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| **REV REQ NO.** | **DESCRIPTION** | **URGENT** | **ERCOT Opinion** | **ERCOT Market Impact Statement** |
| **109PGRR** | **Dynamic Model Review Process Improvement for Inverter-Based Resource (IBR) Modification.** This Planning Guide Revision Request (PGRR) introduces a new requirement for Interconnecting Entities (IEs) associated with Inverter-Based Resources (IBRs) to undergo a dynamic model review process prior to Resource Commissioning Date.  Additionally, this PGRR mandates that Resource Entities owning or controlling operational IBRs must undergo a review process before implementing any changes to settings or equipment (e.g., protection and control settings) that could impact electrical performance and necessitate dynamic model updates.  As part of the review process, ERCOT shall review the model quality tests submitted by an IE or Resource Entity.  In the case of operational IBRs, the review process may require the interconnecting Transmission Service Provider (TSP) conducting a limited dynamic stability study to compare and evaluate the electrical performance before and after the proposed modifications.  [ERCOT] | N | ERCOT supports approval of PGRR109 | ERCOT Staff has reviewed PGRR109 and believes the market impact for PGRR109 is that it improves the dynamic model review process for IBRs by establishing a new requirement for IEs associated with IBRs to undergo a dynamic model review process prior to Resource Commissioning Date, and requiring a review process for operational IBRs before implementing modification to any control settings or equipment that impact the dynamic response  (such as voltage, frequency, and current injections) at the Point of Interconnection (POI). In certain cases for operational IBRs, it requires the interconnecting TSPs conducting a limited dynamic stability study to compare and evaluate the electrical performance before and after the proposed modifications. |
| **1170NPRR** | **Capturing Natural Gas Delivery Information for Natural Gas Generation Resources.** This Nodal Protocol Revision Request (NPRR) requires Qualified Scheduling Entities (QSEs) to provide information related to the delivery of natural gas to Generation Resources being offered into the market.  This required information is deemed to be Protected Information.  [ERCOT] | N | ERCOT supports approval of NPRR1170 | ERCOT Staff has reviewed NPRR1170 and believes the market impact for NPRR1170 is improved situational awareness regarding potential fuel supply disruptions, and supports overall reliability operations. |
| **1179NPRR** | **Fuel Purchase Requirements for Resources Submitting RUC Fuel Costs.** This Nodal Protocol Revision Request (NPRR) ensures that Qualified Scheduling Entities (QSEs) representing Generation Resources that have an executed and enforceable transportation contract and file a Settlement dispute to recover their actual fuel costs incurred when instructed to operate due to a RUC, procure fuel economically. This NPRR also adds an adjustment to the RUC Guarantee to reflect the cost difference between the actual fuel consumed by the Resource to start and operate during the RUC-Committed Intervals and the fuel burn calculated based on Verifiable Cost parameters. Finally, the NPRR clarifies that fuel costs may also include penalties for fuel delivery outside of RUC-Committed Intervals in accordance with the ratable delivery obligations and costs as specified in the enforceable transportation agreement.  [ERCOT] | Y | ERCOT supports approval of NPRR1179 | ERCOT Staff has reviewed NPRR1179 and believes the market impact for NPRR1179 is improved economical fuel purchases by Entities that have an executed and enforceable transportation contract and file a Settlement dispute to recover their actual fuel costs incurred when instructed to operate due to a RUC. |
| **1193NPRR** | **Related to SMOGRR027, Move OBD to Settlement Metering Operating Guide – EPS Metering Design Proposal.** This Nodal Protocol Revision Request (NPRR) changes the referenced location of the EPS Design Proposal Form, as it is moving from the Other Binding Document List into the Settlement Metering Operating Guide (SMOG).  [ERCOT] | N | ERCOT supports approval of NPRR1193 | ERCOT Staff has reviewed NPRR1193 and believes it has a positive market impact by standardizing the approval process for binding language. |
| **1195NPRR** | **Resource Entity Metering Facilities Maintenance.** This Nodal Protocol Revision Request (NPRR) assigns ERCOT-Polled Settlement (EPS) Metering Facilities maintenance and repair responsibilities to the owner of the Metering Facilities when such is not owned by a Transmission and/or Distribution Service Provider (TDSP).  [STEC] | N | ERCOT supports approval of NPRR1195 | ERCOT Staff has reviewed NPRR1195 and believes the market impact for NPRR1195 is clarified responsibility for and improved maintenance of EPS Metering facilities. |
| **1206NPRR** | **Revisions to QSE Operations and Termination Requirements, and Elimination of Providing Certain Market Participant Principal Information.** This Nodal Protocol Revision Request (NPRR) clarifies the types of Qualified Scheduling Entities (QSEs) required to have a Hotline and a 24-hour, seven-day-per-week (24x7) control or operations center.  [ERCOT] | N | ERCOT supports approval of NPRR1206 | ERCOT Staff has reviewed NPRR1206 and believes that it provides a positive market impact by embodying Strategic Plan Object 1 through the clarification of types of Qualified Scheduling Entities (QSEs) that are required to have a Hotline and a 24-hour, seven-day-per week (24x7) control or operations center; the clarification of various Resource Entity deadlines; and the elimination of the requirement to provide certain unnecessary Market Participant Principal information. |
| **1207NPRR** | **Incidental Disclosure of Protected Information and ECEII During ERCOT Control Room Tours.** This Nodal Protocol Revision Request (NPRR) would permit the incidental disclosure of Protected Information and ERCOT Critical Energy Infrastructure Information (ECEII) as part of a tour or overlook viewing of the ERCOT control room provided to eligible persons who, prior to accessing the control room, have signed nondisclosure agreements (“NDAs”) and complied with screening and other requirements provided in a policy adopted by ERCOT security. The policy will include a prohibition on taking photographs and recordings of Protected Information and ECEII. This NPRR would also exempt ERCOT from the requirement to provide notice of disclosure when ECEII or Protected Information is incidentally disclosed as part of a Control Room tour or overlook viewing, consistent with the conditions described above. This exception does not apply to a person who is a director, officer, employee, agent, representative, contractor, or consultant of a Market Participant that is registered with ERCOT as a Resource Entity, Qualified Scheduling Entity (QSE), Load Serving Entity (LSE), or Congestion Revenue Right (CRR) Account Holder.  [ERCOT] | N | ERCOT supports approval of NPRR1207 | ERCOT Staff has reviewed NPRR1207 and believes it would permit the incidental disclosure of Protected Information and ECEII as part of a tour or overlook viewing of the ERCOT control room provided to eligible persons who, prior to accessing the control room, have signed NDAs and complied with screening and other requirements provided in a policy adopted by ERCOT security, establishes a prohibition on taking photographs and recordings of Protected Information and ECEII,  and exempts ERCOT from the requirement to provide notice of disclosure when ECEII or Protected Information is incidentally disclosed as part of a control room tour or overlook viewing, consistent with the conditions described above except for persons who are a director, officer, employee, agent, representative, contractor, or consultant of a Market Participant that is registered with ERCOT as a Resource Entity, QSE, LSE, or CRR Account Holder. |
| **1208NPRR** | **Creation of Invoice Report.** This Nodal Protocol Revision Request (NPRR) creates a new daily report, the ERCOT Invoice Report, which lists the ERCOT Invoices issued for the current day and day prior at a Counter-Party level.  [Reliant Energy] | N | ERCOT supports approval of NPRR1208 | ERCOT Staff has reviewed NPRR1208 and believes the market impact for NPRR1208 provides a consolidated view of Invoices which may reduce instances of late/missed payments by Market Participants and related collection activities at ERCOT. |
| **1211NPRR** | **Move OBD to Section 22 – Methodology for Setting Maximum Shadow Prices for Network and Power Balance Constraints.** This Nodal Protocol Revision Request (NPRR) incorporates the Other Binding Document “Methodology for Setting Maximum Shadow Prices for Network and Power Balance Constraints” into the Protocols.  [ERCOT] | N | ERCOT supports approval of NPRR1211 | ERCOT Staff has reviewed NPRR1211 and believes it has a positive market impact by standardizing the approval process for binding language. |
| **825SCR** | **ERCOT Voice Communications Aggregation.** This System Change Request (SCR) modifies ERCOT’s current control room voice communication configuration(s) to allow for greater flexibility for Qualified Scheduling Entities (QSEs) and their Subordinate QSEs when assigning Agent(s), including allowing SubQSEs to assign Agents different than those used by the parent QSE.  [Tenaska] | N | ERCOT supports approval of SCR825 | ERCOT Staff has reviewed SCR825 and believes the market impact for SCR825 enables ERCOT to recognize QSEs that serve as agents for voice communication with ERCOT and allow a more granular assignment of Agent to Sub QSE voice communication relationships within impacted system(s) which may be requested by currents QSEs and in the future. |
| **179RMGRR** | **TDSP Temporary Emergency Electric Energy Facility (TEEEF) Deployment Transactional Processing.**  This Retail Market Guide Revision Request (RMGRR) adds new Section 7.13 which introduces one method of communication in which Transmission and/or Distribution Service Providers (TDSPs), at their own discretion, may utilize Texas Standard Electronic Transaction (Texas SET) transactions to inform Retail Electric Providers (REPs) of record which Electric Service Identifiers (ESI IDs) were impacted by a TDSP’s mobile generation or “Temporary Emergency Electric Energy Facility” (TEEEF) deployment, therefore minimizing manual work-arounds that are created due to invoicing as opposed to usage exceptions that may impact Customers’ billing and increase MarkeTrak issue volumes for resolution.  This RMGRR also clarifies in Section 7.14.4 that the REF~JH~I data element is dedicated exclusively to Customer-owned generation.  Lastly, this RMGRR is in support of Texas SET Change Control 2023-845, Update the 867\_03 to Add a New Unique Identifier of “M” (Mobile Generation) Into Existing REF~JH (Meter Role) Segment, which RMS voted unanimously to approve for Texas SET Version 5.0 release at their December 5, 2023 meeting.  [TX SET WG] | Y | ERCOT supports approval of RMGRR179 | ERCOT Staff has reviewed RMGRR179 and believes that it provides a positive market impact by offering regulatory requirements by introducing a method in which TDSPs may utilize Texas SET transactions to communicate with REPs to minimize manual work-arounds and clarifying that the REF~JH~I data element is dedicated exclusively to Customer-owned generation. |
| **245NOGRR** | **Inverter-Based Resource (IBR) Ride-Through Requirements.** This NOGRR replaces the current voltage ride-through requirements for Intermittent Renewable Resources (IRRs) with voltage ride-through requirements for Inverter-Based Resources (IBRs) and provides new frequency ride-through requirements for IBRs consistent with or beyond requirements identified in the new 2800-2022 - Institute of Electrical and Electronics Engineers (IEEE) Standard for Interconnection and Interoperability of Inverter-Based Resources (IBRs) Interconnecting with Associated Transmission Electric Power Systems (“IEEE 2800-2022 standard”). It also requires all IBRs to improve performance to meet these standards, and establishes compliance requirements for Resource Entities when it is commercially reasonable to do so. [ERCOT] | Y | ERCOT does not support approval of NOGRR245 as recommended by ROS in the 9/14/23 ROS Report as it does not address the critical reliability risk NOGRR245 intends to address. | ERCOT Staff has reviewed NOGRR245 and believes that end users of the ERCOT System (i.e., wholesale and retail customers) will continue to face exposure to the current high risk of instability and uncontrolled outages up to a system-wide blackout due to the ROS-approved language allowing inadequate ride-through performance requirements for Resource Entities of IBRs and Type 1 and Type 2 WGRs that self-identify if the requirements are not “commercially reasonable” in their determination, among other issues, which do not assure reliable operations.  The associated events will likely lead to higher prices due to system outages and even more stringent regulator reforms after additional major events or catastrophes are realized.  Market Participants can expect to routinely encounter additional events every year like the Odessa events - or worse - including requests for information (“RFIs”), event analysis, and potential NERC, FERC, or PUCT investigations and administrative penalties. |
| **105PGRR** | **Deliverability Criteria for DC Tie Imports.** This Planning Guide Revision Request (PGRR) adds Direct Current Tie (DC Tie) Resources to the list of Resources for which the minimum deliverability condition applies. [REMC] | N | ERCOT does not support approval of PGRR105 as recommended by ROS in the 9/7/23 ROS Report. | ERCOT Staff has reviewed PGRR105 and believes that it is contrary to a recent decision of the Public Utility Commission of Texas (PUCT) and that it raises a policy issue that is best suited for the PUCT. |