|  |  |  |  |
| --- | --- | --- | --- |
| NPRR Number | [1170](https://www.ercot.com/mktrules/issues/NPRR1170) | NPRR Title | Capturing Natural Gas Delivery Information for Natural Gas Generation Resources |
|  |  |
| Date | July 31, 2023 |
|  |  |
| Submitter’s Information |
| Name | Blake Holt, Bill Barnes, Ned Bonskowski, Bryan Sams |
| E-mail Address | blake.holt@lcra.org, bill.barnes@nrg.com, ned.bonskowski@vistracorp.com, bryan.sams@calpine.com |
| Company | LCRA, NRG Texas Power LLC, Luminant Generation Company LLC, Calpine  |
| Phone Number | 512-278-2003, 512-691-6137, 512-349-6464, 512-632-4870 |
| Cell Number |  |
| Market Segment | Cooperative, Independent Generator, Independent Generator, Independent Generator |

|  |
| --- |
| Comments |

Joint Commenters recognize the need for ERCOT to have deeper insight into fuel supply disruptions on the natural gas system that have a reasonable expectation to reduce the generation capacity on the ERCOT system. The methodology proposed in the original revision does not align with how Qualified Scheduling Entities (QSEs) that represent natural gas Generation Resources procure and allocate fuel among their fleet, therefore this compromise solution is proposed.

The first indication of such disruption would be received by the QSE in a written notification from the natural gas pipeline operator or natural gas fuel supplier that controls the supply that is directly connected to its Generation Resource. We believe that upon receiving such a notice and verifying the severity of the impact to the Generation Resource’s ability to supply electricity, that the QSE should submit written notice to ERCOT detailing the Resource’s potential disruption and subsequent timeline that it will be impacted (if available).

These actions should enable ERCOT to have better situational awareness and insight into fuel supply disruptions that could negatively affect the capacity available to the ERCOT system.

|  |
| --- |
| **Market Rules Notes** |

Please note the baseline Protocol language in the following sections has been updated to reflect the incorporation of the following NPRRs into the Protocols:

* NPRR1169, Expansion of Generation Resources Qualified to Provide Firm Fuel Supply Service in Phase 2 of the Service (incorporated 7/1/23)
	+ Section 1.3.1.1

Please note that the following NPRR(s) also propose revisions to the following section(s):

* NPRR1175, Revisions to Market Entry Financial Qualifications and Continued Participation Requirements
* Section 1.3.1.1
* NPRR1181, Submission of Seasonal Coal and Lignite Inventory Declaration
* Section 1.3.1.1
* NPRR1188, Implement Nodal Dispatch and Energy Settlement for Controllable Load Resources
* Section 1.3.1.1

|  |
| --- |
| Revised Cover Page Language |

|  |  |  |  |
| --- | --- | --- | --- |
| NPRR Number | [1170](https://www.ercot.com/mktrules/issues/NPRR1170) | NPRR Title |  Submission of Gas Supply Disruption |
| Nodal Protocol Sections Requiring Revision  | 1.3.1.1, Items Considered Protected Information3.24, Submission of Gas Supply Disruption (new)4.3, QSE Activities and Responsibilities in the Day-Ahead |
| Revision Description | This Nodal Protocol Revision Request (NPRR) defines the instances in which a Qualified Scheduling Entity (QSE) that represents a Generation Resource that relies on natural gas as the primary fuel source should notify ERCOT about disruptions to the Resource’s gas supply. |
| Reason for Revision |  Addresses current operational issues. Meets Strategic goals (tied to the [ERCOT Strategic Plan](https://www.ercot.com/files/docs/2018/12/13/ERCOT_Strategic_Plan_2019-2023.pdf) or directed by the ERCOT Board). Market efficiencies or enhancements Administrative Regulatory requirements Other: To provide the ERCOT control room more information on potential fuel problems that could impact dispatch of Generation Resources and thus reliability of the ERCOT system.*(please select all that apply)* |
| Business Case | ERCOT is currently reviewing planning and reliability needs with regards to fuel supply adequacy. Incomplete data limits planning outcomes and increases risk. During recent cold weather events, it became apparent that not all Resource Entities or their affiliates had purchased enough natural gas to satisfy the level of generation their QSE indicated was available in their Current Operating Plan (COP). This difference between the COP and actual fuel-supply arrangements resulted in Resource Entities being required to purchase spot natural gas from the intra-day market if their Generation Resource was called upon to run. In some cases, the Resource Entities were unable to find intra-day gas which limited the Generation Resources’ ability to perform at the MW output levels indicated in their COPs. This NPRR requires a QSE representing a Generation Resource relying on natural gas as the primary fuel source to notify ERCOT when the QSE or affiliate receives a written notification from the natural gas pipeline operator or natural gas fuel supplier that there is a fuel supply disruption or Force Majeure on a pipeline directly connected to the Generation Resource. This notification will give ERCOT operators additional situational awareness regarding potential outages and planning. ERCOT operators will use this information to identify potential capacity shortfalls and mitigate risk due to potential fuel supply disruptions.When ERCOT receives the fuel supply disruption notification from the QSE, the notice will serve to fill gaps in day ahead and operating day studies and allow for better Real-Time monitoring and analysis. Improved fuel supply disruption awareness supports overall reliability operations. |
| PRS Decision | On 4/13/23, PRS voted unanimously to table NPRR1170. All Market Segments participated in the vote.On 7/13/23, PRS voted unanimously to table NPRR1170 and refer the issue to WMS. All Market Segments participated in the vote. |
| Summary of PRS Discussion | On 4/13/23, participants expressed concern for supplying data for activity that is not controlled by electric generators, and that the NPRR language is not reflective of how various entities buy or manage gas. Participants also discussed support for statutory changes to allow ERCOT to gather data directly from source entities, and requested NPRR1170 be tabled pending legislative action.On 7/13/23, participants noted that anticipated legislation did not pass, and requested further discussion of NPRR1170 at WMS. Participants expressed concern for compliance obligations for entities that do not have the particular data. |

|  |
| --- |
| Revised Proposed Protocol Language |

1.3.1.1 Items Considered Protected Information

(1) Subject to the exclusions set out in Section 1.3.1.2, Items Not Considered Protected Information, and in Section 3.2.5, Publication of Resource and Load Information, “Protected Information” is information containing or revealing any of the following:

(a) Base Points, as calculated by ERCOT. The Protected Information status of this information shall expire 60 days after the applicable Operating Day;

(b) Bids, offers, or pricing information identifiable to a specific Qualified Scheduling Entity (QSE) or Resource. The Protected Information status of part of this information shall expire 60 days after the applicable Operating Day, as follows:

(i) Ancillary Service Offers by Operating Hour for each Resource for all Ancillary Services submitted for the Day-Ahead Market (DAM) or any Supplemental Ancillary Services Market (SASM);

(ii) The quantity of Ancillary Service offered by Operating Hour for each Resource for all Ancillary Service submitted for the DAM or any SASM; and

(iii) Energy Offer Curve prices and quantities for each Settlement Interval by Resource. The Protected Information status of this information shall expire within seven days after the applicable Operating Day if required to be posted as part of paragraph (5) of Section 3.2.5 and within two days after the applicable Operating Day if required to be posted as part of paragraph (7) of Section 3.2.5;

|  |
| --- |
| ***[NPRR1013: Replace paragraph (b) above with the following upon system implementation of the Real-Time Co-Optimization (RTC) project:]***(b) Bids, offers, or pricing information identifiable to a specific Qualified Scheduling Entity (QSE) or Resource. The Protected Information status of part of this information shall expire 60 days after the applicable Operating Day, as follows:(i) Ancillary Service Offers by Operating Hour or Security-Constrained Economic Dispatch (SCED) interval for each Resource for all Ancillary Services submitted for the Day-Ahead Market (DAM) or Real-Time Market (RTM);(ii) The quantity of Ancillary Service offered by Operating Hour or SCED interval for each Resource for all Ancillary Service submitted for the DAM or RTM; and(iii) A Resource’s Energy Offer Curve prices and quantities by Operating Hour or SCED interval. The Protected Information status of this information shall expire within seven days after the applicable Operating Day if required to be posted as part of paragraph (5) of Section 3.2.5 and within two days after the applicable Operating Day if required to be posted as part of paragraph (7) of Section 3.2.5; |

(c) Status of Resources, including Outages, limitations, or scheduled or metered Resource data. The Protected Information status of this information shall expire as follows:

(i) For each Forced Outage, Maintenance Outage, or Forced Derate of a Generation Resource or Energy Storage Resource (ESR) that occurs during or extends into an Operating Day, the Protected Information status of the following information shall expire three days after the applicable Operating Day:

(A) The name and unit code of the Resource affected;

(B) The Resource’s fuel type;

(C) The type of Outage or derate;

(D) The start date/time and the planned and actual end date/time;

(E) The Resource’s applicable Seasonal net maximum sustainable rating;

(F) The available and outaged MW during the Outage or derate; and

(G) The entry in the “nature of work” field in the Outage Scheduler and any other information concerning the cause of the Outage or derate;

(ii) For each Resource Outage or Forced Derate that occurs during, or that extends into, any time period in which ERCOT has declared an Energy Emergency Alert (EEA), ERCOT may immediately disclose the information identified in paragraph (i) above to a state Governmental Authority, the office of the Governor of Texas, the office of the Lieutenant Governor of Texas, or any member of the Texas Legislature, if requested; and

(iii) For all other information, the Protected Information status shall expire 60 days after the applicable Operating Day;

(d) Current Operating Plans (COPs). The Protected Information status of this information shall expire 60 days after the applicable Operating Day;

(e) Ancillary Service Trades, Energy Trades, and Capacity Trades identifiable to a specific QSE or Resource. The Protected Information status of this information shall expire 180 days after the applicable Operating Day;

(f) Ancillary Service Schedules identifiable to a specific QSE or Resource. The Protected Information status of this information shall expire 60 days after the applicable Operating Day;

|  |
| --- |
| ***[NPRR1013: Replace paragraph (f) above with the following upon system implementation of the Real-Time Co-Optimization (RTC) project:]***(f) Ancillary Service awards identifiable to a specific QSE or Resource. The Protected Information status of this information shall expire 60 days after the applicable Operating Day; |

(g) Dispatch Instructions identifiable to a specific QSE or Resource, except for Reliability Unit Commitment (RUC) commitments and decommitments as provided in Section 5.5.3, Communication of RUC Commitments and Decommitments. The Protected Information status of this information shall expire 180 days after the applicable Operating Day;

(h) Raw and Adjusted Metered Load (AML) data (demand and energy) identifiable to:

(i) A specific QSE or Load Serving Entity (LSE). The Protected Information status of this information shall expire 180 days after the applicable Operating Day; or

(ii) A specific Customer or Electric Service Identifier (ESI ID);

(i) Wholesale Storage Load (WSL) data identifiable to a specific QSE. The Protected Information status of this information shall expire 60 days after the applicable Operating Day;

(j) Settlement Statements and Invoices identifiable to a specific QSE. The Protected Information status of this information shall expire 180 days after the applicable Operating Day;

(k) Number of ESI IDs identifiable to a specific LSE. The Protected Information status of this information shall expire 365 days after the applicable Operating Day;

(l) Information related to generation interconnection requests, to the extent such information is not otherwise publicly available. The Protected Information status of certain generation interconnection request information expires as provided in Section 1.3.1.4, Expiration of Protected Information Status;

(m) Resource-specific costs, design and engineering data, including such data submitted in connection with a verifiable cost appeal;

(n) Congestion Revenue Right (CRR) credit limits, the identity of bidders in a CRR Auction, or other bidding information identifiable to a specific CRR Account Holder. The Protected Information status of this information shall expire as follows:

(i) The Protected Information status of the identities of CRR bidders that become CRR Owners and the number and type of CRRs that they each own shall expire at the end of the CRR Auction in which the CRRs were first sold; and

(ii) The Protected Information status of all other CRR information identified above in item (n) shall expire six months after the end of the year in which the CRR was effective.

(o) Renewable Energy Credit (REC) account balances. The Protected Information status of this information shall expire three years after the REC Settlement period ends;

(p) Credit limits identifiable to a specific QSE;

(q) Any information that is designated as Protected Information in writing by Disclosing Party at the time the information is provided to Receiving Party except for information that is expressly designated not to be Protected Information by Section 1.3.1.2 or that, pursuant to Section 1.3.1.4, is no longer confidential;

(r) Any information compiled by a Market Participant on a Customer that in the normal course of a Market Participant’s business that makes possible the identification of any individual Customer by matching such information with the Customer’s name, address, account number, type of classification service, historical electricity usage, expected patterns of use, types of facilities used in providing service, individual contract terms and conditions, price, current charges, billing record, or any other information that a Customer has expressly requested not be disclosed (“Proprietary Customer Information”) unless the Customer has authorized the release for public disclosure of that information in a manner approved by the Public Utility Commission of Texas (PUCT). Information that is redacted or organized in such a way as to make it impossible to identify the Customer to whom the information relates does not constitute Proprietary Customer Information;

(s) Any software, products of software, or other vendor information that ERCOT is required to keep confidential under its agreements;

(t) QSE, Transmission Service Provider (TSP), and Distribution Service Provider (DSP) backup plans collected by ERCOT under the Protocols or Other Binding Documents;

|  |
| --- |
| ***[NPRR857: Replace item (t) above with the following upon system implementation and satisfying the following conditions: (1) Southern Cross provides ERCOT with funds to cover the entire estimated cost of the project; and (2) Southern Cross has signed an interconnection agreement with a TSP and the TSP gives ERCOT written notice that Southern Cross has provided it with: (a) Notice to proceed with the construction of the interconnection; and (b) The financial security required to fund the interconnection facilities:]***(t) QSE, Transmission Service Provider (TSP), Direct Current Tie Operator (DCTO), and Distribution Service Provider (DSP) backup plans collected by ERCOT under the Protocols or Other Binding Documents; |

(u) Direct Current Tie (DC Tie) Schedule information. The Protected Information status of this information shall expire 60 days after the applicable Operating Day;

(v) Any Texas Standard Electronic Transaction (TX SET) transaction submitted by an LSE to ERCOT or received by an LSE from ERCOT. This paragraph does not apply to ERCOT’s compliance with:

(i) PUCT Substantive Rules on performance measure reporting;

(ii) These Protocols or Other Binding Documents; or

(iii) Any Technical Advisory Committee (TAC)-approved reporting requirements;

(w) Information concerning a Mothballed Generation Resource’s probability of return to service and expected lead time for returning to service submitted pursuant to Section 3.14.1.9, Generation Resource Status Updates;

(x) Information provided by Entities under Section 10.3.2.4, Reporting of Net Generation Capacity;

(y) Alternative fuel reserve capability and firm gas availability information submitted pursuant to Section 6.5.9.3.1, Operating Condition Notice, Section 6.5.9.3.2, Advisory, and Section 6.5.9.3.3, Watch, and as defined by the Operating Guides;

(z) Non-public financial information provided by a Counter-Party to ERCOT pursuant to meeting its credit qualification requirements as well as the QSE’s form of credit support;

(aa) ESI ID, identity of Retail Electric Provider (REP), and MWh consumption associated with transmission-level Customers that wish to have their Load excluded from the Renewable Portfolio Standard (RPS) calculation consistent with Section 14.5.3, End-Use Customers, and subsection (j) of P.U.C. Subst. R. 25.173, Goal for Renewable Energy;

(bb) Emergency operations plans submitted pursuant to P.U.C. Subst. R. 25.53, Electric Service Emergency Operations Plans;

(cc) Information provided by a Counter-Party under Section 16.16.3, Verification of Risk Management Framework;

(dd) Any data related to Load response capabilities that are self-arranged by the LSE or pursuant to a bilateral agreement between a specific LSE and its Customers, other than data either related to any service procured by ERCOT or non-LSE-specific aggregated data.  Such data includes pricing, dispatch instructions, and other proprietary information of the Load response product;

(ee) Status of Settlement Only Generators (SOGs), including Outages, limitations, or scheduled or metered output data, except that ERCOT may disclose output data from an SOG as part of an extract or forwarded TX SET transaction provided to the LSE associated with the ESI ID of the Premise where the SOG is located. The Protected Information status of this information shall expire 60 days after the applicable Operating Day;

|  |
| --- |
| ***[NPRR829 and NPRR995: Replace applicable portions of paragraph (ee) above with the following upon system implementation:]***(ee) Status of Settlement Only Generators (SOGs) and Settlement Only Energy Storage System (SOESS), including Outages, limitations, schedules, metered output and withdrawal data, or data telemetered for use in the calculation of Real-Time Liability (RTL) as described in Section 16.11.4.3.2, Real-Time Liability Estimate, except that ERCOT may disclose metered output and withdrawal data from an SOG or SOESS as part of an extract or forwarded TX SET transaction provided to the LSE associated with the ESI ID of the Premise where the SOG is located. The Protected Information status of this information shall expire 60 days after the applicable Operating Day; |

(ff) Any documents or data submitted to ERCOT in connection with an Alternative Dispute Resolution (ADR) proceeding. The Protected Information status of this information shall expire upon ERCOT’s issuance of a Market Notice indicating the disposition of the ADR proceeding pursuant to paragraph (1) of Section 20.9, Resolution of Alternative Dispute Resolution Proceedings and Notification to Market Participants, except to the extent the information continues to qualify as Protected Information pursuant to another paragraph of this Section 1.3.1.1;

(gg) Reasons for and future expectations of overrides to a specific Resource’s High Dispatch Limit (HDL) or Low Dispatch Limit (LDL). The Protected Information status of this information shall expire 60 days after the applicable Operating Day;

(hh) Information provided to ERCOT under Section 16.18, Cybersecurity Incident Notification, except that ERCOT may disclose general information concerning a Cybersecurity Incident in a Market Notice in accordance with paragraph (5) of Section 16.18 to assist Market Participants in mitigating risk associated with a Cybersecurity Incident;

(ii) Information disclosed in response to paragraphs (1)-(4) of the Natural Gas Pipeline Coordination section of Section 22, Attachment K, Declaration of Natural Gas Pipeline Coordination, submitted to ERCOT in accordance with Section 3.21, Submission of Declarations of Natural Gas Pipeline Coordination. The Protected Information status of Resource Outage information shall expire as provided in paragraph (1)(c) of Section 1.3.1.1;

(jj) Information concerning weatherization activities submitted to, obtained by, or generated by ERCOT in connection with P.U.C. Subst. R. 25.55, Weather Emergency Preparedness, if such information allows the identification of any Resource or Resource Entity; and

(kk) Information provided to ERCOT:

(i) By a QSE under paragraph (3) of Section 3.14.5, Firm Fuel Supply Service, as part of an offer to provide Firm Fuel Supply Service (FFSS), except that within ten Business Days of issuing FFSS awards, ERCOT may disclose the identity of all Generation Resources that were offered as primary Generation Resources or alternate Generation Resources to provide FFSS for the most recent procurement period, including prices and quantities offered;

(ii) By a Resource Entity under paragraph (2) of Section 8.1.1.2.1.6, Firm Fuel Supply Service Resource Qualification, Testing, and Decertification, as part of the voluntary process for ERCOT certification of a FFSS Qualified Contract; or

(iii) By a Resource Entity in a Force Majeure Event report required under paragraph (14) of Section 8.1.1.2.6.

3.24 Submission of Gas Supply Disruption

(1) A Qualified Scheduling Entity (QSE) that represents a Generation Resource that relies on natural gas as the primary fuel source shall use reasonable efforts to notify ERCOT when:

(a) A natural gas pipeline operator and/or natural gas fuel supplier issues either:

(i) A written notification to the QSE, or an affiliate of the Generation Resource or QSE responsible for buying natural gas for the Generation Resource, in accordance with a firm contract, indicating that a gas supply disruption on a natural gas pipeline directly connected to the Generation Resource represented by the QSE is projected to occur or is currently in progress, resulting in curtailment of natural gas deliveries to the Generation Resource; or

(ii) A written Force Majeure notice to the QSE, or an affiliate of the Generation Resource or QSE responsible for buying natural gas for the Generation Resource, on a natural gas pipeline directly connected to the Generation Resource represented by the QSE indicating a gas supply disruption; and

(b) The QSE determines that the Generation Resource’s ability to supply electricity will be significantly limited by the gas supply disruption.

(2) Notifications should indicate which Generation Resources are reasonably expected to be impacted by the gas supply disruption based on the criteria above and the expected timeline of the disruption, based on available information.

(3) Notifications to ERCOT should be via email, sent to fuelsupply@ercot.com

4.3 QSE Activities and Responsibilities in the Day-Ahead

(1) During the Day-Ahead, a Qualified Scheduling Entity (QSE):

(a) Must submit its Current Operating Plan (COP) and update its COP as required in Section 3.9, Current Operating Plan (COP); and

(b) May submit Three-Part Supply Offers, Day-Ahead Market (DAM) Energy-Only Offers, DAM Energy Bids, Energy Trades, Self-Schedules, Capacity Trades, Direct Current Tie (DC Tie) Schedules, Ancillary Service Offers, Ancillary Service Trades, Self-Arranged Ancillary Service Quantities, and Point-to-Point (PTP) Obligation bids as specified in this Section.

|  |
| --- |
| ***[NPRR1008 and NPRR1014: Replace applicable portions of paragraph (b) above with the following upon system implementation of the Real-Time Co-Optimization (RTC) project for NPRR1008; or upon system implementation for NPRR1014:]***(b) May submit Three-Part Supply Offers, Day-Ahead Market (DAM) Energy-Only Offers, DAM Energy Bids, Energy Bid/Offer Curves, Energy Trades, Self-Schedules, Capacity Trades, Direct Current Tie (DC Tie) Schedules, Resource-Specific Ancillary Service Offers, DAM Ancillary Service Only Offers, Ancillary Service Trades, Self-Arranged Ancillary Service Quantities, and Point-to-Point (PTP) Obligation bids as specified in this Section. |

(2) By 0600 in the Day-Ahead, each QSE representing Reliability Must-Run (RMR) Units, Firm Fuel Supply Service (FFSS) Resources (FFSSRs), or Black Start Resources shall submit its Availability Plan to ERCOT indicating availability of RMR Units, FFSSRs, and Black Start Resources for the Operating Day and any other information that ERCOT may need to evaluate use of the units.