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| NPRR Number | [1212](https://www.ercot.com/mktrules/issues/NPRR1212) | NPRR Title | Clarification of Distribution Service Provider’s Obligation to Provide an ESI ID |
|  |  |
| Date | January 5, 2024 |
|  |  |
| Submitter’s Information |
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| Market Segment | Cooperative |

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| Comments |

South Texas Electric Cooperative (STEC) appreciates the opportunity to comment on Nodal Protocol Revision Request (NPRR) 1212.

These comments clarify when the Distribution Service Provider (DSP) is required to provide an Electric Service Identifier (ESI ID) to ERCOT. Rather than a blank requirement noting a DSP shall provide the ESI ID to ERCOT and the Resource Entity, these comments note that DSP shall provide to ERCOT and the Resource Entity once applicable requirements of the DSP’s tariff and/or specified Standard Generation Interconnection Agreement (SGIA) are met.

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| Revised Cover Page Language |

None

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| Revised Proposed Protocol Language |

**2.1 DEFINITIONS**

**Resource ID (RID)**

A unique identifier assigned to each ERCOT-Polled Settlement (EPS) Meter or Settlement Only Generator (SOG) meter.

***10.3.2 ERCOT-Polled Settlement Meters***

(1) Each TSP and DSP shall, in accordance with these Protocols and the Settlement Metering Operating Guide (SMOG), provide ERCOT-approved metering communication equipment and connection to permit ERCOT access to the TSP’s or DSP’s EPS Meters.

(2) For a Resource site that consumes Load other than Wholesale Storage Load (WSL) and is not behind a Non-Opt-In Entity (NOIE) tie meter, the DSP that has the right to serve Load at the Resource site shall provide ERCOT and the Resource Entity with Electric Service Identifier(s) (ESI ID(s)) to be used in the generation netting process if all requirements and/or conditions of such DSP’s tariff and/or specified Standard Generation Interconnection Agreement (SGIA) are met.

(3) ERCOT shall retrieve meter data electronically and automatically by MDAS. ERCOT may also collect meter data on demand.

**10.3.2.1 Generation Resource Meter Splitting**

(1) Each Generation Resource must be represented by only one Qualified Scheduling Entity (QSE), except that a jointly owned Generation Resource unit or group of Generation Resources may split the net generation output into two or more Split Generation Resources for a Resource Entity. Each Resource Entity representing a Split Generation Resource may have its energy and capacity scheduled through a separate QSE. For purposes of this paragraph, a jointly owned Generation Resource unit or group of Generation Resources shall also include the San Miguel and Gibbons Creek power projects and Intermittent Renewable Resources (IRRs) such as wind and solar generation.

(2) When a Generation Resource that has been split to function as two or more Split Generation Resources is registered with ERCOT, the Resource Entities representing the Split Generation Resources shall be required to submit a percentage allocation of the Generation Resource to be used to determine the capacity available at each Split Generation Resource.

(3) When a Generation Resource that has been split to function as two or more Split Generation Resources is registered with ERCOT, the owners of the Generation Resource shall submit all required ERCOT Facility registration documentation and an ERCOT-approved splitting agreement executed by an Authorized Representative from each owning Resource Entity. Such agreement shall contain a defined and fixed ownership percentage as among the owning Resource Entities. ERCOT shall establish this Generation Resource as a “split,” essentially establishing Split Generation Resource meters. Generation splitting based on a static ratio is not permitted. Generation splitting requires Real-Time splitting signals.

***10.3.2.1.2 Allocating EPS Metered Data to Split Generation Resource Meters***

(1) ERCOT shall poll the EPS Metering Facilities related to the actual Generation Resource and store the meter data at 15-minute intervals. This metering data must be validated, edited, estimated, and compensated for losses, as necessary, and be netted as required. This resulting data must then have the Split Generation Resource ratios applied to assign the generation to the QSE representing each owner of the Split Generation Resources. The MWh quantities of the Split Generation Resources must be used in all Settlement calculations and reports.

(2) The following example illustrates the splitting of the generation data:

Splitting Example 1

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Integrated values from ERCOT systems** |  |  | **Actual****Metered****MWh** | **Data to be Used in Settlement** |
| **Interval****Ending** | **UNIT1****(MWh)** | **UNIT2****(MWh)** | **UNIT3****(MWh)** | **Total****MWh** |  | **% Ratios****Unit 1,2,3** | **Split MWh** | **Split MWh** | **Split MWh** |
| 13:15 | 10 | 20 | 10 | 40 |  | 25, 50, 25 | 52 | 13 | 26 | 13 |

***10.3.2.1.3 Processing for Missing Dynamic Split Generation Resource Signal***

(1) For any interval when ERCOT has not received a Real-Time signal for any one of the Split Generation Resources, ERCOT shall use the last valid percentage ratio for a completed interval.

Splitting Example 2

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Integrated values from ERCOT systems** |  |  | **Actual****Metered****MWh** | **Data to be Used in Settlement** |
| **Interval****Ending** | **UNIT1****(MWh)** | **UNIT2****(MWh)** | **UNIT3****(MWh)** | **Total****MWh** |  | **% Ratios****Unit 1,2,3** | **Split MWh** | **Split MWh** | **Split MWh** |
| 13:15 | 10 | 20 | 10 | 40 |  | 25, 50, 25 | 52 | 13 | 26 | 13 |
| 13:30 | NA | 21 | 10 | NA |  | Ratio Above | 55 | 13.75 | 27.5 | 13.75 |
| 13:45 | NA | 22 | 10 | NA |  | Ratio Above | 48 | 12 | 24 | 12 |