



Item 6.6: Revision Request Status Update

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Reliability and Markets Committee Meeting

ERCOT Public

April 17, 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**

- 12 Revision Requests for April Board Consideration
 - 9 Revision Requests codify PUCT approval of Revision Requests into Protocols/Guides
- 48 Revision Requests currently in process
- Aging Revision Requests:
 - NOGRR215, Limit Use of Remedial Action Schemes: Tabled since 7/9/20, moved forward at March ROS meeting
 - VCMRR031, Clarification Related to Variable Costs in Fuel Adders: Tabled since 3/3/21, moved forward at March WMS meeting
 - 6 Revision Requests added to aging list – tabled for more than 6 months

Revision Request Summaries and Statistics

Revision Request Summaries

- Revision Requests for Board Consideration
- Revision Requests in Process

Appendix

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

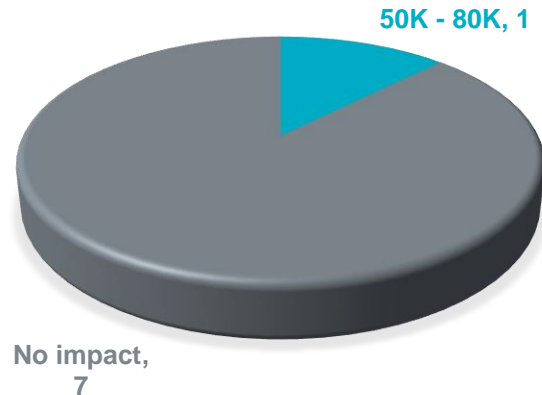
12 Revision Requests for April Board Consideration

Unopposed Revision Requests Recommended by TAC for Approval

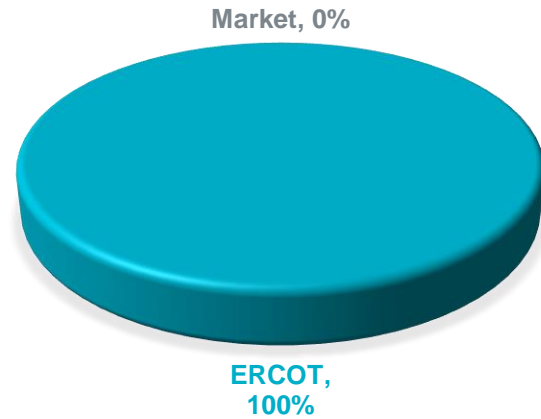
- NPRR1145, Use of State Estimator-Calculated ERCOT-Wide TLFs in Lieu of Seasonal Base Case ERCOT-Wide TLFs for Settlement
- NPRR1155, Attestation Regarding Market Participant Citizenship, Ownership, or Headquarters
- NPRR1157, Incorporation of PUCT Approval into Revision Request Process
- COPMGRR049, Related to NPRR1157, Incorporation of PUCT Approval into Revision Request Process – URGENT
- LPGRR072, Related to NPRR1157, Incorporation of PUCT Approval into Revision Request Process – URGENT
- NOGRR248, Related to NPRR1157, Incorporation of PUCT Approval into Revision Request Process – URGENT
- OBDRR044, Related to NPRR1085, Ensuring Continuous Validity of Physical Responsive Capability (PRC) and Dispatch through Timely Changes to Resource Telemetry and Current Operating Plans (COPs)
- PGRR104, Related to NPRR1157, Incorporation of PUCT Approval into Revision Request Process – URGENT
- RMGRR173, Related to NPRR1157, Incorporation of PUCT Approval into Revision Request Process – URGENT
- RRGRR034, Related to NPRR1157, Incorporation of PUCT Approval into Revision Request Process – URGENT
- SMOGRR026, Related to NPRR1157, Incorporation of PUCT Approval into Revision Request Process – URGENT
- VCMRR036, Related to NPRR1157, Incorporation of PUCT Approval into Revision Request Process – URGENT

12 Revision Requests for April Board Consideration

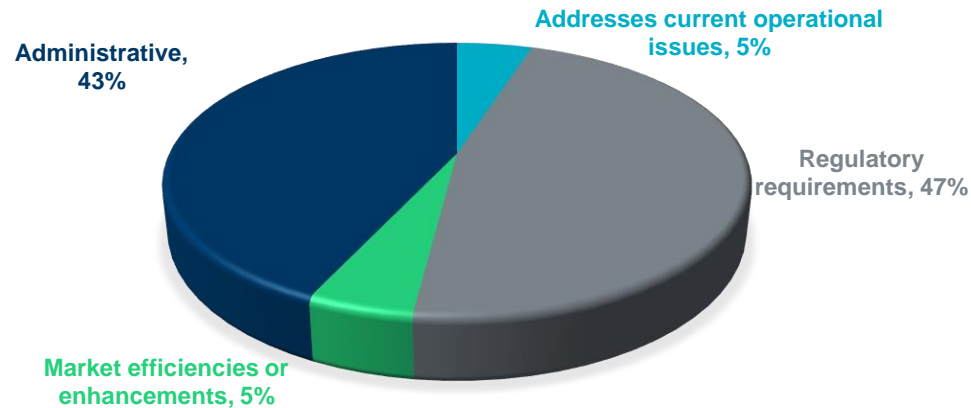
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REVISION REQUEST SPONSORSHIP



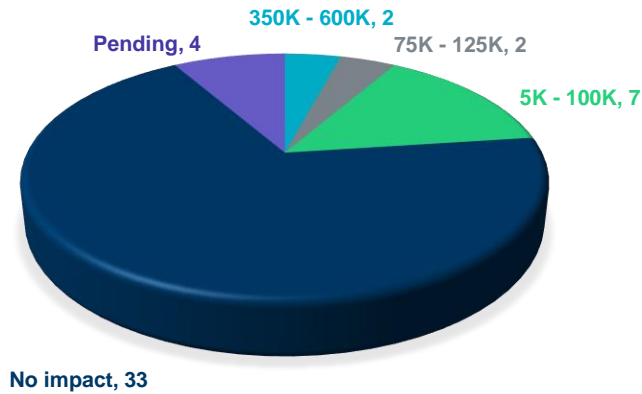
REASONS FOR REVISIONS



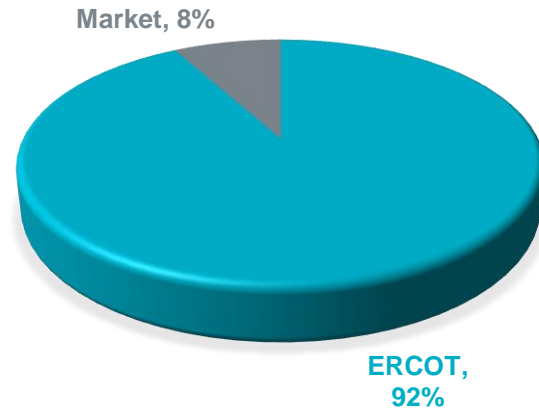
*****Revision Requests can cover multiple Reasons for Revisions***

48 Revision Requests in Process

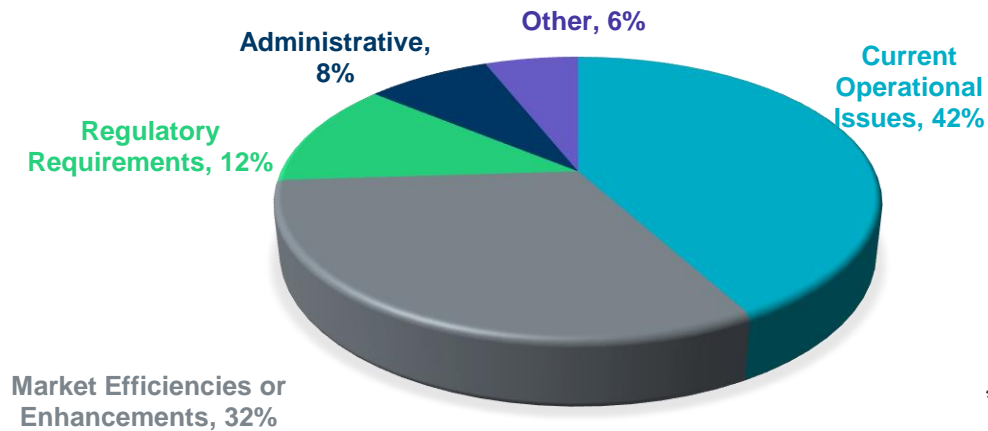
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REVISION REQUEST SPONSORSHIP



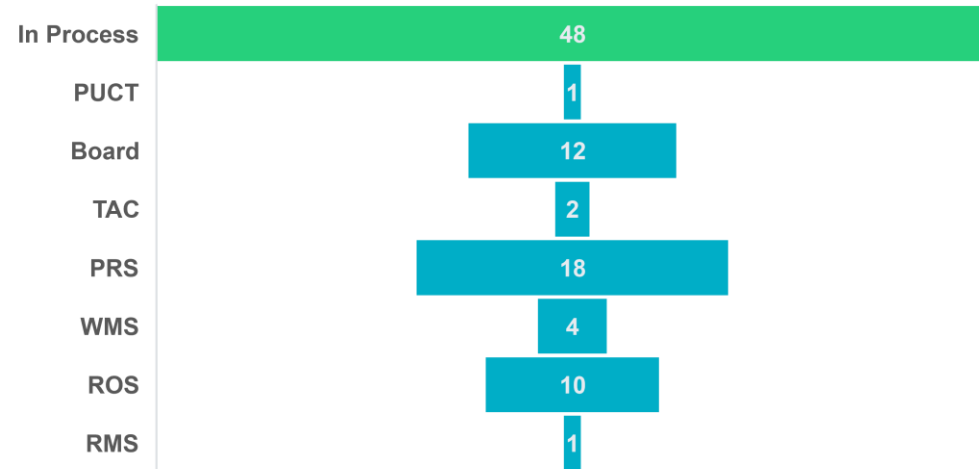
REASONS FOR REVISIONS



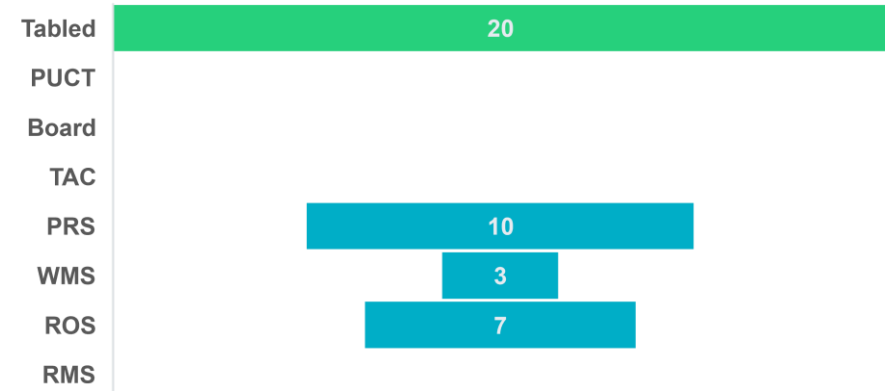
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48 Revision Requests in Process

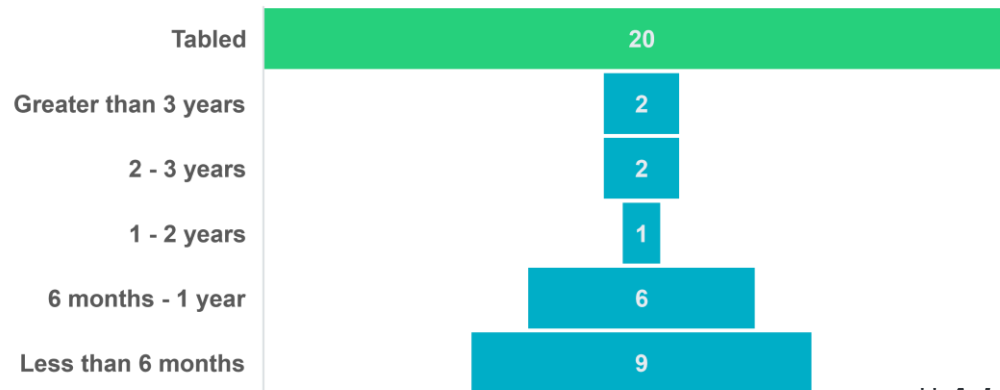
Location of Revision Requests



Location of Tabled Revision Requests



Length Tabled



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

Appendix: Aging Revision Requests in Process

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

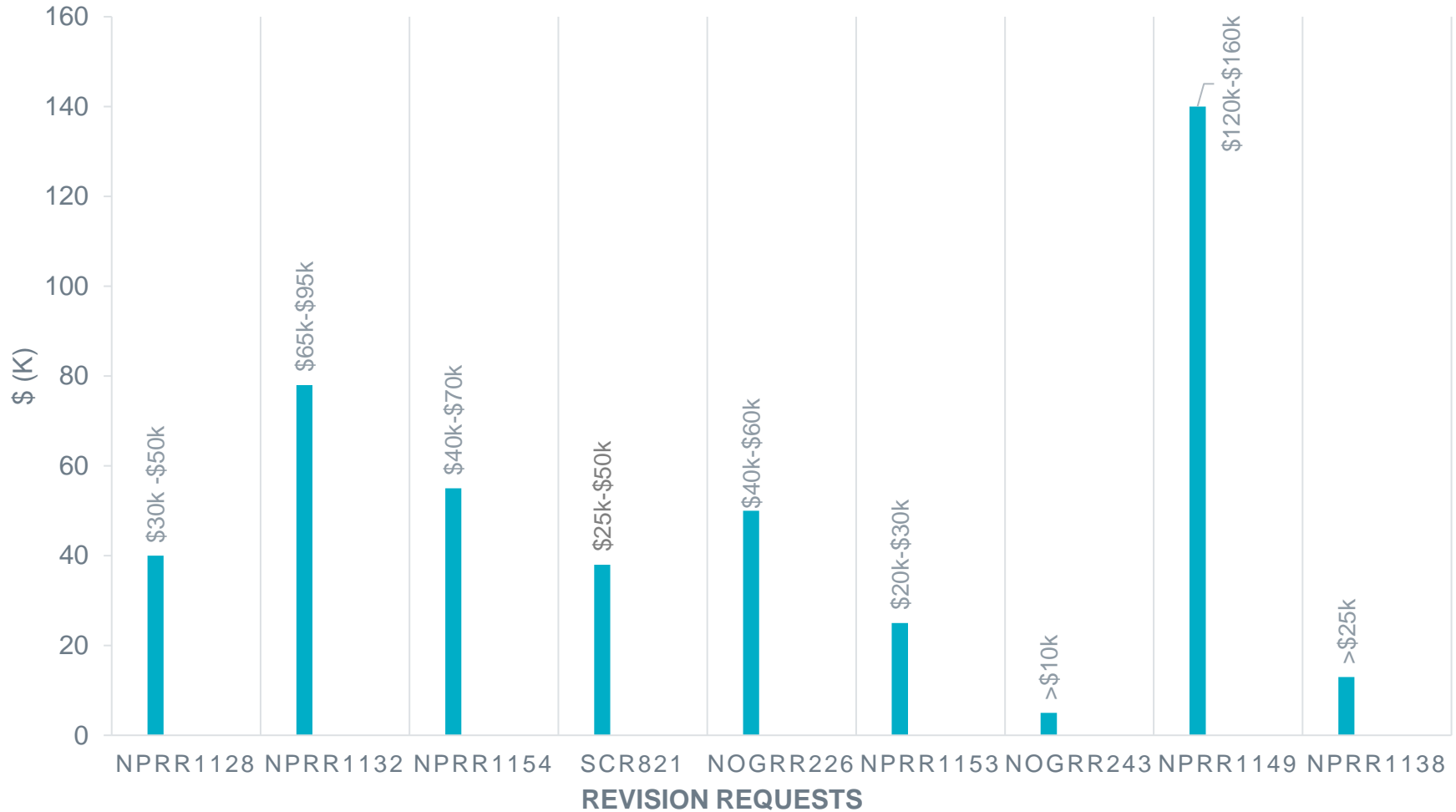
Revision Request	Length Tabled	Notes
NPRR956, Designation of Providers of Transmission Additions. [ERCOT]	Greater than 3 years (7/7/19)	Entities filed suit in the U.S. District Court for the Western District of Texas to challenge the validity of Senate Bill 1938. Although the District has since dismissed 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
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.
NPRR1150, Related to NOGRR230, WAN Participant Security	6 months – 1 year (10/13/22)	See NOGRR230.

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

Revision Request	Length Tabled	Notes
NPRR1143, Provide ERCOT Flexibility to Determine When ESRs May Charge During an EEA Level 3	6 months – 1 year (8/11/22)	Discussed at April WMS – additional discussion at April PRS.
NPRR1146, Credit Changes to Appropriately Reflect TAO Exposure	6 months – 1 year (9/15/22)	9/1/22 ERCOT comments not in support of NPRR1146; presented stakeholder-requested analysis at the March MCWG meeting highlighting issues with the proposed changes in NPRR1146. Discussions will continue at the newly formed Credit Finance Sub Group (CFSG) in April.
VCMRR033, Excluding Exceptional Fuel Costs from Fuel Adders	6 months – 1 year (8/3/22)	Market Participants are working on an NPRR to clarify what costs are included in the fuel adder, and continue to table VCMRR033.
VCMRR034, Excluding RUC Approved Fuel Costs from Fuel Adders	6 months – 1 year (8/3/22)	Market Participants are working on an NPRR to clarify what costs are included in the fuel adder, and continue to table VCMRR034.
VCMRR035, Allow Verified Contractual Costs in Fuel Adder Calculation	6 months – 1 year (8/3/22)	ERCOT Staff and Market Participants are working together to address and expand on concepts in VCMRR035. Possible NPRRs may need to be developed.

Appendix: 2023 Approved Revision Requests - Budgetary Impact/Staffing Impact

2023 Approved Revision Requests – Budgetary Impact



2023 Approved Revision Requests – Budgetary Impact

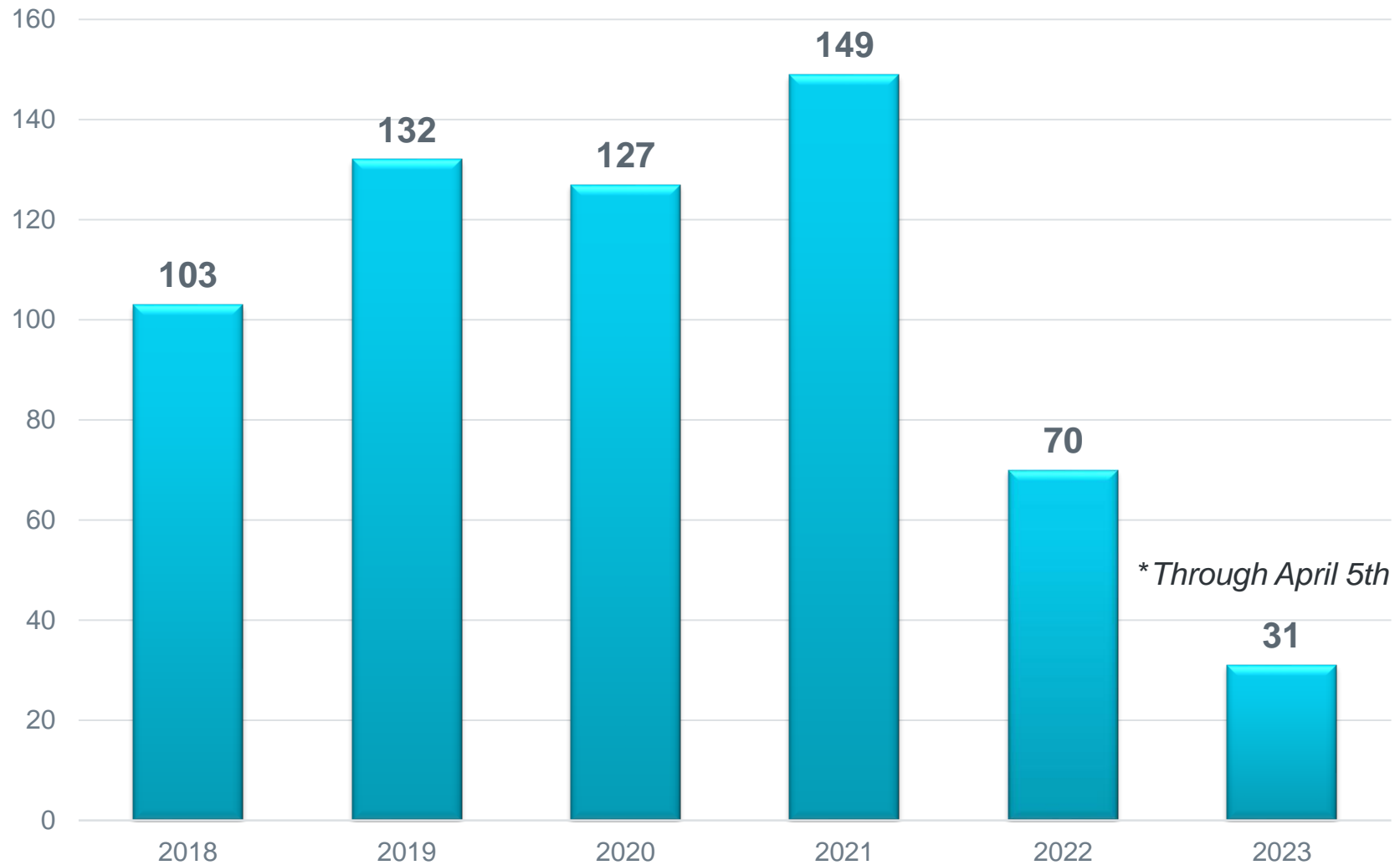
PUC Approval Date	Revision Request	Budgetary Impact
1/26/23	NPRR1128, Allow FFR Procurement up to FFR Limit Without Proration	\$30K - \$50K
1/26/23	NPRR1132, Communicate Operating Limitations during Cold and Hot Weather Conditions	\$60K - \$95K
1/26/23	NPRR1154, Include Alternate Resource in the Availability 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
1/26/23	NPRR1138, Communication of Capability and Status of Online IRRs at 0 MW Output	<\$25K
1/26/23	NOGRR243, Implementation of Seasonal Load Shed Tables	<\$10K
3/23/23	NPRR1153, ERCOT Fee Schedule Changes	\$20K - \$30k
3/23/23	NPRR1149, Implementation of Systematic Ancillary Service Failed Quantity Charges	\$120K - \$160K
TOTAL		~ \$337K - \$550K

2023 Approved Revision Requests – Staffing Impact

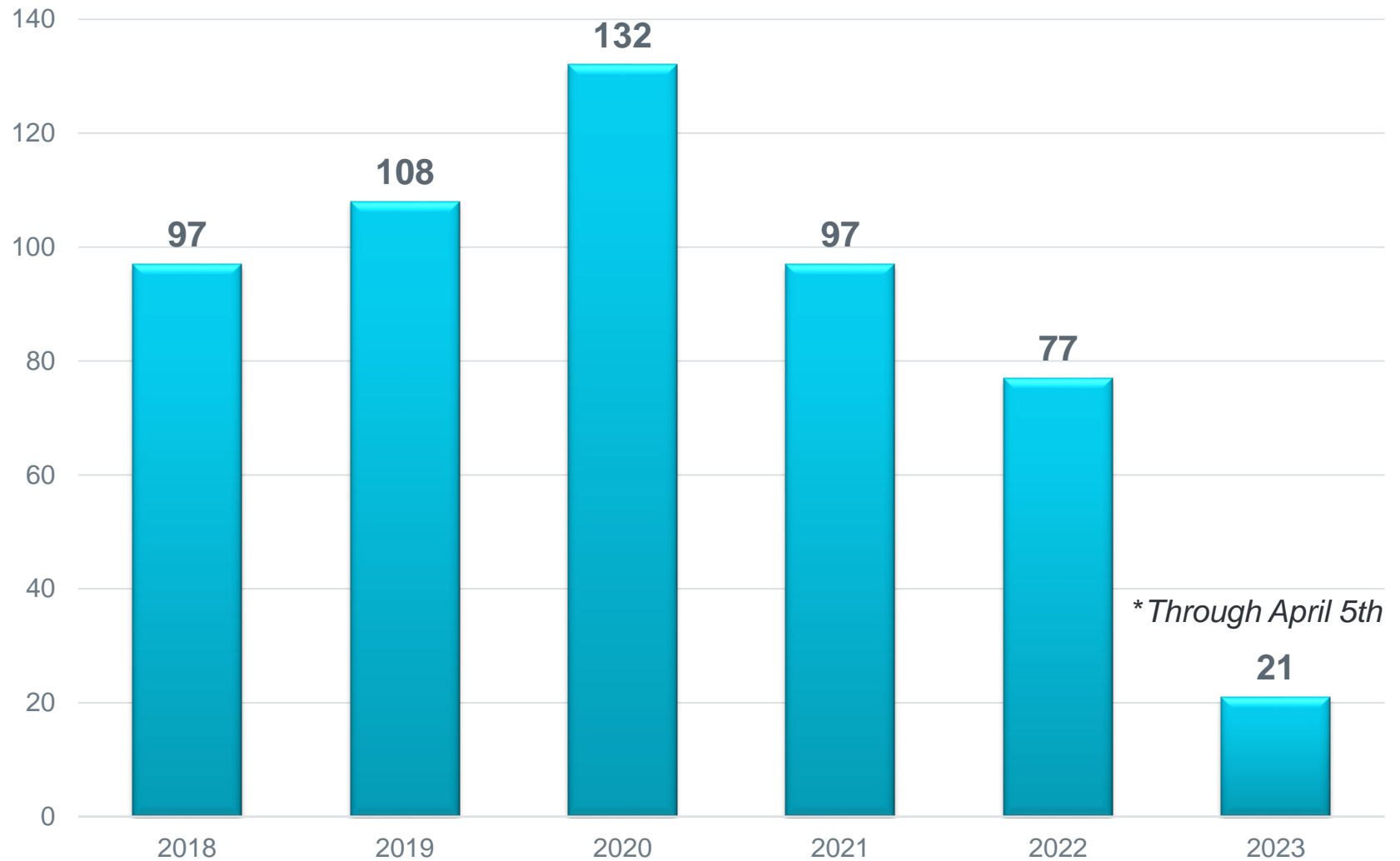
Approval Date	Revision Request	ERCOT Department	FTE Impact	Additional FTEs Required
None				
Totals				None

Appendix: Statistics (Historical to Date)

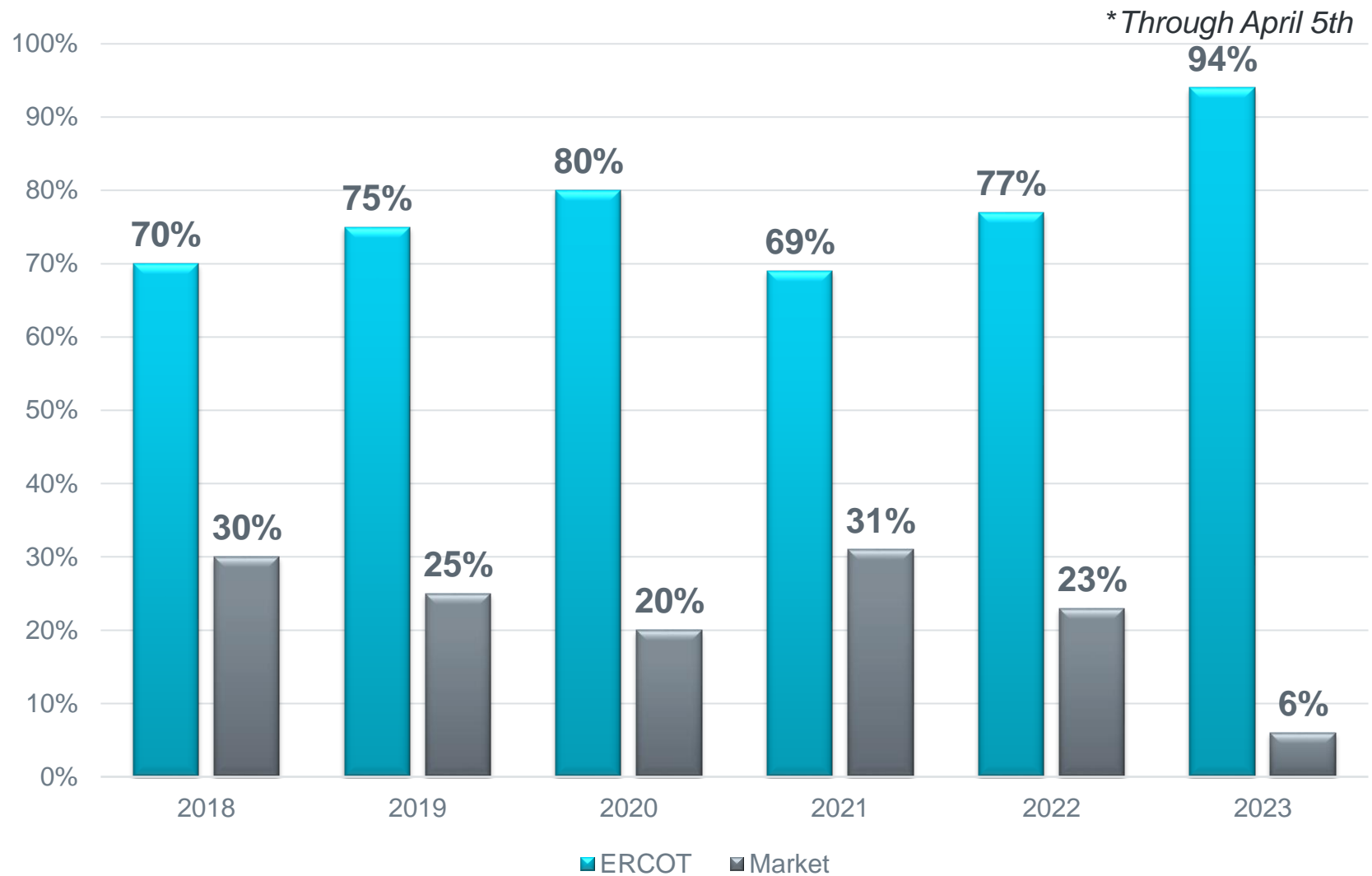
Statistics – New Revision Requests Submitted



Statistics – Approved Revision Requests



Statistics – Revision Request Sponsorship



Appendix: Acronyms

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

Appendix: 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