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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 | March 19, 2024 |
|  |  |
| Submitter’s Information |
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| Market Segment | Independent Generator  |

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| Comments |

Aypa Power LLC (“Aypa”) appreciates and commends the Electric Reliability Council of Texas (“ERCOT”) for filing Nodal Protocol Revision Request (NPRR) 1212. Last year, an Aypa-owned Battery Energy Storage System (“BESS”) project encountered significant frustration and delay in its commercial operation date due to a Market Participant’s misinterpretation of the Protocols and state law related to the provision of auxiliary Load service to BESS projects. NPRR1212, as submitted by ERCOT, should materially improve clarity regarding the right of BESS projects to interconnect and participate in the wholesale market without fear that a competitor might interfere with that right by blocking the issuance of an Electric Service Identifier (ESI ID) for the provision of auxiliary Load service.

Aypa agrees that the proposal offers presented in ERCOT’s original November 22, 2023 draft are the clearest and most preferred revision language offered in NPRR1212 to date. Therefore, Aypa supports a motion for the Protocol Revision Subcommittee (PRS) to recommend approval of NPRR1212 as submitted (without amendments).

In the alternative, if the stakeholder process decides not to adopt ERCOT’s original November 22, 2023 NPRR1212 draft, Aypa offers revisions to paragraph (2)(iii) of Section 10.3.2, ERCOT-Polled Settlement Meters, of the 2/22/24 Oncor comments language below.

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| Revised Proposed Protocol Language |

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# 2.1 DEFINITIONS

Resource ID (RID)

A unique identifier assigned to each ERCOT-Polled Settlement (EPS) Meter or Settlement Only Generator (SOG) meter. The RID for a SOG meter may be identical to the SOG’s Electric Service Identifier (ESI ID).

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:

(i) A Resource site may not energize until ERCOT has received an Electric Service Identifier(s) (ESI ID(s)) to be used in the generation netting process for that site, and the ESI ID has been established in the ERCOT Settlement system in a state that allows for the Load to be properly settled to the appropriate Qualified Scheduling Entity (QSE);

(ii) The Resource Entity must request an ESI ID(s) from the DSP(s) that will be serving the Load at the Resource site;

(iii) Each DSP that will be serving Load at the Resource site shall provide ERCOT and the Resource Entity with the ESI ID(s) if the requirements and/or conditions of a Public Utility Commission of Texas (PUCT) order or rule apply and have been met; and

(iv) The Resource Entity must enter the ESI ID(s) in ERCOT’s Resource Integration and Ongoing Operations (RIOO) interconnection services application, or alternate application designated by ERCOT.

(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 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 |