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| NPRR Number | [1181](https://www.ercot.com/mktrules/issues/NPRR1181) | NPRR Title | Submission of Coal and Lignite Inventory Notifications |
| Date of Decision | | December 19, 2023 | |
| **Action** | | Recommended Approval | |
| Timeline | | Normal | |
| Proposed Effective Date | | First of the month following Public Utility Commission of Texas (PUCT) approval | |
| Priority and Rank Assigned | | Not applicable | |
| Nodal Protocol Sections Requiring Revision | | 1.3.1.1, Items Considered Protected Information  3.24, Notification of Low Coal and Lignite Inventory Levels (new) | |
| Related Documents Requiring Revision/Related Revision Requests | | None | |
| Revision Description | | This Nodal Protocol Revision Request (NPRR) adds the requirement for Qualified Scheduling Entities (QSEs) to notify ERCOT if the coal or lignite inventory level available for Real-Time operations is projected to fall below 15 days of operation at the High Sustained Limit (HSL). If the coal or lignite inventory level available for Real-Time operations is projected to fall below 10 days of operation at HSL, QSEs will be required to provide ERCOT daily inventory updates until the inventory level projection increases above 15 days. For coal or lignite Generation Resources located within 15 miles of their fuel supply or that were originally designed to be located within 15 miles of their fuel supply and are not capable of storing onsite inventory for at least 30 days of operation at the HSL, the QSE must notify ERCOT of any disruption to the coal or lignite supply operations that could impact operations of the Generation Resource within two days of such disruption and provide an explanation. | |
| 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: (explain)  *(please select all that apply)* | |
| Business Case | | Coal and lignite provided nearly 17% of the energy used in ERCOT in 2022. ERCOT currently has no visibility into coal and lignite inventory levels at power plants, and the only way for ERCOT to obtain this information is through an ad hoc process of contacting individual QSEs or Resource Entities. Such an ad hoc process is prone to errors and inconsistent reporting. This NPRR will remedy this information gap by establishing notification processes that will provide ERCOT vital information on low coal and lignite inventory levels. This information will allow ERCOT to have better awareness of coal and lignite inventory levels so that ERCOT can assess associated risks and inform state leadership and regulators as needed. | |
| PRS Decision | | On 6/14/23, PRS voted unanimously to table NPRR1181 and refer the issue to WMS. All Market Segments participated in the vote.  On 10/12/23, PRS voted unanimously to recommend approval of NPRR1181 as amended by the 9/19/23 Luminant comments. All Market Segments participated in the vote.  On 11/9/23, PRS voted unanimously to endorse and forward to TAC the 10/12/23 PRS Report and 5/16/23 Impact Analysis for NPRR1181. All Market Segments participated in the vote. | |
| Summary of PRS Discussion | | On 6/14/23, participants reviewed NPRR1181 and the 6/12/23 LCRA comments. Participants questioned whether certain reporting requirements provided meaningful information and value, and requested the issue be discussed further at WMS.  On 10/12/23, participants reviewed the 9/19/23 Luminant comments.  On 11/9/23, participants reviewed the 5/16/23 Impact Analysis. | |
| TAC Decision | | On 12/4/23, TAC voted unanimously to recommend approval of NPRR1181 as recommended by PRS in the 11/9/23 PRS Report. All Market Segments participated in the vote. | |
| Summary of TAC Discussion | | On 12/4/23, TAC reviewed the ERCOT Opinion, ERCOT Market Impact Statement, and Independent Market Monitor (IMM) Opinion for NPRR1181. | |
| ERCOT Board Decision | | On 12/19/23, the ERCOT Board voted unanimously to recommend approval of NPRR1181 as recommended by TAC in the 12/4/23 TAC Report. | |
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| **Opinions** | | | |
| Credit Review | | ERCOT Credit Staff and the Credit Finance Sub Group (CFSG) have reviewed NPRR1181 and do not believe that it requires changes to credit monitoring activity or the calculation of liability. | |
| Independent Market Monitor Opinion | | IMM supports NPRR1181. | |
| ERCOT Opinion | | ERCOT supports approval of NPRR1181. | |
| ERCOT Market Impact Statement | | ERCOT Staff has reviewed NPRR1181 and believes the market impact for NPRR1181 establishes visibility into coal and lignite inventory levels at power plants, increases awareness and facilitates ERCOT’s ability to assess associated risks, and informs state leadership and regulators as needed. | |

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| Market Segment | Not applicable |

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| **Market Rules Staff Contact** | |
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| **Comments Received** | |
| **Comment Author** | **Comment Summary** |
| LCRA 061223 | Proposed language revisions that modified the triggers for and frequency of reporting coal and lignite inventory levels to better align the requirements with industry practice and goals of the NPRR |
| Joint Commenters 062923 | Did not support seasonal declaration of coal and lignite inventory and proposed corresponding language revisions |
| WMS 071223 | Requested PRS continue to table NPRR1181 for further review by the Wholesale Market Working Group (WMWG) |
| ERCOT 080723 | Accepted the 6/29/23 Joint Commenters comments and added a different notification trigger for Generation Resources with offsite coal and lignite supplies |
| Luminant 091923 | Extended certain notification provisions to Resources that were originally designed to be in close proximity to their fuel source |
| WMS 101123 | Endorsed NPRR1181 as amended by the 9/19/23 Luminant comments |

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| **Market Rules Notes** |

Administrative changes to the language were made and authored as “ERCOT Market Rules.”

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

* NPRR1170, Capturing Natural Gas Delivery Information for Natural Gas Generation Resources
  + Section 1.3.1.1
* NPRR1188, Implement Nodal Dispatch and Energy Settlement for Controllable Load Resources
  + Section 1.3.1.1

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

* NPRR1166, Protected Information Status of DC Tie Schedule Information (incorporated 8/1/23)
  + Section 1.3.1.1
* 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
* NPRR1175, Revisions to Market Entry Financial Qualifications and Continued Participation Requirements (incorporated 11/1/23)
* Section 1.3.1.1

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| Proposed Protocol Language Revision |

**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;

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| ***[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;

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| ***[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;

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| ***[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 on the date on which ERCOT files the report with the PUCT that is required by P.U.C. Subst. R. 25.192, Transmission Rates for Export from ERCOT, relating to energy imported and exported over DC Ties interconnected to the ERCOT System;

(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;

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| ***[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;

(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;

(ll) Information provided to ERCOT pursuant to Section 16.2.1.1, QSE Background Check Process, or Section 16.8.1.1, CRR Account Holder Background Check Process; and

(mm) Information concerning coal or lignite inventory provided by a QSE under Section 3.24, Notification of Low Coal and Lignite Inventory Levels.

**3.24** **Notification of Low Coal and Lignite Inventory Levels**

(1) Each Qualified Scheduling Entity (QSE) representing a Generation Resource that uses coal or lignite as its primary fuel, except as provided in paragraph (2) below, shall notify ERCOT of the following:



(a) If the coal or lignite inventory level available for Real-Time operations is projected to fall below 15 days of operation at the High Sustained Limit (HSL) within the next 90 days, the QSE shall notify ERCOT within three days of such a projection and provide an explanation of any disruption to the coal or lignite supply. Notifications to ERCOT should be via email, sent to FuelSupply@ERCOT.com.

(b) If the coal or lignite inventory level available for Real-Time operations is projected to fall below 10 days of operation at the HSL within the next 90 days, the QSE shall notify ERCOT immediately of such a projection, provide an explanation of any disruption to the coal or lignite supply, and provide daily inventory updates to ERCOT until the inventory level projection increases above 15 days. Notifications to ERCOT should be via email, sent to [FuelSupply@ERCOT.com](mailto:FuelSupply@ERCOT.com).

(2) The requirements of paragraph (1) above do not apply to a QSE of a Generation Resource that uses coal or lignite as its primary fuel if the Generation Resource is located within 15 miles proximity of its fuel supply or was originally designed to be located within 15 miles proximity of its fuel supply and does not have the capability of storing onsite inventory for at least 30 days of operation at the HSL. The QSE of a Generation Resource located within 15 miles of its fuel supply or that was originally designed to be located within 15 miles proximity of its fuel supply and does not have the capability of storing onsite inventory for at least 30 days of operation at the HSL must notify ERCOT of any disruption to the coal or lignite supply operations that could impact operations of the Generation Resource within two days of such disruption and provide an explanation of such disruption. Notifications to ERCOT should be via email, sent to [FuelSupply@ERCOT.com](mailto:FuelSupply@ERCOT.com).