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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 of Decision | | April 15, 2024 | |
| Action | | Recommended Approval | |
| Timeline | | Normal | |
| Estimated Impacts | | Cost/Budgetary: None  Project Duration: No project required | |
| Proposed Effective Date | | First of the month following Public Utility Commission of Texas (PUCT) approval | |
| Priority and Rank Assigned | | Not applicable | |
| Nodal Protocol Sections Requiring Revision | | 2.1, Definitions  10.3.2, ERCOT-Polled Settlement Meters  10.3.2.1, Generation Resource Meter Splitting  10.3.2.1.2, Allocating EPS Metered Data to Split Generation Resource Meters  10.3.2.1.3, Processing for Missing Dynamic Split Generation Resource Signal | |
| Related Documents Requiring Revision/Related Revision Requests | | Planning Guide Revision Request (PGRR) 114, Related to NPRR1212, Clarification of Distribution Service Provider’s Obligation to Provide an ESI ID | |
| Revision Description | | This Nodal Protocol Revision Request (NPRR) revises Section 10.3.2 to clarify the obligation of a Distribution Service Provider (DSP) to provide ERCOT with an Electric Service Identifier (ESI ID) for a Resource site that consumes Load other than Wholesale Storage Load (WSL) and that is not behind a Non-Opt-In Entity (NOIE) tie meter. | |
| Reason for Revision | | [Strategic Plan](https://www.ercot.com/files/docs/2023/08/25/ERCOT-Strategic-Plan-2024-2028.pdf) Objective 1 – Be an industry leader for grid reliability and resilience  [Strategic Plan](https://www.ercot.com/files/docs/2023/08/25/ERCOT-Strategic-Plan-2024-2028.pdf) Objective 2 - Enhance the ERCOT region’s economic competitiveness with respect to trends in wholesale power rates and retail electricity prices to consumers  [Strategic Plan](https://www.ercot.com/files/docs/2023/08/25/ERCOT-Strategic-Plan-2024-2028.pdf) Objective 3 - Advance ERCOT, Inc. as an independent leading industry expert and an employer of choice by fostering innovation, investing in our people, and emphasizing the importance of our mission  General system and/or process improvements  Regulatory requirements  ERCOT Board and/or PUCT Directive  *(please select ONLY ONE – if more than one apply, please select the ONE that is most relevant)* | |
| Justification of Reason for Revision and Market Impacts | | Some Resources in the Resource integration process have begun consuming electricity without ERCOT receiving ESI ID(s). In the past, ERCOT has attributed that energy to Unaccounted for Energy (UFE) and has addressed this in the Final or True-Up Settlement at a later date. However, after 180 days, this cannot be remedied through the True-Up process. ERCOT needs to receive ESI ID(s) earlier in the Resource integration process to avoid the accrual of UFE that cannot be easily resettled.  ERCOT has determined that clarification of the Protocols is needed to ensure that ERCOT timely receives ESI ID(s) before Initial Energization of a project at a Resource site.  Additionally, the modifications in Sections 10.3.2.1, 10.3.2.1.2, and 10.3.2.1.3 are proposed because meters (Resource IDs (RIDs)) are not represented by QSEs and, for Settlement purposes, are not associated with Generation Resources. | |
| PRS Decision | | On 12/15/23, PRS voted unanimously to table NPRR1212. All Market Segments participated in the vote.  On 3/20/24, PRS voted to recommend approval of NPRR1212 as amended by the 2/22/24 Oncor comments as revised by PRS. There were two abstentions from the Cooperative (STEC) and Investor Owned Utilities (Linebacker Power, LLC) Market Segments. All Market Segments participated in the vote.  On 4/5/24, PRS voted to endorse and forward to TAC the 3/20/24 PRS Report and 11/22/23 Impact Analysis for NPRR1212. There were three abstentions from the Cooperative (STEC), Independent Generator (ENGIE), and Independent Power Marketer (IPM) (Tenaska) Market Segments. All Market Segments participated in the vote. | |
| Summary of PRS Discussion | | On 12/15/23, ERCOT Staff reviewed NPRR1212 and referenced PGRR114, tabled at the December 7, 2023 Reliability and Operations Subcommittee (ROS) meeting. Participants requested that PRS table NPRR1212 to provide time to clarify mechanics and for additional discussion at the Resource Integration Working Group (RIWG).  On 3/20/24, PRS reviewed the 1/5/24 STEC, 2/22/24 Oncor, and 3/19/24 Aypa Power comments. Participants applied desktop edits to paragraph (2)(c) of Section 10.3.2 of the 2/22/24 Oncor comments, removing conditional DSP tariff and Standard Generation Interconnection Agreement (SGIA) language regarding DSPs providing ESI ID(s) to ERCOT and Resource Entities.  On 4/5/24, PRS reviewed the 11/22/23 Impact Analysis. | |
| TAC Decision | | On 4/15/24, TAC voted to recommend approval of NPRR1212 as recommended by PRS in the 4/5/24 PRS Report. There were four abstentions from the Cooperative (GSEC, LCRA, PEC, STEC) Market Segment. All Market Segments participated in the vote. | |
| Summary of TAC Discussion | | On 4/15/24, TAC reviewed the 4/12/24 STEC and ERCOT comments. Some participants questioned if NPRR1212, as written, fully resolves the change that it proposes. | |
| TAC Review/Justification of Recommendation | | Revision Request ties to Reason for Revision as explained in Justification  Impact Analysis reviewed and impacts are justified as explained in Justification  Opinions were reviewed and discussed  Comments were reviewed and discussed (if applicable)  Other: (explain) | |

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| **Opinions** | |
| **Credit Review** | ERCOT Credit Staff and the Credit Finance Sub Group (CFSG) have reviewed NPRR1212 and do not believe that it requires changes to credit monitoring activity or the calculation of liability. |
| **Independent Market Monitor Opinion** | IMM has no opinion on NPRR1212. |
| **ERCOT Opinion** | ERCOT supports approval of NPRR1212. |
| **ERCOT Market Impact Statement** | ERCOT Staff has reviewed NPRR1212 and believes that it provides a positive market impact by offering regulatory requirements that clarify the obligation of a DSP to provide ERCOT with an ESI ID for a Resource site that consumes Load other than WSL and that is not behind a NOIE tie meter. |

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| Market Segment | Not applicable |

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| **Comments Received** | |
| **Comment Author** | **Comment Summary** |
| STEC 010524 | Clarified that DSPs are required to provide ESI ID(s) to ERCOT and Resource Entities upon meeting the applicable requirements of the DSP’s tariff and/or specified SGIA |
| Oncor 022224 | Proposed various clarification and specification language; incorporated edits proposed in the 1/5/24 STEC comments |
| Aypa Power 031924 | Requested PRS recommend approval of NPRR1212 as submitted; proposed, alternatively, edits to the 2/22/24 Oncor comments replacing conditional DSP tariff language with conditional PUCT order/rule language regarding DSPs providing ESI ID(s) to ERCOT and Resource Entities |
| RMS 040324 | Endorsed NPRR1212 as recommended by PRS in the 3/20/24 PRS Report |
| STEC 041224 | Resubmitted edits to paragraph (2)(c) of Section 10.3.2 for consideration at the April 15, 2024 TAC meeting |
| ERCOT 041224 | Urged TAC to oppose the 4/12/24 STEC comments |

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| Market Rules Notes |

Administrative changes to the language were made and authored as “ERCOT Market Rules.”

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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); 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

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| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **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

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| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **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 |