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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  |
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| Date | April 12, 2024 |
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| Submitter’s Information |
| Name | Doug Fohn / Holly Heinrich / Randy Roberts / Calvin Opheim  |
| E-mail Address | Douglas.Fohn@ercot.com / Holly.Heinrich@ercot.com / Randy.Roberts@ercot.com / Calvin.Opheim@ercot.com  |
| Company | ERCOT  |
| Phone Number | 512-275-7447 / 512-275-7436 / 512-248-3943 / 512-248-3944 |
| Cell Number |  |
| Market Segment | Not applicable |

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| Comments |

ERCOT opposes the revisions that STEC has proposed to Nodal Protocol Revision Request (NPRR) 1212 in its April 12, 2024 comments because the proposed language ties the obligation to provide an Electric Service Identifier (ESI ID) to compliance with the terms of the Standard Generation Interconnection Agreement (SGIA) and tariff.

First, STEC’s proposed language is unnecessary with respect to the SGIA. Early in the interconnection process, a prospective Resource is not eligible to be included in ERCOT’s Steady State Working Group (SSWG) cases until it has submitted an executed SGIA to ERCOT. As a result, the Interconnecting Entity (IE) would be required to execute the SGIA long before a Transmission and/or Distribution Service Provider (TDSP) would need to provide ERCOT with an ESI ID for the prospective Resource.

ERCOT further opposes STEC’s proposed language because it ties the obligation to provide an ESI ID to the tariff and a TDSP might rely on such language to support the revocation of an ESI ID from an interconnected Resource. If ERCOT is left without an ESI ID for an interconnected Resource, then any Load consumed by the Resource will not be assigned to it, and the Load will become Unaccounted for Energy (UFE). The costs of UFE are paid by Load in competitive areas, forcing a portion of the ERCOT market to bear the costs of a TDSP’s revocation of a Resource’s ESI ID. This interferes with ERCOT’s ability to “ensure that electricity production and delivery are accurately accounted for among the generators and wholesale buyers and sellers in the region,” as required by the Public Utility Regulatory Act (PURA).[[1]](#footnote-1) ERCOT only has 177 days from the date on which UFE is incurred to reassign the UFE to the entity that consumed the Load. After this time, ERCOT is unable to reassign such Load, even if an ESI ID is assigned unless a resettlement of the impacted Operating Day is performed. A resettlement performed to reassign such Load would require ERCOT Board approval.

ERCOT’s view is that, once a TDSP has issued an ESI ID for a Resource, the TDSP should not use threatened or actual revocation of an ESI ID it has provided to ERCOT as leverage in a dispute with the Resource. A dispute between a TDSP and Resource should be handled between the two entities in the appropriate forum without the ERCOT market having to bear the costs.

ERCOT supports the PRS-approved version of NPRR1212 and urges TAC to oppose the changes proposed by STEC in its April 12, 2024 comments.

1. *See* Tex. Util. Code § 39.151(a)(4). [↑](#footnote-ref-1)