



Item 8.6: Revision Request Status Update

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Manager, Market Rules and Stakeholder Support

Reliability and Markets Committee Meeting

ERCOT Public

February 27, 2023

Revision Request Status Update: Overview

- **Purpose**

- Provide an update on recent Revision Request activity

- **Voting Items / Requests**

- No action is requested of the R&M Committee or Board; for discussion only

- **Key Takeaways**

- In 2022, ERCOT processed 70 new Revision Requests and approved 77
- 9 Revision Requests for February Board Consideration
- 35 Revision Requests currently in process
- Aging Revision Requests:
 - NOGRR215, Limit Use of Remedial Action Schemes: Stakeholders plan to advance at March Reliability and Operations Subcommittee (ROS) meeting
 - NPRR1067, Market Entry Qualifications, Continued Participation Requirements, and Credit Risk Assessment: ERCOT staff is developing comments
 - NOGRR230, WAN Participant Security: Request for Information regarding technology currently used is in process

Revision Request Summaries and Statistics

Revision Request Summaries

- Revision Requests for Board Consideration
- Revision Requests in Process
- 2022 Revision Request Recap

Appendix

- Aging Revision Requests in Process (Tabled for over 6 months)
- 2023 Approved Revision Request Budgetary Impact and Staffing Impact Detail
- Statistics (Historical to Date)
 - New Revision Requests
 - Approved Revision Requests
 - Revision Request Sponsorship
- Acronyms

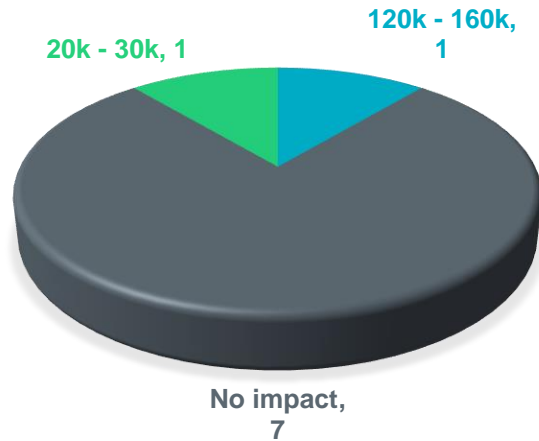
9 Revision Requests for February Board Consideration

Unopposed Revision Requests Recommended by TAC for Approval

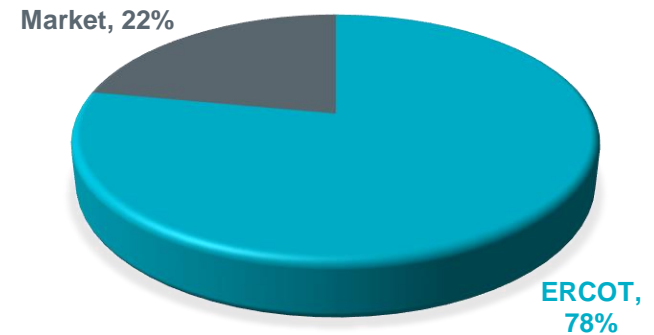
- NPRR1144, Station Service Backup Power Metering
- NPRR1147, Update and Improve Notification and Evaluation Processes Associated with Reliability Must-Run (RMR)
- NPRR1149, Implementation of Systematic Ancillary Service Failed Quantity Charges
- NPRR1151, Protocol Revision Subcommittee Meeting Requirement
- NPRR1153, ERCOT Fee Schedule Changes
- NPRR1158, Remove Sunset Date for Weatherization Inspection Fees
- NPRR1159, Related to RMGRR171, Changes to Transition Process that Require Opt-in MOU or EC that are Designating POLR to provide Mass Transition Methodology to ERCOT
- PGRR102, Dynamic Operation Model Improvement
- RMGRR171, Changes to Transition Process that Require Opt-in MOU and EC that are Designating POLR to provide Mass Transition Methodology to ERCOT

9 Revision Requests for February Board Consideration

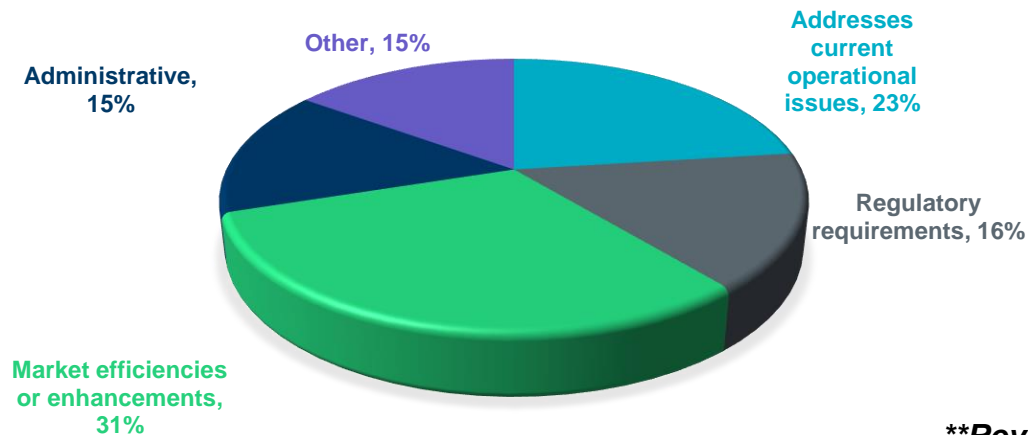
BUDGETARY IMPACTS



REVISION REQUEST SPONSORSHIP



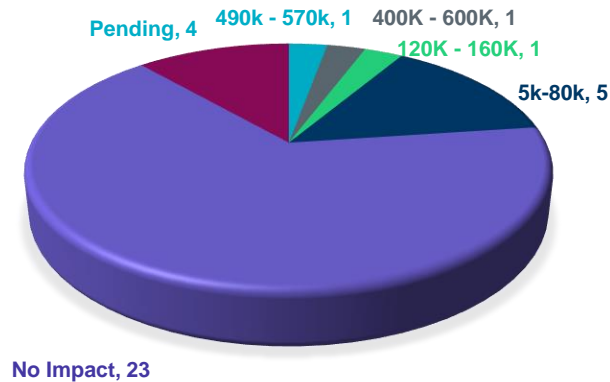
REASONS FOR REVISIONS



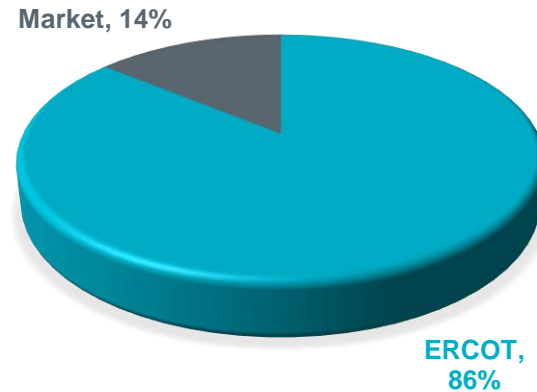
*****Revision Requests can cover multiple Reasons for Revisions***

35 Revision Requests in Process

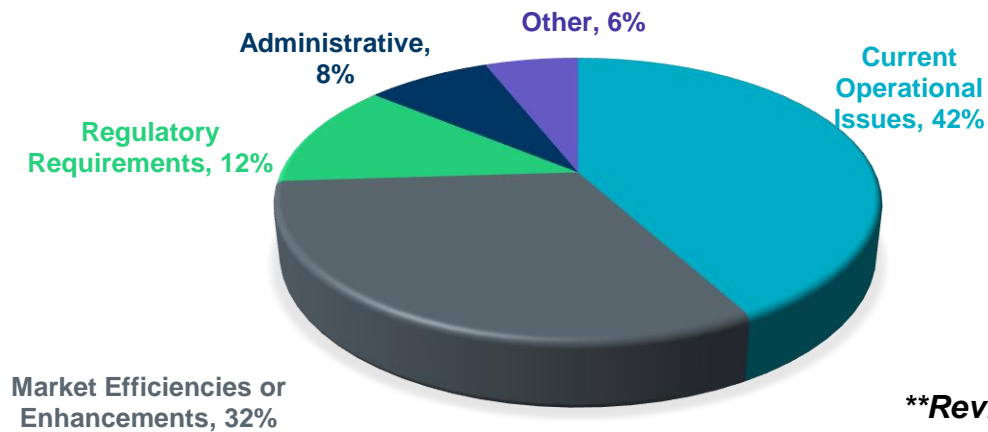
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REVISION REQUEST SPONSORSHIP



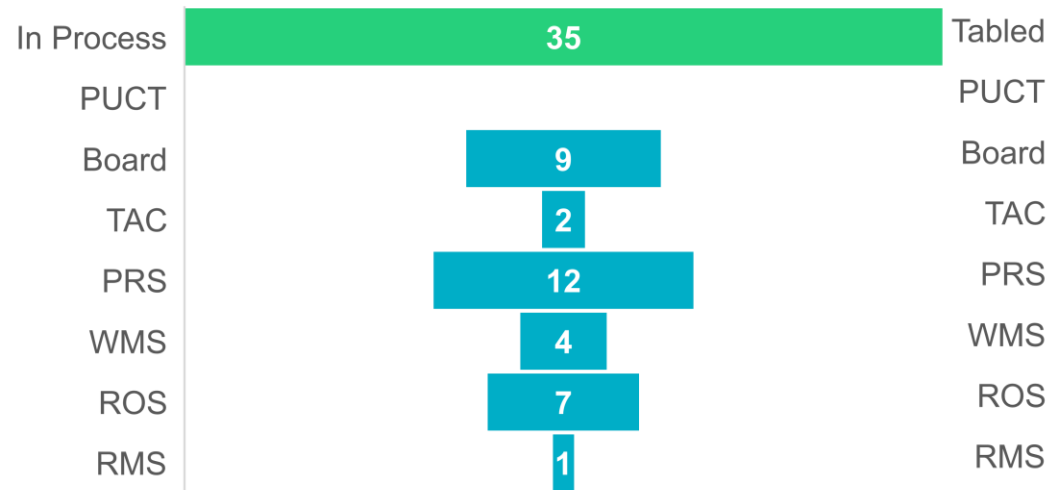
REASONS FOR REVISIONS



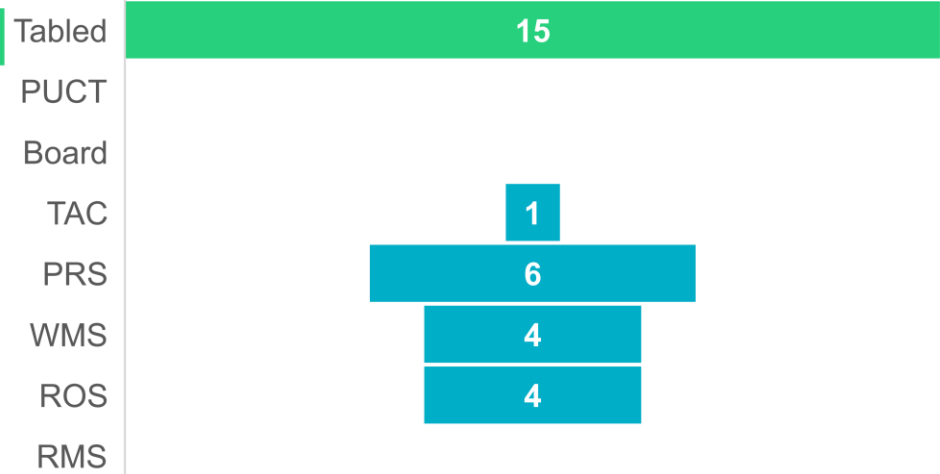
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35 Revision Requests in Process

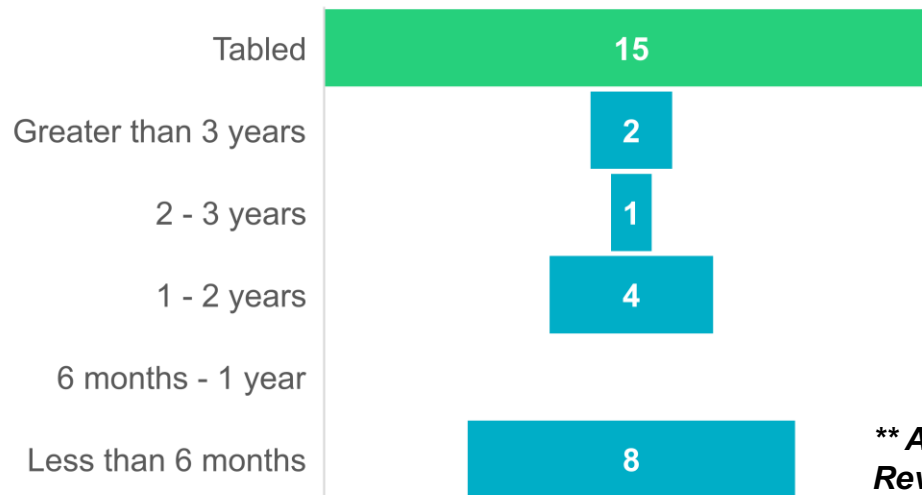
Location of Revision Requests



Location of Tabled Revision Requests



Length Tabled



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

2022 Revision Request Recap

- 70 New Revision Requests Processed
- 77 Revision Requests Approved through Stakeholder Process
- 378 Reports Developed
- 60 Subcommittee/TAC Meetings Supported
- 260+ Working Group/Task Force/Workshop Meetings Supported

Appendix: Aging Revision Requests in Process

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

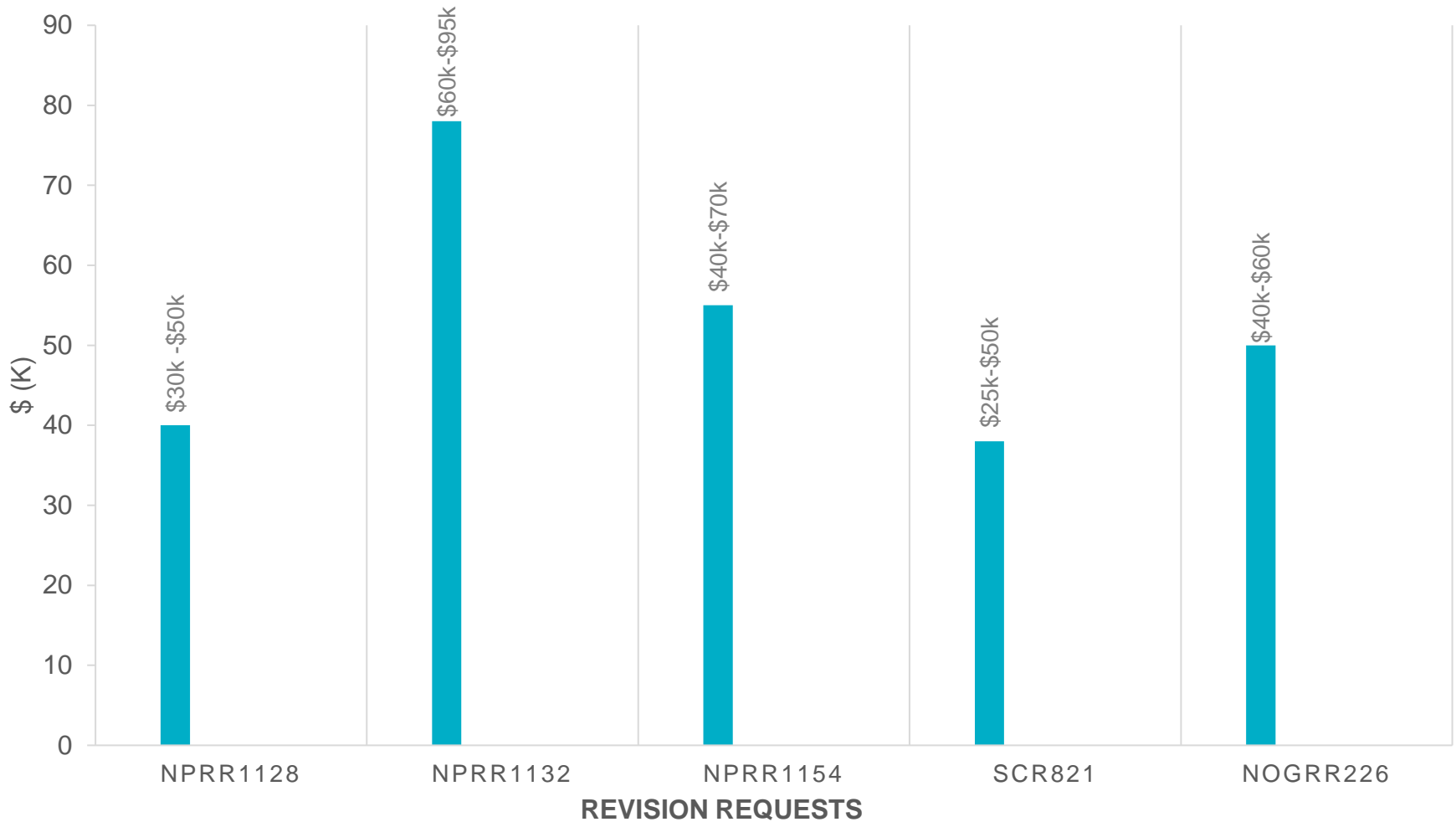
Revision Request	Length Tabled	Notes
NPRR956, Designation of Providers of Transmission Additions. [ERCOT]	Greater than 3 years (7/7/19)	Entities filed suit in the U.S. District Court for the Western District of Texas to challenge the validity of Senate Bill 1938. Although the District has since dismissed 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 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. CMWG/ROS continuing review with intention of moving forward at March ROS meeting.
VCMR031, 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.

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

Revision Request	Length Tabled	Notes
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 developing comments.
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.
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. RFI regarding technology used currently in process.

Appendix: 2023 Approved Revision Request Budgetary Impact / Staffing Impact Detail

2023 Approved Revision Requests – Budgetary Impact



*** 6 No-Impact Revision Requests Approved**

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



2023 Approved Revision Requests – Budgetary Impact

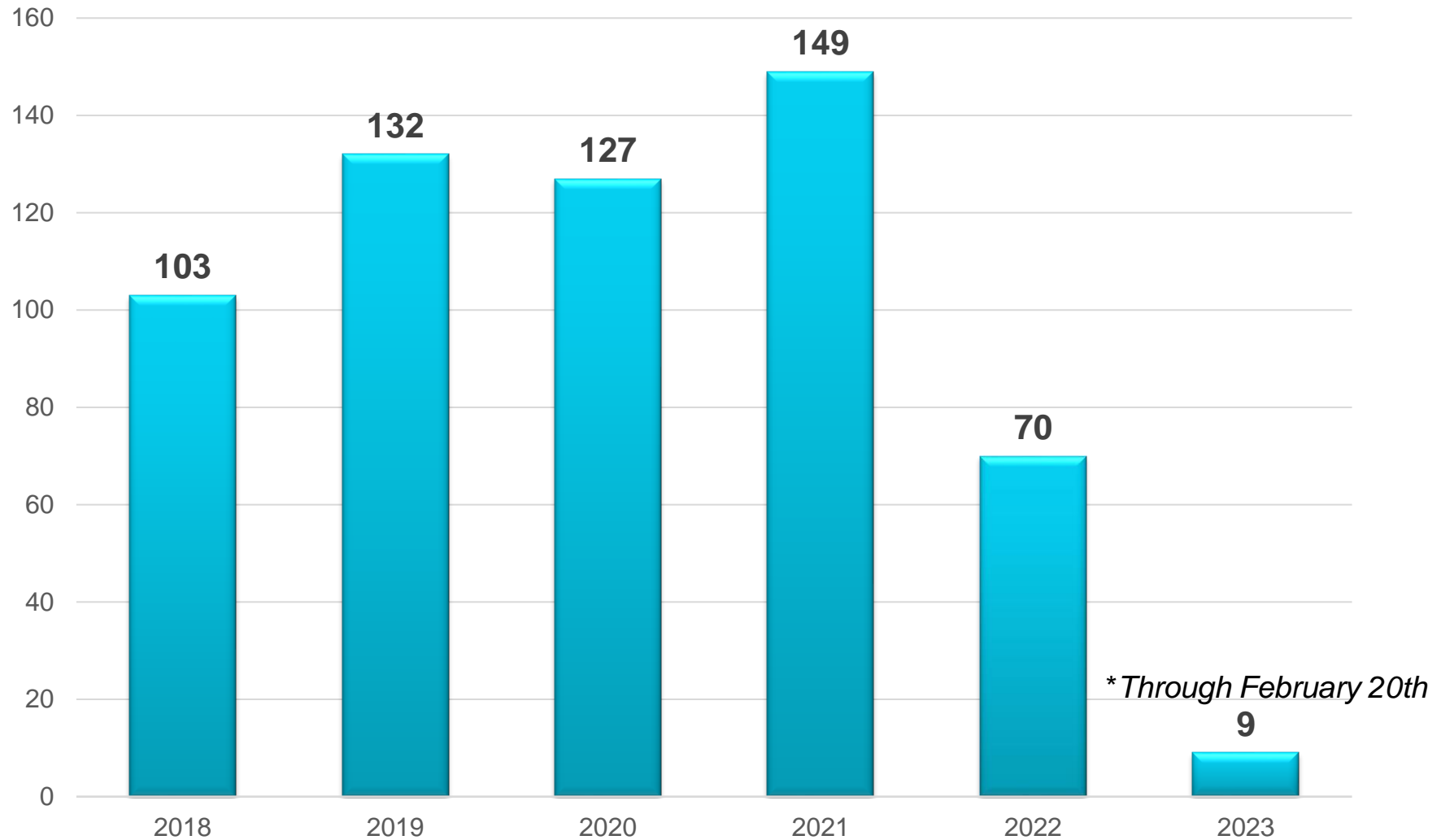
PUC Approval Date	Revision Request	Budgetary Impact
1/26/23	NPRR1128, Allow FFR Procurement up to FFR Limit Without Proration	\$30K - \$50K
1/26/23	NPRR1132, Communicate Operating Limitations during Cold and Hot Weather Conditions	\$60K - \$95K
1/26/23	NPRR1154, Include Alternate Resource in the Availability Plan for the Firm Fuel Supply Service	\$40K - \$70K
1/26/23	SCR821, Voltage Set Point Target Information for Distribution Generation Resource (DGR) or Distribution Energy Storage Resource (DESR)	\$25K - \$50K
1/26/23	NOGRR226, Addition of Supplemental UFLS Stages	\$40K - \$60K
TOTAL		~ \$195K - \$325K

2023 Approved Revision Requests – Staffing Impact

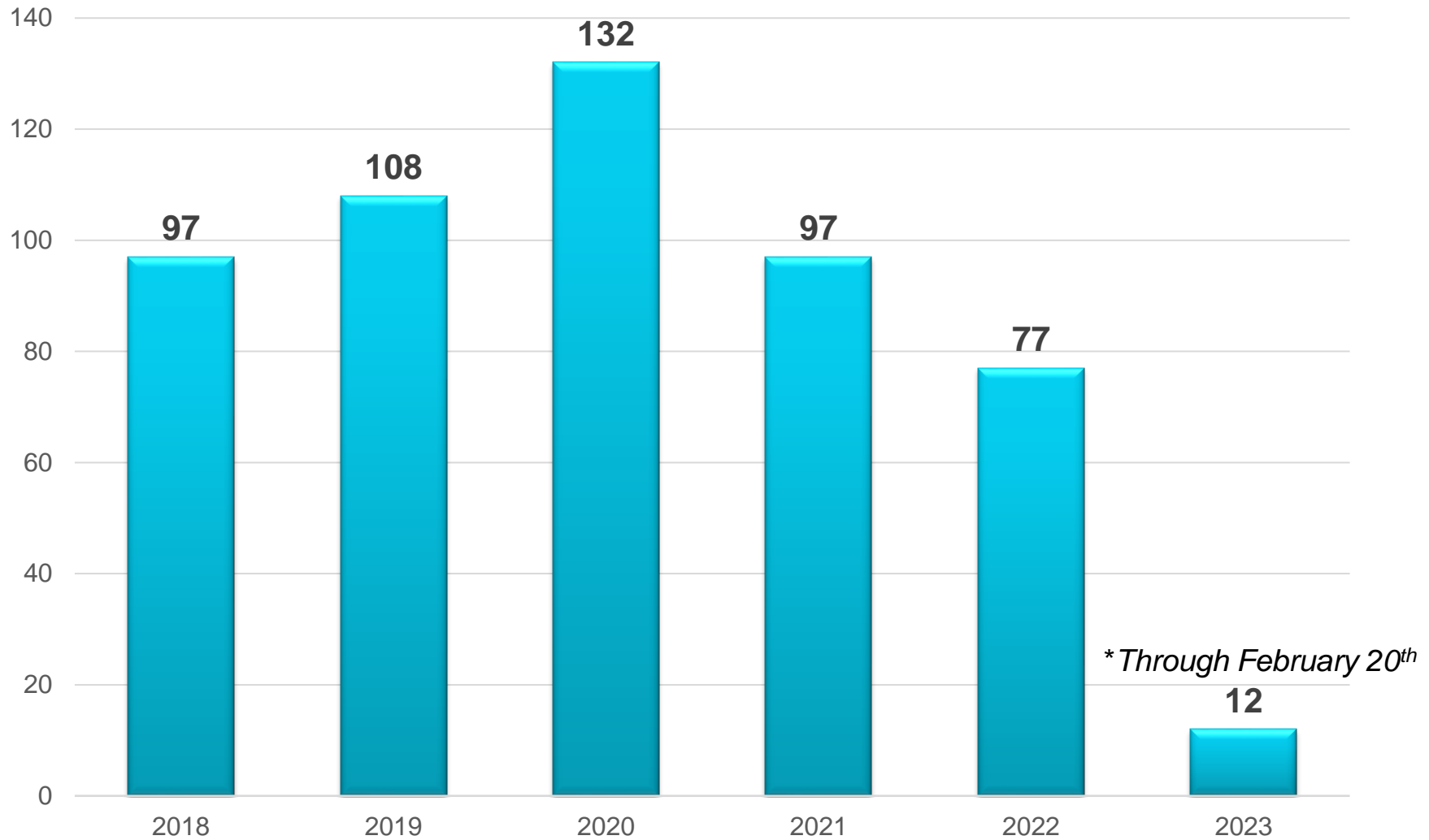
Approval Date	Revision Request	ERCOT Department	FTE Impact	Additional FTEs Required
None				
Totals				None

Appendix: Statistics (Historical to Date)

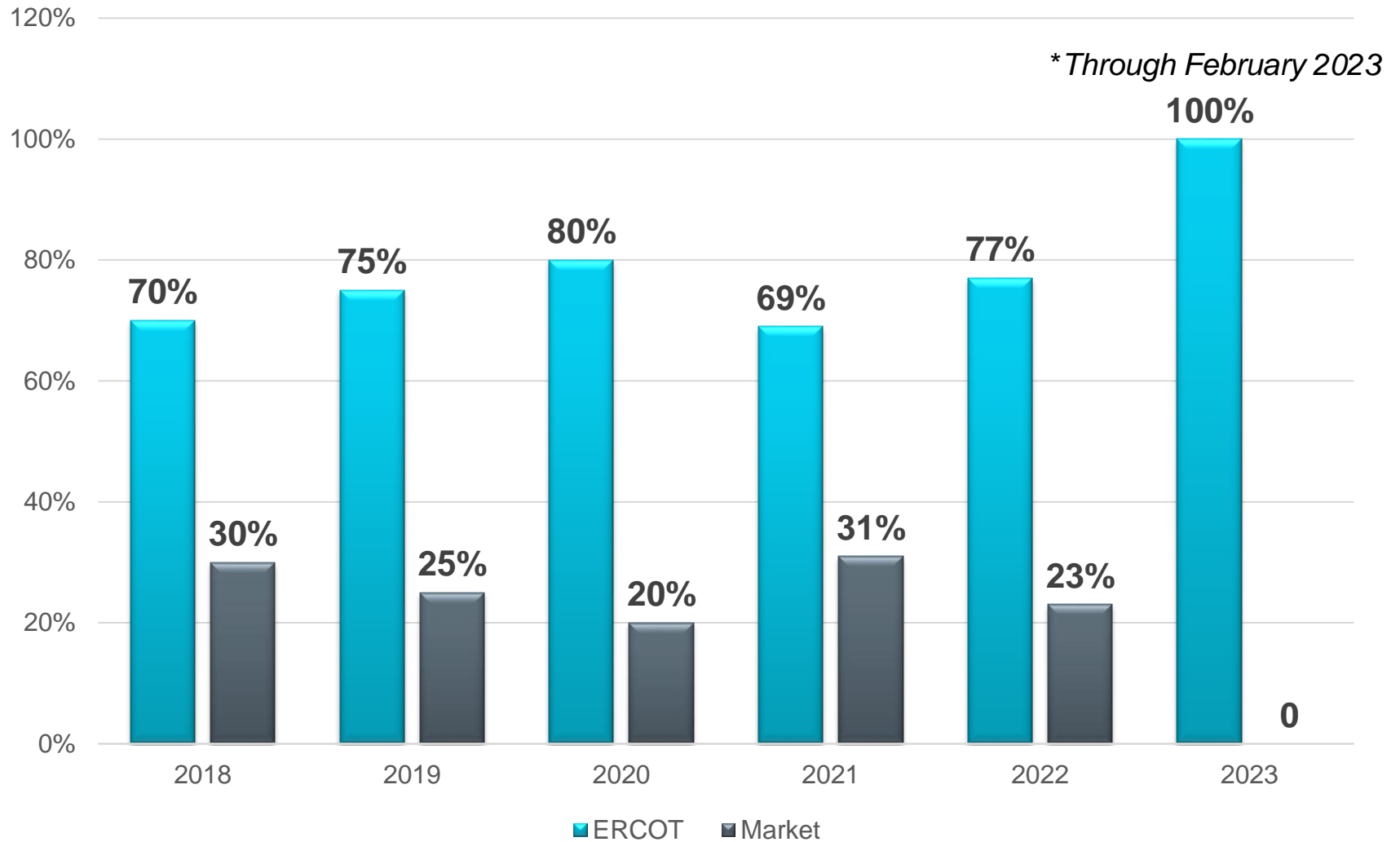
Statistics – New Revision Requests Submitted



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
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