for which no established process presently exists. Therefore, ERCOT believes the proposed five Business Day language is not necessary.

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| Revised Cover Page Language |

None

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| Revised Proposed Protocol Language |

None