



Item 9.6: Revision Request Status Update

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Reliability and Markets Committee Meeting

ERCOT Public

October 17, 2022

Revision Request Summaries and Statistics

Revision Request Summaries

- Revision Requests for Board Consideration
- Revision Requests in Process
- 2022 Approved Revision Requests – Budgetary Impact

Appendix

- Aging Revision Requests in Process (Tabled for over 4 months)
- 2022 Approved Revision Request Budgetary Impact and Staffing Impact Detail
- Statistics (Historical to Date)
 - New Revision Requests
 - Approved Revision Requests
 - Revision Request Sponsorship
- Acronyms

9 Revision Requests for October Board Consideration

Unopposed Revision Requests Recommended by TAC for Approval

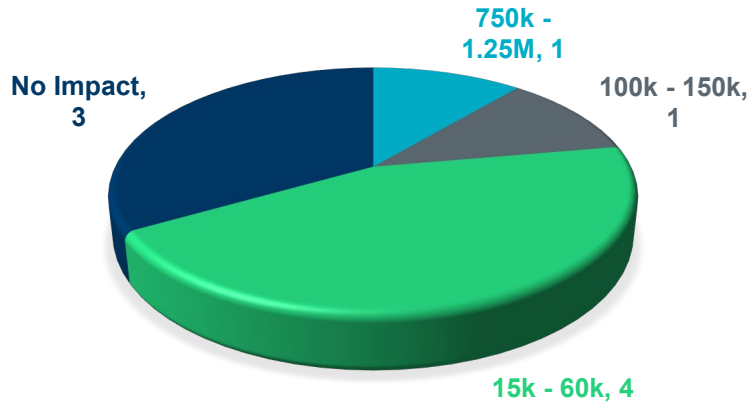
- NPRR1058, Resource Offer Modernization
- NPRR1118, Clarifications to the OSA Process
- NPRR1127, Clarification of ERCOT Hotline Uses
- NPRR1139, Adjustments to Capacity Shortfall Ratio Share for IRRs
- NPRR1140, Recovering Fuel Costs for Generation Above LSL During RUC-Committed Hours
- SCR820, Operator Real-Time Messaging During Emergency
- SCR823, ERCOT Mass System “County Name” File Updates for Texas SET V5.0 Implementation – URGENT
- NOGRR241, Related to NPRR1127, Clarification of ERCOT Hotline Uses

Non-Unanimous Revision Requests Recommended by TAC for Approval

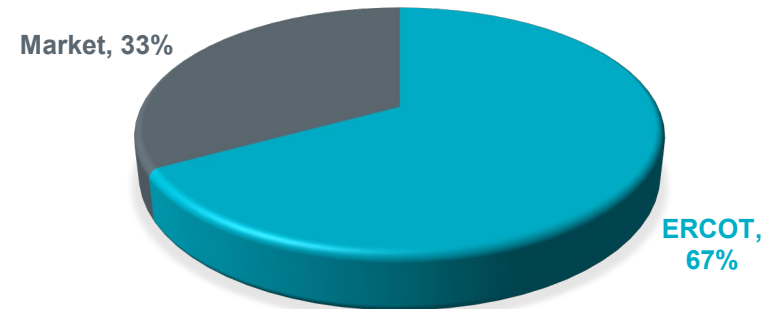
- NPRR1084, Improvements to Reporting of Resource Outages, Derates, and Startup Loading Failures

9 Revision Requests for October Board Consideration

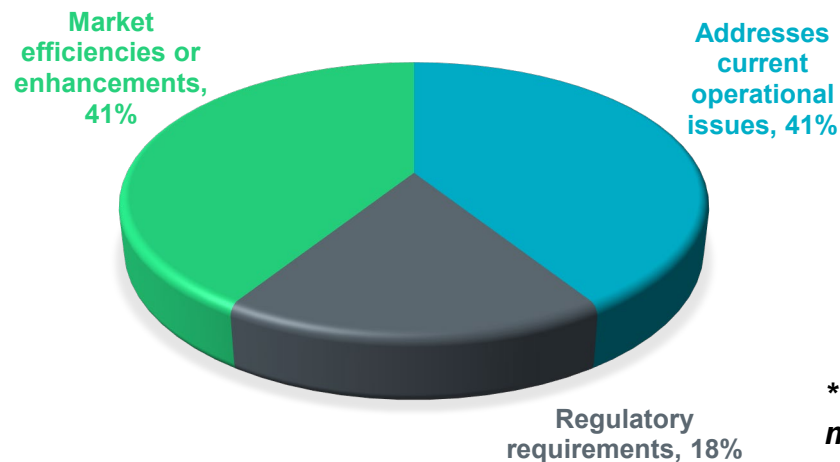
BUDGETARY IMPACTS



REVISION REQUEST SPONSORSHIP



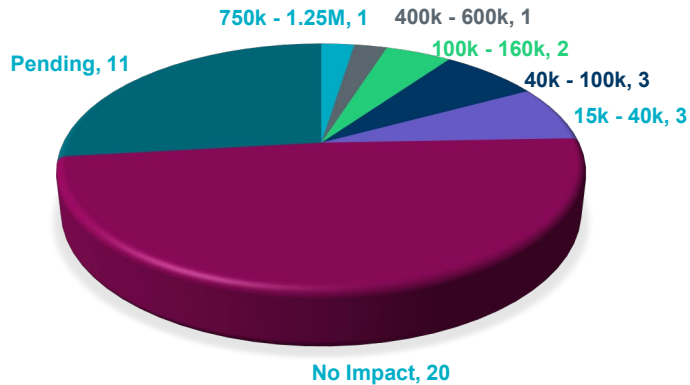
REASONS FOR REVISIONS



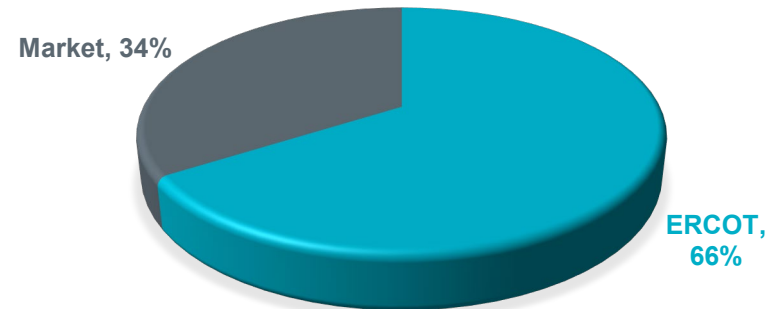
*****Revision Requests can cover multiple Reasons for Revisions***

41 Revision Requests in Process

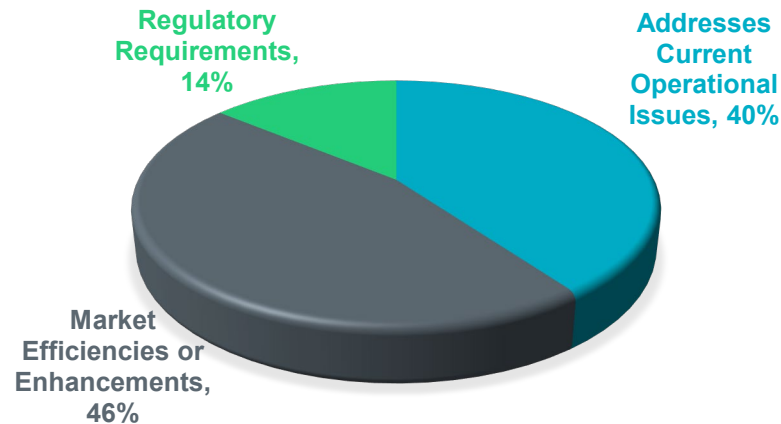
BUDGETARY IMPACTS



REVISION REQUEST SPONSORSHIP



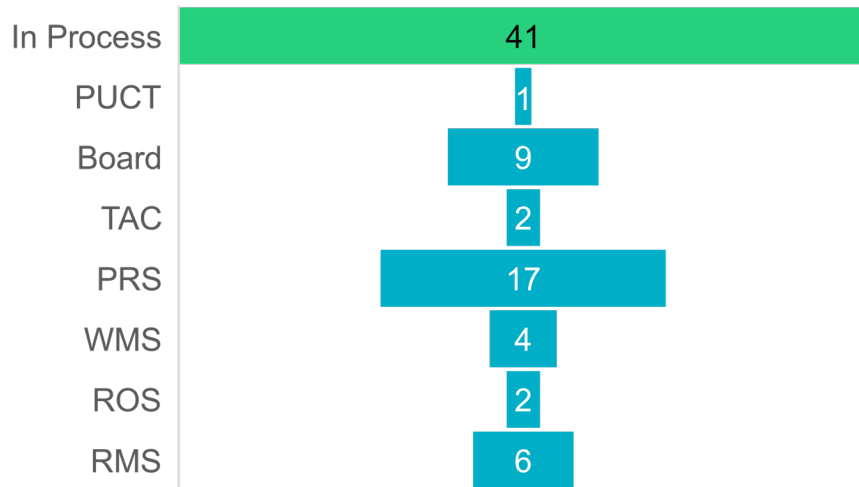
REASONS FOR REVISIONS



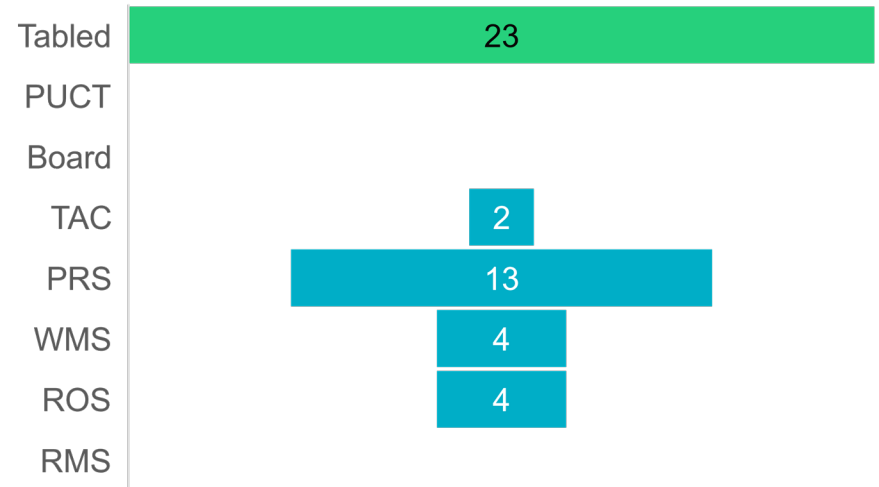
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41 Revision Requests in Process

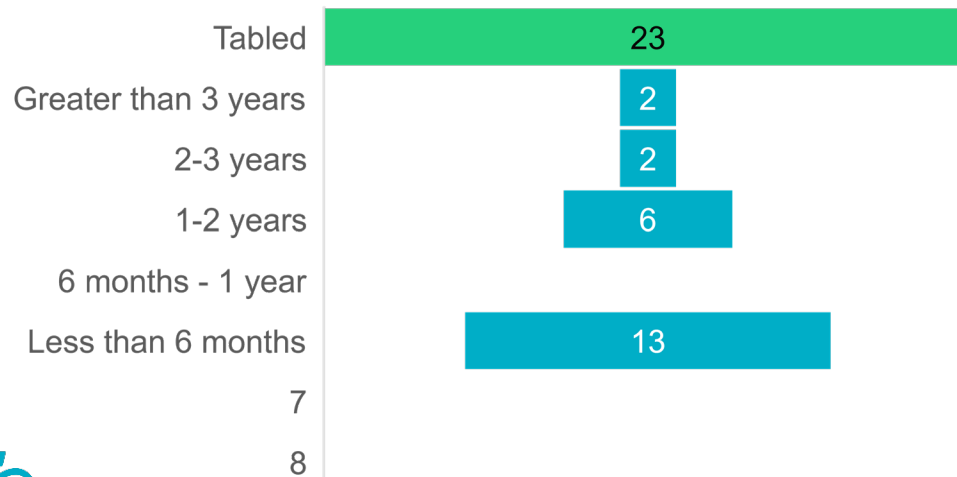
Location of Revision Requests



Location of Tabled Revision Requests

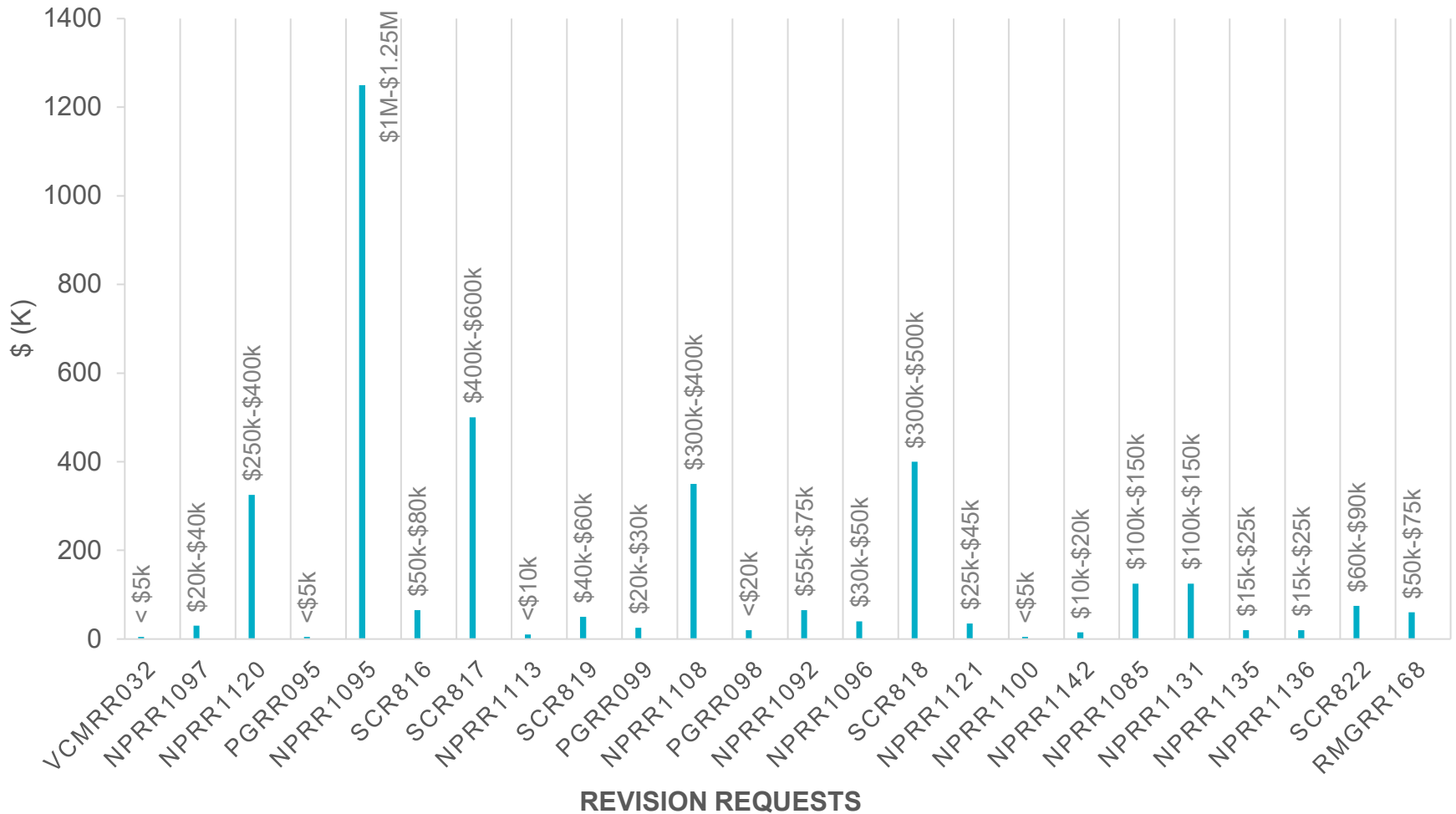


Length Tabled



**** Additional details on Tabled Revision Requests in Appendix**

2022 Approved Revision Requests – Budgetary Impact



*** 38 No-Impact Revision Requests Approved**

*** NPRR1098 and NPRR1114 not reflected as a Budgetary Impact since costs are borne by non-ERCOT funds**

*** Additional details on Budgetary Impact in Appendix**



Appendix: Aging Revision Requests in Process

Aging Revision Requests in Process (Tabled for over 4 months)

Revision Request	Length Tabled	Notes
NPRR956, Designation of Providers of Transmission Additions. [ERCOT]	Greater than 3 years (7/7/19)	Entities filed suit in the U.S. District Court for the Western District of Texas to challenge the validity of Senate Bill 1938. Although the District has since dismissed the case, the suit remains pending on appeal at the Fifth Circuit. There are renewed, internal ERCOT discussions as to whether NPRR956 should remain tabled as SB1938 continues to remain currently valid law. 9/21/22 ERCOT comments requesting that NPRR956 stay tabled due to the ongoing litigation concerning the constitutionality of Senate Bill 1938. ERCOT will continue to comply with SB 1938 unless and until a final judicial determination requires otherwise.
PGRR073, Related to NPRR956, Designation of Providers of Transmission Additions. [ERCOT]	Greater than 3 years (8/8/19)	See NPRR956
NOGRR215, Limit Use of Remedial Action Schemes. [ERCOT]	Greater than 2 years (7/9/20)	Tabled at CMWG and OWG as Market Participants consider additional comments. 5/18/22 ERCOT comments - recommend approval of NOGRR215 as submitted; 5/31/22 LCRA comments asked ERCOT to respond to previous comments and to provide missing, relevant 2021 data; 6/1/22 Lancium comments requested that NOGRR215 stay tabled for discussions at LFLT. 8/31/22 LCRA and Luminant comments requesting NOGRR215 remain tabled and continued commitment from all parties to actively continue working together in search of a compromise.
NPRR981, Day-Ahead Market Price Correction Process. [Luminant]	Greater than 2 years (12/12/19)	Sponsor requested PRS table NPRR981 until such time as stakeholders settle on a preferred resolution for the issues addressed by NPRR903, Day-Ahead Market Timing Deviations (see 12/12/19 PRS Report). Referred to WMWG for review. Sponsor withdrew NPRR981 on 9/7/22. Will continue discussions on this issue and file a new NPRR if needed.

Aging Revision Requests in Process (Tabled for over 4 months)

Revision Request	Length Tabled	Notes
NOGRR226, Revision to 5% Transmission Operator (TO) Load Shedding Relay Set Point. [LCRA]	1 - 2 years (6/3/21)	Tabled out of concern for a wide list of potential, unintended consequences including frequency swing, load shed obligations, overshoot implications, etc. Referred to DWG, OWG, and PDCWG and remains an item of discussion at OWG and PDCWG. 2/16/22 Oncor comments. 9/1/22 ROS recommended approval. Pending Impact Analysis development for consideration at 11/7/22 ROS meeting.
VCMRR031, Clarification Related to Variable Costs in Fuel Adders. [ERCOT]	1 - 2 years (3/3/21)	Removes fixed costs and makes case that should be variable costs. Luminant submitted complaint to ERCOT about the exclusion of those costs, has been at PUCT since, will be table until resolved. 51883 Complaint Luminant Against ERCOT - Commission Staff's Recommendation is complaint be dismissed. Case has not yet been decided. WMS assigned review to WMWG.
NPRR1067, Market Entry Qualifications, Continued Participation Requirements, and Credit Risk Assessment. [ERCOT]	1 - 2 years (2/11/21)	Tabling was requested by DC Energy, to allow for revisions (see 2/9/21 DC Energy Comments). Referred to MCWG for review. NPRR1073 which included parts of NPRR1067, was approved and implemented on January 2, 2022. ERCOT Staff determining what needs to move forward in NPRR1067.
NPRR1070, Planning Criteria for GTC Exit Solutions. [EDF Renewables / Pattern Energy]	1 - 2 years (4/15/21)	ERCOT requested NPRR be tabled until resolution of related PUCT Rulemaking (see 10/22/21 ERCOT comments). Referred to OWG, PLWG, WMWG for further discussion.

Aging Revision Requests in Process (Tabled for over 4 months)

Revision Request	Length Tabled	Notes
NPRR1084, Improvements to Reporting of Resource Outages and Derates. [ERCOT]	1 - 2 years (7/15/21)	Market participants noted the difficulty in balancing a desire for information on Forced Outages quickly with the need to allow crews working those Outages time to safely resolve the underlying issue before reporting to ERCOT, and requested additional review by ROS and WMS (see 7/15/21 PRS Report). Referred to OWG for review. During 6/9/22 PRS meeting, Luminant requested time to review 6/8/22 ERCOT comments. Recommended for approval by PRS/TAC – consideration at 10/18/22 Board meeting.
NPRR1089, Requiring Highest-Ranking Representative, Official, or Officer of a Resource Entity to Execute Weatherization and Natural Gas Declarations. [ERCOT]	1 - 2 years (8/12/21)	Market Participants requested that weatherization questions currently under consideration at the PUCT be resolved first and expressed concern that appropriate highest-level personnel descriptions may be difficult to capture, given various Entities' structures (see 8/12/21 PRS Report).
SCR821, Voltage Set Point Target Information for Distribution Generation Resource (DGR) or Distribution Energy Storage Resource (DESR). [AEP]	1 - 2 years (4/14/21)	TSPs requested discussion with SCR Sponsor, AEP which occurred in June 2022. Stakeholders want additional discussion re varying metering accuracy for voltage across devices. Referred to OWG, NDSWG, VPWG for review. TSPs and ERCOT want simplicity/low cost to implement and want optionality for DGs. Until PUCT adopts rule that says voltage support is required, not everyone wants it. 8/11/22 PRS recommended approval. Pending Impact Analysis development for consideration at 10/13/22 PRS meeting.
NPRR1118, Clarifications to the OSA Process. [ERCOT]	6 months - 1 year (2/9/22)	Stakeholders requested tabling to allow for additional review by ROS and WMS (see 2/9/22 PRS Report). Referred to OWG, WMWG. 6/13/22 ERCOT comments being reviewed. Recommended for approval by PRS/TAC – consideration at 10/18/22 Board meeting.

Aging Revision Requests in Process (Tabled for over 4 months)

Revision Request	Length Tabled	Notes
NOGRR230, WAN Participant Security. [ERCOT]	1 – 2 years (9/2/21)	Tabled in anticipation of pending ERCOT comments. Internal discussion resumed in March 2022. 9/28/22 - Related NPRR1150 was filed. Pending ERCOT comments.
SCR820, Operator Real-Time Messaging During Emergency. [AEP / CenterPoint]	6 months - 1 year (2/9/22)	PRS recommended approval of SCR820 on 1/13/22. Awaiting ERCOT to provide Impact Analysis. Recommended for approval by PRS/TAC – consideration at 10/18/22 Board meeting.
NPRR1126, Default Uplift Allocation Enhancement. [DC Energy]	Less than 6 months (4/14/22)	PRS participants requested additional time for discussion of NPRR1126 at credit groups (see 4/14/22 PRS Report). Referred to MCWG for review. 6/30/22 DC Energy comments incorporated some MCWG feedback. PRS rejected on 9/15/22.
NPRR1128, Allow FFR Procurement up to FFR Limit Without Proration. [Hunt Energy Network]	Less than 6 months (4/14/22)	4/29/22 TIEC comments recommended rejection. 5/27/22 ERCOT comments recommended continued tabling for discussion at PDCWG and WMWG. 9/15/22 PRS recommended approval. Pending Impact Analysis development for consideration at 10/13/22 PRS meeting.
NPRR1132, Communicate Operating Limitations during Cold and Hot Weather Conditions [ERCOT]	Less than 6 months (5/11/22)	WMS will consider it at the 10/12/22 WMS meeting; 9/29/22 ROS recommended approval of NPRR1132.
NPRR1138, Communication of Capability and Status of Online IRRs at 0 MW Output [ERCOT]	Less than 6 months (6/9/22)	8/5/22 WMS Comments – Requested NPRR1138 stay tabled for further discussion at WMWG. 8/11/22 ROS Comments – Requested NPRR1138 stay tabled for further discussion at OWG & IBRTF.
OBDRR041, Updates to Requirements for Aggregate Load Participation in the ERCOT Markets [Tesla]	Less than 6 months (5/25/22)	Tabled for further review. ERCOT Staff and stakeholders are working on a draft governing document for the proposed ADER pilot program to gather more information on how these types of facility configurations would best fit into the market.

Appendix: 2022 Approved Revision Request Budgetary Impact / Staffing Impact Detail

2022 Approved Revision Requests – Budgetary Impact

PUC Approval Date	Revision Request	Budgetary Impact
2/10/22	VCMR032, Calculation of Average Running Hours per Start when Determining the Variable O&M for QSGRs	Less than \$5k
3/31/22	NPRR1097, Create Resource Forced Outage Report	\$20k - \$40k
3/31/22	NPRR1120, Create Firm Fuel Supply Service	\$250k - \$400k
3/31/22	PGRR095, Establish Minimum Delivery Criteria	Less than \$5k
3/31/22	NPRR1095, Texas SET V5.0 Changes	\$1M - \$1.5M
3/31/22	NPRR1098, Direct Current Tie (DC Tie) Reactive Power Capability Requirements	\$10k - \$20k (borne by Southern Cross Transmission – not included in total)
3/31/22	SCR816, CRR Auction Bid Credit Enhancement	\$50k - \$80k
3/31/22	SCR817, Related to NPRR1095, MarkeTrak Validation Revisions Aligning with Texas SET V5.0	\$400k - \$600k
3/31/22	NPRR1113, Clarification of Regulation-Up Schedule for Controllable Load Resources in Ancillary Service Imbalance	Less than \$10k
3/31/22	NPRR1114, Securitization – PURA Subchapter N Uplift Charges	\$1.8M and \$2.4M (borne by Securitization funding – not included in total)
3/31/22	SCR819, Improving IRR Control to Manage GTC Stability Limits	\$40k - \$60k
3/31/22	PGRR099, Revise GIM Process to Ensure Compliance with the Lone Star Infrastructure Protection Act	\$20k - \$30k
5/12/22	NPRR1108, ERCOT Shall Approve or Deny All Resource Outage Requests	\$300k - \$400k
5/12/22	PGRR098, Consideration of Load Shed in Transmission Planning Criteria	Less than \$20k
5/12/22	NPRR1092, Reduce RUC Offer Floor and Remove RUC Opt-Out Provision.	\$55k - \$75k
5/12/22	NPRR1096, Require Sustained Two-Hour Capability for ECRS and Four-Hour Capability for Non-Spin	\$30k - \$50k

2022 Approved Revision Requests – Budgetary Impact

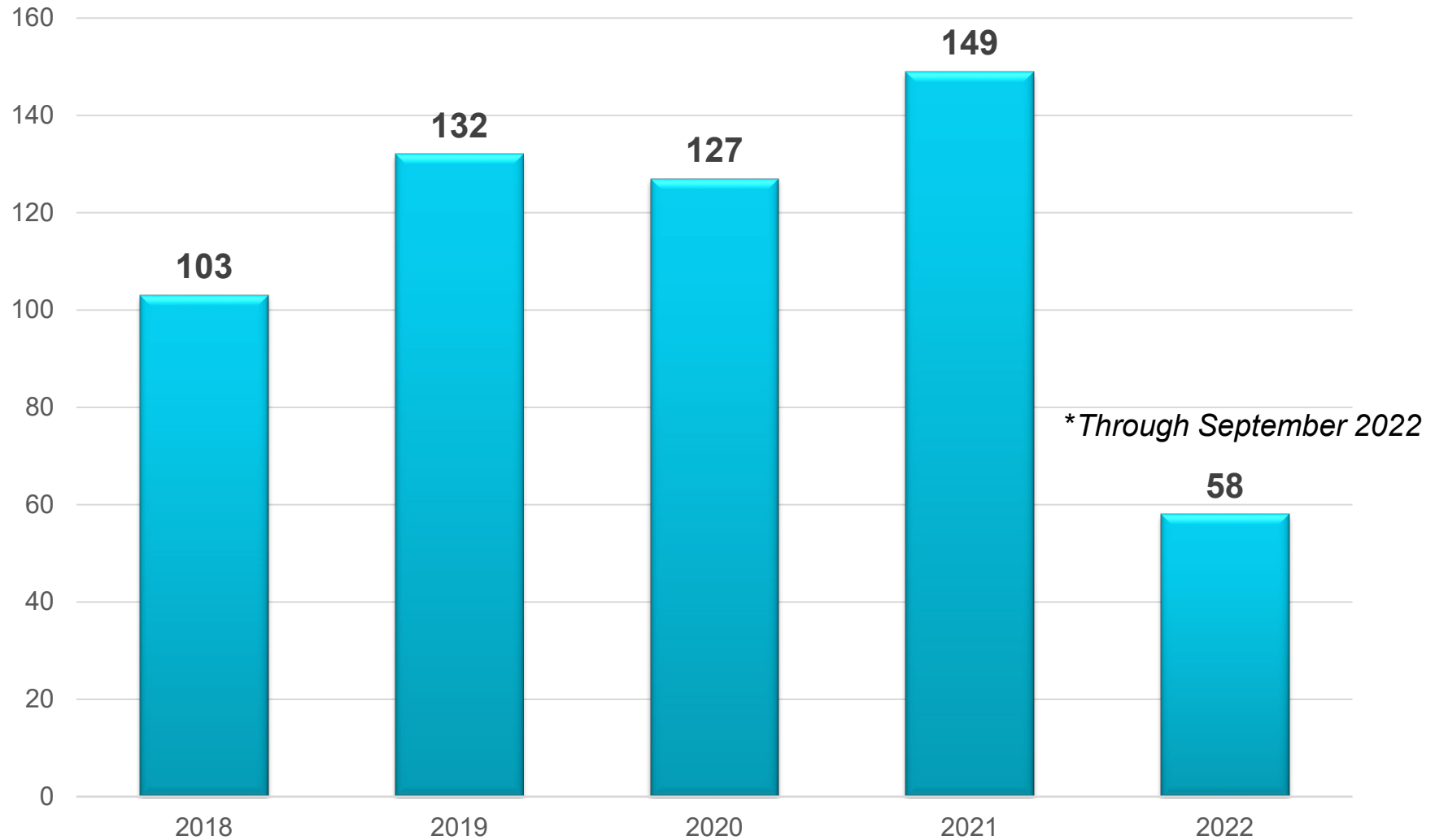
PUC Approval Date	Revision Request	Budgetary Impact
5/12/22	SCR818, Changes to Incorporate GIC Modeling Data into Existing Modeling Applications	\$300k - \$500k
7/14/22	NPRR1121, Add a Posting Requirement to the Exceptional Fuel Cost Submission Process	\$25k - \$45k
7/14/22	NPRR1100, Allow Generation Resources and Energy Storage Resources to Serve Customer Load When the Customer and the Resource are Disconnected from the ERCOT System	Less than \$5k
8/26/22	NPRR1142, ERS Changes to Reflect Updated PUCT Rule Changes re SUBST. R. 25.507	\$10k - \$20k
9/15/22	NPRR1085, Ensuring Continuous Validity of Physical Responsive Capability (PRC) and Dispatch through Timely Changes to Resource Telemetry and Current Operating Plans (COPs)	\$100k - \$150k
9/15/22	NPRR1131, Controllable Load Resource Participation in Non-Spin	\$100k - \$150k
9/15/22	NPRR1135, Add On-Line Status Check for Resources Telemetry OFFNS for Ancillary Service Imbalance Settlements	\$15k - \$25k
9/15/22	NPRR1136, Updates to Language Regarding a QSE Moving Ancillary Service Responsibility Between Resources	\$15k - \$25k
9/15/22	SCR822, Create Daily Energy Storage Integration Report and Dashboard	\$60k - \$90k
9/15/22	RMGRR168, Modify ERCOT's Mass Transition Responsibilities	\$50k - \$75k
TOTAL TO DATE		~ \$2.85M – \$4.36M

2022 Approved Revision Requests – Staffing Impact

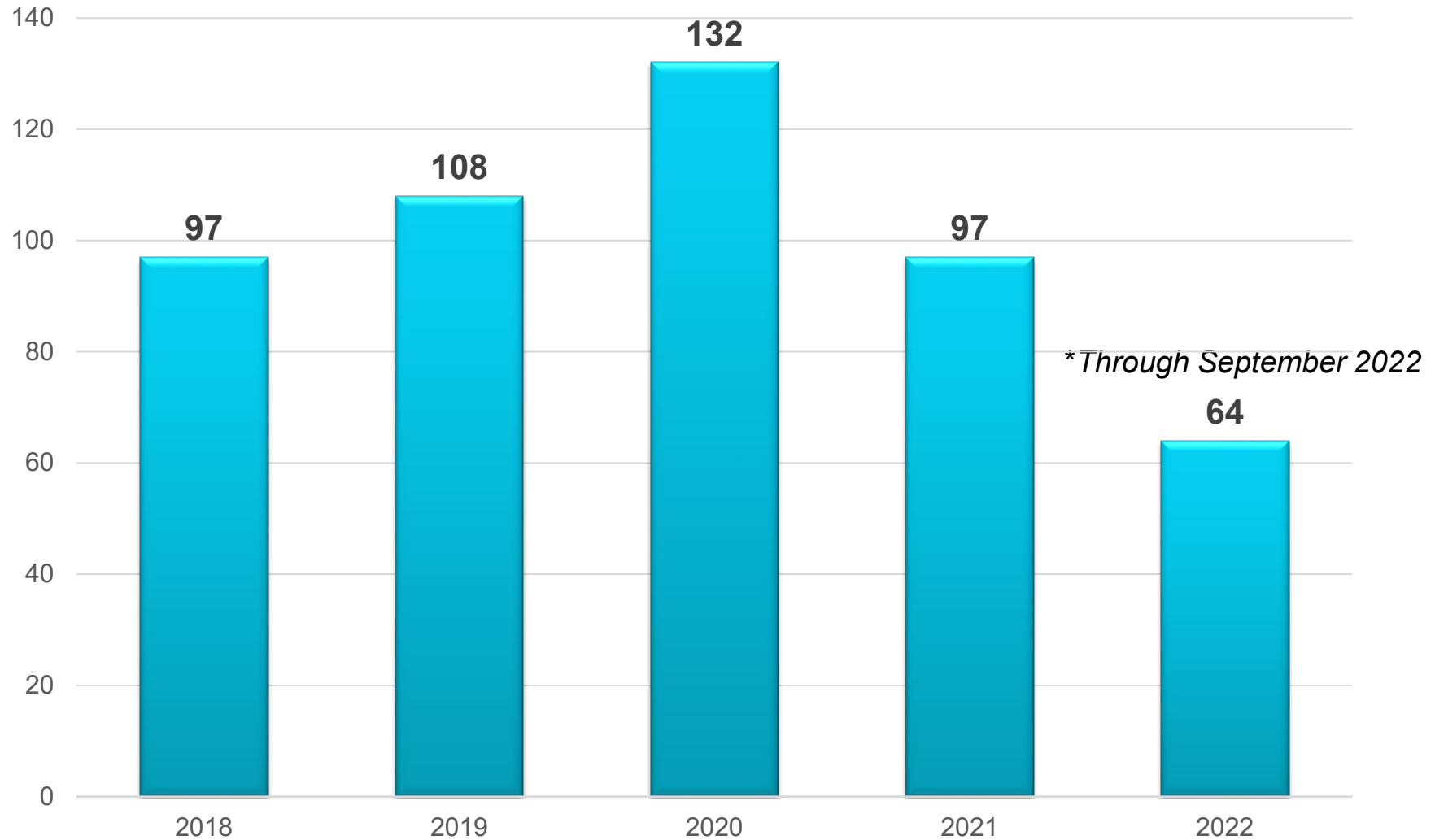
Approval Date	Revision Request	ERCOT Department	FTE Impact	Additional FTEs Required
5/12/22	PGRR098, Consideration of Load Shed in Transmission Planning Criteria	Transmission Planning	0.8	1.0
Totals			0.8	1.0

Appendix: Statistics (Historical to Date)

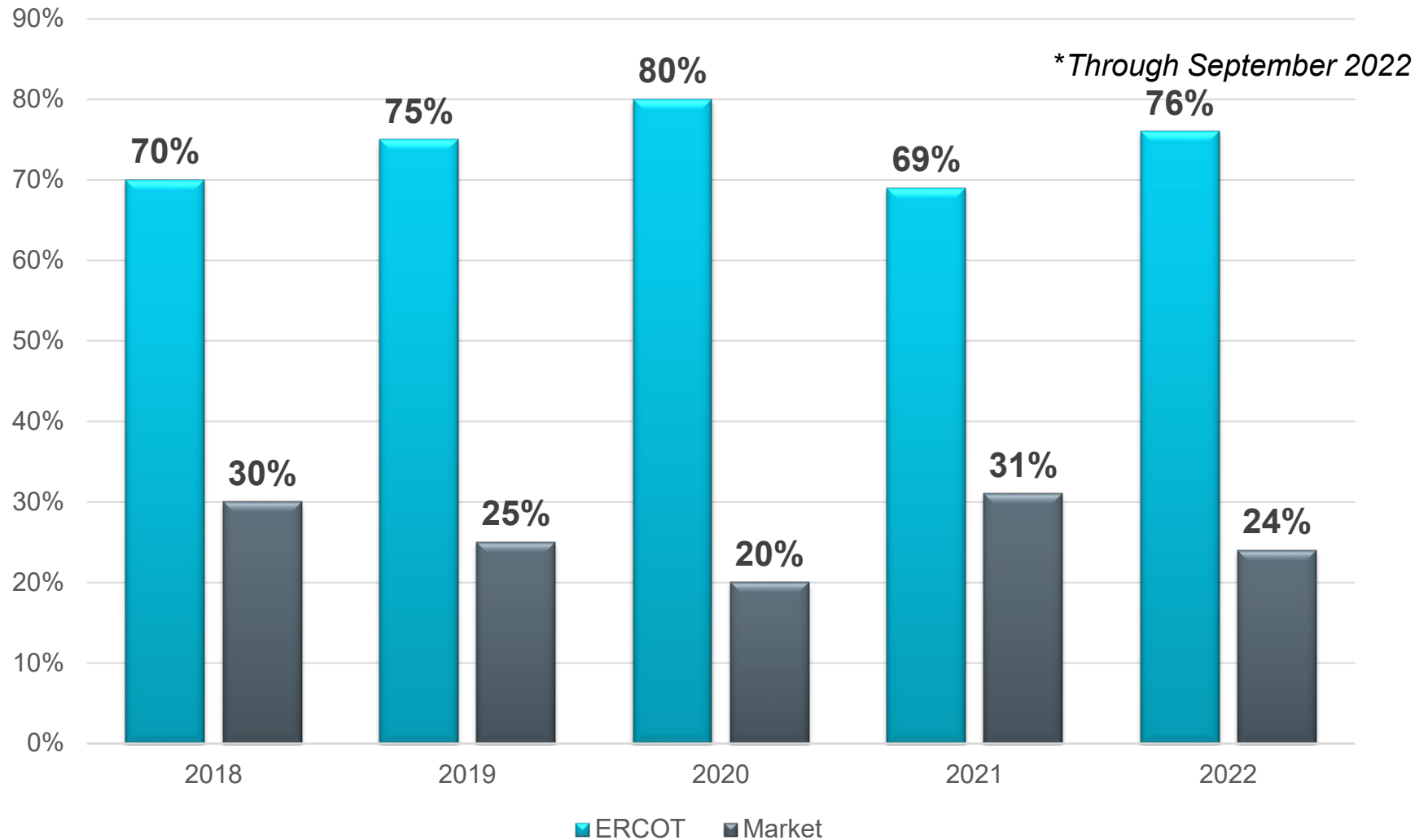
Statistics – New Revision Requests Submitted



Statistics – Approved Revision Requests



Statistics – Revision Request Sponsorship



Appendix: Acronyms

Acronyms

Acronym	Term
CMWG	Congestion Management Working Group
DG	Distributed Generation
DWG	Dynamics Working Group
LFLTF	Large Flexible Load Task Force
IBRTF	Inverter-Based Resource Task Force
MCWG	Market Credit Working Group
NDSWG	Network Data Support Working Group
NPRR	Nodal Protocol Revision Request
NOGRR	Nodal Operating Guide Revision Request
OWG	Operations Working Group
PDCWG	Performance, Disturbance, Compliance Working Group
PGRR	Planning Guide Revision Request
PLWG	Planning Working Group
PRS	Protocol Revision Subcommittee
RMGRR	Retail Market Guide Revision Request
ROS	Reliability and Operations Working Group
RRGRR	Resource Registration Glossary Revision Request
SCR	System Change Request
TSP	Transmission Service Provider
VCMRR	Verifiable Cost Manual Revision Request

Acronyms

Acronym	Term
VPWG	Voltage Profile Working Group
WMS	Wholesale Market Subcommittee
WMWG	Wholesale Market Working Group