July 24, 2023

Dispatchable Reliability Reserve Service (DRRS) [Workshop](https://www.ercot.com/calendar/07272023-DRRS-Discussion-Workshop)

As the Independent Market Monitor of ERCOT for the Public Utility Commission of Texas, Potomac Economics appreciates the opportunity to submit comments on the filed ERCOT materials posted for the DRRS workshop on July 27, 2023.

Below we list our questions and concerns:

Slide 3- 1) Did ERCOT consider removing online non-spin?

2) Did ERCOT consider allowing load resources to provide DRRS?

3) What criteria will be used to limit the amount of “non-spin” by longer lead time resources?

Slide 4- 1) When will ERCOT perform the holistic review? Will it be prior to the approval of the DRRS protocol changes? It would be helpful to know the procurement methodology ahead of approval.

Slide 5- 1) Will ERCOT reconsider the minimum limit on Security Constrained Economic Dispatch (SCED) dispatchable non-spin at the next ancillary services methodology update?

Slide 6- 1) We have concerns with the Operating Reserve Demand Curve (ORDC) statements. That approach will result in inaccurate offline ORDC values. Our understanding is that DRRS resources will telemeter OFFNS status code. Can ERCOT add a filter on RTOFFNSHSL to ensure that only <=30 minute resources contribute? If not immediately upon implementation due to resource constraints, then can this be grey-boxed to be accomplished soon after?