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| SCR Number | [825](https://www.ercot.com/mktrules/issues/SCR825) | SCR Title | ERCOT Voice Communications Aggregation |
| Date of Decision | | January 24, 2024 | |
| Action | | Recommended Approval | |
| Timeline | | Normal | |
| Estimated Impacts | | Cost/Budgetary: Between $150K and $250K  Project Duration: 7 to 10 months | |
| Proposed Effective Date | | Upon system implementation | |
| Priority and Rank Assigned | | Priority – 2025; Rank – 4510 | |
| Supporting Protocol or Guide Sections/Related Documents | | Nodal Operating Guide Section 7.1, ERCOT Wide Area Network  Nodal Operating Guide Section 7.1.2, WAN Participant Responsibilities  Protocol Section 23, Form F, Qualified Scheduling Entity (QSE) Agency Agreement | |
| System Change Description | | 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 (Sub-QSE) when assigning Agent(s), including allowing Sub-QSEs to assign Agents different than those used by the parent QSE. | |
| Reason for Revision | | [Strategic Plan](https://www.ercot.com/files/docs/2023/08/25/ERCOT-Strategic-Plan-2024-2028.pdf) Objective 1 – Be an industry leader for grid reliability and resilience  [Strategic Plan](https://www.ercot.com/files/docs/2023/08/25/ERCOT-Strategic-Plan-2024-2028.pdf) Objective 2 - Enhance the ERCOT region’s economic competitiveness with respect to trends in wholesale power rates and retail electricity prices to consumers  [Strategic Plan](https://www.ercot.com/files/docs/2023/08/25/ERCOT-Strategic-Plan-2024-2028.pdf) Objective 3 - Advance ERCOT, Inc. as an independent leading industry expert and an employer of choice by fostering innovation, investing in our people, and emphasizing the importance of our mission  General system and/or process improvement(s)  Regulatory requirements  ERCOT Board and/or PUCT Directive  *(please select ONLY ONE – if more than one apply, please select the ONE that is most relevant)* | |
| Justification of Reason for Revision and Market Impacts | | Currently, ERCOT’s control room voice communications system is configured to require a control room communication button for each QSE that the agent represents. Increases in the number of Sub-QSEs and use of QSE agents, including Data Agent-Only QSEs, has stretched the limits in the number of buttons possible for voice communication between the ERCOT control room and QSEs.  ERCOT systems need to aggregate voice communication for Resources based on the responsible entity for voice communication (QSE or agent) to limit the growth in voice communications contact points and still have reliable communications paths.  Nodal Protocol Revision Request (NPRR) 1162, Single Agent Designation for a QSE and its Sub-QSEs for Voice Communications over the ERCOT WAN, is an attempt to fix an aggregation problem for technology. It is doing this without taking advantage of Protocol Section 23, Form F, that allows ERCOT to communicate with the QSE agent for all voice communication related to Resources represented by QSEs and Sub-QSEs represented by the agent.  Current ERCOT communication systems limit the flexibility of QSEs and Sub-QSEs to independently designate QSE agents utilizing existing Wide Area Network (WAN) equipment. The intent of the original Section 23 Form F is to use the currently installed off-premise exchanges (OPXs) of the QSE agent for voice communications. No new WAN equipment is required as shown in the Nodal Operating Guide.  The Nodal Protocols and Operating Guides do not need to be changed to limit the effect of technology sprawl. Instead, the Protocols and Nodal Operating Guides can remain in place, and current technology can be reconfigured to address this issue.  Paragraph (4)(c) of Nodal Operating Guide Section 7.1 states the WAN shall be used for:  “(c) Operational voice communications for both normal and emergency use. The ERCOT WAN includes support for, but not limited to, off-premise exchanges (OPX) with ERCOT’s control facilities and the ERCOT Hotlines.”  Paragraph (1)(g) of Nodal Operating Guide Section 7.1.2 states:  “(g) If a TSP and QSE share a centralized PBX or call management, separate OPX circuits will be terminated for each participant”  The word “participant” points to the separation of “TSP and QSE” not each QSE. | |
| PRS Decision | | On 9/13/23, PRS voted unanimously to table SCR825 and refer the issue to WMS. The Independent Retail Electric Provider (IREP) Market Segment did not participate in the vote.  On 10/12/23, PRS voted unanimously to recommend approval of SCR825 as submitted. All Market Segments participated in the vote.  On 11/9/23, PRS voted unanimously to table SCR825. All Market Segments participated in the vote.  On 1/11/24, PRS voted unanimously to endorse and forward to TAC the 12/15/23 PRS Report and 1/9/24 Impact Analysis for SCR825 with a recommended priority of 2025 and rank of 4510. All Market Segments participated in the vote. | |
| Summary of PRS Discussion | | On 9/13/23, the sponsor provided an overview of SCR825. Participants requested additional review of SCR825 by WMS alongside NPRR1162.  On 10/12/23, participants noted the WMS endorsement of SCR825 and the desire to trigger development of an Impact Analysis for SCR825 to better assess its viability.  On 11/9/23, participants noted the 11/7/23 ERCOT comments for an alternative schedule for the Impact Analysis.  On 1/11/24, participants review the 1/9/24 Impact Analysis and discussed the appropriate priority and rank for SCR825; noting that SCR825 would not have to be implemented until a participant requires this change. | |
| TAC Decision | | On 1/24/24, TAC voted unanimously to recommend approval of SCR825 as recommended by PRS in the 1/11/24 PRS Report. All Market Segments participated in the vote. | |
| Summary of TAC Discussion | | On 1/24/24, there was no additional discussion beyond TAC review of the items below. | |
| TAC Review/Justification of Recommendation | | Revision Request ties to Reason for Revision as explained in Justification  Impact Analysis reviewed and impacts are justified as explained in Justification  Opinions were reviewed and discussed  Comments were reviewed and discussed (if applicable)  Other: (explain) | |

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| **Opinions** | |
| Credit Review | Not applicable |
| Independent Market Monitor Opinion | IMM has no opinion on SCR825. |
| ERCOT Opinion | ERCOT supports approval of SCR825. |
| ERCOT Market Impact Statement | 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 allows 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. |

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| **Comments Received** | |
| Comment Author | **Comment Summary** |
| WMS 101123 | Endorsed SCR825 as submitted |
| ERCOT 110723 | Proposed an alternative schedule for completion of the Impact Analysis for SCR825 prior to the December 14, 2023 PRS meeting |
| ERCOT 120623 | Proposed an alternative schedule for completion of the Impact Analysis for SCR825 prior to the January 11, 2024 PRS meeting |

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| Market Rules Notes |

None

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| Proposed System Change |

**Issue:**

ERCOT’s current configuration of its communication system does not take full advantage of the Nodal Operating Guides and Protocols and requires QSEs and any Sub-QSEs to use a single QSE agent for WAN voice communications.

**Resolution:**

Reconfigure aggregation of voice communication between ERCOT and QSEs represented by agents using ERCOT Protocols Section 23 Form F, Qualified Scheduling Entity (QSE) Agency Agreement, to allow the sharing of OPXs, as contemplated in Section 7 of the Nodal Operating Guide, and aggregate voice communication (or other system changes) for Resources based on the responsible entity for voice communication (QSE or agent) and to allow flexibility in designation of QSE agents for voice communication by QSEs and Sub-QSEs.