



## **Item 7.6: Revision Request Status Update**

*Ann Boren*

Manager, Market Rules and Stakeholder Support

Reliability and Markets Committee Meeting

ERCOT Public

December 19, 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 6 months)
- 2022 Approved Revision Request Budgetary Impact and Staffing Impact Detail
- Statistics (Historical to Date)
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  - Approved Revision Requests
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- Acronyms

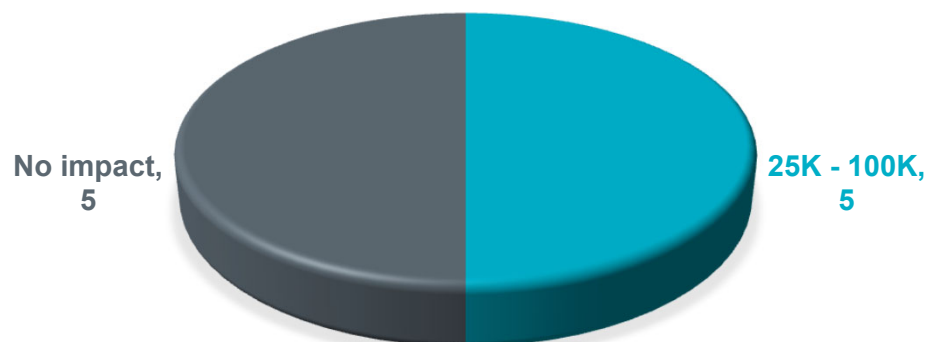
# 10 Revision Requests for December Board Consideration

## Unopposed Revision Requests Recommended by TAC for Approval

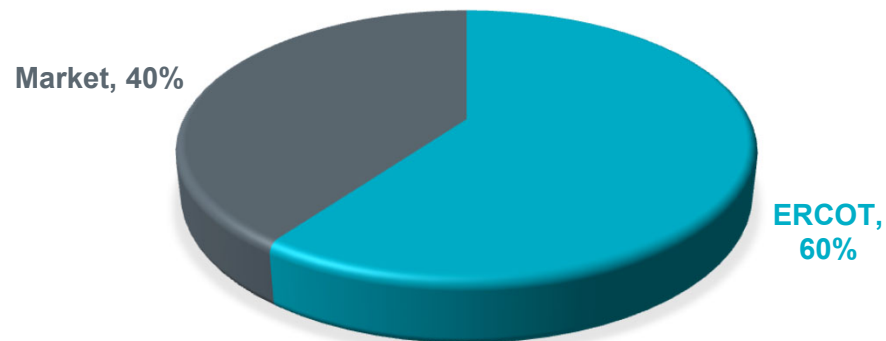
- NPRR1128, Allow FFR Procurement up to FFR Limit Without Proration
- NPRR1132, Communicate Operating Limitations during Cold and Hot Weather Conditions
- NPRR1138, Communication of Capability and Status of Online IRRs at 0 MW Output
- NPRR1148, Language Cleanup Related to ERCOT Contingency Reserve Service (ECRS)
- NPRR1152, Remove Requirements to Submit Emergency Operations Plans, Weatherization Plans, and Declarations of Summer/Winter Weather Preparedness
- NPRR1154, Include Alternate Resource in the Availability Plan for the Firm Fuel Supply Service
- SCR821, Voltage Set Point Target Information for Distribution Generation Resource (DGR) or Distribution Energy Storage Resource (DESR)
- NOGRR226, Addition of Supplemental UFLS Stages
- OBDRR043, Related to NPRR1148, Language Cleanup Related to ERCOT Contingency Reserve Service (ECRS)
- RRGRR032, Related to NPRR1132, Communicate Operating Limitations during Cold and Hot Weather Conditions

# 10 Revision Requests for December Board Consideration

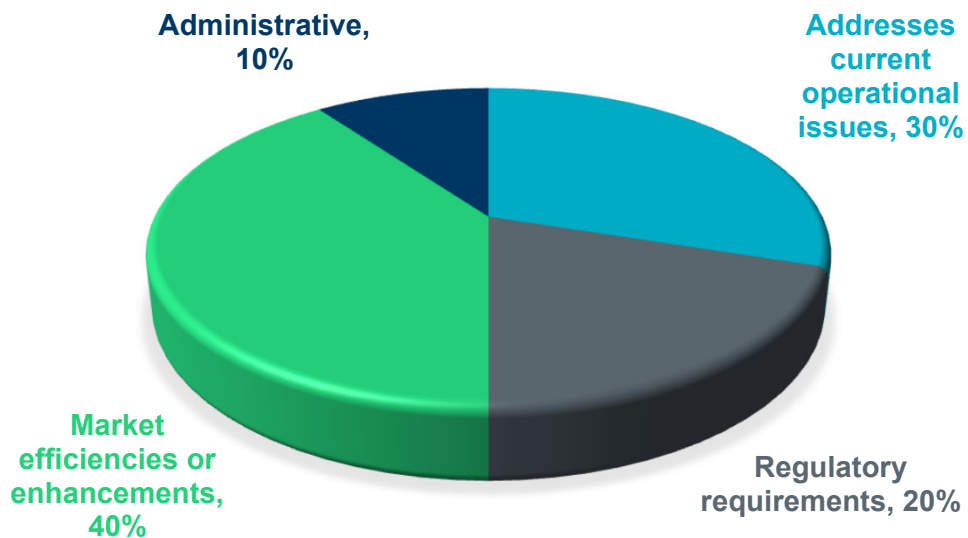
## BUDGETARY IMPACTS



## REVISION REQUEST SPONSORSHIP



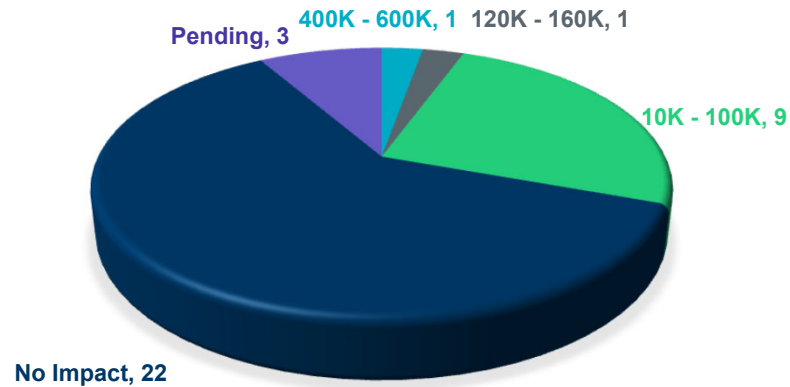
## REASONS FOR REVISIONS



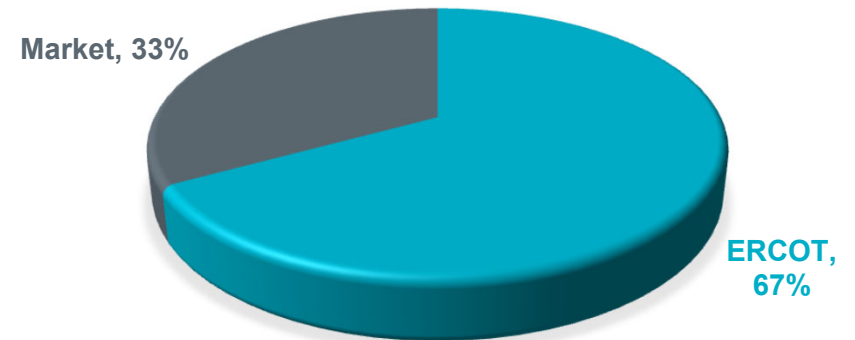
***\*\*Revision Requests can cover multiple Reasons for Revisions***

# 36 Revision Requests in Process

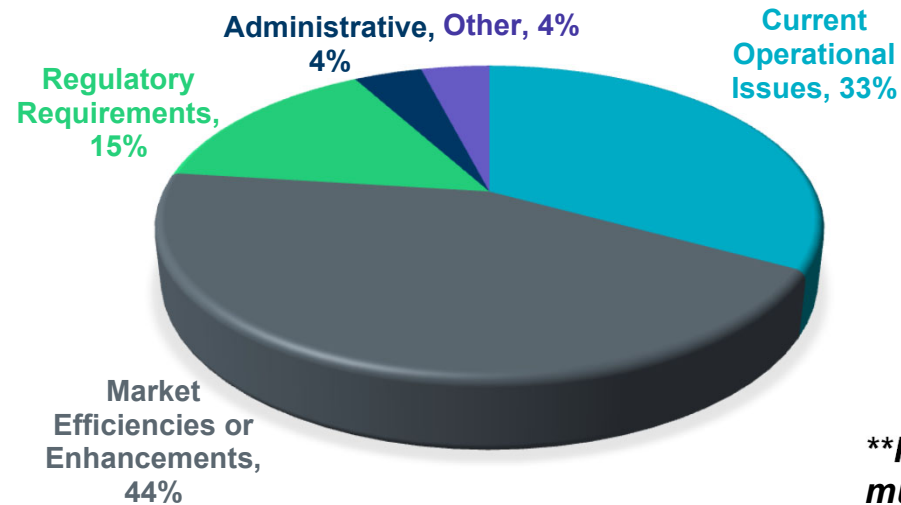
## BUDGETARY IMPACTS



## REVISION REQUEST SPONSORSHIP



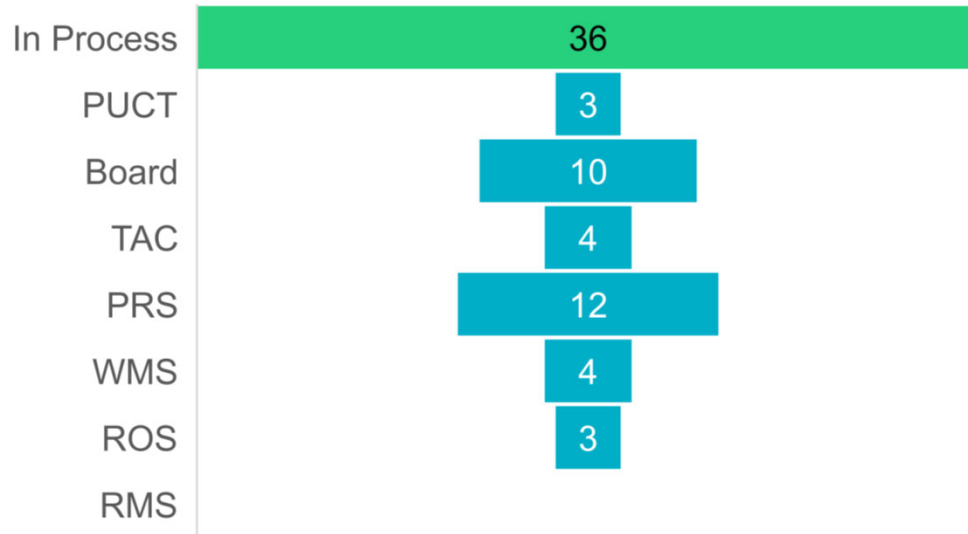
## REASONS FOR REVISIONS



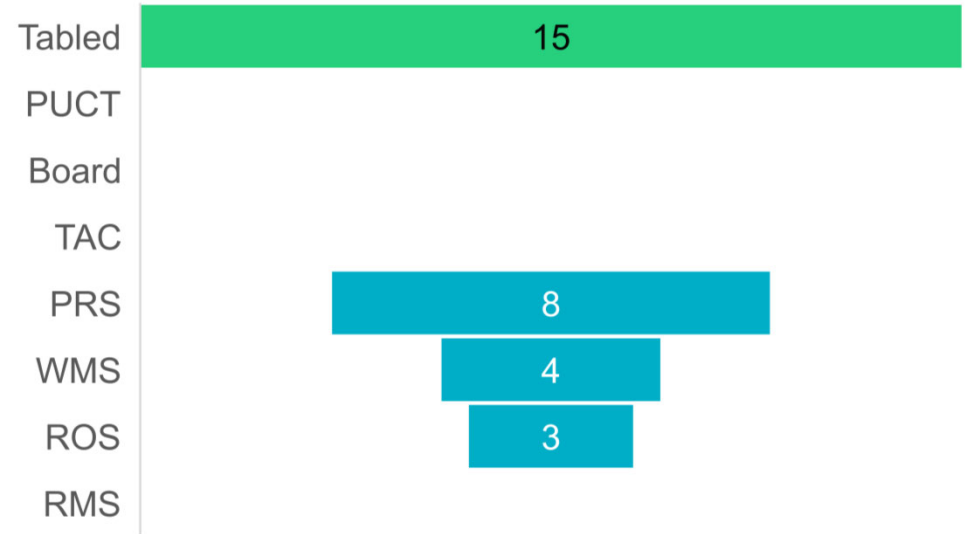
***\*\*Revision Requests can cover multiple Reasons for Revisions***

# 36 Revision Requests in Process

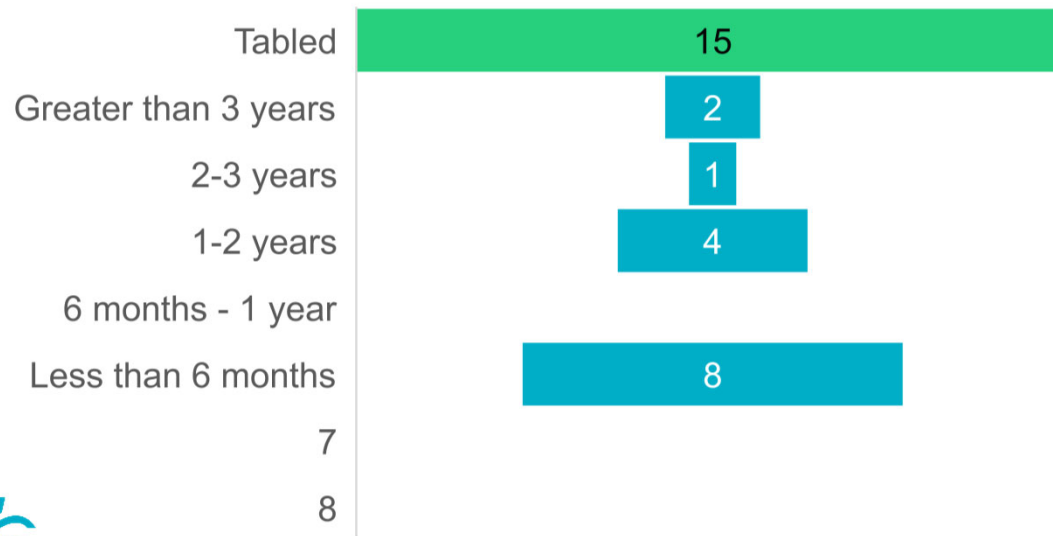
Location of Revision Requests



Location of Tabled Revision Requests

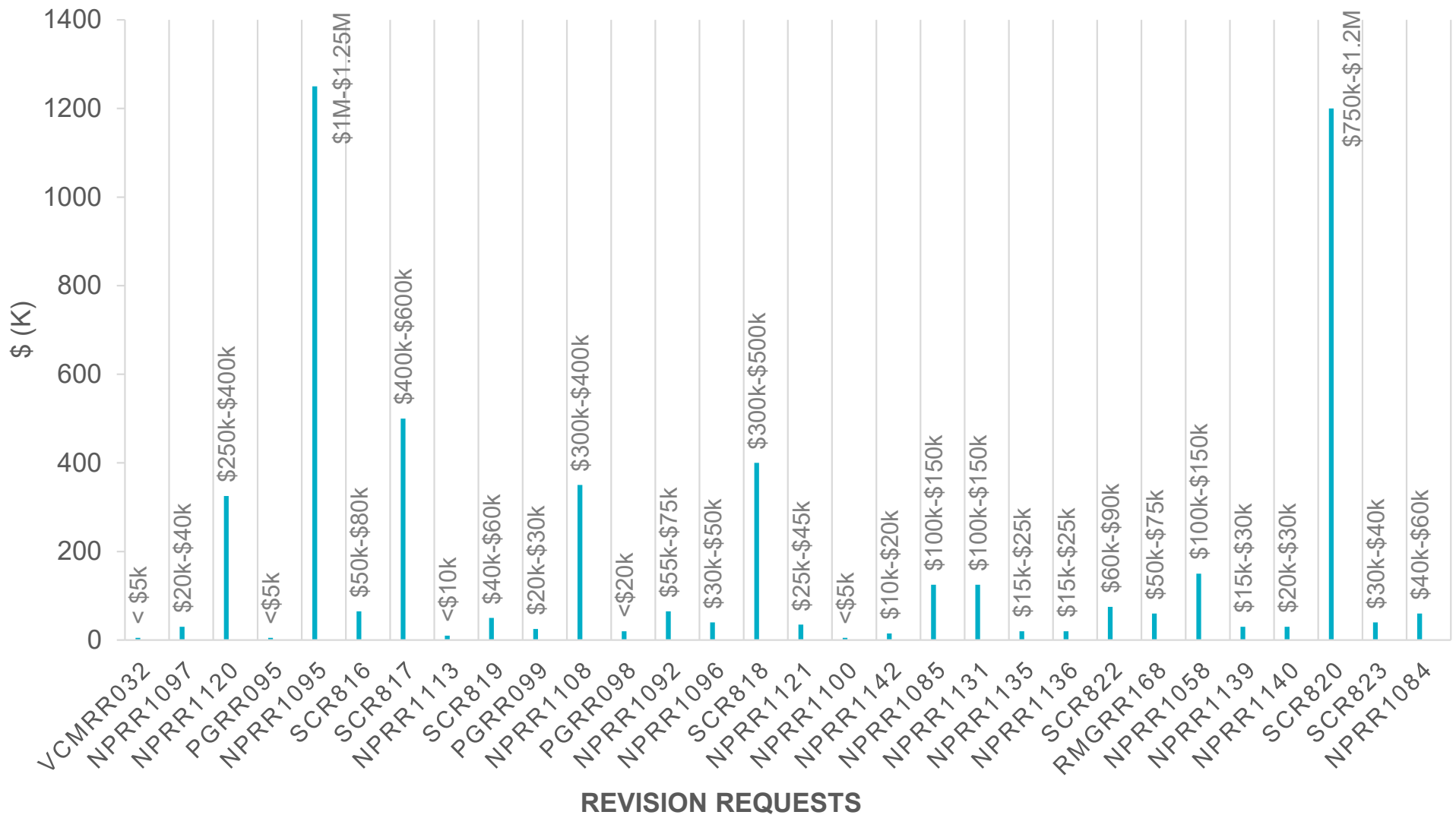


Length Tabled



**\*\* 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 6 months)

Revision Request	Length Tabled	Notes
<b>NPRR956, Designation of Providers of Transmission Additions.</b> [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.
<b>PGRR073, Related to NPRR956, Designation of Providers of Transmission Additions.</b> [ERCOT]	Greater than 3 years (8/8/19)	See NPRR956
<b>NOGRR215, Limit Use of Remedial Action Schemes.</b> [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 LFLTF. 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. <b>CMWG/OWG will be reviewing at December meetings – expectation for NOGRR215 to move forward in January.</b>
<b>VCRR031, Clarification Related to Variable Costs in Fuel Adders.</b> [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.

# Aging Revision Requests in Process (Tabled for over 6 months)

Revision Request	Length Tabled	Notes
<b>NPRR1067, Market Entry Qualifications, Continued Participation Requirements, and Credit Risk Assessment.</b> [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. <b>ERCOT Staff developing comments.</b>
<b>NPRR1070, Planning Criteria for GTC Exit Solutions.</b> [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.
<b>NOGRR230, WAN Participant Security.</b> [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. <b>Technology Working Group (TWG) reviewing in December.</b>

# 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	VCRR032, 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 Telemetering 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
11/3/22	NPRR1058, Resource Offer Modernization	\$100k - \$150k
11/3/22	NPRR1139, Adjustments to Capacity Shortfall Ratio Share for IRRs	\$15k - \$30k
11/3/22	NPRR1140, Recovering Fuel Costs for Generation Above LSL During RUC-Committed Hours	\$20k - \$30k

## 2022 Approved Revision Requests – Budgetary Impact

PUC Approval Date	Revision Request	Budgetary Impact
11/3/22	SCR820, Operator Real-Time Messaging During Emergency	\$750k - \$1.2M
11/3/22	SCR823, ERCOT Mass System “County Name” File Updates for Texas SET V5.0 Implementation	\$30k - \$40k
11/3/22	NPRR1084, Improvements to Reporting of Resource Outages, Derates, and Startup Loading Failures	\$40k - \$60k
<b>TOTAL TO DATE</b>		<b>~ \$3.8M - \$5.87M</b>

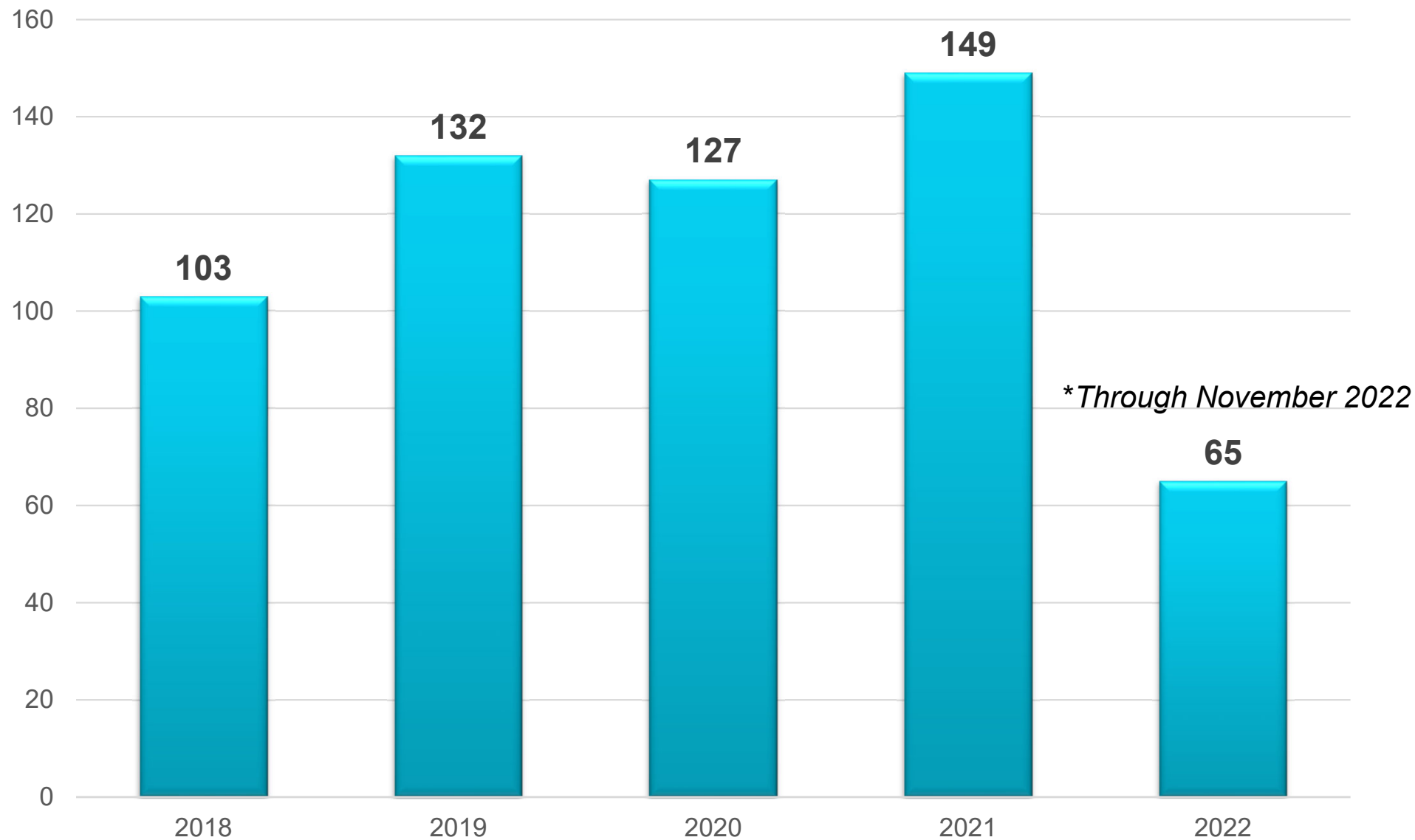
## 2022 Approved Revision Requests – Staffing Impact

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

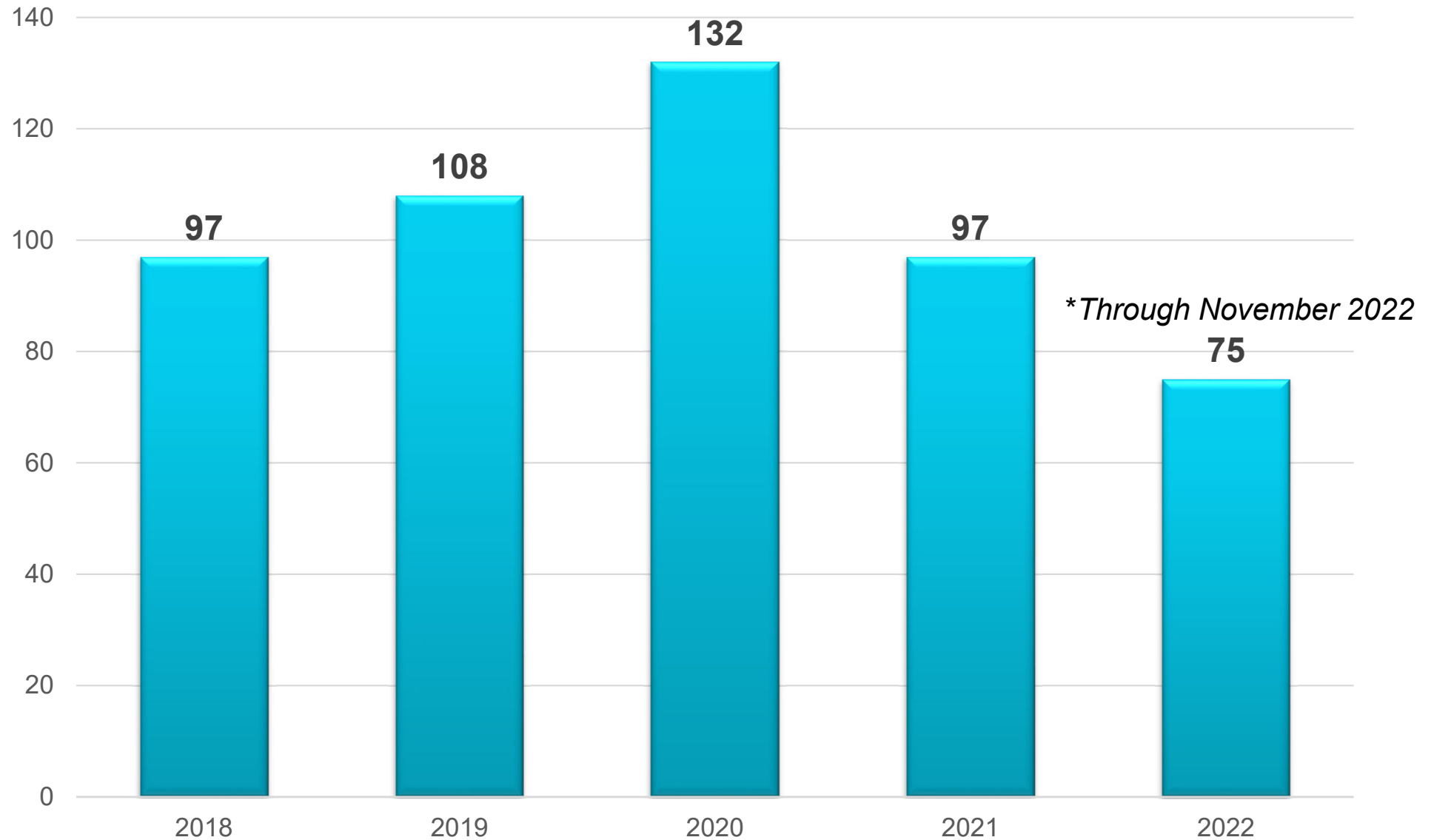
# Appendix: Statistics (Historical to Date)



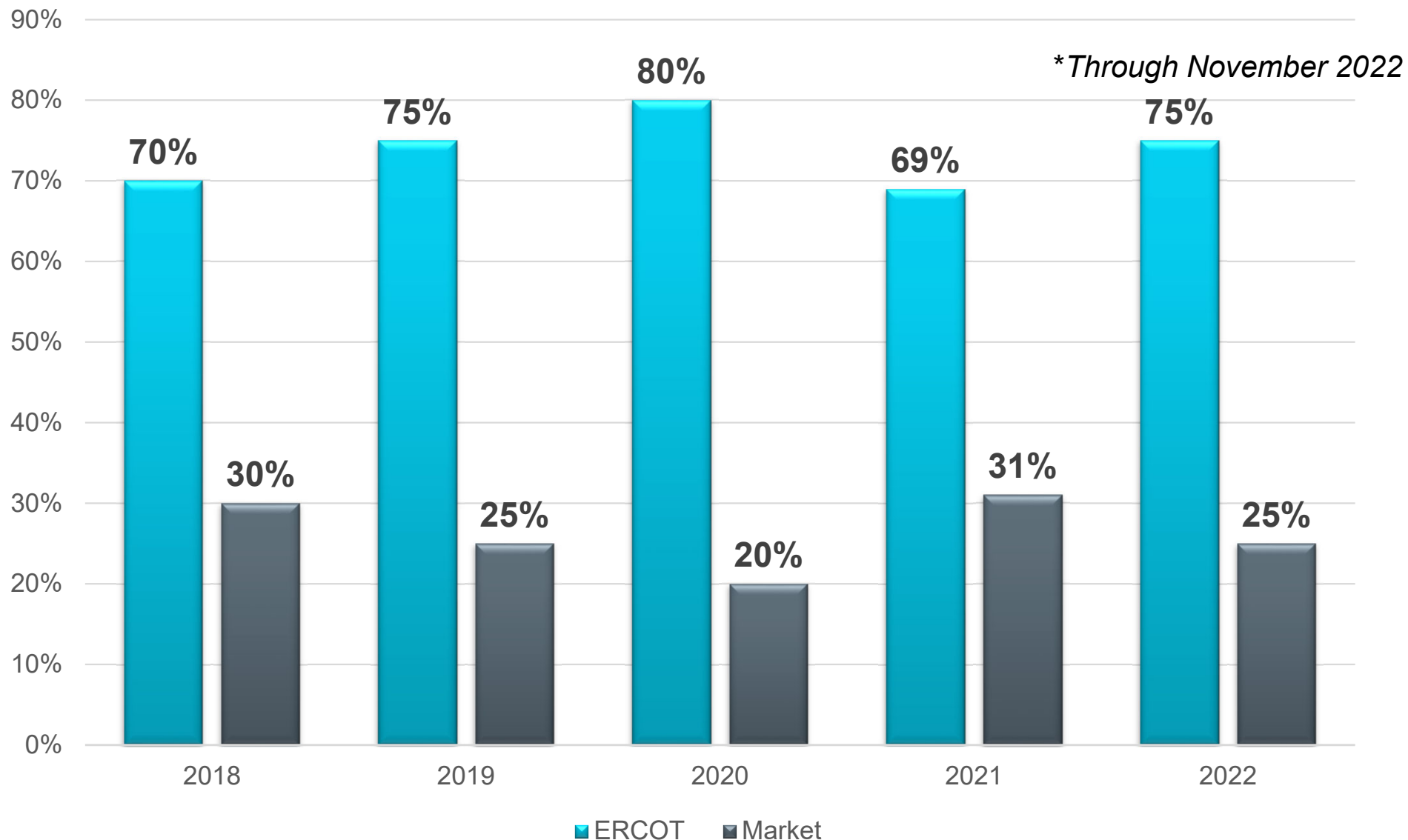
## Statistics – New Revision Requests Submitted



## 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
VCMR	Verifiable Cost Manual Revision Request

# Acronyms

Acronym	Term
VPWG	Voltage Profile Working Group
WMS	Wholesale Market Subcommittee
WMWG	Wholesale Market Working Group
FFR	Fast Frequency Response
UFLS	Under-Frequency Load Shed
ECRS	ERCOT Contingency Reserve Service
DESR	Distribution Energy Storage Resource
DGR	Distribution Generation Resource
IRR	Intermittent Renewable Resource
QSGR	Quick Start Generation Resource
DC Tie	Direct Current Tie
PRC	Physical Responsive Capability
COP	Current Operating Plan
GTC	Generic Transmission Constraint
QSE	Qualified Scheduling Entity
LSL	Low Sustained Limit
RUC	Reliability Unit Commitment
GIC	Geomagnetically-Induced Current
GIM	Generator Interconnection or Modification
Texas SET	Texas Standard Electronic Transaction

