12/9/2022

Electric Reliability Council of Texas, Inc. (ERCOT)

8000 Metropolis Drive (Building E), Suite 100

Austin, Texas 78744

Re: Request for stakeholder written comments on proposed ERCOT Framework for Firm Gas Firm Fuel Supply Service Phase 2

Constellation appreciates the opportunity to submit comments on the proposed ERCOT Framework for Firm Gas Firm Fuel Supply Service (FFSS) Phase 2. As we look to expanding the eligibility of additional gas Resources, Constellation recommends the further expansion of the Firm Gas FFSS Service to consider resources that have duration capabilities beyond the current 48-hour duration. Winter storm Uri experienced load shed for up to 70.5 hours with the grid experiencing fuel limitations through the event. To mitigate against longer duration extreme weather events, Constellation recommends the procurement of a subset of resources that can provide up to 96 hours of contractual right to firm gas storage capacity on a third-party system under a Firm Gas Storage Agreement.

An additional criteria Constellation would like ERCOT to consider are Resources with redundant firm gas transportation contracts that provide direct path supply from gas storage facilities. As we saw with Uri, parts of the gas pipeline infrastructure experienced reduced pressures and in some cases had difficultly supplying gas plants. Resources with multiple pipeline interconnections and enough capacity to supply the plant on either pipeline individually, with firm rights to an independent storage provider (where they also hold firm rights), provides redundancy and additional reliability to that generator’s gas supply. ERCOT can continue to procure the Resource types as proposed in Phase 1 and 2, however Constellation believes it is important to have a subset of resources to protect against longer periods of gas supply constraints as well as individual pipeline constraints.

Furthermore, Constellation believes having long term supply firm gas transportation contracts are essential to ensuring the long term sustainability to provide this service and would like ERCOT to include a metric in the procurement process that awards Resources with contracts that extend beyond the contracted period.

Constellation looks forward to participating in stakeholder discussions at the December 14th workshop.

Respectfully submitted,

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Director, Wholesale Market Development

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