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| NPRR Number | [1224](https://www.ercot.com/mktrules/issues/NPRR1224) | NPRR Title | ECRS Manual Deployment Triggers |
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| Date | April 20, 2024 |
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| Submitter’s Information |
| Name | Michele Richmond |
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| Company | Texas Competitive Power Advocates (TCPA) |
| Phone Number |  |
| Cell Number | 512-653-7447 |
| Market Segment | Not applicable |

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| Comments |

Texas Competitive Power Association (TCPA)[[1]](#footnote-2) appreciates the support from ERCOT Staff, the Independent Market Monitor (IMM), and stakeholders in deliberating the impacts of this change as well as the robust discussion during the Protocol Revision Subcommittee (PRS) meeting on April 5th. We submit these comments to provide modifications to the proposed method of releasing ERCOT Contingency Reserve Service (ECRS) Capacity in a way that is more consistent with Real-Time Co-optimization (RTC) principles.

Under RTC, ERCOT would not have to purchase/withhold/release ECRS. ERCOT would procure ECRS only to the level the Ancillary Service Demand Curve (ASDC) supports. Nodal Protocol Revision Request (NPRR) 1224 proposes to approximate this by manually releasing part of ECRS as market prices approach certain points on the Power Balance Penalty Curve (PBPC). This manual release, if approved, should take care to ensure that the manual trigger is not based on a price level that undervalues ECRS or results in energy price suppression as energy and Ancillary Services pricing. Not only are sufficient price signals necessary to attract investment and incentivize those Resources to be available in Real-Time to provide the needed operational reliability, but many Market Participants have already entered into bilateral agreements for the Summer 2024 shifting pricing risk. Implementing such a material change so close to the delivery period may have a chilling effect on investment and the willingness for buyers and sellers to engage in future transactions. Therefore, any change to ECRS deployment must balance these concerns.

Releasing hundreds of MWs of Resource capacity carrying ECRS when energy reaches a price level of $500/MWh and without imposing a price floor on the portion of the Energy Offer Curve that was released would present those very price suppression concerns. Additionally, choosing the wrong point on the PBPC undervalues ECRS relative to the current projected RTC ASDCs. Per ERCOT’s [March 19, 2024 ECRS Workshop] presentation, the ECRS release corresponded to $780/MWh to $1429/MWh in the currently-approved ASDC. Note that the Commission-approved ASDC framework was approved before ERCOT instituted conservative operations [and the implemented ECRS in June 2024]. Discussions at the RTC+B Task Force have highlighted that the currently-approved ASDC does not reflect the proper market clearing value of ECRS. Day-Ahead Market (DAM) Ancillary Service clearing prices, which are indicative of the market value of ECRS, take into account factors like conservative operations backstopped by Reliability Unit Commitments (RUCs), conservative operating procedures for tighter grid conditions, changing ECRS use cases, changes to the EEA trigger points, addition of 2hr/4hr duration requirement for ECRS/Non-Spin, etc. that happened after the current ASDC framework was approved in 2019. If the currently-approved ASDC framework were to survive unchanged, it would price ECRS below current DAM Ancillary Service clearing prices in many tight hours. To ensure that the manual release doesn’t significantly undervalue ECRS, TCPA proposes to raise the trigger from 30 MW of under-generation on the PBPC to 40 MW of under-generation on the PBPC, which better aligns with the currently-approved ASDC value of releasing 500 MW of ECRS at $1,000/MWh. Furthermore, by adding the requirement of an offer floor of $1,000/MWh for the ECRS portion of the Energy Offer Curve, this change would ensure that the released ECRS capacity would have minimal distortion on the ERCOT market.

Finally, in ERCOT’s March 19, 2024 presentation, it was specified that when manually releasing ECRS under the proposed NPRR1224 framework ERCOT would plan to continue to reserve 900 MW of SCED-dispatchable ECRS for frequency recovery contingency risks. TCPA notes that NPRR1224 did not include this provision as-filed and therefore proposes to memorialize that expectation in these comments to support transparency to Market Participants.

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| Revised Cover Page Language |

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| Nodal Protocol Sections Requiring Revision  | 6.4.4.3, Energy Offer Curve for On-Line ERCOT Contingency Reserve Capacity (new)6.5.7.3, Security Constrained Economic Dispatch 6.5.7.6.2.4, Deployment and Recall of ERCOT Contingency Reserve Service |
| Revision Description | This NPRR introduces a trigger that ERCOT may use to manually release ERCOT Contingency Reserve Service (ECRS) from Security-Constrained Economic Dispatch (SCED)-dispatchable Resources when the system power balance constraint is consistently violated and the MW amount of the power balance violation is at least 40 MW for ten consecutive minutes. This NPRR also requires that the Energy Offer Curves for the capacity assigned to ECRS be offered at no less than $1,000 per MWh and has ERCOT automatically raise Energy Offer Curves for the capacity assigned to ECRS to $1,000 upon system implementation.  |
| Justification of Reason for Revision and Market Impacts | During the 2024 Ancillary Service methodology discussion at the Technical Advisory Committee (TAC) and the Board of Directors of ERCOT (ERCOT Board), ERCOT was asked to review the methodology used to compute the minimum quantities of ECRS and identify potential alternatives by April 30, 2024, taking into account the analysis that the Independent Market Monitor (IMM) has conducted on the impact of ECRS. This timeline was selected so that proposed changes (if necessary) could be in place by summer 2024. ERCOT and the IMM have been working on this issue. The IMM recommended a few changes to alleviate its concerns. ERCOT has closely reviewed these recommendations. One proposal was to require ERCOT to release some portion of ECRS in every hour at an energy offer floor via a standing deployment. ERCOT is agreeable to this proposal but notes that this concept may need some system changes (potentially both for systems at ERCOT and on the Market Participant end) and may not be feasible to implement by summer 2024. Another IMM proposal was to allow ERCOT to manually release ECRS capacity from SCED-dispatchable Resources when the power balance constraint is violated. ERCOT has worked with the IMM to develop this concept further in a manner that would allow it to be implemented by summer 2024. Based on that work, this NPRR proposes to include a trigger that will allow manually releasing ECRS capacity on SCED-dispatchable Resources when the power balance constraint is consistently violated and the MW amount of the power balance violation is at least 40 MW for ten consecutive minutes. ERCOT is open to stakeholder comments regarding alternative values of power balance violation and duration.When manually releasing SCED-dispatchable ECRS, ERCOT plans to preserve some SCED-dispatchable ECRS to ensure that ERCOT has sufficient capacity that can respond and help recover frequency within the parameters required by NERC Reliability Standards. However, if the power balance constraint violation remains at or above 40 MW, ERCOT will continue to release ECRS in small blocks.Further, when ECRS capacity from SCED-dispatchable Resources is manually released, ERCOT will recall the manually released ECRS when the triggering condition has ended and the ERCOT System is operating with a steady-state frequency above 59.97 Hz. |

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| Revised Proposed Protocol Language |

**6.4.4.3 Energy Offer Curve for On-Line ERCOT Contingency Reserve Capacity**

(1) The following applies to Generation Resources that a QSE assigns ERCOT Contingency Reserve Service (ECRS) Ancillary Service Resource Responsibility in its COP to meet the QSE’s Ancillary Service Supply Responsibility for ECRS and applies to On-Line ECRS assignments arising as the result of Day-Ahead Market (DAM) or Supplemental Ancillary Services Market (SASM) Ancillary Service awards, or Self-Arranged Ancillary Service Quantity.

(a) Prior to the end of the Adjustment Period for an Operating Hour during which a Generation Resource is assigned On-Line ECRS Ancillary Service Resource Responsibility, the QSE shall ensure that a valid Output Schedule or Energy Offer Curve for the Operating Hour has been submitted and accepted by ERCOT. The Energy Offer Curves submitted by the QSE for the capacity assigned to ECRS may not be offered at less than $1,000 per MWh.

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| [NPRR1058: Replace paragraph (a) above with the following upon system implementation:](a) For an Operating Hour during which a Generation Resource is assigned On-Line ECRS Ancillary Service Resource Responsibility, the QSE shall ensure that a valid Output Schedule or Energy Offer Curve for the Operating Hour has been submitted and accepted by ERCOT. The Energy Offer Curves submitted by the QSE for the capacity assigned to ECRS may not be offered at less than $1,000 per MWh. |

(b) If the QSE also assigns Responsive Reserve (RRS) and/or Regulation Up Service (Reg-Up) to a Generation Resource that has been assigned ECRS, the QSE shall ensure that a valid Output Schedule or Energy Offer Curve for the Operating Hour has been submitted and accepted by ERCOT. The Energy Offer Curves submitted by the QSE for the capacity assigned to the sum of the RRS, ECRS, and Reg-Up, as well as any Non-Frequency Responsive Capacity (NFRC) that is above the Resource’s High Ancillary Service Limit (HASL) and will not be utilized prior to deployment of a Resource’s ECRS, may not be offered at less than $1,000 per MWh.

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| [NPRR1010: Delete Section 6.4.4.3 above upon system implementation of the Real-Time Co-Optimization (RTC) project.] |

6.5.7.3 Security Constrained Economic Dispatch

(1) The SCED process is designed to simultaneously manage energy, the system power balance and network congestion through Resource Base Points and calculation of LMPs every five minutes. The SCED process uses a two-step methodology that applies mitigation prospectively to resolve Non-Competitive Constraints for the current Operating Hour. The SCED process evaluates Energy Offer Curves, Output Schedules and Real-Time Market (RTM) Energy Bids to determine Resource Dispatch Instructions by maximizing bid-based revenues minus offer-based costs, subject to power balance and network constraints. The SCED process uses the Resource Status provided by SCADA telemetry under Section 6.5.5.2, Operational Data Requirements, and validated by the Real-Time Sequence, instead of the Resource Status provided by the COP.

(2) The SCED solution must monitor cumulative deployment of Regulation Services and ensure that Regulation Services deployment is minimized over time.

(3) In the Generation To Be Dispatched (GTBD) determined by LFC, ERCOT shall subtract the sum of the telemetered net real power consumption from all Controllable Load Resources available to SCED.

(4) For use as SCED inputs, ERCOT shall use the available capacity of all committed Generation Resources by creating proxy Energy Offer Curves for certain Resources as follows:

(a) Non-IRRs and Dynamically Scheduled Resources (DSRs) without Energy Offer Curves

(i) ERCOT shall create a monotonically increasing proxy Energy Offer Curve as described below for:

(A) Each non-IRR for which its QSE has submitted an Output Schedule instead of an Energy Offer Curve; and

(B) Each DSR that has not submitted incremental and decremental Energy Offer Curves.

|  |  |
| --- | --- |
| MW | Price (per MWh) |
| HSL | SWCAP |
| Output Schedule MW plus 1 MW | SWCAP minus $0.01 |
| Output Schedule MW | -$249.99 |
| LSL | -$250.00 |

(b) DSRs with Energy Offer Curves

(i) For each DSR that has submitted incremental and decremental Energy Offer Curves, ERCOT shall create a monotonically increasing proxy Energy Offer Curve. That curve must consist of the incremental Energy Offer Curve that reflects the available capacity above the Resource’s Output Schedule to its HSL and the decremental Energy Offer Curve that reflects the available capacity below the Resource’s Output Schedule to the LSL. The curve must be created as described below:

|  |  |
| --- | --- |
| MW | Price (per MWh) |
| Output Schedule MW plus 1 MW to HSL | Incremental Energy Offer Curve |
| LSL to Output Schedule MW  | Decremental Energy Offer Curve |

(c) Non-IRRs without full-range Energy Offer Curves

(i) For each non-IRR for which its QSE has submitted an Energy Offer Curve that does not cover the full range of the Resource’s available capacity, ERCOT shall create a proxy Energy Offer Curve that extends the submitted Energy Offer Curve to use the entire available capacity of the Resource above the highest point on the Energy Offer Curve to the Resource’s HSL and the offer floor from the lowest point on the Energy Offer Curve to its LSL, using these points:

|  |  |
| --- | --- |
| MW | Price (per MWh) |
| HSL (if more than highest MW in submitted Energy Offer Curve) | Price associated with highest MW in submitted Energy Offer Curve |
| Energy Offer Curve | Energy Offer Curve |
| 1 MW below lowest MW in Energy Offer Curve (if more than LSL) | -$249.99 |
| LSL (if less than lowest MW in Energy Offer Curve) | -$250.00 |

(d) IRRs

(i) For each IRR that has not submitted an Energy Offer Curve, ERCOT shall create a monotonically increasing proxy Energy Offer Curve as described below:

|  |  |
| --- | --- |
| MW | Price (per MWh) |
| HSL | $1,500 |
| HSL minus 1 MW | -$249.99 |
| LSL | -$250.00 |

(ii) For each IRR for which its QSE has submitted an Energy Offer Curve that does not cover the full range of the IRR’s available capacity, ERCOT shall create a monotonically increasing proxy Energy Offer Curve as described below:

|  |  |
| --- | --- |
| MW | Price (per MWh) |
| HSL (if more than highest MW in submitted Energy Offer Curve) | Price associated with the highest MW in submitted Energy Offer Curve |
| Energy Offer Curve | Energy Offer Curve |
| 1 MW below lowest MW in Energy Offer Curve (if more than LSL) | -$249.99 |
| LSL (if less than lowest MW in Energy Offer Curve) | -$250.00 |

(e) RUC-committed Resources

(i) For each RUC-committed Resource that has not submitted an Energy Offer Curve, ERCOT shall create a proxy Energy Offer Curve as described below:

|  |  |
| --- | --- |
| **MW** | **Price (per MWh)** |
| HSL  | $250 |
| Zero | $250 |

(ii) For each RUC-committed Resource that has submitted an Energy Offer Curve, ERCOT shall create a monotonically increasing proxy Energy Offer Curve as described below:

|  |  |
| --- | --- |
| **MW** | **Price (per MWh)** |
| HSL (if more than highest MW in Energy Offer Curve) | Greater of $250 or price associated with the highest MW in QSE submitted Energy Offer Curve |
| Energy Offer Curve | Greater of $250 or the QSE submitted Energy Offer Curve |
| Zero | Greater of $250 or the first price point of the QSE submitted Energy Offer Curve |

(iii) For each Combined Cycle Generation Resource that was RUC-committed from one On-Line configuration in order to transition to a different configuration with additional capacity, as instructed by ERCOT, that has not submitted an Energy Offer Curve for the RUC-committed configuration, ERCOT shall create a proxy Energy Offer Curve as described below:

|  |  |
| --- | --- |
| **MW** | **Price (per MWh)** |
| HSL of RUC-committed configuration  | $250 |
| Zero | $250 |

(iv) For each Combined Cycle Generation Resource that was RUC-committed from one On-Line configuration in order to transition to a different configuration with additional capacity, as instructed by ERCOT, that has submitted an Energy Offer Curve for the RUC-committed configuration, ERCOT shall create a monotonically increasing proxy Energy Offer Curve as described below:

|  |  |
| --- | --- |
| **MW** | **Price (per MWh)** |
| HSL of RUC-committed configuration (if more than highest MW in Energy Offer Curve) | Greater of $250 or price associated with the highest MW in QSE submitted Energy Offer Curve |
| Energy Offer Curve for MW at and above HSL of QSE-committed configuration | Greater of $250 or the QSE submitted Energy Offer Curve |
| HSL of QSE-committed configuration (if more than highest MW in Energy Offer Curve and price associated with highest MW in Energy Offer Curve is less than $250) | $250 |
| HSL of QSE-committed configuration (if more than highest MW in Energy Offer Curve) | Price associated with the highest MW in QSE submitted Energy Offer Curve |
| Energy Offer Curve for MW at and below HSL of QSE-committed configuration | The QSE submitted Energy Offer Curve |
| 1 MW below lowest MW in Energy Offer Curve (if more than LSL) | -$249.99 |
| LSL (if less than lowest MW in Energy Offer Curve) | -$250.00 |

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| [NPRR1224: Insert paragraph (f) below upon system implementation:](f) Generation Resources carrying On-Line ECRS capacity (i) For each Generation Resource carrying On-Line ECRS capacity, ERCOT shall adjust the submitted or proxy Energy Offer Curve as described above in the manner described below:

|  |  |
| --- | --- |
| **MW** | **Price (per MWh)** |
| HSL  | Greater of $1000, or the proxy Energy Offer Curve as described in paragraph (4) (a)-(e) above, or the originally submitted Energy Offer Curve. |
| HSL less the sum of the RRS, ECRS, and Reg-Up, as well as any Non-Frequency Responsive Capacity (NFRC) that is above the Resource’s High Ancillary Service Limit (HASL) and will not be utilized prior to deployment of a Resource’s ECRS | Greater of $1000, or the proxy Energy Offer Curve as described in paragraph (4) (a)-(e) above, or the originally submitted Energy Offer Curve. |

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(5) The Entity with decision making authority, as more fully described in Section 3.19.1, Constraint Competitiveness Test Definitions, over how a Resource or Split Generation Resource is offered or scheduled, shall be responsible for all offers associated with each Resource, including offers represented by a proxy Energy Offer Curve.

(6) For a Controllable Load Resource whose QSE has submitted an RTM Energy Bid that does not cover the full range of the Resource’s available Demand response capability, consistent with the Controllable Load Resource’s telemetered quantities, ERCOT shall create a proxy energy bid as described below:

|  |  |
| --- | --- |
| MW | Price (per MWh) |
| LPC to MPC minus maximum MW of RTM Energy Bid | Price associated with the lowest MW in submitted RTM Energy Bid curve |
| MPC minus maximum MW of RTM Energy Bid to MPC | RTM Energy Bid curve |
| MPC | Right-most point (lowest price) on RTM Energy Bid curve |

(7) ERCOT shall ensure that any RTM Energy Bid is monotonically non-increasing. The QSE representing the Controllable Load Resource shall be responsible for all RTM Energy Bids, including bids updated by ERCOT as described above.

(8) If a Controllable Load Resource telemeters a status of OUTL, it is not considered as dispatchable capacity by SCED. A QSE may use this function to inform ERCOT of instances when the Controllable Load Resource is unable to follow SCED Dispatch Instructions. Under all telemetered statuses including OUTL, the remaining telemetry quantities submitted by the QSE shall represent the operating conditions of the Controllable Load Resource that can be verified by ERCOT. A QSE representing a Controllable Load Resource with a telemetered status of OUTL is still obligated to provide any applicable Ancillary Service Resource Responsibilities previously awarded to that Controllable Load Resource. This paragraph does not apply to ESRs.

(9) Energy Offer Curves that were constructed in whole or in part with proxy Energy Offer Curves shall be so marked in all ERCOT postings or references to the energy offer.

(10) The two-step SCED methodology referenced in paragraph (1) above is:

(a) The first step is to execute the SCED process to determine Reference LMPs. In this step, ERCOT executes SCED using the full Network Operations Model while only observing limits of Competitive Constraints. Energy Offer Curves for all On-Line Generation Resources and RTM Energy Bids from available Controllable Load Resources, whether submitted by QSEs or created by ERCOT under this Section, are used in the SCED to determine “Reference LMPs.”

(b) The second step is to execute the SCED process to produce Base Points, Shadow Prices, and LMPs, subject to security constraints (including Competitive and Non-Competitive Constraints) and other Resource constraints. The second step must:

(i) Use Energy Offer Curves for all On-Line Generation Resources, whether submitted by QSEs or created by ERCOT. Each Energy Offer Curve must be bounded at the lesser of the Reference LMP (from Step 1) or the appropriate Mitigated Offer Floor. In addition, each Energy Offer Curve subject to mitigation under the criteria described in Section 3.19.4, Security-Constrained Economic Dispatch Constraint Competitiveness Test, must be capped at the greater of the Reference LMP (from Step 1) at the Resource Node plus a variable not to exceed 0.01 multiplied by the value of the Resource’s Mitigated Offer Cap (MOC) curve at the LSL or the appropriate MOC;

(ii) Use RTM Energy Bid curves for all available Controllable Load Resources, whether submitted by QSEs or created by ERCOT. There is no mitigation of RTM Energy Bids. An RTM Energy Bid from a Controllable Load Resource represents the bid for energy distributed across all nodes in the Load Zone in which the Controllable Load Resource is located. For an ESR, an RTM Energy Bid represents a bid for energy at the ESR’s Resource Node; and

(iii) Observe all Competitive and Non-Competitive Constraints.

(c) ERCOT shall archive information and provide monthly summaries of security violations and any binding transmission constraints identified in Step 2 of the SCED process. The summary must describe the limiting element (or identified operator-entered constraint with operator’s comments describing the reason and the Resource-specific impacts for any manual overrides). ERCOT shall provide the summary to Market Participants on the MIS Secure Area and to the Independent Market Monitor (IMM).

(11) For each SCED process, in addition to the binding Base Points and LMPs, ERCOT shall calculate a non-binding projection of the Base Points and Resource Node LMPs, Real-Time Reliability Deployment Price Adders, Real-Time On-Line Reserve Price Adders, Real-Time Off-Line Reserve Price Adders, Hub LMPs and Load Zone LMPs at a frequency of every five minutes for at least 15 minutes into the future based on the same inputs to the SCED process as described in this Section, except that the Resource’s HDL and LDL and the total generation requirement will be as estimated at future intervals. The Resource’s HDL and LDL will be calculated for each interval of the projection based on the ramp rate capability over the study period. ERCOT shall estimate the projected total generation requirement by calculating a Load forecast for the study period. In lieu of the steps described in Section 6.5.7.3.1, Determination of Real-Time On-Line Reliability Deployment Price Adder, the non-binding projection of Real-Time Reliability Deployment Price Adders shall be estimated based on GTBD, reliability deployments MWs, and aggregated offers. The Energy Offer Curve from SCED Step 2, the virtual offers for Load Resources deployed and the power balance penalty curve will be compared against the updated GTBD to get an estimate of the System Lambda from paragraph (2)(m) of Section 6.5.7.3.1. ERCOT shall post the projected non-binding Base Points for each Resource for each interval study period on the MIS Certified Area and the projected non-binding LMPs for Resource Nodes, Real-Time Reliability Deployment Price Adders, Real-Time On-Line Reserve Price Adders, Real-Time Off-Line Reserve Price Adders, Hub LMPs and Load Zone LMPs on the ERCOT website pursuant to Section 6.3.2, Activities for Real-Time Operations.

(12) For each SCED process, ERCOT shall calculate a Real-Time On-Line Reserve Price Adder and a Real-Time Off-Line Reserve Price Adder based on the On-Line and Off-Line available reserves in the ERCOT System and the Operating Reserve Demand Curve (ORDC). The Real-Time Off-Line available reserves shall be administratively set to zero when the SCED snapshot of the Physical Responsive Capability (PRC) is equal to or below the PRC MW at which Energy Emergency Alert (EEA) Level 1 is initiated. In addition, for each SCED process, ERCOT shall calculate a Real-Time On-Line Reliability Deployment Price Adder. The sum of the Real-Time Reliability Deployment Price Adder and the Real-Time On-Line Reserve Price Adder shall be averaged over the 15-minute Settlement Interval and added to the Real-Time LMPs to determine the Real-Time Settlement Point Prices. The price after the addition of the sum of the Real-Time On-Line Reliability Deployment Price Adder and the Real-Time On-Line Reserve Price Adder to LMPs approximates the pricing outcome of the impact to energy prices from reliability deployments and the Real-Time energy and Ancillary Service co-optimization since the Real-Time On-Line Reserve Price Adder captures the value of the opportunity cost of reserves based on the defined ORDC. An Ancillary Service imbalance Settlement shall be performed pursuant to Section 6.7.5, Real-Time Ancillary Service Imbalance Payment or Charge, to make Resources indifferent to the utilization of their capacity for energy or Ancillary Service reserves.

(13) ERCOT shall determine the methodology for implementing the ORDC to calculate the Real-Time On-Line Reserve Price Adder and Real-Time Off-Line Reserve Price Adder. Following review by TAC, the ERCOT Board shall review the recommendation and approve a final methodology. Within two Business Days following approval by the ERCOT Board, ERCOT shall post the methodology on the ERCOT website.

(14) At the end of each season, ERCOT shall determine the ORDC for the same season in the upcoming year, based on historic data using the ERCOT Board-approved methodology for implementing the ORDC. Annually, ERCOT shall verify that the ORDC is adequately representative of the loss of Load probability for varying levels of reserves. Twenty days after the end of the Season, ERCOT shall post the ORDC for the same season of the upcoming year on the ERCOT website.

(15) ERCOT may override one or more of a Controllable Load Resource’s parameters in SCED if ERCOT determines that the Controllable Load Resource’s participation is having an adverse impact on the reliability of the ERCOT System.

(16) The QSE representing an ESR, in order to charge the ESR, must submit RTM Energy Bids, and the ESR may withdraw energy from the ERCOT System only when dispatched by SCED to do so. An ESR may telemeter a status of OUTL only if the ESR is in Outage status.

6.5.7.6.2.4 Deployment and Recall of ERCOT Contingency Reserve Service

(1) ECRS is intended to:

(a) Help restore the frequency to 60 Hz within ten minutes of a significant frequency deviation;

(b) Provide energy to avoid, or during the implementation of, an EEA;

(c) Provide backup to Reg-Up; and

(d) Provide energy upon detection of insufficient available capacity for net load ramps.

(2) ERCOT shall deploy ECRS to meet NERC Standards and other performance criteria as specified in these Protocols and the Operating Guides by taking one or more of the following actions:

(a) Automatic Dispatch Instruction signal to release ECRS capacity from Generation Resources and Controllable Load Resources to SCED; and/or

(b) Dispatch Instruction for deployment of energy from Load Resources via electronic Messaging System.

(3) ERCOT shall release ECRS from Generation Resources and Controllable Load Resources to SCED when frequency drops below 59.91 Hz and available Reg-Up is not sufficient to restore frequency. Upon deployment of Off-Line ECRS from a QSGR providing ECRS, the Resource’s Ancillary Service Schedule for ECRS must be adjusted for the ERCOT instructed ECRS deployment and the Resource’s status must be set to OFFQS to be available for dispatch by SCED. Once recalled QSGRs providing ECRS must follow the decommitment process outlined in Section 3.8.3.1, Quick Start Generation Resource Decommitment Decision Process.

(4) Energy from Resources providing ECRS may also be manually deployed by ERCOT pursuant to Section 6.5.9, Emergency Operations.

(5) ERCOT may manually release up to 500 MW of ECRS capacity from SCED-dispatchable Resources when the power balance constraint is violated and the MW amount of power balance constraint violation is at or above 40 MW for at least ten consecutive minutes. Following such an ECRS release, if the power balance constraint violation remains at or above 40 MW, ERCOT may release additional MW of ECRS from SCED-dispatchable Resources but will reserve at least 900 MW of SCED-dispatchable ECRS.

(6) ERCOT shall use SCED and Non-Spin as soon as practicable to recover ECRS reserves.

(7) Following an ECRS deployment to SCED-dispatchable Resources, the QSE’s obligation to deliver ECRS remains in effect until ERCOT issues a recall instruction or its ECRS obligation expires, whichever occurs first. Following an ECRS deployment to Load Resources, excluding Controllable Load Resources, or Resources operating in synchronous condenser fast-response mode, the QSE’s obligation to deliver ECRS remains in effect until ERCOT issues a recall instruction.

(8) Following a deployment or recall Dispatch Instruction of ECRS, a QSE shall adjust the telemetered ECRS Ancillary Service Schedule for the Resource providing the service and ERCOT shall adjust the HASL based on the QSE’s telemetered Ancillary Service Schedule for ECRS, as described in Section 6.5.7.2, Resource Limit Calculator, to account for such deployment.

(9) For Generation Resources and Controllable Load Resources providing ECRS, Base Points include ECRS energy as well as any other energy dispatched by SCED. A Resource must be able to be fully dispatched by SCED to its ECRS Ancillary Service Resource Responsibility within the ten-minute time frame according to its telemetered Emergency Ramp Rate.

(10) Each QSE providing ECRS shall meet the deployment performance requirements specified in Section 8.1.1.4.2, Responsive Reserve Energy Deployment Criteria.

(11) ERCOT shall issue instructions to release ECRS capacity provided from Generation Resources and Controllable Load Resources to SCED over ICCP and shall issue deployment instructions for Load Resources providing ECRS via XML. Such instructions shall contain the MW requested.

(12) To the extent that ERCOT deploys a Load Resource that is not a Controllable Load Resource and that has chosen a block deployment option, ERCOT shall either deploy the entire Ancillary Service Resource Responsibility or, if only partial deployment is possible, skip the Load Resource with the block deployment option and proceed to deploy the next available Resource.

(13) ERCOT shall recall automatically deployed ECRS capacity once system frequency recovers above 59.97 Hz.

(14) ERCOT shall recall ECRS deployment provided from a Load Resource that is not a Controllable Load Resource once PRC is above a pre-defined threshold, as described in the Operating Guides.

(15) ERCOT shall recall manually released ECRS capacity from SCED-dispatchable Resources when the triggering condition in paragraph (5) has ended and the ERCOT System is operating with a steady-state frequency above 59.97 Hz.

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| [NPRR1010: Replace Section 6.5.7.6.2.4 above with the following upon system implementation of the Real-Time Co-Optimization (RTC) project:]**6.5.7.6.2.4Deployment and Recall of ERCOT Contingency Reserve Service**(1) ECRS is intended to:(a) Help restore the frequency to 60 Hz within ten minutes of a significant frequency deviation;(b) Provide energy to avoid, or during the implementation of, an EEA;(c) Provide backup to Reg-Up; and(d) Provide energy upon detection of insufficient available capacity for net load ramps.(2) ERCOT shall deploy ECRS to meet NERC Standards and other performance criteria as specified in these Protocols and the Operating Guides by taking one or more of the following actions:(a) ERCOT shall issue ECRS deployment Dispatch Instructions, specifying the required MW output, over ICCP for Resources awarded ECRS with a Resource Status of ONSC.(b) Dispatch Instruction for deployment of energy from Load Resources via electronic Messaging System.(3) Energy from Resources providing ECRS may also be manually deployed by ERCOT pursuant to Section 6.5.9, Emergency Operations.(4) ERCOT shall use SCED and Non-Spin as soon as practicable to recover ECRS reserves.(5) Following a manual ECRS deployment to Load Resources, excluding Controllable Load Resources, or Resources telemetering a Resource Status of ONSC, the QSE’s obligation to deliver ECRS remains in effect until ERCOT issues a recall instruction.(6) For Generation Resources and Controllable Load Resources providing ECRS, Base Points include ECRS energy as well as any other energy dispatched by SCED. A Resource must be able to be fully dispatched by SCED to its ECRS Ancillary Service award within the ten-minute time frame according to its telemetered ramp rate that reflects the Resource’s capability of providing ECRS. (7) Each Resource providing ECRS shall meet the deployment performance requirements specified in Section 8.1.1.4.2, Responsive Reserve Energy Deployment Criteria.(8) ERCOT shall issue deployment instructions for Load Resources providing ECRS via XML. Such instructions shall contain the MW requested. (9) To the extent that ERCOT deploys a Load Resource that is not a Controllable Load Resource and that has chosen a block deployment option, ERCOT shall either deploy the entire Ancillary Service award or, if only partial deployment is possible, skip the Load Resource with the block deployment option and proceed to deploy the next available Resource.(10) ERCOT shall recall deployed ECRS capacity provided from Resource telemetering Resource Status of ONSC once system frequency recovers above 59.98 Hz. (11) ERCOT shall recall ECRS deployment provided from a Load Resource that is not a Controllable Load Resource once PRC is above a pre-defined threshold, as described in the Operating Guides. |

1. TCPA Member NRG is not joining these comments. [↑](#footnote-ref-2)