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| NPRR Number | [1162](https://www.ercot.com/mktrules/issues/NPRR1162) | NPRR Title | Single Agent Designation for a QSE and its Sub-QSEs for Voice Communications over the ERCOT WAN |
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| Date | | March 30, 2023 | |
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| Submitter’s Information | | | |
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| Phone Number | | 817-303-1869 | |
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| Market Segment | | Independent Power Marketer (IPM) | |

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| Comments |

TPS appreciates the opportunity to submit these comments in support of both reliability and the continued availability of current business practices.

TPS does not fully understand the Business Case as described by ERCOT in the Nodal Protocol Revision Request (NPRR) as drafted.  ERCOT states that this unnecessary restriction would reduce uncertainty over which Qualified Scheduling Entity (QSE) represents its Sub-QSEs for purposes of communications with ERCOT.  The QSE Agency Agreement clearly delineates this responsibility and correct mapping within ERCOT’s phone systems should prevent any potential miscommunications.

Additionally, implementation of this NPRR would limit the ability of an Agent to represent a sub-QSE without also representing the main QSE and all other sub-QSEs under that main QSE.  Any parties currently utilizing this model would be forced to terminate contracts or potentially register new QSEs and sub-QSEs.

TPS respectfully recommends that this NPRR be rejected.

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| Revised Cover Page Language |

None

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| Revised Proposed Protocol Language |

None