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| **NPRR Number** | [**1198**](https://www.ercot.com/mktrules/issues/NPRR1198) | **NPRR Title** | **Congestion Mitigation Using Topology Reconfigurations** |
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| **Date** | | September 20, 2023 | |
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| **Submitter’s Information** | | | |
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| **Market Segment** | | Independent Retail Electric Provider | |

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| **Comments** |

As a Retail Electric Provider (REP) whose customers are adversely affected by rising and substantial congestion costs, Octopus Energy submits these comments in support of this NPRR and its related NOGRR258.

The proposed revisions are intended to optimize the ERCOT Transmission Grid topology to reduce congestion costs by reconfiguring the network to automatically reroute power flows around congestion bottlenecks. Topology reconfigurations would be an inexpensive, fast, and low-risk way to reduce congestion costs that adversely affect ERCOT Market Participants. The Independent Market Monitor (IMM) filed comments on September 6, 2023, in support of the NPRR and associated NOGRR stating that the proposed change “will benefit market efficiency substantially by reducing unnecessary congestion.” Octopus Energy agrees, and supports moving this NPRR forward without delay, as topology reconfiguration would serve as a low-cost mechanism to improve grid reliability and resilience, minimize congestion costs in Real-Time and the Day-Ahead Market (DAM), provide adaptive capabilities in response to Emergency Conditions, and optimize the benefits of new projects. Finding ways to reduce costs is especially critical given rising costs in the market following Winter Storm Uri, and the potential for continued cost increases due to wholesale market design changes.