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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 | April 12, 2024 |
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| Submitter’s Information |
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| Market Segment | Cooperative  |

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| Comments |

STEC appreciates the opportunity to comment again on Nodal Protocol Revision Request (NPRR) 1212. STEC believes PRS erred when they recommended approval of NPRR1212 as amended by the 2/22/24 Oncor comments as revised by PRS at their March 20, 2024 meeting. STEC’s previously-submitted language that limited the provision of an Electric Service Identifier (ESI ID) only to situations where the requirements and/or conditions of the Distribution Service Provider’s (DSP’s) tariff and/or the Standard Generation Interconnection Agreement (SGIA) have been met is appropriate and in accordance with the Public Utility Regulatory Act (PURA) and the rules of the Public Utility Commission of Texas (PUCT).

PURA § 41.055(1) states that an Electric Cooperative’s (EC’s) board of directors has the exclusive jurisdiction to “set all terms of access, conditions, and rates applicable to services provided by the electric cooperative….” The authority delegated to an EC’s board of directors to set the terms and conditions for access to an EC’s Distribution System cannot be modified or inhibited by ERCOT or the PUCT. As such, a Resource Entity seeking to interconnect to an EC’s Distribution System must comply with and meet all requirements in the EC’s tariff. Similarly, for Resource Entities seeking to interconnect to an EC’s transmission system, 16 Texas Administrative Code (TAC) § 25.195(c) states that “a transmission service customer that owns electrical facilities in the ERCOT region must execute an interconnection agreement with the TSP to which it is physically interconnected” as a condition of obtaining transmission service.

PURA § 41.053(b) also provides that metering functions are not competitive and remain under the purview of an EC even in the instance that Customer Choice is adopted, stating, “the metering function . . . may, at the option of the electric cooperative, continue to be offered by the electric cooperative as sole provider.” Similar language exists for Municipally Owned Utilities (MOUs) in PURA § 40.053(b). PURA § 41.001 also states that with respect to the “regulation of electric cooperatives, [Chapter 41] shall control over any other provision of this title, except for sections in which the term “electric cooperative” is specifically used.” Similar language exists for MOUs in PURA Chapter 40, Competition for Municipally Owned Utilities and River Authorities. No other PURA provisions address metering with respect to MOUs and ECs. Accordingly, PURA §§ 40.053(b) and 41.053(b) are controlling and retail metering remains within the exclusive purview of ECs and MOUs and must be performed in accordance with PURA.

The language as approved by PRS preempts the rights reserved to ECs and MOUs because neither ERCOT nor the PUCT may affect or control the terms of access, operation, management, or rates for the Distribution Systems of an EC or an MOU. Consistent with the requirements of PURA, STEC submits the redline below in paragraph (2)(c) of Section 10.3.2, ERCOT-Polled Settlement Meters, for reconsideration by TAC at their April 15, 2024 meeting.

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| Proposed Protocol Language Revision |

# 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:

(a) 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);

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

(c) 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 the DSP’s tariff and/or the Standard Generation Interconnection Agreement (SGIA) have been met; and

(d) 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 |