



ERCOT Reliability Monitor Role in Weatherization

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Definitions

Reliability Requirement – Reliability-related provisions of PURA, PUC Substantive Rules, ERCOT Protocols, and Other Binding Documents

Incident Review – Investigation performed by ERM to assess compliance with a Reliability Requirement

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Background

- Beginning in 2020, ERCOT and PUC Staff monitored/investigated potential Market Participant non-compliance events (before 2020 – Texas RE
- PUC Staff sought to formalize collaboration by naming ERCOT the reliability monitor for ERCOT Region (16 TAC § 25.503(c)(7))
- On November 3, 2022, PUC directed ERCOT to serve as Reliability Monitor
- ERM monitors/investigates **ERCOT** and Market Participants
- ERCOT ERM web page - [Reliability Monitor Program \(ercot.com\)](https://ercot.com/reliability-monitor-program)

Background (ERM Webpage)

[Home](#) > [About ERCOT](#) > ERCOT Reliability Monitor Program

ERCOT Reliability Monitor Program

On November 3, 2022, the Public Utility Commission (PUC) issued an order directing ERCOT to assume the duties and responsibilities of the Reliability Monitor for the Texas power grid. ERCOT, acting as the Reliability Monitor, gathers and analyzes information and data to meet its monitoring obligations as required by [16 TAC § 25.503\(k\)](#), under the direction of the PUC.

REPORT VIOLATION: To report occurrences of potential non-compliance with any part of the Public Utility Regulatory Act (PURA), PUC Substantive Rules, ERCOT Protocols, ERCOT Operating Guides, or ERCOT Other Binding Documents in the ERCOT region, email ERM@ercot.com.



ERCOT's Role as the ERCOT Reliability Monitor (ERM):

1. Assess the compliance of both ERCOT and ERCOT Market Participants with Texas electric reliability laws (including, PURA, PUC Substantive Rules, ERCOT Protocols and Other Binding Documents)
2. Assist PUC Staff in reliability-related compliance and enforcement activities
3. Support PUC Staff in enforcement proceedings (e.g., providing expert advice, analysis, reporting, and testimony)
4. Maintain a communications plan with PUC Staff to ensure effective coordination and communication on ERM activities

ERCOT Role in Weatherization

- ERCOT Weatherization & Inspection (W&I) Team performs ERCOT's role as required in 16 Texas Administrative Code § 25.55
 - Historical Weather Study
 - Create Declaration of Preparedness Template
 - Receive Declarations of Preparedness
 - File compliance report w/ PUC (by June 20 and December 20)
 - Develop inspection checklist
 - Inspect facilities
 - Identify deficiencies (if any)
 - Create inspection report
 - Develop cure period for deficiencies (if needed)
 - Report to PUC entities that do not timely remedy deficiencies
 - Notify entities and PUC of repeated or major weather-related operations failures

NOTE: No ERM involvement

ERM Role in Weatherization

- W&I Team notifies ERM if Market Participant does not comply with § 25.55:
 - Fails to timely respond to inspection notice
 - Submits false/inaccurate Declaration
 - Fails to timely remedy deficiency
 - Repeated or major-weather related forced interruption of service
 - Failure to start following ≥ 1 attempts for ≥ 12 continuous hours due to weather emergency (Resource)
 - Loss of $\geq 50\%$ of capacity in seasonal net maximum sustainable rating for ≥ 12 continuous hours due to weather emergency (Resource)
 - Non-momentary transmission service outage caused by damage to, or inoperability of, transmission facility due to weather emergency (TSP)
 - ≥ 3 of any combination of following due to separate weather emergencies w/n 3-year period:
 - Failure of Resource to start;
 - Loss of $\geq 50\%$ of capacity in Resource's seasonal net maximum sustainable rating for ≥ 30 minutes
 - Loss or derate of $\geq 50\%$ of transmission facility's rating

ERM Responsibilities

- Gathers and analyzes information to meet monitoring obligations in 16 TAC § 25.503(k)
 - Assesses compliance of ERCOT **and** Market Participants w/ Texas electric reliability laws/rules, including: PURA, PUC Substantive Rules, ERCOT Protocols, and Other Binding Documents
 - Assist PUC Staff in reliability-related compliance and enforcement activities
 - Support PUC Staff in enforcement proceedings (*e.g.*, provide expert advice, analysis, reporting, and testimony)
 - Maintain communications w/ PUC Staff to ensure effective coordination and communication

ERM Responsibilities (cont'd)

Independence:

- Must be objective and use independent judgment free of undue influence by individuals whose actions may impact outcome of ERM activity
- Codes of Conduct
 - ERM Employees – work on all ERM matters and sign general code of conduct
 - If ERCOT SME assists in ERM Incident Review:
 - Signs code of conduct *specific to matter*
 - Access to ERM SharePoint site *for that matter only*

ERM Responsibilities (cont'd)

Confidentiality

- ERM activities and records are confidential pursuant to:
 - Section 1.3 of ERCOT Protocols
 - PUC Substantive Rules
 - Section 1500 of NERC Rules of Procedure
 - Other law
- Disclosure prohibited unless directed by PUC Staff or other governing or legal authority
- ERM maintains restricted SharePoint site
- SMEs assisting in Incident Reviews have access to only confidential case sites / documents

ERM Employees

Cannot share information related to Incident Reviews or results with anyone except:

- Other ERM Employees working on same Incident Review
- PUC Staff as part of Incident Reviews
- Market Participants or affiliates to conduct Incident Reviews and track remedial actions, as necessary
- As required by law

ERM Process

- Upon receiving notice of possible violation, ERM determines if event is “reliability-related”
 - If not, sent to Legal for follow-up
 - If market-related, sent to IMM
- Reliability Requirement Incident Reviews can be initiated through:
 - Market Participant or ERCOT employee notifying ERM
 - ERCOT Compliance identifying potential violation during routine monitoring, periodic audits, or reviewing system disturbance
 - PUC Staff notifying ERCOT

ERM Process

- If reliability-related, ERM performs Incident Review
 - Applies to ERCOT **and** MPs
 - ERM *may* request assistance from ERCOT SMEs
 - If so, Code of Conduct signed
 - Review data, send RFIs, conduct interviews, *etc.*
 - Determine if violation occurred
 - If yes, report to PUC Staff for enforcement decision

How to Contact ERM

Email ERM@ercot.com with:

- Reliability-related referrals
- Questions related to ERCOT's role as ERM

Visit [Reliability Monitor Program](https://ercot.com/reliability-monitor-program) (ercot.com)



Questions?