



Item 10.5: Revision Request Status Update

Chad V. Seely

Senior Vice President, General Counsel and
Corporate Secretary

Reliability and Markets Committee Meeting

ERCOT Public

December 18-19, 2023

Revision Request Status Update: Overview

- **Purpose**

Provide an update on recent Revision Request activity

- **Voting Items / Requests**

No action is requested of the Reliability and Markets (R&M) Committee or Board; for discussion only

- **Key Takeaways**

- 9 Revision Requests for December Board Consideration
 - 1 Revision Request was non-unanimous
- 65 Revision Requests currently in process
 - 14 new Revision Requests since October Board
- Aging Revision Requests:
 - 7 Revision Requests on aging list – tabled for more than 6 months
 - 3 Revision Requests added to aging list

9 Revision Requests for December Board Consideration

Unopposed Revision Requests Recommended by TAC for Approval

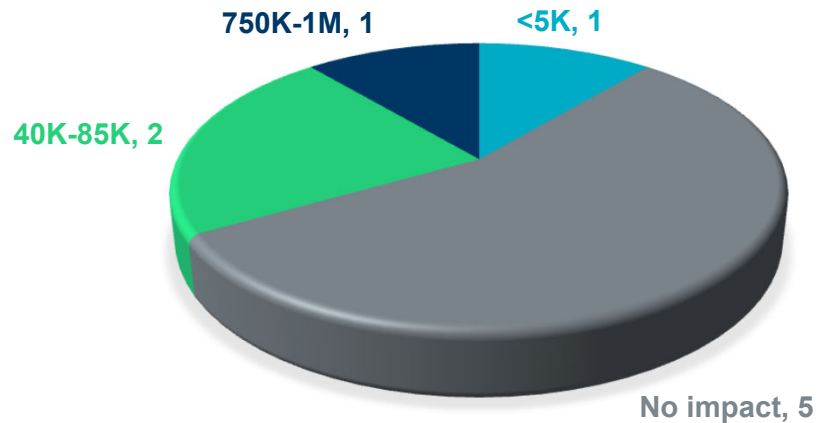
- NPRR1181, Submission of Coal and Lignite Inventory Notifications
- NPRR1192, Move OBD to Section 22 – Requirements for Aggregate Load Resource Participation in the ERCOT Markets
- NPRR1196, Correction of NCLR Ancillary Service Failed Quantity Calculations under NPRR1149
- NPRR1201, Limitations on Resettlement Timeline and Default Uplift Exposure Adjustments
- NPRR1204, Considerations of State of Charge with Real-Time Co-Optimization Implementation – URGENT
- NOGRR257, Removal of Redundant ERS Reporting Requirement
- PGRR110, Revision to Accommodate Steady-State Node-Breaker Modeling
- RMGRR176, Addition of Market Processes Specific to LP&L – URGENT

Non-Unanimous Revision Requests Recommended by TAC for Approval

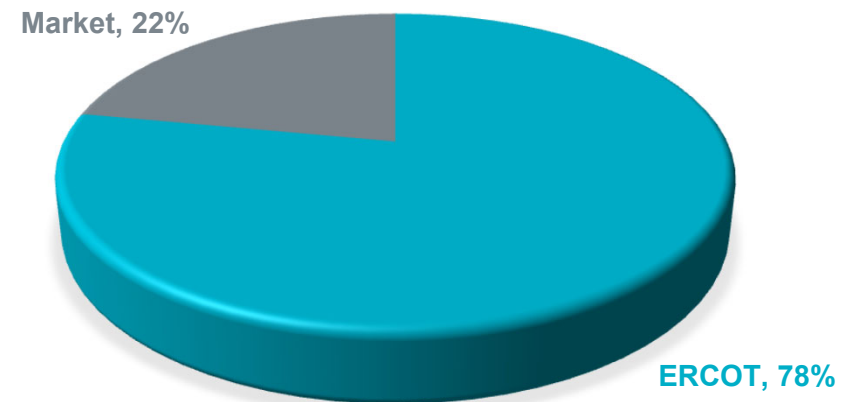
- NPRR1172, Fuel Adder Definition, Mitigated Offer Caps, and RUC Clawback

9 Revision Requests for December Board Consideration

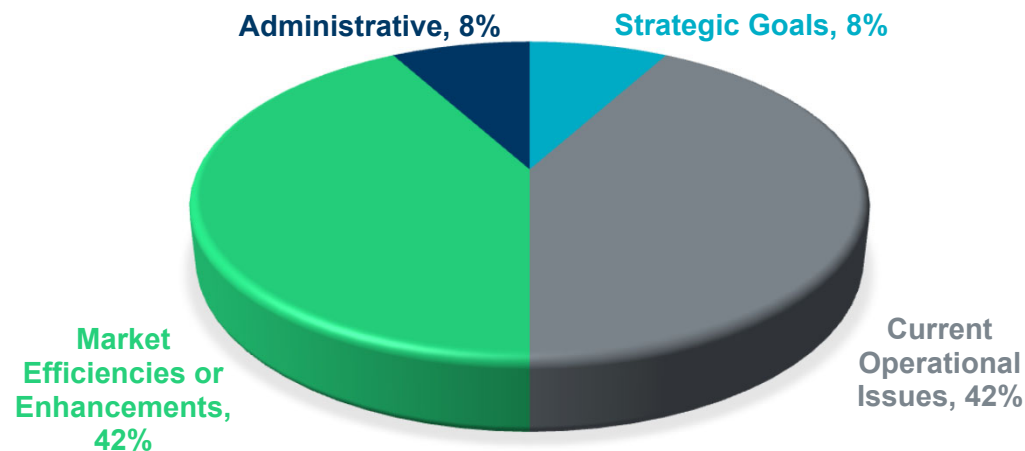
BUDGETARY IMPACTS



REVISION REQUEST SPONSORSHIP



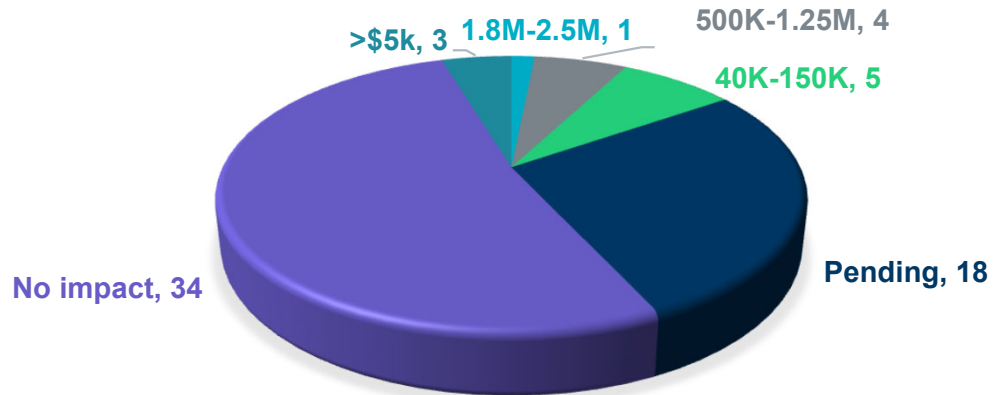
REASONS FOR REVISION



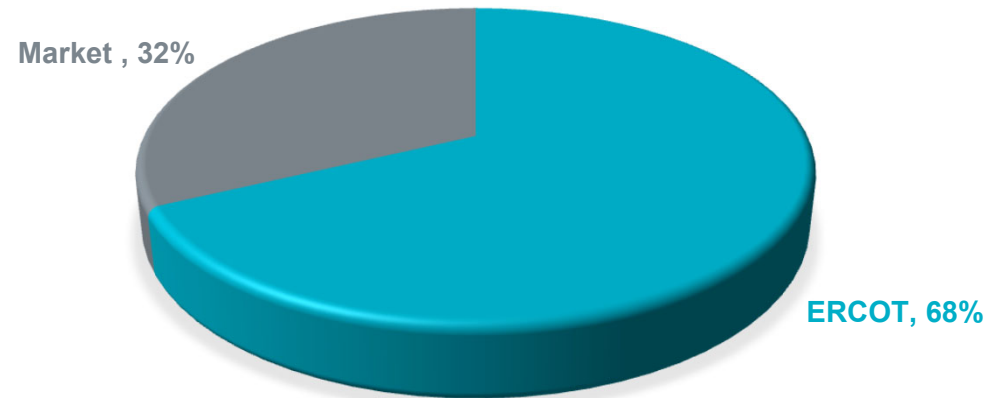
****Revision Requests can cover multiple Reasons for Revisions**

65 Revision Requests in Process

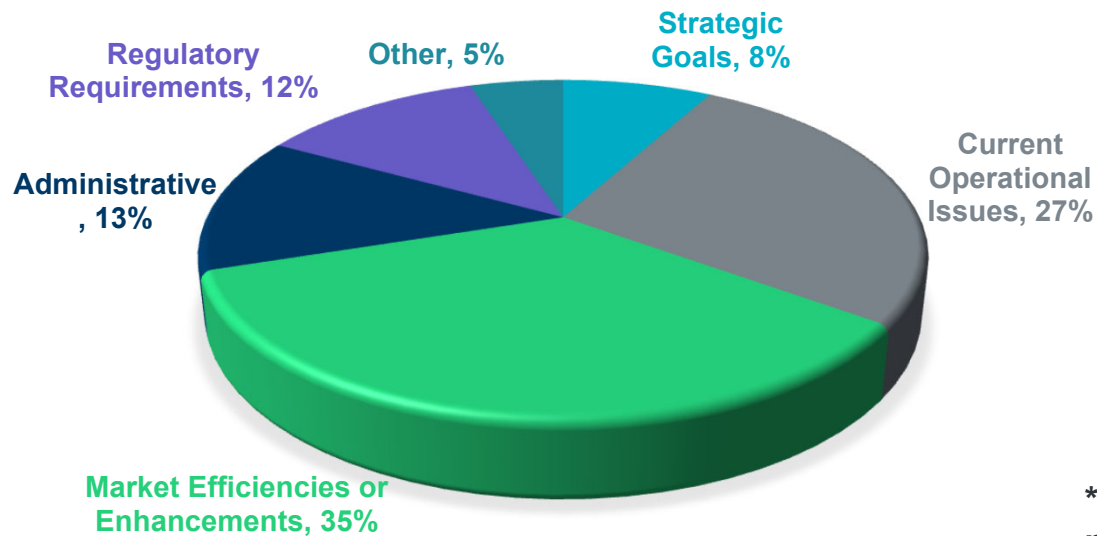
BUDGETARY IMPACT



REVISION REQUEST SPONSORSHIP



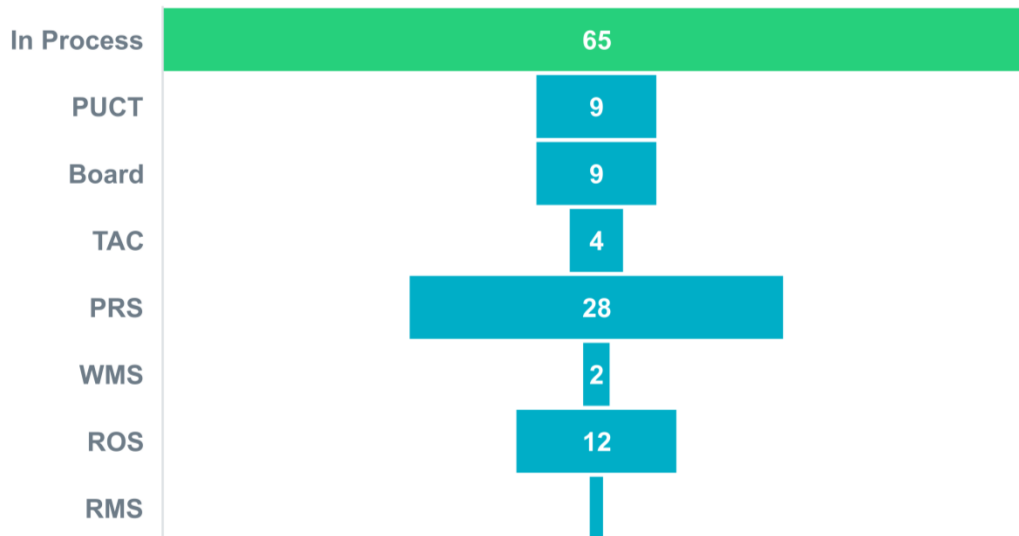
REASONS FOR REVISION



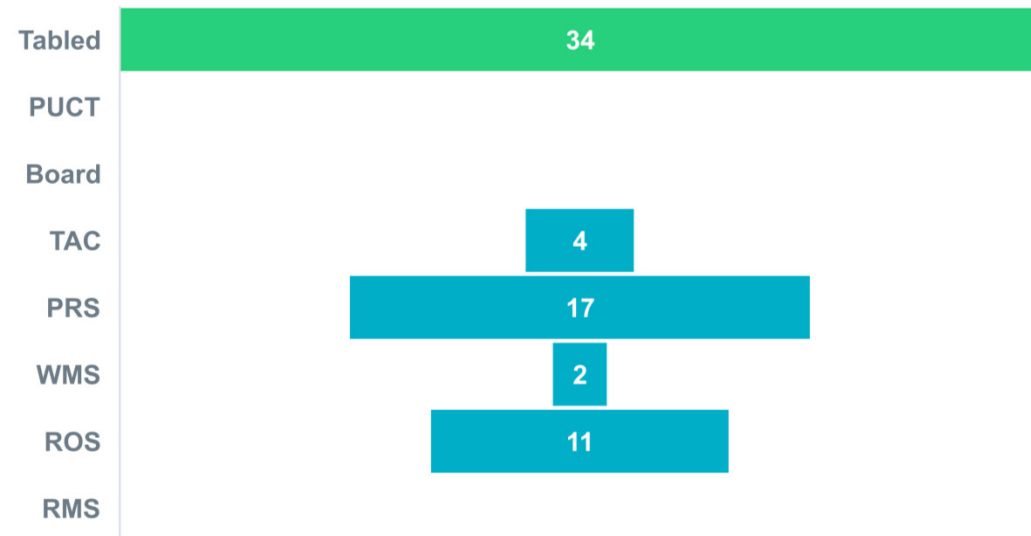
*****Revision Requests can cover multiple Reasons for Revisions***

65 Revision Requests in Process

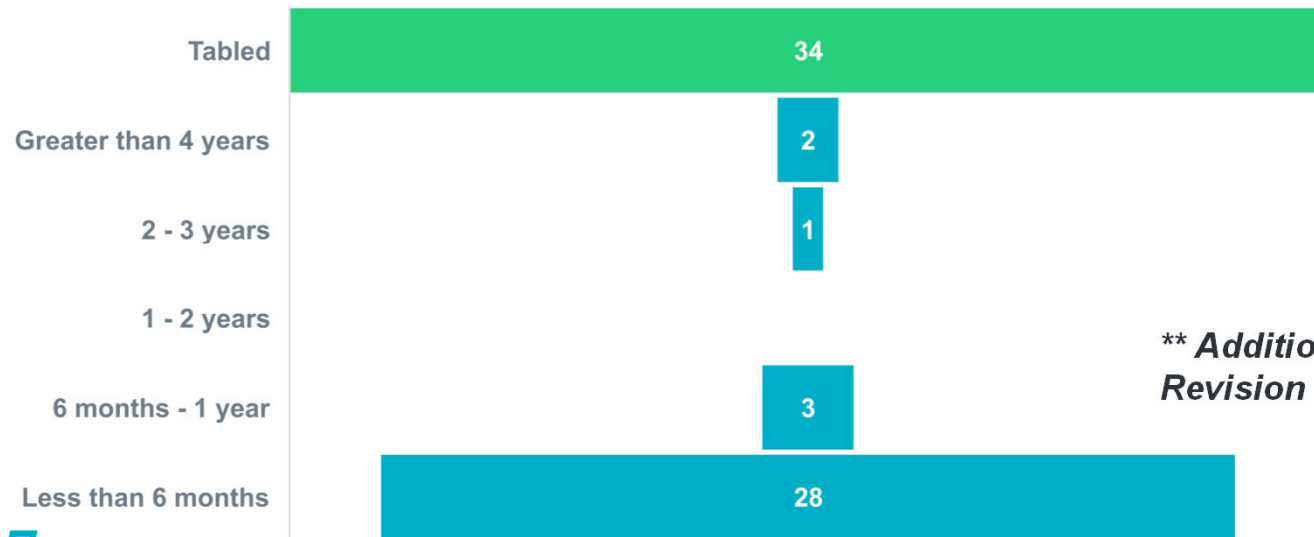
Location of Revision Requests



Location of Tabled Revision Requests



Length Tabled



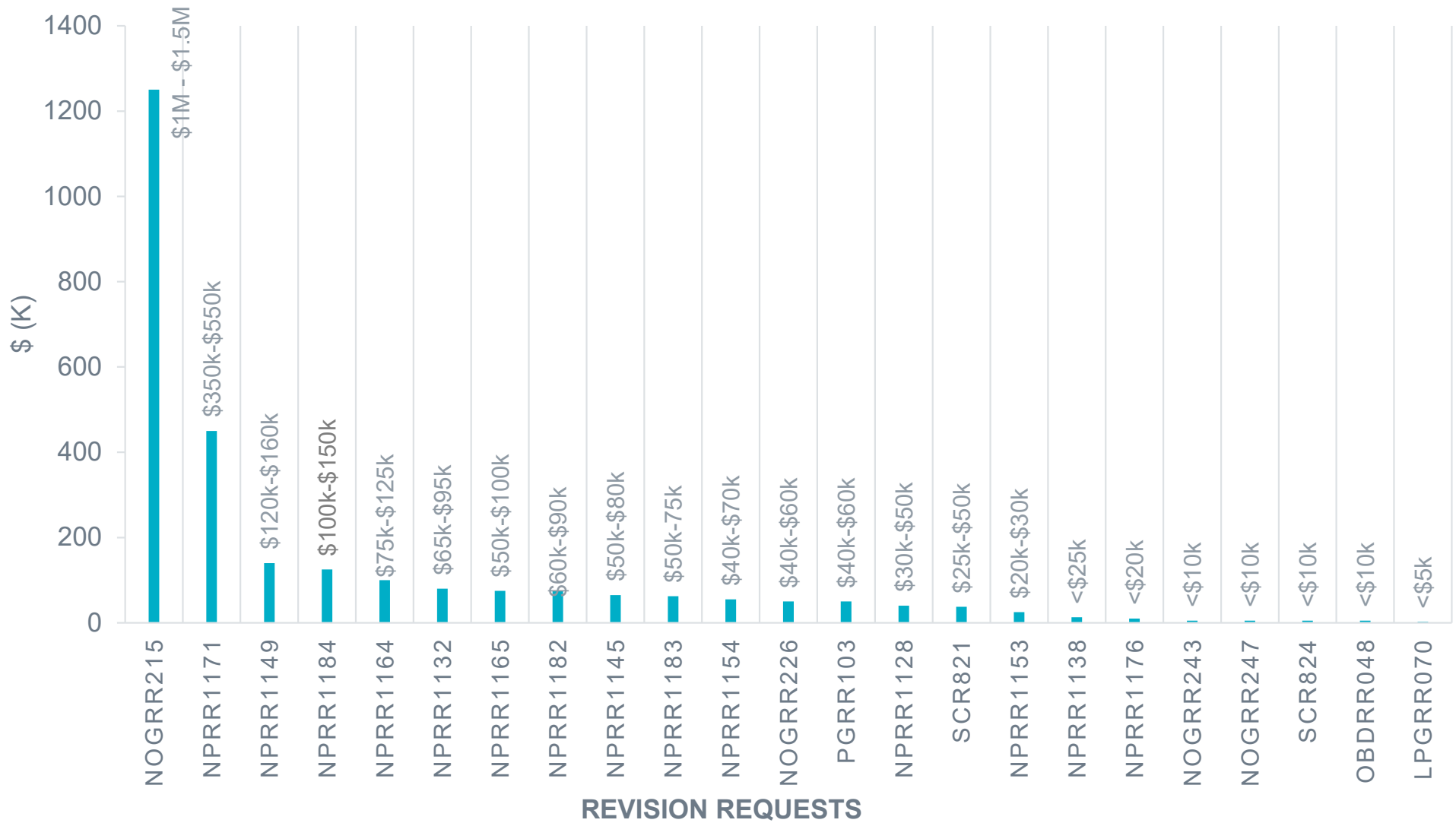
**** Additional details on Tabled Revision Requests in Appendix**

Appendix

Aging Revision Requests in Process (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
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.
NPRR1162, Single Agent Designation for a QSE and its Sub-QSEs for Voice Communications over the ERCOT WAN	6 months – 1 year (9/8/23)	Referred to WMS. Continued discussion regarding ERCOT's current practices and system capabilities; and concerns with NPRR1162 precluding contractual relationships that might be commercially beneficial to QSEs.
PGRR106, Clarify Projects Included in Transmission Project Information and Tracking (TPIT) Report	6 months – 1 year (5/4/23)	Tabled at ROS. Continued discussion on how best to clarify which projects are included in the TPIT Report. ERCOT will be filing comments after the 12/7 ROS meeting.
NPRR1180, Inclusion of Forecasted Load in Planning Analyses	6 months – 1 year (6/14/23)	Tabled at ROS. ERCOT will be filing comments to NPRR1180 after the 12/7 ROS meeting.
PGRR107, Related to NPRR1180, Inclusion of Forecasted Load in Planning Analyses	6 months – 1 year (6/8/23)	Tabled at ROS. ERCOT will be filing comments to associated NPRR1180 after the 12/7 ROS meeting.

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
5/11/23	NPRR1145, Use of State Estimator-Calculated ERCOT-Wide TLFs in Lieu of Seasonal Base Case ERCOT-Wide TLFs for Settlement	\$50k - \$80k
10/12/23	NOGRR215, Limit Use of Remedial Action Schemes	\$1M - \$1.5M
10/12/23	NPRR1171, Requirements for DGRs and DESRs on Circuits Subject to Load Shedding	\$350K - \$550K
10/12/23	NPRR1164, Black Start and Isochronous Control Capable Identification	\$75K - \$125K
10/12/23	NPRR1165, Revisions to Requirements of Providing Audited Financial Statements and Providing Independent Amount	\$50K - \$100K
10/12/23	NPRR1182, Inclusion of Controllable Load Resources and Energy Storage Resources in the Constraint Competitiveness Test Process	\$60K - \$90K

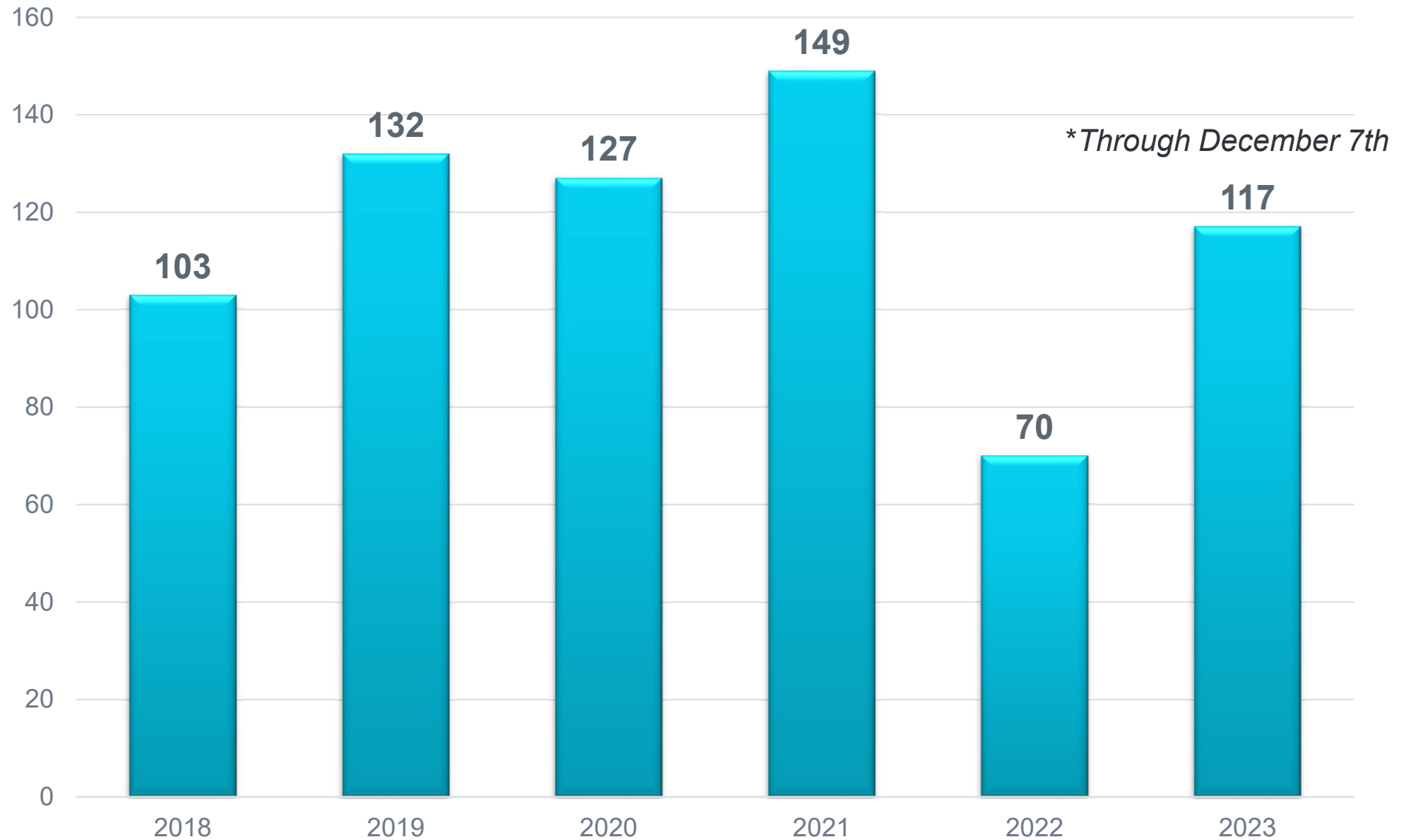
2023 Approved Revision Requests – Budgetary Impact

PUC Approval Date	Revision Request	Budgetary Impact
10/12/23	NPRR1183, ECEI Definition Clarification and Updates to Posting Rules for Certain Documents without ECEI	\$50K - \$75K
10/12/23	PGRR103, Establish Time Limit for Generator Commissioning Following Approval to Synchronize	\$40K - \$60K
10/12/23	NPRR1176, Update to EEA Trigger Levels	<\$20K
10/12/23	NOGRR247, Change UFLS Stages and Load Relief Amounts	<\$10K
10/12/23	OBDRR048, Implementation of Operating Reserve Demand Curve (ORDC) Multi-Step Price Floor	<\$10K
10/12/23	LPGRR070, Discontinuation of Interval Data Recorder (IDR) Meter Weather Sensitivity Process	<\$5K
11/30/23	NPRR1184, Update to Procedures for Managing Interest on Cash Collateral	\$100K - \$150K
11/30/23	SCR824, Increase File Size and Quantity Limits for RIOO Attachments	<\$10K
TOTAL		~\$2.12M - \$3.34M

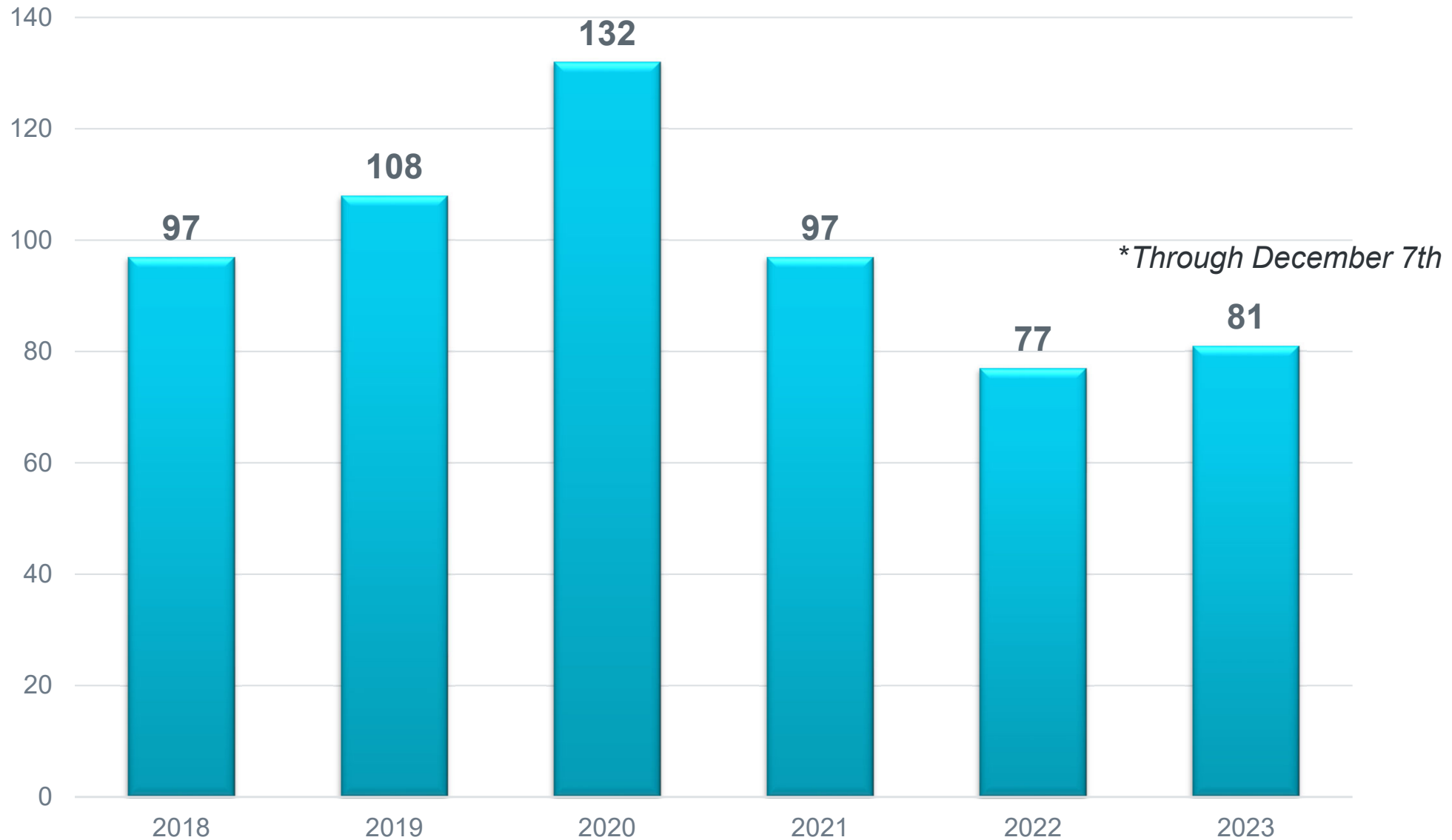
2023 Approved Revision Requests – Staffing Impact

PUC Approval Date	Revision Request	ERCOT Department	FTE Impact	Additional FTEs Required
10/12/23	NOGRR215, Limit Use of Remedial Action Schemes	Operations Stability Analysis	0.5	1.0
Totals				1.0

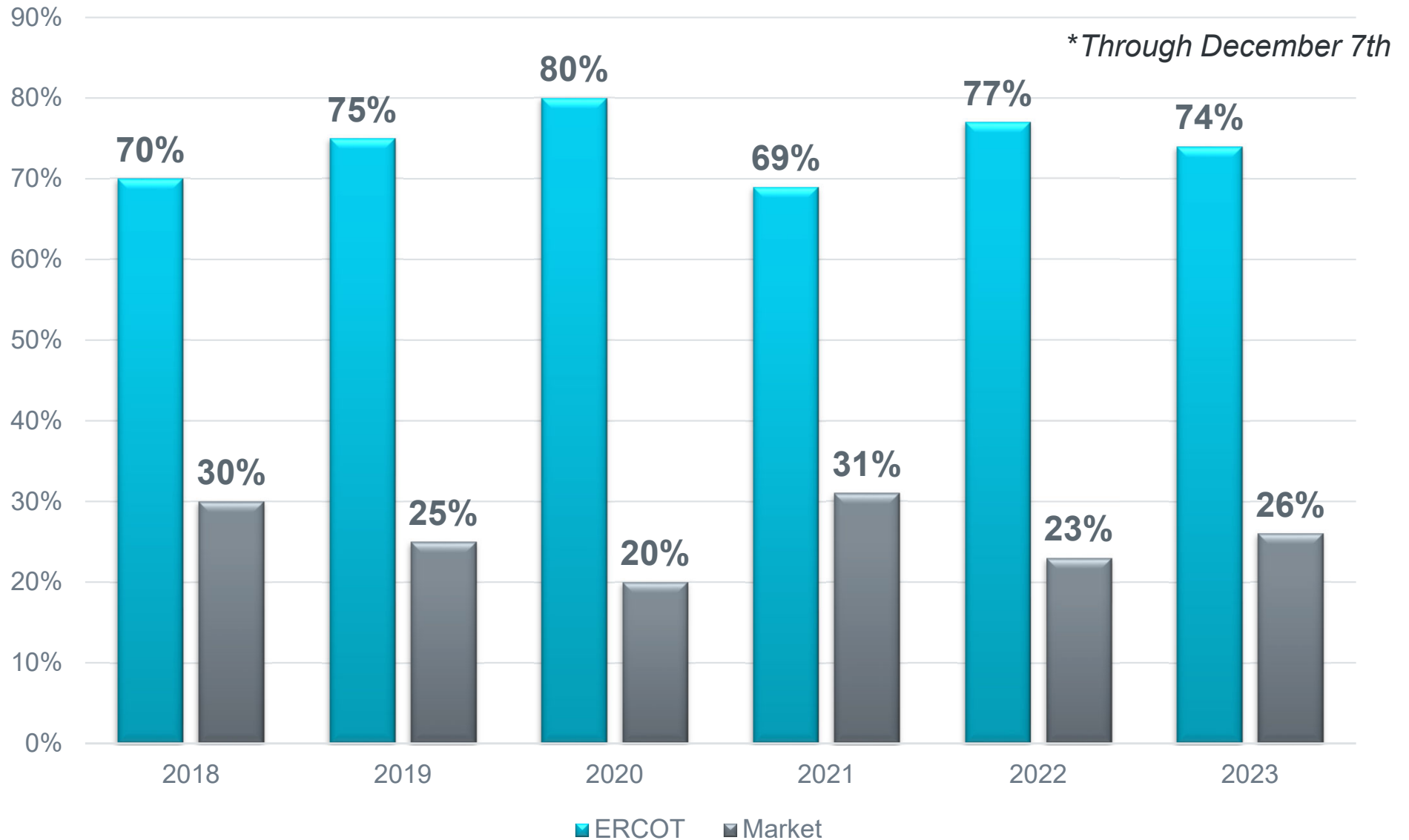
Statistics – New Revision Requests Submitted



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
VCMR	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