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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 6, 2023 | |
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| Submitter’s Information | | | |
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| Market Segment | | Not Applicable | |

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| Comments |

As the Independent Market Monitor (IMM), we appreciate the opportunity to submit comments on this Nodal Protocol Revision Request (NPRR). We support this concept and encourage approval of this NPRR and associated NOGRR 258 Related to NPRR1198, Congestion Mitigation Using Topology Reconfigurations, with the opinion that this change will benefit market efficiency substantially by reducing unnecessary congestion. As we stated in recommendation 2022-3 in the 2022 State of the Market Report:

“..[t]here are times in which a transmission reconfiguration can relieve congestion without negatively affecting reliability… We recommend that ERCOT accept a limited number of proposals and independently identify options to reconfigure transmission elements in the network operations model when they are physically feasible and economically beneficial. A process can be established to identify which limited number of reconfiguration options have the biggest benefits.”

In NOGRR258, submitters propose that eligible constraints for this type of relief are those that result in over $1 million of congestion rent in a given month within the past 36 months. Below is a view of non-Generic Transmission Constraints (GTCs) over this threshold value:

